

COMP A3 PUBLIC CONSULTATION

Subject: North Norway European Office (NNEO)

From: Nils Kristian Sørheim Nilsen

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North Norway European Office, on behalf of Troms and Finnmark, and Nordland counties, Norway:

On behalf of North Norway, we welcome the opportunity to submit our feedback on the draft for a

Commission Regulation on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to *de minimis* aid.

Firstly, we fully support an increase of a threshold which takes inflation into account. However, and in line with the EU Green Deal and the new EU Arctic Communication dated 13th October 2021, we propose an increased ceiling to 500 000 Euro for SMBs and 250 000 Euro for freight transport in the Arctic regions of Europa. Alongside other outermost regions, the EU should allow a higher threshold in order to reflect the increased costs of doing business due to our remoteness and structural insufficiencies. An OECD report prepared for the Northern Sparsely Populated Areas (NSPA) in 2017 clearly indicates that our regions lack investment capital. Our regions have many of the resources (energy, raw materials, oceans, competence etc) that the EU needs to manage the green transition. The EU have asked us to take responsibility of fulfilling the objectives of both the Green Deal and the EU Arctic Communication. To be able to do this, we need investment capital. An increased threshold to 500 000 Euro can contribute to remedy this somewhat. Secondly, the regions of Northern Norway also support that the transparency requirements can be improved, and that mandatory registration of *de minimis* grants in a public register will benefit stakeholders. However, a mandatory registration should not only cover *de minimis* grants. All sorts of state aid should be registered.

When introducing such registration, one should aim to lower the administrative burden for granting authorities and for companies. The requirements for mandatory registration must be regulated in such a way that it can replace a self-declaration system, instead of being an additional requirement for the granting authority. A system based on self-declaration will demand a comprehensive competence within all companies receiving state aid, not least in connection with the clarification of what constitutes state aid, and what to register. How this register is regulated will be of great importance when it comes to the usefulness of the register and the ease of implementation of the register. We also propose that the register is both public and searchable.

Best regards,

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The North Norway European Office (NNEO), represents the regional interests of northern Norway in Brussels. The office was established in 2005 to front and improve regional and economic development in North Norway.

NNEO is owned by the two northernmost counties in Norway: Troms and Finnmark as well as Nordland. In addition, the office has five partners: City of Tromsø, Nord University, UiT – The Arctic University of Norway, Salten regional council, and the Norwegian Fishermen's Sales Organization.