

Public consultation on the general de minimis Regulation

First of all we are very grateful for getting the opportunity to contribute to this consultation.

We strongly support the increase of the de minimis ceiling announced by the EU Commission. This should be raised to EUR 500,000.

In our opinion, this is essential in view of the current and predicted inflation trend. The European economy will face enormous challenges in the coming years, in particular due to the consequences of the COVID-19 pandemic and Russia's military attack on Ukraine, and the resulting energy crisis. If we add the EU's political objectives in terms of climate protection, sustainability and digitalisation, it becomes clear that the member states must be given more freedom and scope to achieve these goals. If the EU's political objectives demand significantly more from the member states and the economy, the EU must provide more support accordingly. A slight increase in the de minimis ceiling from 200,000 euros to 275,000 euros will not be sufficient in this respect.

The maximum amounts for aid in the form of loans and guarantees must also be raised much more than has been proposed so far. In this respect, we call for an increase to EUR 2 million (for loans) and EUR 3 million (for guarantees).

Currently, a so-called de minimis declaration must be obtained and a de minimis certificate must be issued. In our view, it is questionable whether the introduction of a central register can replace this adequately and with full legal certainty. From our perspective, this presupposes that the data in the register is always up to date. Whether this can be guaranteed is unclear. Should a corresponding register be introduced, it must be ensured that the aid recipients do not incur any disadvantages if the granting of aid is unlawful due to faulty data in the register.

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