



Ministry of Economic Affairs
and Employment of Finland

European Commission
Directorate-General for Competition – Unit A1
COMP-HBERs-REVIEW@ec.europa.eu

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Answer of the Ministry of Economic Affairs and Employment of Finland

Finland would like to highlight that, since the Finnish Parliament has not yet given its view on this topic, the following views are only preliminary and subject to possible changes.

Finland supports the Commission's efforts on updating the Horizontal Block Exemption Regulations and Horizontal Guidelines. The horizontal cooperation of undertakings made possible by the specialization and R&D agreements covered by the Block Exemption Regulations is important for advancing digital and green transitions. Such cooperation can also help improve the resilience of the internal markets.

Finland considers the Horizontal Guidelines an important instrument in supporting the undertakings self-evaluation. It is therefore advisable to ensure that the Guidelines are up-to-date and take into account the recent jurisprudence. Finland also supports adding a new chapter on sustainability agreements to the Guidelines, since undertakings play a crucial role in advancing sustainability and it is important to provide them with guidance on how sustainability aspects are taken into account in competition analysis.

Regarding the usefulness of the Horizontal Block Exemption Regulations and Horizontal Guidelines, Finland would appreciate it if the Commission could provide some kind of estimation of their economic benefits. Such estimation could help different stakeholders to gain a better understanding of the rationale and effects of these instruments.

Kimmo Ruth
Labour Market Counsellor

Iiro Ihanamäki
Senior Specialist