

# Competition *State aid brief*

## The use of crisis State aid measures in response to the Russian invasion of Ukraine (until end-June 2023)

Sara FERRARO, Giuseppina CANNAS, Koen VAN DE CASTEELE

### Overview of the Temporary Crisis and Transition Framework

Under Article 107(3)(b) TFEU, aid to remedy a serious disturbance in the economy of a Member State (or across the EU economy) may be considered compatible with the internal market. On this basis, the European Commission has used this flexibility within its State aid toolbox to enable Member States to assist companies and sectors severely impacted by the Russian military aggression against Ukraine and its repercussions, in particular on energy markets, while setting clear safeguards to minimise distortions to competition in the Single Market.

On 23 March 2022, the Commission adopted the Temporary Crisis Framework (TCF)<sup>1</sup> under Article 107(3)(b) TFEU. The TCF provided for three types of aid that Member States could grant: (i) limited amount of aid that could be granted in any form and did not have to be linked to an increase in energy prices (section 2.1), (ii) liquidity support in the form of State guarantees (section 2.2) and subsidised loans (section 2.3), and (iii) aid to compensate for high energy prices (section 2.4). The Framework was amended in July<sup>2</sup> and October 2022<sup>3</sup>.

In some instances, national measures did not fit in the TCF, so that the Commission assessed these under TCF principles and approved them directly under Article 107(3)(b) TFEU.

<sup>1</sup> Communication from the Commission, Temporary Crisis Framework for State Aid measures to support the economy following the aggression against Ukraine by Russia 2022/C 131 I/01, C/2022/1890, OJ C 131 I, 24.3.2022, p. 1–17

<sup>2</sup> Communication from the Commission, Amendment to the Temporary Crisis Framework for State Aid measures to support the economy following the aggression against Ukraine by Russia 2022/C 280/01, C/2022/5342, OJ C 280, 21.7.2022, p. 1–13

<sup>3</sup> Communication from the Commission, Temporary Crisis Framework for State Aid measures to support the economy following the aggression against Ukraine by Russia 2022/C 426/01, C/2022/7945, OJ C 426, 9.11.2022, p. 1–34

The content of this article does not necessarily reflect the official position of the European Commission. Responsibility for the information and views expressed lies entirely with the authors.

On 9 March 2023, the TCF was ultimately replaced by the Temporary Crisis and Transition Framework (TCTF)<sup>4</sup>. Through the TCTF, the Commission expanded and further simplified the provisions for support to accelerate renewable energy deployment and industrial decarbonisation. These provisions were also prolonged until 31 December 2025 and are intended to contribute to address one major contributing factor of the energy crisis, namely the dependency on fossil fuels, and to accelerate the green transition. The TCTF also included a new section applicable also until 31 December 2025, aimed at accelerating investments in key sectors for the transition towards a net-zero economy, by enabling investment support for the manufacturing of strategic equipment, namely batteries, solar panels, wind turbines, heat-pumps, electrolysers and carbon capture usage and storage, as well as for production of key components and for production and recycling of related critical raw materials.

### Gradual phase-out of the T(C)TF

On 20 November 2023, the Commission decided to postpone the phase-out of limited aid amounts (section 2.1) and aid compensating for high energy prices (section 2.4) by six months until end-June 2024.<sup>5</sup> This reflected the persisting uncertainties

<sup>4</sup> Communication from the Commission, Temporary Crisis and Transition Framework for State Aid measures to support the economy following the aggression against Ukraine by Russia 2023/C 101/03, C/2023/1711, OJ C 101, 17.3.2023, p. 3–46

<sup>5</sup> Communication from the Commission – Amendment to the Temporary Crisis and Transition Framework for State Aid measures to support the

The authors would like to thank Gerrit BETHUYNE (from DG ECFIN), Ioana DAVIDESCU and Alejandro DONNAY (from DG COMP) for valuable contribution to this article.

KD-AM-24-001-EN-N, doi 10.2763/394754

© European Union, 2024

Reproduction is authorised provided the source is acknowledged.

More publications on: [https://ec.europa.eu/competition-policy/publications\\_en](https://ec.europa.eu/competition-policy/publications_en) and <http://bookshop.europa.eu>

in the energy market, especially during the winter heating period<sup>6</sup>, and took account of feedback from Member States. The Commission also increased the aid ceilings for limited amounts of aid (section 2.1) to cover the winter heating period until the end of March. The other crisis-related sections of the TCTF (sections 2.2 and 2.3 on liquidity support in form of State guarantees and subsidised loans, and section 2.7 on measures aimed at supporting electricity demand reduction) expired on 31 December 2023, as scheduled.

Sections covering support to accelerate renewable energy deployment, industrial decarbonisation, and investments in key sectors for the transition to a net-zero economy (sections 2.5, 2.6, and 2.8) remain applicable until 31 December 2025.

## Overview of the measures approved by DG Competition until June 2023

Between March 2022 and end of June 2023, the Commission had adopted 295 decisions and amendment decisions<sup>7</sup> under the TCTF or directly under the Treaty and based on TCTF principles, approving 257 national measures notified by 27 Member States. The overall budget that Member States notified and that was approved by the Commission under such State aid measures is worth a total of €729.72 billion. Slightly less than half of this amount concerned Germany (48.8%). Aid approved for France and Italy respectively represent around 23% and 7.8%. The aid notified by Denmark represents 3.3% of the total budget, while the aid notified by Finland and Spain represent respectively 2.6% and 2.3%. Aid notified by other Member States individually represent between 2.1% and 0.01% of the total €729.72 billion.

## A closer look at the actual implementation

### Data collected by DG Competition

In order to have a better overview of the aid actually granted under State aid measures adopted in the context of Russia's war of aggression against Ukraine, the Commission launched a survey to seek information from Member States on the implementation of State aid measures approved directly under the TC(T)F or based on its principles<sup>8</sup>. The data therefore do not include cases approved under ordinary State aid rules.

The survey collected preliminary information on aid granted since the adoption of the TC(T)F on 23 March 2022 until the end of

June 2023. The survey aimed at taking stock at two points in time: 31 March 2023 and 30 June 2023<sup>9</sup>.

It is important to underline that the information made available to the Commission by Member States is preliminary and data may be subject to correction by Member States. Moreover, there are a number of caveats to survey figures, including that they represent the nominal amount of aid granted via different instruments (e.g., direct grants, equity, loans and guarantees), which have different distortive impacts on competition (repayable forms of support are generally less distortive of competition). Furthermore, data concern aid granted under the approved measures, and not aid actually paid out. For instance, Member States may grant the full aid amount at a given time in one year, while disbursing it to beneficiaries over several years.

It is also important to underline that these figures exclusively refer to the measures that qualify as State aid and that have been notified to and approved by the Commission. Member States have also granted sizable support to their economies and households through other measures that are not included in these statistics, and the overall support to the economy and households differs from the State aid figures presented here.

### Overview

Based on the replies of all the Member States, in the period between the adoption of the TC(T)F on 23 March 2022 and end of June 2023, of nearly €729.72 billion of aid approved, €140.79 billion was actually granted to companies, representing 19.3% of all the aid approved and corresponding to 0.6% of EU27 GDP in 2022 and the first half of 2023. Thus, Member States have only granted a relatively small percentage, of the amounts approved by the Commission from March 2022 to June 2023. While the EU economy performed better than expected over the past winter (as recognised in the Commission's Spring 2023 Economic Forecast), there may be different reasons for the relatively low amount of aid granted compared to the total aid approved, which require further analysis before any conclusions can be drawn.

In absolute terms, according to the preliminary data sent by Member States, Germany has provided €72.8 billion, representing 52% of all the aid granted. The second largest spender, Italy, has granted €39.2 billion, followed by Spain, with €12.1 billion. Romania has granted €3.8 billion and Hungary €3.6 billion. In absolute terms, the three countries that have granted the most, Germany, Italy, and Spain, have granted 88% of all the aid.

---

economy following the aggression against Ukraine by Russia, OJ C, C/2023/1188, 21.11.2023.

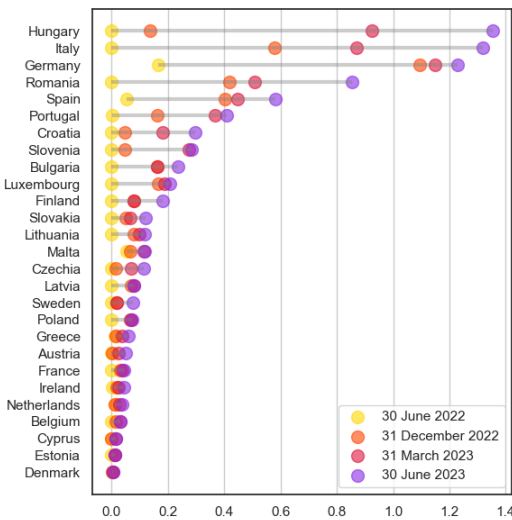
<sup>6</sup> The Commission's Autumn 2023 Economy Forecast notes that Russia's ongoing war against Ukraine and wider geopolitical tensions continue to pose a risk and remain a source of uncertainty, especially on energy markets.

<sup>7</sup> More specifically, 295 decisions, of which 94 decisions approving amendments to the 257 national measures.

<sup>8</sup> Five other surveys addressed to the Member States authorities have been launched in the past, four to collect data on the aid granted under the COVID-19 State aid measures and one on the aid granted under the Temporary Crisis Framework.

<sup>9</sup> The survey also included information on the aid granted under sections 3.13 and 3.14 of the COVID-19 Temporary Framework. However, those figures are outside the scope of this brief.

Figure 1: Total State aid granted as of 30 June 2023 under TC(T)F measures or based on its principles as percentage of national GDP



Total State aid under the TCTF or based on its principles granted in % of 2022 + half 2023 GDP

In relative terms, when looking at the aid granted by each Member State as a percentage of national GDP, Hungary is the largest provider, having granted an amount equating to 1.35% of its 2022 plus half 2023 GDP. The second largest one in relative terms is Italy (1.32 % of its GDP), followed by Germany (1.23% of its GDP) and Romania (0.85% of its GDP). However, as already highlighted, the amounts reported are the nominal amounts of the aid granted through different instruments, repayable and non-repayable, that have different economic impacts.

### Member States' State aid approaches differ in practice

As of end of June 2023, Member States have supported businesses with State resources in various ways, directly under the Treaty or pursuant to the options offered by the TCTF.

As regards Germany, Spain, and Portugal, over half of the aid granted by these Member States was directly based on the Treaty. Specifically, 55% of the total aid granted in Germany concerned the recapitalisations of Uniper SE<sup>10</sup> (€33 billion) and SEFE GmbH<sup>11</sup> (€6.5 billion), both approved under the Treaty. These large recapitalisations were justified by the systemic character of these two energy supply companies, extending beyond the German wholesale energy markets. Additionally, both Uniper SE and SEFE GmbH received a credit line under a German umbrella scheme for guarantees and loans approved under the TCF. During the course of 2023, the original KfW credit facility for Uniper SE<sup>12</sup> (€16 billion) was restructured and reduced to €14.5

<sup>10</sup> SA.103791 Recapitalisation of Uniper SE.

<sup>11</sup> SA.104353 Recapitalisation of SEFE GmbH I and SA.105001 Recapitalisation of SEFE GmbH II.

<sup>12</sup> SA.102631 (2022/N) – Germany TCF: Umbrella schemes for guarantees on loans and subsidised loans as amended by SA.104019 (2022/N) –

billion due to favourable market conditions. Similarly, at the end of December 2022 the original amount of the revolving credit facility available to SEFE GmbH (€13.8 billion) was reduced to €7.5 billion. These figures represent the maximum available credit lines, irrespective of whether the funds have been drawn or not.

54% of all the aid granted in Spain was granted directly based on the Treaty for the *MIBEL fossil fuel cost adjustment mechanism*<sup>13</sup> (€6.6 billion), a common Spanish and Portuguese measure aiming to reduce the electricity wholesale price in the Iberian electricity market. Portugal has granted €1.2 billion under the same *MIBEL* measure, 80% of the total aid granted by the Member State.

As regards aid granted under the T(C)TF, 13 Member States<sup>14</sup> have provided more than 50% of their respective total aid pursuant to section 2.1 – *Limited amounts of aid* of the TCF. Section 2.1 enables Member States to set up schemes where aid can take different forms (direct grants, tax and payment advantages or other forms such as repayable advances, guarantees, loans and equity), provided that the aid does not exceed a certain threshold per company<sup>15</sup>. Overall, aid granted under 2.1 TC(T)F measures by Member States in 2023 amounts to €17.29 billion, i.e. 12% of the total aid granted, be it under the TC(T)F or based on its principles.

Italy, Romania, Croatia, and France have granted more than 50% of their crisis aid in the form of large guarantees on loans, as per section 2.2 – *Liquidity support in the form of guarantees* of the TC(T)F. With the exception of these four Member States, the use of guarantees on loans to provide liquidity support to undertakings affected by the energy crisis has been very limited. The total nominal amount of the guarantees granted on the basis of section 2.2 of the TC(T)F in the EU in 2022 is €41.03 billion (29% of the total).

Denmark, Hungary, Lithuania, and Luxembourg have granted more than 50% of their aid under section 2.3 – *Liquidity support in the form of subsidised loans*. Also, Finland and Germany have substantially made use of loans at favourable terms (representing 50% and 42% respectively of the total aid granted). At the EU level, subsidised loans amount to €24.68

Germany TCF: Modifications to SA.102542, SA.102631 and SA.104756 TCF: Modifications to SA.102542, SA.102631, SA.104019.

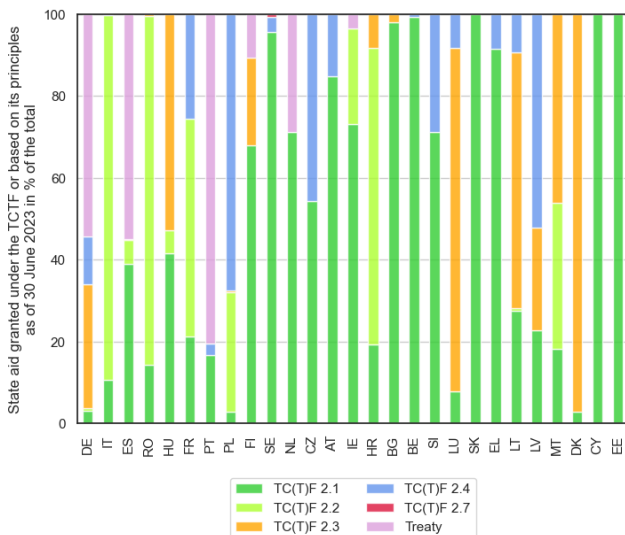
<sup>13</sup> The measure provides support in the form of a payment to the operators of fossil fuel power plants (except for those subject to regulated revenues such as certain combined heat and power plants, or plants outside the Spanish mainland) to cover part of their fuel costs, thereby lowering the price of marginal (fossil fuel) energy and, as a result, obtaining a reduced overall price of electricity for users. The payment, funded by payments by electricity providers with infra-marginal costs (such as those running renewable plants), functions as a direct grant aimed to finance part of the fuel costs.

<sup>14</sup> Austria, Belgium, Bulgaria, Cyprus, Czechia, Estonia, Greece, Finland, Ireland, the Netherlands, Sweden, Slovenia and Slovakia.

<sup>15</sup> €2 million per undertaking, €250 000 per undertaking active in the primary production of agricultural products and €300 000 per undertaking active in the fishery and aquaculture sectors, per Member State.

billion, including subsidised loans to Uniper SE and SEFE GmbH, and represent 18% of all the aid granted under crisis measures.

Figure 2: Total State aid granted as of 30 June 2023 under TC(T)F measures or based on its principles, breakdown by legal basis



Latvia and Poland have granted more than 50% of their respective aid under section 2.4 - *Aid for additional costs due to exceptionally severe increases in natural gas and electricity prices*. Aid granted by 14 Member States<sup>16</sup> under this section amounts to €9.96 billion. This represents around 7% of the total €141 billion granted under TCTF or in line with its principles. The sharp increase from around €300.6 million at the end of 2022 to €9.96 billion by June 2023 can be attributed partly to the time lag between the moment when energy costs are incurred and when aid is granted. Indeed, most Member States opted to grant aid only at the end of the eligible period, after additional energy costs were incurred and verified, so that even if aid schemes for high energy costs were adopted in 2022, most of the compensation was granted in 2023. Further, the conditions for support under section 2.4 TC(T)F were changed on 28 October 2022, allowing potentially more beneficiaries to qualify for aid, which was not granted before 2023. For example, the condition requiring that a company had incurred losses was replaced by the condition requiring a significant EBITDA reduction compared to the pre-crisis level. Germany accounts for €8.26 billion of the €9.96 billion granted under section 2.4. This aid was granted under the electricity, gas and district heating price brake<sup>17</sup>, which caps prices that energy suppliers charge their customers, with the German State compensating suppliers for the difference between the capped price and the market price. The price brake measure

<sup>16</sup> Austria, Belgium, Greece, Germany, France, Czechia, Italy, Poland, Portugal, Sweden, Slovenia, Lithuania, Latvia, and Luxembourg.

<sup>17</sup> SA.104606 Temporary cost containment of natural gas, heat and electricity price increases.

requires ex-post checks, so that amounts reported by Germany in 2023 may be reduced as a result.

As of the end of June 2023, only a small amount (around €3.5 million) had been granted under section 2.7 – *Aid for additional reduction of electricity consumption*.

Finally, no aid has yet been granted under sections 2.5 – *Aid for accelerating the rollout of renewable energy, storage, and renewable heat relevant for REPowerEU*, 2.6 – *Aid for the decarbonisation of industrial production processes through electrification and/or the use of renewable and electricity-based hydrogen fulfilling certain conditions and for energy efficiency measures* or 2.8 – *Aid for accelerated investments in sectors strategic for the transition towards a net-zero economy* of the TC(T)F. This is explained by the fact that the first schemes approved under these sections of the TC(T)F were approved at the end of 2022 or beginning of 2023.

### Preliminary observations and perspectives

As previously noted, it is important to highlight that the survey data do not capture sizable support measures taken by all Member States to support their economy and households that do not constitute State aid, but which are reflected in the Member State deficits.

### Data collected by DG Economic and Financial Affairs

The Commission’s Directorate-General for Economic and Financial Affairs has been monitoring the budgetary impact of the fiscal policy measures taken by the Member States to mitigate the impact of high energy prices on households and businesses. The data presented below refer to the budgetary impact of energy measures for the full 2023.

Based on the estimates included in the Commission’s Autumn economic forecast<sup>18</sup>, in 2023 the net budgetary cost of such measures amounted to around €165 billion, corresponding to 0.97% of EU27 GDP. These include mostly measures that do not qualify as State aid.

In absolute terms, the measures Germany, France, and Italy had the highest net budgetary cost in 2023, of €59.4 billion, 22.8 billion and €21.4 billion respectively, representing altogether 63% of all the energy fiscal measures in the EU (respectively around 36%, 14%, and 13% of the total EU spending on energy fiscal measures). These are followed by Spain, with €13.5 billion (8% of the total), followed by the Netherlands, with €10.6 billion (6% of the total). In all the other Member States the net budgetary cost

<sup>18</sup> European Commission’s Directorate-General for Economic and Financial Affairs (2023), European Economic Forecast, Autumn 2023. Available at:

[https://economy-finance.ec.europa.eu/document/download/4139ef72-9eb3-4fad-a116-ee87979f4d35\\_en?filename=ip258\\_en.pdf](https://economy-finance.ec.europa.eu/document/download/4139ef72-9eb3-4fad-a116-ee87979f4d35_en?filename=ip258_en.pdf)

The budgetary impact reflect the measures put in place or announced before the end of October 2023. For Slovakia, the forecast estimates have been updated after the submission of the 2024 Draft Budgetary Plan on 12 December 2023.

was between 3% of the total (Poland) and 0.01% (Greece) of total EU spending on energy fiscal measures.

In relative terms, Slovakia, Croatia and Malta had the highest net budgetary cost as a share of their GDP (1.89%, 1.77% and 1.6% of their 2023 GDP, respectively). They are followed by Austria (1.56% of its 2023 GDP) and Germany (with a net budgetary cost corresponding to 1.45% of its 2023 GDP. Hungary (1.34%), Portugal (1.25%), Czechia (1.18%), Italy (1.04%) and the Netherlands (1.03%) had a budgetary cost above the EU27 average (0.97%). At the EU27 level, the average budgetary cost reduced from 1.2% of GDP in 2022 to 0.97% in 2023.

For the purposes of these estimations, 'energy measures' are defined as: (1) measures that have a direct impact on the marginal cost of energy consumption for households and/or firms ('price measures'); (2a) measures that provide temporary income support to households; (2b) measures that provide compensation to firms other than price measures (both 'income measures'); and (3) revenues from (new taxes or levies on) windfall profits by energy companies.

State guarantees and loans are not included, as they have no immediate budgetary cost. Purely regulatory measures or measures that are administered by public (or private) corporations outside the perimeter of general government are not included, unless the government provides a direct compensation to the companies involved, for example in the form of a subsidy or capital transfer to cover the losses resulting from these support measures. Recapitalisations of energy companies in distress caused by general market conditions unrelated to the support measures are also not included in these estimates. Permanent increases in public salaries and social benefits are not included, as their permanent nature prevents them from being phased out once the peak in energy prices has subsided. Moreover, the estimates do not include the (semi-)automatic adjustments of social benefits to the general price level or the impact of the deceleration in economic activity on tax collection.

It is important to stress that the estimates of the budgetary impact of the fiscal policy measures to mitigate the impact of high energy prices on households and businesses are not directly comparable with the data on the aid granted under State aid measures, as they follow a different definition. They were collected with the objective of identifying the impact on public finances, not the potential impact on competition.

Compared to earlier estimates for 2023, two opposing trends can be observed: on the one hand, while existing measures often had a lower budgetary cost than initially expected, mainly because of lower energy prices on international markets, on the other hand, Member States introduced several new measures for 2023 or 2024 (or prolonged the validity of existing ones), which increases the budgetary costs. In relative terms, despite the high dispersion of the amounts in percentage of GDP, the data on the fiscal policy measures overall continue to show little evidence of certain Member States providing excessively larger public

spending in relation to the crisis compared to the others, in relation to the crisis.

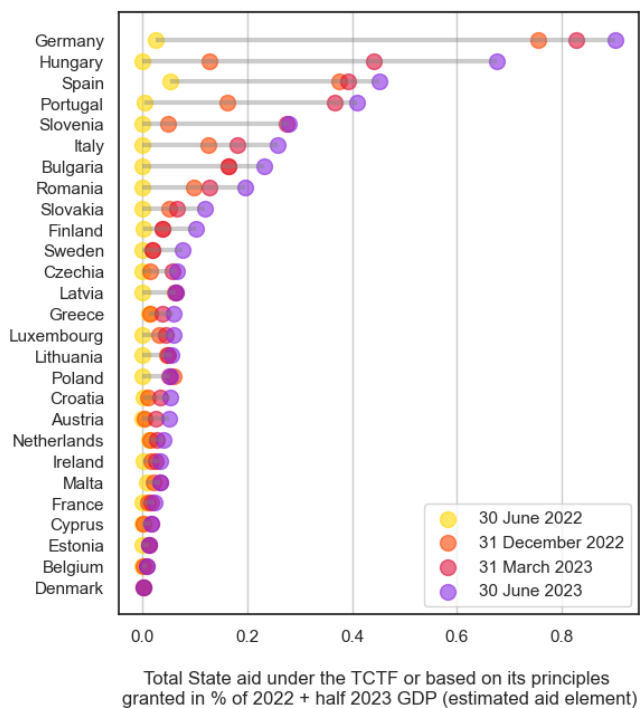
However, this data from DG Economic and Financial Affairs were collected with the objective of identifying the impact on public finances, not the potential impact on competition. As such, observations related to this data do not allow firm conclusions about possible market distortions in terms of competition given that data on fiscal policy measures also include public spending that does not amount to State aid, like support to households, and at the same time exclude sizeable support measures that constitute State aid and likely had an impact on competition.

### State aid data and estimates of aid elements

As previously highlighted, the information collected in the survey was the nominal amounts of the aid granted through different instruments, repayable and non-repayable. Yet these different instruments, used in varying degrees by Member States, have different economic impacts. Instead of nominal amounts, when looking at the aid granted through different instruments, aid elements should be considered, as they represent the actual advantage passed on to the undertaking, and may constitute a better metric for a fair comparison of aid granted through repayable and non-repayable instruments. This is because non-repayable instruments, such as grants, are generally more distortive of competition compared with repayable instruments such as guarantees or soft loans.

The aid element can be estimated in different ways depending on the type of instrument: for non-repayable instruments, the advantage passed on to the beneficiary normally corresponds to the nominal amount, which itself is the budgetary expenditure. For other repayable aid instruments, the advantage to the beneficiary and the cost to government may differ. The aid element, and the budgetary expenditure, is generally (much) lower than the nominal amount. For aid instruments, such as loans or guarantees, the advantage to the beneficiary and the cost to government is respectively the lower interest rate and the reduced guarantee fee actually paid by the undertaking compared to the one that would have been paid at market values.

Figure 3: Total State aid granted as of 30 June 2023 under TC(T)F measures or based on its principles as percentage of national GDP (using estimated **aid element**)



Considering the estimated aid elements<sup>19</sup> in percentage of GDP, Germany is the largest State aid spender, having granted around 0.9% of its GDP for 2022 and the first half of 2023 GDP. It is followed by Hungary (approximately 0.68% of its GDP), Spain (0.45%) and Portugal (0.41%). Italy and Romania respectively granted 0.26% and 0.20% of their GDP.

Thus, Member States' order in terms of aid granted compared to GDP differs depending on whether nominal amounts or aid elements are considered (contrast Figure 1 with Figure 3). Based on the latter metric, Germany is the largest spender, having spent 55% of the total aid granted on the recapitalisations of the systemic energy companies Uniper SE and SEFE GmbH. Conversely, while appearing as significant spenders under Figure 1 above, Italy and Romania have granted a smaller share of their respective GDPs when looking at aid elements, reflecting the large use of repayable instruments, mainly guarantees under section 2.2 of the TCTF.

Looking ahead, the Commission will continue to monitor closely the implementation of aid measures approved under the TCTF or based on its principles.

### Appendix

In a spirit of transparency, DG Competition provides its data to the public in a statistical appendix: *Statistical Annex* ([xlsx version](#)).

<sup>19</sup> The aid elements were estimated by DG Competition. A standard method was applied and based on information provided by the Member States in the past in the annual reports. For more detail, see the Methodology section of the State aid Scoreboard. For soft loans (under TCTF 2.1 and 2.3) a proxy of 15% of the total amount lent by the government is estimated, while for guarantees (under TCTF 2.1 and 2.2) the aid element is estimated to be 10% of the capital value guaranteed.

| Member State      | Total amount granted (nominal amount) in EUR billion | Total amount granted (nominal amount) - TC(T)F only - in EUR billion | Total amount granted (nominal amount) - Treaty only - in EUR billion | Total amount granted (nominal amount) in % GDP | Total amount granted (nominal amount) - TC(T)F only - in % GDP | Total amount granted (nominal amount) - Treaty only - in % GDP | Total amount granted (nominal amount) in % of EU total | Total amount granted (nominal amount) - TC(T)F only - in % of EU total | Total amount granted (nominal amount) - Treaty only - in % of EU total |
|-------------------|--|--|--|--|--|--|--|--|--|
| Austria           | 0,34   | 0,34   | 0,00   | 0,05%  | 0,05%  | 0,00%  | 0%   | 0%   | 0%   |
| Belgium           | 0,26   | 0,27   | 0,00   | 0,03%  | 0,03%  | 0,00%  | 0%   | 0%   | 0%   |
| Bulgaria          | 0,32   | 0,31   | 0,00   | 0,24%  | 0,23%  | 0,00%  | 0%   | 0%   | 0%   |
| Cyprus            | 0,01   | 0,01   | 0,00   | 0,02%  | 0,02%  | 0,00%  | 0%   | 0%   | 0%   |
| Czechia           | 0,50   | 0,50   | 0,00   | 0,12%  | 0,12%  | 0,00%  | 0%   | 0%   | 0%   |
| Germany           | 72,80  | 33,28  | 39,53  | 1,23%  | 0,56%  | 0,67%  | 52%  | 24%  | 28%  |
| Denmark           | 0,02   | 0,02   | 0,00   | 0,00%  | 0,00%  | 0,00%  | 0%   | 0%   | 0%   |
| Estonia           | 0,01   | 0,01   | 0,00   | 0,02%  | 0,02%  | 0,00%  | 0%   | 0%   | 0%   |
| Greece            | 0,19   | 0,19   | 0,00   | 0,06%  | 0,06%  | 0,00%  | 0%   | 0%   | 0%   |
| Spain             | 12,10  | 5,44   | 6,64   | 0,58%  | 0,26%  | 0,32%  | 9%   | 4%   | 5%   |
| Finland           | 0,75   | 0,67   | 0,08   | 0,18%  | 0,16%  | 0,02%  | 1%   | 0%   | 0%   |
| France            | 1,82   | 1,82   | 0,00   | 0,04%  | 0,04%  | 0,00%  | 1%   | 1%   | 0%   |
| Croatia           | 0,32   | 0,32   | 0,00   | 0,30%  | 0,30%  | 0,00%  | 0%   | 0%   | 0%   |
| Hungary           | 3,61   | 3,62   | 0,00   | 1,35%  | 1,35%  | 0,00%  | 3%   | 3%   | 0%   |
| Ireland           | 0,33   | 0,31   | 0,01   | 0,04%  | 0,04%  | 0,00%  | 0%   | 0%   | 0%   |
| Italy             | 39,23  | 39,20  | 0,02   | 1,32%  | 1,32%  | 0,00%  | 28%  | 28%  | 0%   |
| Lithuania         | 0,12   | 0,12   | 0,00   | 0,12%  | 0,12%  | 0,00%  | 0%   | 0%   | 0%   |
| Luxembourg        | 0,25   | 0,24   | 0,00   | 0,42%  | 0,40%  | 0,00%  | 0%   | 0%   | 0%   |
| Latvia            | 0,04   | 0,05   | 0,00   | 0,03%  | 0,04%  | 0,00%  | 0%   | 0%   | 0%   |
| Malta             | 0,03   | 0,03   | 0,00   | 0,11%  | 0,11%  | 0,00%  | 0%   | 0%   | 0%   |
| Netherlands       | 0,57   | 0,41   | 0,16   | 0,04%  | 0,03%  | 0,01%  | 0%   | 0%   | 0%   |
| Poland            | 0,75   | 0,75   | 0,00   | 0,07%  | 0,07%  | 0,00%  | 1%   | 1%   | 0%   |
| Portugal          | 1,53   | 0,30   | 1,23   | 0,41%  | 0,08%  | 0,33%  | 1%   | 0%   | 1%   |
| Romania           | 3,82   | 3,82   | 0,00   | 0,85%  | 0,85%  | 0,00%  | 3%   | 3%   | 0%   |
| Sweden            | 0,62   | 0,63   | 0,00   | 0,07%  | 0,08%  | 0,00%  | 0%   | 0%   | 0%   |
| Slovenia          | 0,25   | 0,25   | 0,00   | 0,28%  | 0,28%  | 0,00%  | 0%   | 0%   | 0%   |
| Slovakia          | 0,20   | 0,20   | 0,00   | 0,12%  | 0,12%  | 0,00%  | 0%   | 0%   | 0%   |
| <b>Total EU27</b> | <b>140,79</b>  | <b>93,12</b>   | <b>47,66</b>   | <b>0,58%</b>                                   | <b>0,38%</b>   | <b>0,20%</b>   | <b>100%</b>  | <b>66%</b>   | <b>34%</b>   |

| Member State      | Total TC(T)F or based on its principles State aid expenditure in EUR billion, as of 30 June 2022 | Total TC(T)F or based on its principles State aid expenditure in EUR billion, as of 31 December 2022 | Total TC(T)F or based on its principles State aid expenditure in EUR billion, as of 31 March 2023 | Total TC(T)F or based on its principles State aid expenditure in EUR billion, as of 30 June 2023 |
|-------------------|--|--|---|--|
| Austria           | 0,00   | 0,02   | 0,17  | 0,34   |
| Belgium           | 0,00   | 0,12   | 0,25  | 0,27   |
| Bulgaria          | 0,00   | 0,22   | 0,22  | 0,31   |
| Cyprus            | 0,00   | 0,00   | 0,01  | 0,01   |
| Czechia           | 0,00   | 0,06   | 0,30  | 0,50   |
| Germany           | 9,82   | 64,96  | 68,09   | 72,81  |
| Denmark           | 0,01   | 0,01   | 0,03  | 0,02   |
| Estonia           | 0,00   | 0,01   | 0,01  | 0,01   |
| Greece            | 0,04   | 0,05   | 0,12  | 0,19   |
| Spain             | 1,08   | 8,37   | 9,30  | 12,08  |
| Finland           | 0,00   | 0,32   | 0,32  | 0,75   |
| France            | 0,00   | 1,28   | 1,54  | 1,82   |
| Croatia           | 0,00   | 0,05   | 0,19  | 0,32   |
| Hungary           | 0,00   | 0,37   | 2,47  | 3,62   |
| Ireland           | 0,02   | 0,13   | 0,19  | 0,32   |
| Italy             | 0,00   | 17,23  | 25,88   | 39,22  |
| Lithuania         | 0,00   | 0,08   | 0,10  | 0,12   |
| Luxembourg        | 0,00   | 0,19   | 0,22  | 0,24   |
| Latvia            | 0,00   | 0,04   | 0,05  | 0,05   |
| Malta             | 0,01   | 0,02   | 0,03  | 0,03   |
| Netherlands       | 0,16   | 0,20   | 0,40  | 0,57   |
| Poland            | 0,00   | 0,70   | 0,69  | 0,75   |
| Portugal          | 0,01   | 0,61   | 1,38  | 1,53   |
| Romania           | 0,00   | 1,88   | 2,27  | 3,82   |
| Sweden            | 0,00   | 0,15   | 0,15  | 0,63   |
| Slovenia          | 0,00   | 0,04   | 0,24  | 0,25   |
| Slovakia          | 0,00   | 0,09   | 0,11  | 0,20   |
| <b>Total EU27</b> | <b>11,16</b>   | <b>97,18</b>   | <b>114,74</b>   | <b>140,79</b>  |



| Member State             | TC(T)F 2.1   | TC(T)F 2.2   | TC(T)F 2.3   | TC(T)F 2.4  | TC(T)F 2.7   | Treaty       | All legal bases |
|--------------------------|--------------|--------------|--------------|-------------|--------------|--------------|-----------------|
| Austria                  | 0,29         | 0,00         | 0,00         | 0,05        | 0,00         | 0,00         | 0,34            |
| Belgium                  | 0,26         | 0,00         | 0,00         | 0,00        | 0,00         | 0,00         | 0,26            |
| Bulgaria                 | 0,31         | 0,00         | 0,01         | 0,00        | 0,00         | 0,00         | 0,32            |
| Cyprus                   | 0,01         | 0,00         | 0,00         | 0,00        | 0,00         | 0,00         | 0,01            |
| Czechia                  | 0,27         | 0,00         | 0,00         | 0,23        | 0,00         | 0,00         | 0,50            |
| Germany                  | 2,27         | 0,33         | 22,21        | 8,46        | 0,00         | 39,53        | 72,80           |
| Denmark                  | 0,00         | 0,00         | 0,02         | 0,00        | 0,00         | 0,00         | 0,02            |
| Estonia                  | 0,01         | 0,00         | 0,00         | 0,00        | 0,00         | 0,00         | 0,01            |
| Greece                   | 0,17         | 0,00         | 0,00         | 0,02        | 0,00         | 0,00         | 0,19            |
| Spain                    | 4,71         | 0,73         | 0,02         | 0,00        | 0,00         | 6,64         | 12,10           |
| Finland                  | 0,51         | 0,00         | 0,16         | 0,00        | 0,00         | 0,08         | 0,75            |
| France                   | 0,39         | 0,97         | 0,00         | 0,46        | 0,00         | 0,00         | 1,82            |
| Croatia                  | 0,06         | 0,23         | 0,03         | 0,00        | 0,00         | 0,00         | 0,32            |
| Hungary                  | 1,50         | 0,20         | 1,91         | 0,00        | 0,00         | 0,00         | 3,61            |
| Ireland                  | 0,24         | 0,08         | 0,00         | 0,00        | 0,00         | 0,01         | 0,33            |
| Italy                    | 4,18         | 35,00        | 0,00         | 0,03        | 0,00         | 0,02         | 39,23           |
| Lithuania                | 0,03         | 0,00         | 0,08         | 0,01        | 0,00         | 0,00         | 0,12            |
| Luxembourg               | 0,02         | 0,00         | 0,21         | 0,02        | 0,00         | 0,00         | 0,25            |
| Latvia                   | 0,01         | 0,00         | 0,01         | 0,02        | 0,00         | 0,00         | 0,04            |
| Malta                    | 0,01         | 0,01         | 0,01         | 0,00        | 0,00         | 0,00         | 0,03            |
| Netherlands              | 0,41         | 0,00         | 0,00         | 0,00        | 0,00         | 0,16         | 0,57            |
| Poland                   | 0,02         | 0,22         | 0,00         | 0,51        | 0,00         | 0,00         | 0,75            |
| Portugal                 | 0,25         | 0,00         | 0,00         | 0,05        | 0,00         | 1,23         | 1,53            |
| Romania                  | 0,55         | 3,26         | 0,01         | 0,00        | 0,00         | 0,00         | 3,82            |
| Sweden                   | 0,60         | 0,00         | 0,00         | 0,02        | 0,003        | 0,00         | 0,62            |
| Slovenia                 | 0,18         | 0,00         | 0,00         | 0,07        | 0,00         | 0,00         | 0,25            |
| Slovakia                 | 0,20         | 0,00         | 0,00         | 0,00        | 0,00         | 0,00         | 0,20            |
| <b>Total EU27</b>        | <b>17,45</b> | <b>41,02</b> | <b>24,68</b> | <b>9,95</b> | <b>0,003</b> | <b>47,67</b> | <b>140,79</b>   |
| <i>In % of the total</i> | 12,39%       | 29,14%       | 17,53%       | 7,07%       | 0,002%       | 33,86%       | 100,00%         |

\* Figures in EUR billion