

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Re: FW: comp(2025)2013037-HT.6062-MTNG-Invitation to the Advisory Committee and Multilateral meeting  
**Date:** Freitag, 21. März 2025 16:19:45  
**Importance:** High

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> Dear colleagues,

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> Following the virtual meeting of march 12th, we come back with the  
> following comments from the Greek authorities.

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> - Regarding the amendment of the Code of Best Practices (Annex VI):

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> 1. Section 11.7 provides for the time limits of the Internal review  
> mechanism. We consider that the time limits both for filling a request  
> (par.

> 96) and also for the reply of the Commission (par. 97-98) should not  
> exceed

> in total a period of 14 weeks. Taking into account the risks involved  
> into

> an investment we consider that these time limits will add and extra  
> obstacle.

> 2. In Section 11.4 (par. 84) we suggest a correction of the Greek  
> version (in bold: «α») instead of «ε»): «ι. Το άρθρο 107 παράγραφος 3  
> στοιχείο α) της ΣΛΕΕ»

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> - Regarding the revised General Notification Form (Annex II): we  
> consider

> that the confirmation of par. 6.8. (that neither the aided activity nor  
> any

> aspects of the notified State aid measure that are indissolubly linked  
> to

> the object of the aid are in breach of Union environmental law) could  
> prove

> burdensome for the member states, is not in line with the State Aid  
> Modernization objectives, therefore we do not agree to adding this

> confirmation. In the further alternative, if adding this confirmation  
> is to

> be adopted, for reasons of legal certainty it would be necessary to

> explicitly indicate the provisions of environmental law implied in this  
> paragraph. Otherwise such an explicit confirmation would not make any  
> sense».

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> Best regards,

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> [REDACTED]

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