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To: [COMP STATE AID GREECE; COMP A3](#)
Cc: [REDACTED]
Subject: comp(2025)2013037-HT.6062 / Written preliminary comments by Finland
Date: vendredi 21 mars 2025 08:28:46

Dear Sir / Madam,

Following the meeting on the 12 March, please find below Finland's written preliminary comments:

Thank you for the opportunity to give written comments and thank you also for the answers given to our questions concerning the Århus Convention.

Finland supports the proposed amendments to address the findings of the Århus Convention Compliance Committee. Finland considers that the **proposed amendments address key concerns** of the Århus Convention Compliance Committee by creating a procedure which enables certain Non-Governmental Organizations to request review of Commission decisions taken under Article 108(2) TFEU. The proposals also account for the need to ensure efficient State aid procedures.

Regarding the suggested changes on the reporting obligation stipulated in the Implementing Regulation, after the 12 March meeting it remains somewhat unclear whether the Commission is indeed considering **changing the annual reporting format to pre-formatted spreadsheets**, as stated in the attached Annex III A. If that is the case and the reporting would be done in the future using spreadsheets instead of an electronic reporting system (SARI2 or similar), **Finland is very much against this**. In our view, that would increase notably the administrative burden on the Member States as well as make the long-term monitoring of aid measures notably harder for the national aid authorities.

Thank you for your consideration.

With best wishes,

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