

## Comments on the Communication on the Framework for State Aid for RDI

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### Chapter 2.1.1. point 22

*“The monitoring of the ancillary character of the economic activity shall apply for at least 10 years from the start of operations of the research organisation or the research infrastructure. In case the research infrastructure or the research organisation increases its economic activity so that it cannot be considered as ancillary, the public funding of the whole economic activity will fall under State aid rules.”*

The additional rule for monitoring economic and non-economic activities of research organisations does not seem clear. There are doubts about the impact of this rule within the practice. It's unclear who will be responsible for this monitoring, and what will happen after 10 years of monitoring. When will it be possible to exclude economic activity from state aid? From the beginning of the existence of a research organisation or after ten years? And if the first possibility is right, what happens if the whole economic activity will fall under state aid rules with already provided state aid?

It is clear that when economic activity of a research organisation increases, the public funding will fall under State aid rules, but what happens after 10 years of monitoring? The monitoring will not be necessary? What impact will it have on already provided state aid?

### Chapter 3.2.3.1 point 81:

Due to different needs of various types of state aid schemes we suggest not to mention a concrete limit for flat-rate and consider allowing all types of simplified cost approach. This could simplify the rules for eligibility of indirect costs and could help to target state aid. Limit 15 % is not compatible for example with Horizont 2020 which is a pattern to other state aid schemes.