



REVIEW OF THE COMMUNICATION ON THE FRAMEWORK FOR STATE AID FOR RESEARCH AND DEVELOPMENT AND INNOVATION

The draft revision of the Research, Development and Innovation framework does not include the need to support industries in their digital transformation. The new draft framework only introduces small notes about digitization in certain definitions (Experimental development, Innovation support services, Innovation in terms of organization and processes ...) that simply collect what we had already been doing with the previous framework: we have already interpreted with the current framework, the implementation of digital technologies in a production process was already innovation, without the need to include that in the definition. The new framework does not bring anything new regarding digitization.

The introduction of a definition of digitization does not clarify anything since it is quite scarce, it should include many more concepts related to digital strategy. In addition, together with digitization are other types of fundamental actions, included in the European Digital Strategy, such as cybersecurity, which are currently outside of any framework (except minimis, of course)

One of the problems that we find when supporting the digital transition of industries is that although the definition of innovation includes the implementation of new digital techniques in production or organization processes, the concepts that can be financed are designed for typical scientific R&D tasks (personnel costs, equipment used for the duration of the project). The implementation of digital technologies (and any other new technology) implies to a much greater extent the acquisition of certain assets and the contracting of technical assistance or service companies that carry out the implementation, as well as other expenses such as cybersecurity that are inherent and fundamental for this transformation

It is essential that this aspect is collected (acquisition of assets and expenses in cybersecurity) for several reasons:

- To be able to finance the implementation of digitization in the industry
- To be able to absorb recovery funds
- To carry out digital transformation in a context in which companies are making an effort for their survival and their resilience happens because they can be digitized

In addition, we believe that there should be a specific category for digitization in the Block Exemption Regulation, and this could be the framework of guidelines in which it fits.