

Subject: HT.5594 -Public consultation on the Prolongation of the State aid Regulations and Guidelines reformed under the State aid modernisation (SAM) package and expiring by the end of 2020

Estonia does not object to the prolongation of the State aid Regulations and Guidelines reformed under the State aid modernisation (SAM) package and expiring by the end of 2020.

At the same time we would like to clarify one issue related to the regional aid maps as it was not clear from the drafts – are regional aid maps with „ a“ regions are to be reviewed now or they will be any way prolonged for 2 years after presenting a new notification?

In addition we would like to comment Draft Commission Regulation Article 3, which provides, that „ *Where a Member State wishes to prolong, as a consequence of the amendment of Regulation (EU) No 651/2014, measures in respect of which summary information was submitted to the Commission in accordance with Article 11 of Regulation (EU) No 651/2014, the summary information regarding the prolongation of those measures shall be duly updated and communicated to the Commission within 20 working days following the prolongation decision by the Member States*“. It is not clear from the wording what is meant under the „prolongation decision by the Member States“ – what is the starting point for counting 20 working days? We assume that obligation to present a new summary information would result in increasing of administrative burden and suggest to consider in Article 3 the possibility to prolong automatically block exempted measures which were notified to be in force till 31.12.2020.

Tallinn
Ministry of Finance of Estonia
14.05.2019