

Dear Sir or Madam

As the largest business development agency in Germany, we would like to table a brief suggestion. It may come as a surprise that such an institution does this, but perhaps our more local perspective will help.

As you know, the overall objective of regional aid as a contribution to an objective of common interest, as formulated so far, is "to reduce disparities between the levels of development of the various regions of the European Union". All regulations in support programmes such as the ERDF or HORIZON follow this guiding principle.

This definition dates from a time when the European single market had to be built up and the focus was directed solely inwards. In general, the rules of the law on state aid are also based on it. At the time when these guidelines were formulated, Europe was at least in first or second place in almost all economic and technological fields.

It is a fact, however, that this is no longer the case and that we therefore no longer need these considerations only internally, but must add an external dimension to the compatibility of regional aid and compatibility assessment. They must be possible in those economic sectors in which the European Union no longer occupies an economically or technologically significant position. After all, what use is such a set of rules if the real rules of the game are determined by others?

With this in mind, we would appeal to you to add a clause to the legal framework to the effect that such regional aid is regional aid if it can be demonstrated that the European Union as a whole does not occupy an economically or technologically significant position here.

Kind regards,