From:	Lönnqvist Maija (Tekes)
To:	COMP STATE AID GREFFE
Subject:	HT.4691_Reply_from_a_public_authority
Date:	lundi 30 mai 2016 08:54:26
Attachments:	image001.png

Dear Sir / Madame,
Tekes thanks for the opportunity to give its comments to the proposed amendments to the GBER. We would like to raise one concern on the amendments proposed on Article 22 of the GBER on aid for start-ups:

Article 22, paragraph 2 – Aid for Start-ups

For start-up aid, a new additional condition for eligibility is proposed (the new point a): the enterprise should start an activity that is new for this enterprise. In our view, in the case of unlisted small enterprises and up to five years following their registration or start of economic activity, the activity of the enterprise is per se new. Thus, the proposed new condition does not seem necessary or clearly justified. We would like to ask the Commission to clarify this point. Naturally, new enterprises which have solely been established to continue an activity of an 'old' company in order to be eligible for aid for start-ups should be excluded.

Additionally, we would like to propose an amendment/addition to Art. 22, paragraph 2, point c) as regards the requirement that the enterprise has not been formed through a merger:
We would like to propose that if two enterprises that are eligible for start-up aid merge into a single enterprise, the new enterprise should also be eligible for start-up aid if other conditions for aid are met.

Sincerely,
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