From:	Niitepõld Merike
To:	COMP STATE AID GREFFE
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Representing the Managing Authority of an Interreg programme, the following points (as presented also by Interact) are of crucial importance for us:

European Territorial Cooperation should be fully exempted from State aid.

- Article 20 of the GBER (SMEs in ETC projects) is being applied by ETC programmes and can potentially help (there is presently not much experience yet). But the situation is far from solved. The GBER Article does not allow for typical ETC co-financing rates, no solution for large undertakings such as universities, etc.).
- The solution requires clarification of European priorities: Do the benefits of cooperation out-weight potential distortions of the market?
- Other cooperation programmes (managed by EC) such as Horizon 2020 have already been exempted from State aid already.

Furthermore, and especially if the above proposed exemption is not possible, Interreg programmes would need a contact person at EC who knows about State aid rules AND Interreg.

Interreg programmes would also need access to the DG Competition WIKI to ask questions directly to DG COMP. Currently only Member States have access but cooperation programmes do not.

Interreg programmes fund a number of very "typical Interreg activities". For these it would be possible to give a standard answer. This would simplify Interreg programme management to a great extent.

With best regards,

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