

Thessaloniki, 3/7/2020

**Hellenic Republic  
Ministry of Development and Investments  
Special Secretariat for ERDF and CF Sectoral Programmes**

**Managing Authority of  
European Territorial Cooperation / INTERREG Programmes**

**“Contribution to the targeted modification of the General Block  
Exemption Regulation for State Aid (2<sup>nd</sup> consultation)”**

The Special Service for Managing European Territorial Cooperation (INTERREG) Programmes of the Hellenic Ministry of Development and Investments, in its capacity as **Managing Authority of five (5) Cross-Border and one (1) Transnational Programmes**, would hereby like to provide feedback on the proposed **targeted review of the General Block Exemption Regulation (GBER / Reg. (EU) 651/2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty)** (2<sup>nd</sup> consultation).

Within this 2<sup>nd</sup> **consultation** and in the context of the European Commission's suggested revised GBER Draft, the proposals of the Greek Managing Authority of European Territorial Cooperation Programmes regarding ETC Programmes, are as follows:

**Overall:**

- a. The Managing Authority takes this opportunity to **welcome again the launching of the present (2nd) consultation**, just on time for the new programming period (2021-2027). Being a Managing Authority of several Cooperation Programmes since the beginning of “INTERREG”, this Service is very pleased to be able to continue contributing to the modification of the GBER.
- b. Overall, as MA, we are **very content to acknowledge that many of our**, long ago as well as recently (1st consultation) expressed, **ideas on the issue have been taken on board** the present modification proposal (2nd consultation).

**1. Articles 11 and 12:**

We are positive to the suggested simplification of the reporting and monitoring conditions for limited amounts of aid granted under Article 20a.

**2. Article 20:**

- a. We agree with the European Commission proposal to align aid intensity with the ETC Regulation co-financing rates for all project partners (undertakings/enterprises), independently of their size.
- b. Please, **add** the following: *“In case the undertaking is a public body, maximum aid intensity may be up to 100% of the budget of the undertaking”*.
- c. Alternatively to b. above, please, add the following: *“Maximum aid intensity may be up to 100% of the budget of the undertaking, in case this budget is up to EUR 200.000”*.

d. Please, clarify whether, in case of public and public equivalent bodies/beneficiaries, the public national co-financing shall be considered as “private” contribution of the beneficiary.

3. **Article 20, par. 2:**

We suggest that **the special reference to certain eligible costs should be deleted**, as this may cause problems of interpretation. There should be only **direct reference to the Interreg eligibility rules, according to the Commission Delegated Regulation 481/2014 and the new ETC Regulation (2021-2027)**. This shall be similar to the eligibility references in Articles 25a – 25d for Horizon Programme, etc.

4. **Article 20a:**

a. The new Article 20a is in the right direction, particularly in combination to the modifications of article 11 and 12.

b. However, we suggest that the **total amount of aid to be considered “limited” shall be set at EUR 30.000 (instead of EUR 20.000)**, as this shall facilitate most of the cases of ETC participants (beneficiaries/undertakings), in line with the intention of the European Commission to cater for these project participants/partners, by limiting the administrative burden, given the small aid amounts.

5. **Alignment of Article 14, par. 15 and Article 20, par. 4:**

It is essential to ensure alignment of the Article 14, par. 15 to the modified Article 20. Therefore, and taking into account the intention of the European Commission to ensure reduction of the unnecessary administrative burden for ETC projects, please:

a. In Article 14, par. 15, **please delete the second and third phase of the paragraph**, as follows: *“If the initial investment is located in two or more assisted areas, the maximum aid intensity shall be the one applicable in the assisted area where the highest amount of eligible costs is incurred. In assisted areas eligible for aid under Article 107(3)(c) of the Treaty, this provision shall apply to large undertakings only if the initial investment concerns a new economic activity.”*

b. Alternatively, in order to ensure alignment as suggested in a. above, please add in the new par. 4 of Article 20 the following: “Maximum aid intensity may be the same for all undertakings of projects within the same European Territorial cooperation Programme.

5. **Greek version of the draft amended Regulation:**

Although the term **“undertakings”** has replaced the term **“enterprises”** in many parts of the proposed amended Regulation, including Articles 20 and 20a, in the **Greek version the term “επιχειρήσεις”** is used to translate both the term **“undertakings”** and the term **“enterprises”** of the English version.

**MA’s PROPOSAL for the Greek version of the draft amended Regulation:**

In the Greek version, the term **“ενισχυόμενοι”** or **“λαμβάνοντες ενίσχυση”** or **“λήπτες ενίσχυσης”** or **“δικαιούχοι φορείς”** or **“αναλαμβάνοντες φορείς”** or any other appropriate term should be used to translate the term **“undertakings”** of the English version, while the term **“επιχειρήσεις”** should be used only for translating the term **“enterprises”**.

Further contribution and/or additional information may also be provided if needed (INFO: [elenkatsi@mou.gr](mailto:elenkatsi@mou.gr); [thvladikas@mou.gr](mailto:thvladikas@mou.gr); and copy: [abouziani@mou.gr](mailto:abouziani@mou.gr)).