



Athens, 6/7/2020

The General Secretariat for Research and Technology (GSRT) of Greece, would like to thank the EC services for all the effort put forward in preparing the document for the targeted consultation of GBER which is a good basis for discussion. Some comments concern the following:

Article 2

On page 3, point 9 of the consultation document it is mentioned that *“The Digital Europe Programme will ...provide financial contribution to ...European Digital Innovation Hubs”*. Therefore, we propose that a definition of European Digital Innovation Hubs is included in article 2.

Article 25

- 1) In order to enhance synergies between EU partnerships or EU co-funded projects with ESIF funds, we propose to amend point 3 (e) so as to include management costs as well as dissemination costs. In various EU initiatives (like PRIMA, Eranets etc), the National State Aid Authority considers such costs as NOT eligible since they are not explicitly mentioned in article 25 of GBER. Therefore, beneficiaries whose proposals were positively evaluated on the European level, have to alter their initial proposals and “transform” the particular costs in other category costs keeping the total budget unchanged. Consequently, it is difficult for evaluators to verify that the original proposal, submitted at the European level, is the same as the one submitted on the national level. Following that, monitoring of the implementation of the projects as well as reporting (to the European and to National authorities) presents difficulties.
- 2) For H2020/Horizon Europe funding rates are calculated according to the type of the action (ie RIA or IA) and the category of beneficiary (ie for profit and non-profit organisations). For example, in the case of non-profit legal entities H2020 may reimburse up to 100% of the total eligible costs. According to state aid rules a non-profit organization may as well perform economic activities and in this respect it may be subject to state aid limits for aid intensities. Does the proposed revision imply that a non-profit organization performing economic activities can be reimbursed up to 100% (total public funding from HEP and national resources) irrespective of the research category (e.g. experimental development)?
- 3) In article 25 a provision for using the same categories of eligible costs is set. These costs include indirect costs in the form of a flat rate of 25% of direct cost in H2020/HEP. However, in article 7 of the proposed revision the phrasing of the current regulation is kept unchanged. According to this phrasing, simplified cost options may be used only in the case of actions co-financed by a Union fund that allows these options (e.g. Structural Funds). Since H2020/HEP are not considered a “fund” does this provision also apply to national funding that is not provided under regulation 1303/2013 (or new CPR Regulation)?

Article 27



- 1) On page 3, point 9 of the consultation document it is mentioned that “*The Digital Europe Programme will ...provide financial contribution to ...European Digital Innovation Hubs*”. The European Commission has published a draft document to prepare the implementation of European Digital Innovation Hubs (<https://ec.europa.eu/digital-single-market/en/news/draft-document-dihs-digital-europe-programme-call-feedback>). According to the document and regarding state aid issues, it is proposed that DIHs “*should be in line with Art 27 (92) GBER ‘Innovation clusters’*” (page 17 of the working document).
- 2) The General Secretariat for Research and Technology of Greece has recently announced a call to support the creation of Competence Centers in the country. The National State Aid Authority decided to use article 27 of GBER as the legal base of the call for state aid issues.

Therefore, based on points 1) and 2) above, we propose that article 27 of GBER is updated accordingly so as to refer not only to Innovation clusters but also to similar new instruments, like Digital Innovation Hubs and Competence Centers.

General remarks

The concept of Seal of Excellence (SOE) could be also applied for the European Digital Innovation Hubs that receive a positive evaluation from the EC services but do not get funded due to lack of funds (Digital Europe funds). Awarding a SOE to these positively-evaluated hubs would:

- 1) Help national authorities to support such DIHs with the same rules as on the European level, if suitable provisions are included in article 27 of GBER, like article 25 (a) that is proposed in the current GBER consultation
- 2) act as an incentive/reassurance for SMEs to use the services provided by the DIHs