

**HT.5224 - Targeted review of the General Block Exemption Regulation (State aid):
extended scope for national funds to be combined with certain Union programmes (2nd
consultation)**

Estonia's position on II draft

In general we support the draft. Please find below our comments on two points.

- 1) **Recital 9** – in this point the reference to „Digital Europe Programme“ is made and it is written that „The programme will provide financial contribution to advanced computing including High Performance-, cloud-, edge- and quantum computing, Artificial Intelligence including the creation of European Digital Innovation Hubs, testing and experimentation facilities.“ Yet there is no indication in the draft text which Articles of Chapter I and Chapter III of the draft cover Digital Europe Programme and more specifically European Digital Innovation Hubs. We are asking to clarify this issue.
- 2) **Article 20a, Article 11** – according to Article 11 (last sentence) the reporting obligation shall not apply in respect of aid granted to European Territorial Cooperation projects referred to in Article 20a, i.e. no summary information should be sent to the Commission regarding Article 20a. As there is also no obligation to submit annual reports and no publication obligation according to Article 9(1) we are of the opinion that such aid is not transparent. In this case such aid cannot be registered also in the national state aid and de minimis aid registry and no record what so ever can be kept on this type of aid.

We are asking the Commission to refrain the last sentence of Article 11 so that it would not concern the obligation to send summary information on aid measures based on Article 20a to the Commission. Sending summary information would not be an excessive burden on the Member State but ensure the transparency of aid under GBER.

Tallinn,
02 July 2020