

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

Prague, July 2, 2020

We would like to thank the EC for the 1st and the 2nd consultation in order to make the GBER rules as adequate as possible. We perceive a real step forward between the 1st and the 2nd modification draft. However, we still have some remarks that are important especially from the point of view of synergies and elimination of useless bureaucracy.

- Article 25a still speaks only about SMEs, whereas Small mid caps are eligible for funding under Horizon Europe Accelerator, where EIC supposes to deliver Seal of Excellence label. We suggest to add small mid caps.  
If small mid caps are not added, more bureaucracy will be created on the side of research funding organisation as they will have to create two different approaches - one for SMEs with SoE which could be financed under Horizon 2020/Horizon Europe rules and one for small mid caps to which other state aid rules will apply.
- Article 25a modifies rules for SoE project only when awarded to SMEs. However, when the SoE is awarded remains open, upon statement in the call text (even if now it concerns only mono beneficiaries, a solution for multi beneficiaries could be found during Horizon Europe implementation). Under the lifetime of Horizon Europe additional Seal of Excellence could be provided and GBER shall be open to include those under general conditions.
  - The eligible activities of the aided research and development project or feasibility study shall be those defined as eligible under the Horizon 2020 or the Horizon Europe programme rules, excluding activities going beyond experimental development activities.
  - The categories, maximum amounts and methods of calculation of eligible costs of the aided research and development project or feasibility study shall be those defined as eligible under the Horizon 2020 or Horizon Europe programme rules.
  - The total public funding provided for each aided action shall not exceed the maximum level of support provided for in the Horizon 2020 or the Horizon Europe programme.

- As stated already above, the article shall not put any restriction on type of entity (SMEs, midcaps, etc.) and shall cover all which are eligible under the H2020 or HE call within which the SoE will be delivered.
- Article 25c quotes Co-funded actions but does not mention Co-funded partnerships. A clear reference to the Co-funded partnerships would be very helpful as only institutionalized partnerships are clearly quoted.

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