

European Commission  
Directorate-General for Competition  
State Aid Registry  
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Belgique/België  
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Ljubljana, 2 August 2021

**Subject: Comments on the revised Climate, Energy and Environmental Aid Guidelines (CEEAG) 2022**

We are sending the position of the Chamber of Commerce and Industry of Slovenia, which was formed in a group of energy-intensive companies. We generally welcome the preparation of these state aid guidelines as for an indispensable tool for ensuring the competitiveness of the European economy in the future as well.

Past experience of the Sloven

ian economy showed that such guidelines are an indispensable mechanism for ensuring competitiveness, but at the same time the implementation of state aid schemes in Slovenia had unfortunately happened much later than in other Member States with higher GDP. This sometimes creates a lot of uncertainty in companies regarding further business and development and, in the meantime, less competitive business conditions.

**Our proposal is to establish kind of obligation for implementation of the identified, necessary state aid schemes for climate, environmental protection and energy in all Member States.**

This is the only way to ensure competitive conditions for all companies in certain branch within the European Union. That is also the way to ensure the self-sufficiency of the European Union and the Member States in areas arising from the European Green Deal.

In terms of content, we generally agree with the chapters and the expanded content of the new 2022 guidelines, but we have some comments and suggestions for chapter 4.11:

**4.11.2. Scope: Levies from which reductions can be granted**

**Point 356** regarding the overall cumulative level, defined in EUR / MWh, the position of Slovenian energy-intensive companies is, that the specifics of each individual Member State must be taken into account when determining these values.

The specifics of Slovenian companies is their small size compared to competitors in the same branches in other Member States, so we propose that the overall cumulative level of these levies (before any reductions) is to be defined on the level of each Member State.

#### **4.11.3.2. Proportionality of the aid measure**

In **point 359**, we propose that the aid to be proportionate if the beneficiaries pay at least 15% of the costs generated by the electricity levies which a Member State includes in its scheme and not 25% as proposed under the new proposal.

Furthermore, in **point 360**, we propose that for the particularly exposed companies defined in point 357 of the guidelines, their own contribution can be limited to 0.5% of the gross value added of the undertaking concerned and not to 1.5% as proposed.

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