Issue 1/2023 – July 2023

ISBN: 978-92-68-06049-0, ISSN: 2363-3468

# Competition *State aid brief*

## The use of crisis State aid measures in response to the Russian invasion of Ukraine.

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### In a nutshell

**By the end of 2022, of nearly €672 billion of aid approved during that period either under the Temporary Crisis Framework or directly under the Treaty and based on TCF principles, only €93.52 billion was actually granted to companies, representing 14% of the aid approved and corresponding to 0.59% of EU27 GDP in 2022.**

**These figures do not include sizeable support measures taken by several Member States to support their economy and households that do not qualify as State aid.**

### Overview of the Temporary Crisis and Transition Framework

On 23 March 2022, the European Commission adopted the Temporary Crisis Framework (TCF)[1] to enable Member States to use the flexibility foreseen under State aid rules to support the economy in the context of Russia's invasion of Ukraine, while complying with a set of rules aiming to minimise distortions to competition in the Single Market. The Temporary Crisis Framework, based principally on Article 107(3)(b) of the Treaty on the Functioning of the European Union ('TFEU'), recognises that the EU economy is experiencing a serious disturbance caused by Russia's unjustified attack on Ukraine. The Temporary Crisis Framework was extended on 20 July 2022 to complement the Winter Preparedness Package and in line with the REPowerEU plan objectives[2], and further prolonged on 28 October 2022[3].

On 9 March 2023, the Commission adopted the Temporary Crisis and Transition Framework[4] (TCTF), which replaced the previous Temporary Crisis Framework. The TCTF maintains the existing possibilities to address the consequences of the current crisis until 31 December 2023 by providing (1) direct support to all companies affected in terms of small aid amounts, (2) liquidity support in terms of subsidised loans or public guarantees, (3) targeted support to cover increased energy costs, and (4) tools to incentivise electricity demand reduction, especially during peak hours.

After consultation with the Member States, the Commission has decided to expand and further simplify the provisions for support to accelerate renewable energy deployment and industrial decarbonisation. These provisions have been prolonged until 31 December 2025 and will contribute to address one major contributing factor of the current energy crisis in Europe, namely the dependency on fossil fuels.

In addition, the Commission added a new section (2.8 - *Aid for accelerated investments in sectors strategic for the transition towards a net-zero economy*), applicable until 31 December 2025, aimed at further accelerating investments in key sectors for the transition towards a net-zero economy, by enabling investment support for the manufacturing of strategic equipment, namely batteries, solar panels, wind turbines, heat-pumps, electrolysers and carbon capture usage and storage as well as for production of key components and for production and recycling of related critical raw materials. For this purpose, Member States may design schemes providing support capped at a certain percentage of the investment costs and nominal amounts, depending on the location of the investment and the size of the beneficiary. Where the support under such schemes is not sufficient to prevent those investments from being diverted away from Europe, the Commission can authorise higher support to individual companies, potentially up to matching any subsidies available in third countries, though not higher than the project's funding gap in Europe. This is further subject to several strict safeguards, including a requirement to benefit assisted areas, absence of relocation and the use of state-of-the-art production technology.

[1] Communication from the Commission, Temporary Crisis Framework for State Aid measures to support the economy following the aggression against Ukraine by Russia 2022/C 131 I/01, C/2022/1890, OJ C 131I , 24.3.2022, p. 1–17

[2] Communication from the Commission, Amendment to the Temporary Crisis Framework for State Aid measures to support the economy following the aggression against Ukraine by Russia 2022/C 280/01, C/2022/5342, OJ C 280, 21.7.2022, p. 1–13

[3] Communication from the Commission, Temporary Crisis Framework for State Aid measures to support the economy following the aggression against Ukraine by Russia 2022/C 426/01, C/2022/7945, OJ C 426, 9.11.2022, p. 1–34

[4] Communication from the Commission, Temporary Crisis and Transition Framework for State Aid measures to support the economy following the aggression against Ukraine by Russia 2023/C 101/03, C/2023/1711, OJ C 101, 17.3.2023, p. 3–46



Competition

The authors would like to thank Wojciech BALCEROWICZ, Gerrit BETHUYNE (from DG ECFIN), Andreas BERGMANN, Ioana DAVIDESCU and Alejandro DONNAY (from DG COMP) for valuable contribution to this article.

KD-AM-23-001-EN-N, doi 10.2763/850906

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These possibilities are temporarily available in addition to the ordinary possibilities for compatible State aid, including in particular under the General Block Exemption Regulation, the Regional aid Guidelines and the Climate, environmental protection and energy aid Guidelines.

## Overview of the measures approved by DG Competition in 2022

In 2022, the Commission has adopted 195 decisions and amendment decisions under the TCF or directly under the Treaty and based on TCF principles, approving 182 national measures notified by 27 Member States. The overall budget that Member States notified and that was approved by the Commission under such State aid measures is worth a total of nearly €671.78 billion, representing 4.3% of combined EU27 GDP in 2022. More than half of this budget was approved in Germany (53%). France has notified measures that represent around 24% of the total budget, while the aid notified by Italy represents 7.7%. The aid notified by Denmark represents 3.6% of the total budget, while the aid notified by Finland and the Netherlands represent respectively 2.6% and 1.7%. Aid notified by other Member States is estimated to be between 1.7% and 0.01% of the total €671.78 billion.

## A closer look at the actual implementation

### Data collected by DG Competition

In order to have a better overview of the aid actually granted under State aid measures adopted in the context of Russia's war of aggression against Ukraine, the Commission has launched a survey to seek information from Member States on the implementation of State aid measures approved directly under the Temporary Crisis Framework or based on its principles[5]. The data therefore do not include cases approved under ordinary State aid rules.

The survey collected preliminary information on the aid granted since the adoption of the TCF on 23 March 2022 until the end of 2022. The survey aimed at taking stock at two points in time: 30 June 2022 and 31 December 2022[6].

It is important to underline that the information made available to the Commission by Member States is preliminary and data may be subject to correction by Member States. Moreover, there are a number of caveats to survey figures, including that they represent the nominal amount of aid granted via different instruments (e.g., direct grants, equity, loans and guarantees), which have different distortive impacts on competition (repayable forms of support are generally less distortive of competition). Furthermore, data concern aid granted under the approved measures, and not aid actually paid out. For instance, Member States may grant the full aid amount at a given time in one year and put it at the beneficiaries' disposal over several years.

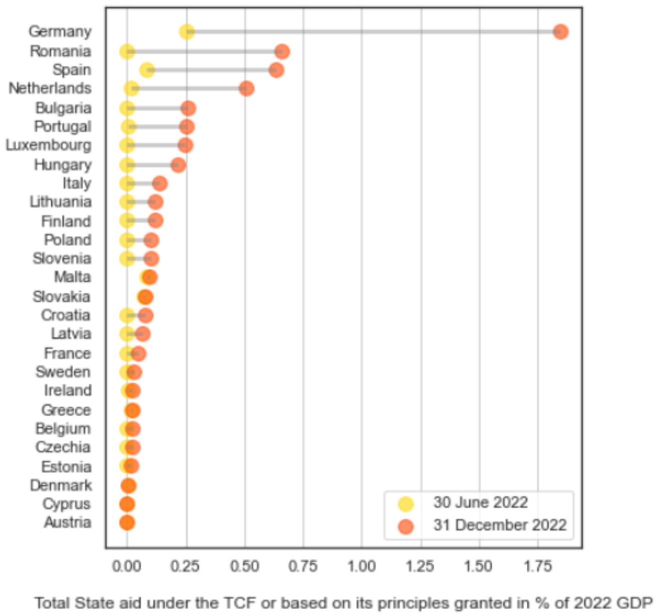
It is also important to underline that these figures exclusively refer to the measures that qualify as State aid and that have been notified to and approved by the Commission. Member States have also granted sizable support to their economies and households through other measures that are not included in these statistics, and the overall support to the economy and households differs from the State aid figures presented here.

### Overview

Based on the replies of all the Member States, in the period between the adoption of the TCF on 23 March 2022 and end of December 2022, of nearly €672 billion of aid approved, €93.52 billion was actually granted to companies, representing 14% of all the aid approved and corresponding to 0.59% of EU27 GDP in 2022. The gap between the amounts committed and the amounts actually deployed shows that in 2022 Member States used only a small part of their support capacity allocated to measures for companies struggling with the energy crisis and other consequences of Russia's war of aggression against Ukraine.

In absolute terms, according to the preliminary data sent by Member States, Germany has provided €71.29 billion, representing 76% of all the aid granted. The second largest spender, Spain, has granted €8.42 billion, followed by the Netherlands, with €4.77 billion. Italy has granted €2.66 billion and Romania €1.88 billion. In absolute terms, the three countries that have granted the most, Germany, Spain and the Netherlands, have granted 91% of all the aid. Only Austria did not report any granting of State aid under the TCF in 2022.

*Figure 1: Total State aid granted in 2022 under TCF measures or based on its principles as percentage of national GDP*




[5] Other four surveys addressed to the Member States authorities have been launched in the past to collect data on the aid granted under the COVID-19 State aid measures.

[6] The survey also included information on the aid granted under COVID-19 measures in 2022. However, those figures are outside the scope of this brief.

In relative terms, when looking at the aid granted by each Member State as a percentage of national GDP, Germany remains the largest provider, having granted an amount equating to 1.85% of its 2022 GDP. The second largest one in relative terms is Romania (0.66% of its GDP), followed by Spain (0.65% of its GDP) and the Netherlands (0.51% of its GDP).

Aid granted in Germany to two beneficiaries (namely Uniper SE and SEFE GmbH) account for 75% of the total aid granted at the EU27 level and around 97% of the aid granted by Germany, i.e. approx. €69.3 billion out of a total €71.29 billion. These concern the recapitalisation of Uniper SE (€33 billion) and loans made available to Uniper SE under a German umbrella scheme for guarantees on loans and subsidised loans (€16 billion), and the recapitalisations of SEFE GmbH (€6.5 billion) as well as subsidised loans made available to SEFE GmbH under the same German umbrella scheme for guarantees on loans and subsidised loans (€13.8 billion). These interventions were necessary to avoid the collapse of the two German utilities that had outstanding long-term contracts which they could no longer honour following Russia's drastic reduction of gas supplies to Germany. Their collapse would have had severe consequences for their customers and more generally on the German and European energy market.

## Member States' State aid approaches differ in practice

In 2022, Member States have supported businesses with State resources in various ways, directly under the Treaty or pursuant to the options offered by the TCF[7].

Germany, Spain and Portugal have granted the greatest part of the aid under the Treaty. Specifically, 55% of the total aid granted in Germany concerned the recapitalisations of Uniper SE (€33 billion) and SEFE GmbH (€6.5 billion), both approved under the Treaty. The size of the recapitalisations necessary to restore the viability of the companies raised important competition concerns for the internal market (also considering that these companies benefited from subsidised loans in parallel). This is why the aid was approved subject to several structural and behavioural commitments from the two companies to limit competition distortions. These commitments include a claw-back mechanism that the State receives all additional equity gained by the end of 2024 compared to the companies' equity position at the end of 2021, commitments to divest parts of the business, which represent a significant part of the two companies' earnings, various governance conditions and a ban on acquisitions.

79% of all the aid granted in Spain was granted under the Treaty for the *MIBEL fossil fuel cost adjustment mechanism* (€6.6 billion), a common Spanish and Portuguese measure aiming to reduce the electricity wholesale price in the Iberian electricity market. The measure provides support in the form of a payment to the operators of fossil fuel power plants (except for those subject to regulated revenues such as certain combined heat and power plants, or plants outside the Spanish mainland) to cover part of their fuel costs, thereby lowering the price of marginal (fossil fuel) energy and, as a result, obtaining a reduced overall price of electricity for users. The payment, funded by payments by electricity providers with infra-marginal costs (such as those running renewable plants), functions as a direct grant aimed to finance part of the fuel costs. Portugal has granted €500 million under the *MIBEL* measure.

14 Member States[8] have provided more than 80% of their respective total aid granted under the TCF pursuant to and within the ceilings set out in section *2.1 - Limited amounts of aid* of the TCF. Section 2.1 enables Member States to set up schemes where aid can take different forms (direct grants, tax and payment advantages or other forms such as repayable advances, guarantees, loans and equity), provided that the aid does not exceed a certain threshold per company[9]. Overall, aid granted under 2.1 TCF measures by EU Member States in 2022 is €12.63 billion, i.e. 13.5% of the total aid granted, be it under the Treaty or under the TCF.

Croatia and Romania have granted more than 80% of their crisis aid in the form of large guarantees on loans, as per section 2.2 - *Liquidity support in the form of guarantees* of the TCF. With the exception of these two Member States, the use of guarantees on loans to provide liquidity support to undertakings affected by the energy crisis has been very limited. The total nominal amount of the guarantees granted on the basis of section 2.2 of the TCF in the EU in 2022 is €3.48 billion (4% of the total).

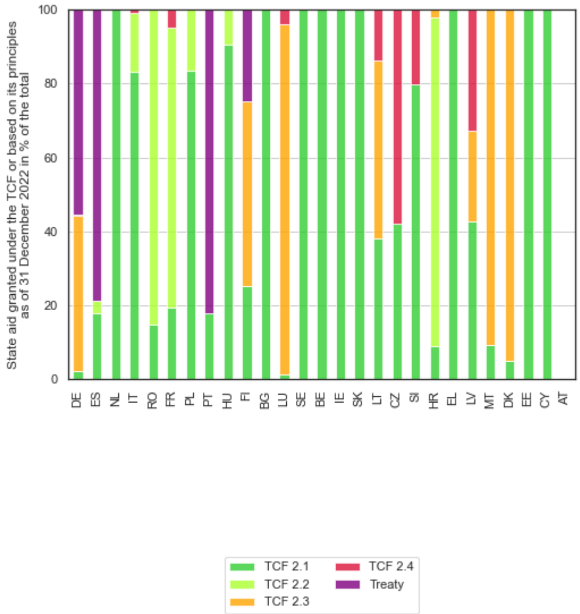
Denmark, Malta and Luxembourg have granted more than 90% of their aid under section *2.3 - Liquidity support in the form of subsidised loans*. Also Finland and Germany have substantially made use of loans at favourable terms (representing 50% and 42% respectively of the total aid granted). At the EU level, subsidised loans represent 32% of all the aid granted under crisis measures (€ 30.35 billion), including subsidised loans to Uniper SE and SEFE GmbH.

[7] The new section of the Temporary Crisis and Transition Framework (*2.8 - Aid for accelerated investments in sectors strategic for the transition towards a net-zero economy*), is not included in the survey since it was introduced in the amendment of 9 March 2023, and therefore subsequent to the period covered by the survey.

[8] Belgium, Bulgaria, Cyprus, Estonia, Greece, Hungary, Ireland, Italy, Netherlands, Poland, Portugal, Sweden, Slovenia and Slovakia.

[9] €2 million per undertaking per Member State.

*Figure 2: Total State aid granted in 2022 under TCF measures or based on its principles, breakdown by legal basis*




The aid granted in 2022 by the EU Member States under section 2.4 - *Aid for additional costs due to exceptionally severe increases in natural gas and electricity prices* amounts to EUR 315 million; the aid was reported by only a few Member States, namely Germany, France, Czechia, Italy, Slovenia, Lithuania, Latvia and Luxembourg. There are a number of factors that can explain this relatively low uptake in 2022: first, the available statistics are unavoidably incomplete. For example, several Member States introduced measures (and will therefore grant aid) under section 2.4 only in 2023, although such measures cover energy costs incurred in 2022. Second, even where the measures were introduced in 2022, most Member States have opted to grant aid only at the end of the eligible period, after energy costs have been incurred and verified. In such situations, it is likely that aid in relation to costs incurred in 2022 will likely be granted only in 2023. Section 2.4 in fact includes a derogation allowing Member States to grant aid until 31 March in the following year when they opt out of using advance payments (a single Member State, Germany, can use advance payments in their 2.4 measure[10]). Third, many energy-intensive users had partially or fully hedged the procurement price for the energy required for production in 2022 or benefited from long term fixed-priced contracts, which protected them against the electricity/gas price volatility experienced during 2022. Long-term planning as part of a structured energy procurement system is a common feature in energy intensive sectors, in particular if a company cannot directly pass on price fluctuations to their customers by raising product prices. As hedging contracts expire (mostly at the end of the year), the impact of higher energy prices will be felt more in 2023 (even though these prices are much lower than at their peak), and is thus not captured by the available statistics. Additionally, the companies which did pass-on cost increases to their customers could not benefit from support under section 2.4 because their economic performance was not sufficiently affected by the crisis. Finally, a few Member States have chosen to grant support covering energy costs to a broad group of beneficiaries, but limiting the maximum aid amount to EUR 2 million, i.e. have granted aid related to energy prices under section 2.1 TCF, rather than section 2.4.

In 2022, no aid has been granted under sections 2.5 – *Aid for accelerating the rollout of renewable energy, storage, and renewable heat relevant for REPowerEU*, 2.6 – *Aid for the decarbonisation of industrial production processes through electrification and/or the use of renewable and electricity-based hydrogen fulfilling certain conditions and for energy efficiency measures* and 2.7 – *Aid for additional reduction of electricity consumption* of the TCF. This is to be expected since the first schemes under these sections of the TCF were approved at the end of 2022 or beginning of 2023.

## Preliminary observations and perspectives

A number of preliminary observations can be drawn from these figures, subject in particular to the abovementioned general caveats.

Member States have only granted a relatively small percentage of the amounts approved by the Commission in 2022 (directly under the TCF or based on its principles, meaning subject to clear safeguards to ensure that such aid is necessary, proportionate and does not unduly distort competition to preserve the Single Market). While the EU economy performed better than expected over the past winter (as recognised in the Commission's Spring 2023 Economic Forecast[11]), there may be different reasons for the relatively low amount of aid granted, which require further analysis before any conclusions can be drawn.

It is important to highlight that the survey data do not capture sizable support measures taken by all Member States to support their economy and households that do not constitute State aid, but which are reflected in the Member State deficits.

## Data collected by DG Economic and Financial Affairs

The Commission's Directorate-General for Economic and Financial Affairs has been monitoring the budgetary impact of the fiscal policy measures taken by the Member States to mitigate the impact of high energy prices on households and businesses.

Based on the estimates included in the Commission's 2023 spring economic forecast[12], in 2022 the net budgetary cost of such measures amounted to around €195 billion, corresponding

[10] State Aid SA. 104606 (2022/N) – Germany TCF: Temporary cost containment of natural gas, heat and electricity price increases

[11] European Commission's Directorate-General for Economic and Financial Affairs (2023), *European Economic Forecast, Spring 2023*. Available at: https://economy-finance.ec.europa.eu/system/files/2023-05/ip200_en_1.pdf

[12] ibid.

to 1.2% of EU27 GDP in 2022. These include mostly measures that do not qualify as State aid.

In absolute terms, the measures by Italy and Germany had the highest net budgetary cost in 2022, of €47.7 billion and €47.1 billion respectively, representing altogether 48.6% of all the energy fiscal measures in the EU (Italy represents 24.4% of the total and Germany 24.1%). Next came France, with €25 billion (12.8% of the total), followed by Spain, with €21.1 billion (10.8% of the total). In Poland the net budgetary cost amounted €12.2 billion (6.2% of the total) and €6.6 billion (3.4% of the total) in Austria. In all the other Member States the net budgetary cost was between 3% of the total (the Netherlands) and 0.1% (Cyprus).

In relative terms, Italy, Greece and Malta had the highest net budgetary cost as a share of their GDP (2.5% of their 2022 GDP each). Germany appears in the middle of the distribution with a net budgetary cost corresponding to 1.2% of its 2022 GDP.

For the purposes of these estimations, 'energy measures' are defined as[13] and net budgetary cost are calculated based on: (1) measures that have a direct impact on the marginal cost of energy consumption for households and/or firms ('price measures'); (2a) measures that provide temporary income support to households; (2b) measures that provide compensation to firms other than price measures (both 'income measures'); and (3) revenues from (new taxes or levies on) windfall profits by energy companies.

State guarantees and loans are not included, as they have no immediate budgetary cost. Purely regulatory measures or measures that are administered by public (or private) corporations outside the perimeter of general government are not included, unless the government provides a direct compensation to the companies involved, for example in the form of a subsidy or capital transfer to cover the losses resulting from these support measures. Recapitalisations of energy companies in distress caused by general market conditions unrelated to the support measures are also not included in these estimates. Permanent increases in public salaries and social benefits are not included, as their permanent nature prevents them from being phased out once the peak in energy prices has subsided. Moreover, the estimates do not include the (semi-)automatic adjustments of social benefits to the general price level or the impact of the deceleration in economic activity on tax collection.

It is important to stress that the estimates of the budgetary impact of the fiscal policy measures to mitigate the impact of high energy prices on households and businesses are not directly comparable with the data on the aid granted under State aid measures, as they follow a different definition. They were collected with the objective of identifying the impact on public finances, not the potential impact on competition.

Therefore, the data on the fiscal policy measures overall show a more equally distributed public spending in relation to the crisis, with no evidence of one Member State that has provided an excessively larger amount compared to the others. However, this does not allow firm conclusions about possible market distortions in terms of competition given that data on fiscal policy measures also include public spending that does not amount to State aid, like support to households, and at the same time exclude sizeable support measures that constitute State aid and had an impact on competition.

## Relation between State aid crisis measures and sensitivity to the energy shocks

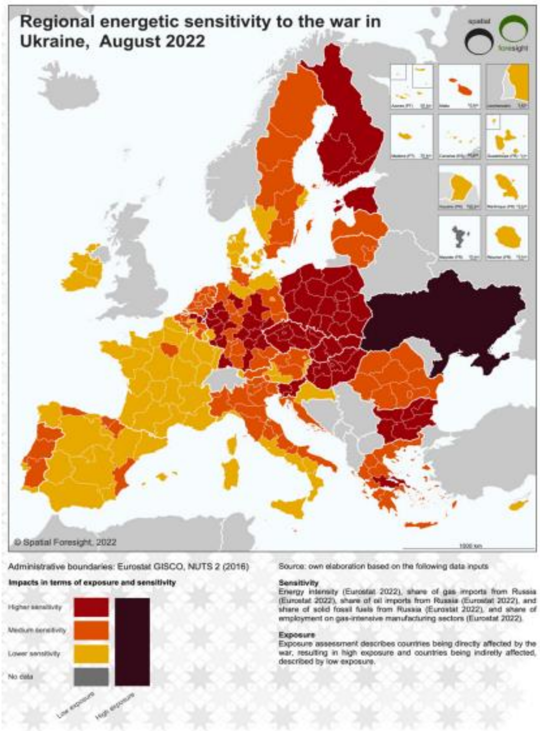
In order to have a first indication on the correlation between the State aid granted to companies and the potential needs in the energy crisis, the amounts of State aid granted by Member States have been put into perspective with an indicator of energy sensitivity to the war in Ukraine. Germany, which counts for 76% of the aid granted, appears among the highly exposed Member States. However, other highly exposed Member States neither notified aid with the same intensity (Estonia, Greece, Czechia, Slovakia, Bulgaria, Finland, Hungary and Poland), nor granted aid with the same intensity. With the exception of Finland, the other mentioned Member States are among the ones with the lowest GDP per capita.

This may reflect the important disparities that exist within the EU in terms of fiscal ability of Member States to grant support to undertakings, which cannot be addressed by State aid policy and may strengthen the call for EU-level funds to counterbalance national disparities.

It may also be explained by differing economic fabrics in Member States, in particular in terms of size or importance of heavy or energy-intensive industries, or by differently structured energy sectors, so that risks of failures of systemic energy companies on the scale of Uniper or SEFE did not materialise in other Member States. Thus, in other Member States, companies may have (indirectly) benefited from general energy measures, often benefiting households, without necessarily needing major industrial schemes designed for (heavy) industry and qualifying as State aid.

[13] G. Bethuyne, W. Balcerowicz and M. Erdei, Budgetary policy measures to mitigate the impact of high energy prices on households and firms: methodology and budgetary impact, Commission services internal working document, DG ECFIN, 15 September 2022.

*Figure 3: Regional energetic sensitivity to the war in Ukraine, August 2022*




*Source: The impact of the COVID-19 pandemic and the war in Ukraine on EU cohesion* [*https://www.europarl.europa.eu/RegData/etudes/STUD/2022/733095/IPOL_STU(2022)733095_EN.pdf*](https://www.europarl.europa.eu/RegData/etudes/STUD/2022/733095/IPOL_STU(2022)733095_EN.pdf)

## Conclusions

Looking ahead, the Commission will continue to monitor closely the implementation of aid measures approved under the TCTF or based on its principles. The Commission will also soon launch the reflections on the future of the Framework, in particular as regards the possibilities for crisis support, which are due to expire by the end of 2023. These reflections will depend on expectations as regards economic and energy price developments, and the need to further preserve the effective functioning of the Single Market. Member States will as always be closely consulted.

## Appendix

In a spirit of transparency, DG Competition provides its data to the public in a statistical appendix: *Statistical Annex* ([.xlsx version](.xlsx version)).

| Member State | Total amount granted (nominal amount) in EUR billion | Total amount granted (nominal amount) - TCF only - in EUR billion | Total amount granted (nominal amount) - Treaty only - in EUR billion | Total amount granted (nominal amount) in % GDP | Total amount granted (nominal amount) - TCF only - in % GDP | Total amount granted (nominal amount) - Treaty only - in % GDP | Total amount granted (nominal amount) in % of EU total | Total amount granted (nominal amount) - TCF only - in % of EU total | Total amount granted (nominal amount) - Treaty only - in % of EU total |
|---|---|---|---|---|---|---|---|---|---|
| **Austria** | *0,00* | *0,00* | *0,00* | *0,00%* | *0,00%* | *0,00%* | *0%* | *0%* | *0%* |
| **Belgium** | *0,12* | *0,12* | *0,00* | *0,02%* | *0,02%* | *0,00%* | *0%* | *0%* | *0%* |
| **Bulgaria** | *0,22* | *0,22* | *0,00* | *0,26%* | *0,26%* | *0,00%* | *0%* | *0%* | *0%* |
| **Cyprus** | *0,00* | *0,00* | *0,00* | *0,00%* | *0,00%* | *0,00%* | *0%* | *0%* | *0%* |
| **Czechia** | *0,06* | *0,06* | *0,00* | *0,02%* | *0,02%* | *0,00%* | *0%* | *0%* | *0%* |
| **Germany** | *71,29* | *31,77* | *39,53* | *1,85%* | *0,82%* | *1,03%* | *76%* | *34%* | *42%* |
| **Denmark** | *0,01* | *0,01* | *0,00* | *0,00%* | *0,00%* | *0,00%* | *0%* | *0%* | *0%* |
| **Estonia** | *0,01* | *0,01* | *0,00* | *0,02%* | *0,02%* | *0,00%* | *0%* | *0%* | *0%* |
| **Greece** | *0,05* | *0,05* | *0,00* | *0,02%* | *0,02%* | *0,00%* | *0%* | *0%* | *0%* |
| **Spain** | *8,42* | *1,79* | *6,64* | *0,65%* | *0,14%* | *0,51%* | *9%* | *2%* | *7%* |
| **Finland** | *0,32* | *0,24* | *0,08* | *0,12%* | *0,09%* | *0,03%* | *0%* | *0%* | *0%* |
| **France** | *1,28* | *1,28* | *0,00* | *0,05%* | *0,05%* | *0,00%* | *1%* | *1%* | *0%* |
| **Croatia** | *0,05* | *0,05* | *0,00* | *0,08%* | *0,08%* | *0,00%* | *0%* | *0%* | *0%* |
| **Hungary** | *0,37* | *0,37* | *0,00* | *0,23%* | *0,23%* | *0,00%* | *0%* | *0%* | *0%* |
| **Ireland** | *0,12* | *0,12* | *0,00* | *0,02%* | *0,02%* | *0,00%* | *0%* | *0%* | *0%* |
| **Italy** | *2,66* | *2,66* | *0,00* | *0,14%* | *0,14%* | *0,00%* | *3%* | *3%* | *0%* |
| **Lithuania** | *0,08* | *0,08* | *0,00* | *0,12%* | *0,12%* | *0,00%* | *0%* | *0%* | *0%* |
| **Luxembourg** | *0,19* | *0,19* | *0,00* | *0,25%* | *0,25%* | *0,00%* | *0%* | *0%* | *0%* |
| **Latvia** | *0,03* | *0,03* | *0,00* | *0,07%* | *0,07%* | *0,00%* | *0%* | *0%* | *0%* |
| **Malta** | *0,02* | *0,02* | *0,00* | *0,10%* | *0,10%* | *0,00%* | *0%* | *0%* | *0%* |
| **Netherlands** | *4,77* | *4,77* | *0,00* | *0,51%* | *0,51%* | *0,00%* | *5%* | *5%* | *0%* |
| **Poland** | *0,67* | *0,67* | *0,00* | *0,10%* | *0,10%* | *0,00%* | *1%* | *1%* | *0%* |
| **Portugal** | *0,61* | *0,11* | *0,50* | *0,26%* | *0,05%* | *0,21%* | *1%* | *0%* | *1%* |
| **Romania** | *1,88* | *1,88* | *0,00* | *0,66%* | *0,66%* | *0,00%* | *2%* | *2%* | *0%* |
| **Sweden** | *0,15* | *0,15* | *0,00* | *0,03%* | *0,03%* | *0,00%* | *0%* | *0%* | *0%* |
| **Slovenia** | *0,06* | *0,06* | *0,00* | *0,10%* | *0,10%* | *0,00%* | *0%* | *0%* | *0%* |
| **Slovakia** | *0,09* | *0,09* | *0,00* | *0,08%* | *0,08%* | *0,00%* | *0%* | *0%* | *0%* |
| **Total EU27** | **93,52** | **46,78** | **46,74** | **0,59%** | **0,30%** | **0,30%** | **100%** | **50%** | **50%** |

| Member State | Total TCF or based on its principles State aid expenditure in EUR billion, as of 30 June 2022 | Total TCF or based on its principles State aid expenditure in EUR billion, as of 31 December 2022 |
|---|---|---|
| **Austria** | *0,00* | *0,00* |
| **Belgium** | *0,00* | *0,12* |
| **Bulgaria** | *0,00* | *0,22* |
| **Cyprus** | *0,00* | *0,00* |
| **Czechia** | *0,00* | *0,06* |
| **Germany** | *9,82* | *71,29* |
| **Denmark** | *0,01* | *0,01* |
| **Estonia** | *0,00* | *0,01* |
| **Greece** | *0,04* | *0,05* |
| **Spain** | *1,08* | *8,42* |
| **Finland** | *0,00* | *0,32* |
| **France** | *0,00* | *1,28* |
| **Croatia** | *0,00* | *0,05* |
| **Hungary** | *0,00* | *0,37* |
| **Ireland** | *0,02* | *0,12* |
| **Italy** | *0,00* | *2,66* |
| **Lithuania** | *0,00* | *0,08* |
| **Luxembourg** | *0,00* | *0,19* |
| **Latvia** | *0,00* | *0,03* |
| **Malta** | *0,01* | *0,02* |
| **Netherlands** | *0,16* | *4,77* |
| **Poland** | *0,00* | *0,67* |
| **Portugal** | *0,01* | *0,61* |
| **Romania** | *0,00* | *1,88* |
| **Sweden** | *0,00* | *0,15* |
| **Slovenia** | *0,00* | *0,06* |
| **Slovakia** | *0,08* | *0,09* |
| **Total EU27** | **11,24** | **93,52** |

| Member State | TF 2.1 | TF 2.2 | TF 2.3 | TF 2.4 | Treaty | All legal bases |
|---|---|---|---|---|---|---|
| **Austria** | *0,00* | *0,00* | *0,00* | *0,00* | *0,00* | *0,00* |
| **Belgium** | *0,12* | *0,00* | *0,00* | *0,00* | *0,00* | *0,12* |
| **Bulgaria** | *0,22* | *0,00* | *0,00* | *0,00* | *0,00* | *0,22* |
| **Cyprus** | *0,00* | *0,00* | *0,00* | *0,00* | *0,00* | *0,00* |
| **Czechia** | *0,03* | *0,00* | *0,00* | *0,03* | *0,00* | *0,06* |
| **Germany** | *1,66* | *0,02* | *29,93* | *0,16* | *39,53* | *71,29* |
| **Denmark** | *0,00* | *0,00* | *0,01* | *0,00* | *0,00* | *0,01* |
| **Estonia** | *0,01* | *0,00* | *0,00* | *0,00* | *0,00* | *0,01* |
| **Greece** | *0,05* | *0,00* | *0,00* | *0,00* | *0,00* | *0,05* |
| **Spain** | *1,50* | *0,29* | *0,00* | *0,00* | *6,64* | *8,42* |
| **Finland** | *0,08* | *0,00* | *0,16* | *0,00* | *0,08* | *0,32* |
| **France** | *0,25* | *0,97* | *0,00* | *0,06* | *0,00* | *1,28* |
| **Croatia** | *0,00* | *0,04* | *0,00* | *0,00* | *0,00* | *0,05* |
| **Hungary** | *0,33* | *0,03* | *0,00* | *0,00* | *0,00* | *0,37* |
| **Ireland** | *0,12* | *0,00* | *0,00* | *0,00* | *0,00* | *0,12* |
| **Italy** | *2,22* | *0,42* | *0,00* | *0,03* | *0,00* | *2,66* |
| **Lithuania** | *0,03* | *0,00* | *0,04* | *0,01* | *0,00* | *0,08* |
| **Luxembourg** | *0,00* | *0,00* | *0,18* | *0,01* | *0,00* | *0,19* |
| **Latvia** | *0,01* | *0,00* | *0,01* | *0,01* | *0,00* | *0,03* |
| **Malta** | *0,00* | *0,00* | *0,01* | *0,00* | *0,00* | *0,02* |
| **Netherlands** | *4,77* | *0,00* | *0,00* | *0,00* | *0,00* | *4,77* |
| **Poland** | *0,56* | *0,11* | *0,00* | *0,00* | *0,00* | *0,67* |
| **Portugal** | *0,11* | *0,00* | *0,00* | *0,00* | *0,50* | *0,61* |
| **Romania** | *0,28* | *1,60* | *0,00* | *0,00* | *0,00* | *1,88* |
| **Sweden** | *0,15* | *0,00* | *0,00* | *0,00* | *0,00* | *0,15* |
| **Slovenia** | *0,05* | *0,00* | *0,00* | *0,01* | *0,00* | *0,06* |
| **Slovakia** | *0,09* | *0,00* | *0,00* | *0,00* | *0,00* | *0,09* |
| **Total EU27** | **12,63** | **3,48** | **30,35** | **0,31** | **46,74** | **93,52** |
| *In % of the total* | *13,51%* | *3,72%* | *32,45%* | *0,34%* | *49,98%* | *100,00%* |

** Figures in EUR billion*