

European Commission  
Directorate-General for Competition, Unit F.3  
State aid register  
1049 Brussels  
Belgium

Ref: HT.6507

Prague, 30 May 2023

**Contribution to consultation: proposal for the revision of the Regulation on *de minimis* aid granted to undertakings providing services of general economic interest**

Dear Sir or Madam,

the Czech Bishops' Conference, as the body acting on behalf of the Roman Catholic Church in the Czech Republic, is submitting its contribution to the consultation on the draft regulation on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to *de minimis* aid granted to undertakings providing services of general economic interest (SGEI), which was approved by the European Commission on 19 April 2023.

Initially, it should be stated that the draft regulation under discussion has a significant impact on the activities of the Church, whose task, in addition to worship, is also charity, which is manifested in the provision of health and social services to all those in need and across the regions of the Czech Republic. As the Church does not engage in these activities for profit, their success is substantially dependent on the scale of public support.

The Czech Bishops' Conference therefore supports the proposed increase of the SGEI *de minimis* ceiling from EUR 500 000 to EUR 650 000. However, we are afraid that the proposed increase is not sufficient.

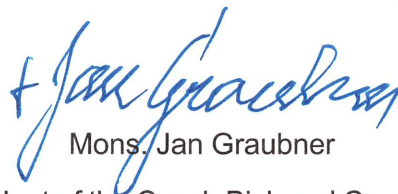
While it is commendable that the European Commission has taken inflation into account when increasing the ceiling, as it declares, it cannot be said that the increase corresponds to an actual increase in prices. These days, the Church in the Czech Republic is facing an unprecedented rate of inflation, the average value of which, moreover, does not take into account the significant increase in the prices of selected goods and services that are crucial for the provision of health and social services. The energy crisis and the ongoing war conflict in Ukraine have significantly increased the costs of services of general economic interest, while also leading to an increase in the number of beneficiaries of social services. The setting of a ceiling on aid to undertakings providing services of general economic interest should not only

be linked to the indicators of the economic cycle, but also to the exceptional conditions in which we currently find ourselves.

It can also be recalled that the last time the aid ceiling was set was in 2012 and the proposed increase of EUR 150 000 is therefore a single increase for the whole period from 2012 to the end of 2030. The Church considers this to be disproportionate. Comparing the situation in 2012 and 2030, the Czech Bishops' Conference believes that the proposed nominal increase in the ceiling to EUR 650 000 will ultimately lead to a real decrease in the value of public support for undertakings providing services of general economic interest. Unfortunately, this also means a real decline in these services and a declaration of a lower priority of general interest.

**The Czech Bishops' Conference therefore proposes to increase the ceiling in the draft regulation on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid granted to undertakings providing services of general economic interest to EUR 1 200 000.**

Sincerely



Mons. Jan Graubner

President of the Czech Bishops' Conference