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**PRELIMINARY CONTRIBUTION FROM FINLAND regarding the draft Regulation from the Commission on SGEI *de minimis* aid**

The Commission has invited Member States to submit written comments on the review of the SGEI *de minimis* Regulation. Ministry of Economic Affairs and Employment of Finland coordinates matters related to EU's state aid policy in Finland. Ministry hereby delivers the preliminary views of the Finnish authorities.

**General remarks**

Finland welcomes the Commission's proposal for the targeted revision of the Regulation on SGEI *de minimis* aid.

**Specific comments:**

**Finland sees that raising the SGEI *de minimis* aid ceiling to EUR 650 000 is in principle justified due to inflation.** However, in connection with further preparation of the regulation, Finland sees that the Commission should provide further information on the calculation criteria for the inflation. In Finland's view, the approach for adjusting to a higher inflation rate should be strictly based on facts and evidence. This entails taking into account the best possible estimates on the forecasted inflation development. Overall, Finland's view is that keeping the SGEI *de minimis* ceiling at a relatively low level is justified to ensure functioning of the internal market. Aid granted under the SGEI *de minimis* regulation can be targeted to any costs of the undertaking – also as operating aid –, which can be very distortive. Therefore, raising the ceiling more than proposed could significantly increase the risk of competition distortions within the Member States and in the internal market. **For these reasons, Finland is critical for any higher SGEI *de minimis* ceiling than proposed.**

**A mandatory public register at national or EU level**

**Finland welcomes the Commission's proposal for a mandatory public register at a national or EU level where Member States should provide complete information on SGEI *de minimis* and *de minimis* aid granted by any aid granting authority.** The public register would simplify and enhance the transparency, monitoring and impact assessment of SGEI *de minimis* and *de minimis* aid as well as information on the allocation of aid. The register would also increase legal certainty for those granting and receiving aid. The register would also enable the harmonisation and high-quality management of the aid data.

Finland highlights that the benefits concerning simplification and legal certainty will be fully achieved only, if the aid granting authorities can entirely rely on the register when monitoring the aid ceiling (instead of declarations from the beneficiary). In this respect, the Commission should clarify, how reliable and up-to-date the register should be. Given especially the need to monitor the aid amounts at the level of single undertaking. In Finland's view, it is very difficult to set up an up-to-date register that would cover information set out in the regulation. Finland would also like to highlight issues related to data protection needs to be properly taken into account when setting up the requirements.

**Finally, Finland considers that the six-month transition period for the register, as proposed by the Commission, is too short. In our view, the transition period should be at least 18 months** to ensure adequate time for the successful implementation. In Finland, setting up a national register is likely to require legislative changes that will require careful preparations.