



Subject: Response to the Public Consultation on review of rules on exemptions for small amounts of aid (de minimis aid) in agriculture

The Italian Federation of Independent Winegrowers – FIVI – was born with the aim of representing and defending independent winegrowers. Independent winegrowers carry out the entire chain within their own company, starting from the cultivation of the vineyard to the direct sale of the bottle, passing through vinification. It now counts over 1700 members. At European level, FIVI joins the European Confederation of the Independent Winegrowers, being one of the twelve national federations associated.

Context and state of play

Currently, the de minimis aids in agriculture are regulated by Reg. (UE) 1408/2013 and in place until the 31 December 2027. Those aids are specifically addressed to SMEs which operate in the primary production of agricultural products. The de minimis regulation plays a crucial role in supporting small agricultural enterprises, allowing them to receive aid without facing the complexities of state aid regulations. This support has to be considered essential for:

- i. Maintaining the competitiveness of small agricultural businesses;
- ii. Promoting innovation and sustainability in the sector;
- iii. Supporting rural economies and preventing the abandonment of agricultural land.

Despite its benefits, the de minimis regulation presents some limitations that could be reviewed, as proposed by the European Commission, in order to improve the effectiveness of the support, namely:

- i. Individual maximum aid threshold: the continuum increase of the costs, from the energy sector to the raw materials, and general inflation make the actual maximum threshold (€20.000, up to €25.000 if the Member state has implemented the national register) potentially insufficient for an enterprise.
- ii. Bureaucracy: small enterprises are often family business which manage independently the administrative procedures. Guaranteeing simple and immediate processes is an essential condition to assure the efficacy of measures.

Observations and possible enhancements on the revision proposal

FIVI generally welcomes the proposed changes made by the Commission, which underline its attention on the agricultural sector. Below, some observations on the proposals, which could ensure an improvement of the current status.

- i. Increase of the maximum aid threshold: the Commission proposal foresees to raise the maximum aid threshold up to €37.000. Although the writer appreciates the efforts made by the legislator, it is essential to consider the inflation process that Europe is experiencing and that does not seem to be stopping. For this reason FIVI suggests a further raise up to €50.000 as already proposed by the Italian Ministry.
- ii. National register: FIVI welcomes the introduction of the national register obligation; indeed, FIVI believes that uniformity of application through Member states is a fundamental requirement to guarantee the same benefits at European level. In addition, the national register reaches a double objective: on the first side it ensures transparency and, on the other side, it makes the administrative procedures simplified.



In conclusion, FIVI remarks the importance of maintaining the de minimis aid and is pleased of the extension of the validity of the system until 2032, ensuring to SMEs the chance to have access to this strategic tool for the competitiveness and the improvement of the activity.

Thanking for the opportunity, best regards.

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FIVI President