

## FOSZCZYNSKI Ania (COMP)

---

**From:** COMP H6 CONSULTATION  
**Sent:** vendredi 19 juillet 2024 13:35  
**To:** SCHULYOK Felix (COMP); FOSZCZYNSKI Ania (COMP); BLEHOVA Lenka (COMP)  
**Subject:** FW: HT.100254\_Reply\_from\_an\_organisation Re: Public Consultation: State aid – review of rules on exemptions for small amounts of aid (de minimis aid) in agriculture

---

**From:** John Enright <johnenright@icmsa.ie>  
**Sent:** Thursday, July 18, 2024 3:10 PM  
**To:** COMP STATE AID GREFFE <Stateaidgreffe@ec.europa.eu>  
**Cc:** COMP H6 CONSULTATION <COMP-H6-CONSULTATION@ec.europa.eu>  
**Subject:** HT.100254\_Reply\_from\_an\_organisation Re: Public Consultation: State aid – review of rules on exemptions for small amounts of aid (de minimis aid) in agriculture

### **State aid – review of rules on exemptions for small amounts of aid (de minimis aid) in agriculture.**

Dear Sir/Madam,

In relation to the above consultation, ICMSA wishes to make the following comments:

- In light of the increased regulation on farmers, the increased costs of compliance on farmers and general inflation, while welcoming the proposal to increase de minimis aid to €37,000, ICMSA believes that €37,000 is too low and ICMSA believes that de minimis aid should be increased to €75,000 over a three-year period. In light of developments in the CAP and its budget and the growing requirements on farmers in particular on environmental issues, ICMSA believes that it would be prudent to increase the level to €75,000 allowing member states to support farmers if required.
- In relation to the publication of individual data, ICMSA has concerns in relation to people's right to privacy and data protection and ICMSA believes that national or regional data should suffice rather than personal data.
- Given that delays do occur in relation to payments, ICMSA believes that the payment date should be the date "deemed granted" rather than "the legal right to receive the aid is conferred". The legal right proposal could create unnecessary anomalies and ICMSA believes that payment date would be the preferred option.

De-Minimis is hugely important in the context of supporting farmers particularly through difficult periods and I hope you will take our proposals on board.

Kind regards,

Denis Drennan,

President.