



Ministry of Climate and Enterprise

HT.100254 – Swedish comments on the proposed amendment of Regulation 1408/2013 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to de minimis aid in the agriculture sector

Article 3, paragraph 2

The Swedish government does not oppose the Commission's proposal to increase the nominal individual aid ceiling to EUR 37 000. As noted, changes in the framework of de minimis aid should not lead to de facto increased levels of state aid in the EU. Since the current threshold is based on 2019-year levels, it is reasonable to adjust it upwards to take into account inflation, increasing pressure on the agricultural sector as well as the need to strengthen food security. A new threshold should be adjusted to the price level of the current threshold and not exceed 37 000 euro if the current assessment of affecting competition and the internal market is to be maintained.

A strict state aid framework and state aid control has been a cornerstone of EU competition policy, aimed at preserving the integrity of the Single Market and a level playing field. Aid instruments should not be introduced to countervail impediments to the economy that can be solved by remedying institutional or regulatory flaws. Better regulation, enforcement and reduced regulatory burden should be a key priority, while improving implementation and enforcement.

Article 3, paragraph 3

The Swedish government is in favour of the Commission's proposal to align the calculation with Regulation 2023/2832 and to calculate the cumulative

amount over three years, instead of the current calculation over three fiscal years.

Article 3, paragraph 4

No comment.

Article 4, paragraph 3, point (b)

The Swedish government does not oppose the Commission's proposal to increase the loan amounts due to inflation.

Article 4, paragraph 6, point (b)

The Swedish government does not oppose the Commission's proposal to increase the loan amounts due to inflation.

Article 5, paragraph 2a

No comment.

Article 6, paragraph 1–6

The Swedish government is not in favour of a mandatory central register due to increased administrative burden to government authorities.

Article 7, paragraph 3a

No comment.

Article 7, paragraph 5

No comment.

Article 8, the second paragraph

No comment.