

Lokal Utveckling Sverige - LUS contribution to the General Block Exemption Regulation (the GBER) Targeted Review public consultation in September 2019

Dear all,

Lokal Utveckling Sverige, LUS, gathering Sweden's 53 LAGs in one organization, with thousands of members on local level in rural Sweden, has the following proposal to the amendment of the General Block Exemption Regulation.

LUS welcomes the opportunity offered by the European Commission to contribute to the review of the extension of General Block Exemption to national funds combined with EU programmes.

LUS considers that a block exemption for LEADER/CLLD should be taken account of, as stated in ELARD's Position, "ELARD Renewing LEADER/CLLD for 2021-2027 programming period", approved by ELARD GA on April 10, 2019.

Given that cooperation is a priority that the European Commission wishes to foster and given that current procedures related to ensuring the respect of the minimis for each single beneficiary are deterring potential actors from getting involved, it is LUS' opinion that:

1. LEADER/CLLD does not indeed entail major risks of creating unfair competition between businesses in the EU,

- as LEADER/CLLD is a cooperation instrument (with inbuilt method ensuring democratic control, balanced representation, open and transparent selection of projects, etc.) on local level and between Local Action Groups (LAGs);
- LEADER/CLLD has a local dimension (regulation limits it to sub-regional areas, current limits of 150 000 population) and vocation to develop communities and local areas;
- All rural areas in EU are eligible, thus the instrument is available equally in all MS.

Currently, Member States experience difficulties in assessing this as well as the impact of the State Aid clearance narrowing down the scope of LEADER/CLLD, thus limiting its value added.

2. The current de-minimis is too burdensome to assess and not cost-effective given the multitude of small projects and final beneficiaries involved. Also, many projects have often a collective dimension.

LUS welcomes the efforts for simplification and de-regulation in the legislation and have faith that these will materialize on all levels. Regarding the difficulties which LEADER is experiencing due to the application of State Aid provisions, **it would be useful to consider a block exemption for LEADER / CLLD projects in the framework of this simplification.**

We are looking forward to solutions on this matter,
Yours sincerely,