



## Contribution from the Basque Government to the public consultation on targeted review of the GBER

We very much welcome the proposal by the Commission to ease the combination of shared managed and centrally managed funds through an extension of cases under the scope of the GBER.

Nevertheless, we consider that the **European Territorial Cooperation (ETC) programmes** should benefit from a specific approach in terms of State aid rules. The aids granted by ETC programmes finance collaborative projects of great European added value and they respond to a European interest of cooperation. This is why we understand **they could be excluded from the scope of application of state aid rules, as proposed by the European Parliament<sup>1</sup>**.

Within the scope of the proposals included in the present consultation, we support the extension the exemption for ETC programmes aids to all undertakings and to limited amounts of aids. Nevertheless, the exemption of 20 000 EUR aid granted to an undertaking per project is yet a low threshold.

We welcome the exemption of national funding for SMEs for projects labelled with the Seal of Excellence. Therefore, **we call for the application of the Seal of Excellence model and consequent exemption to other centrally managed European programmes or instruments** following the reasoning behind the SoE for Horizon 2020/Europe. In our view, the exemption for projects with the Seal of Excellence should be applicable to other EU programmes and to the new Interregional Innovation Investments instrument (so called component 5) proposed by the Commission for the next programming period 2021-2027.

Future **Interregional Innovation Investments instrument**, under direct or indirect management, was initially proposed within the ETC Regulation but could finally end within ERDF regulation. Regardless its final legal location, we find the logic for a Seal of excellence disposal for this instrument as well as the benefit from an exemption for the same reasons applicable to the SoE/Horizon.

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<sup>1</sup> **A8-0470/2018** Report Arimont: Amendment to Article -62. Exemption from reporting requirements under Article 108(3) TFEU. The Commission may declare that aid in favour of projects supported by EU European territorial cooperation are compatible with the internal market and are not subject to the notification requirements of Article 108(3) TFEU.