

Contribution to the public consultation on targeted review of the General Block Exemption Regulation (GBER)

We welcome the Commission's proposals aiming at facilitating the combination of shared managed and centrally managed funds through the targeted review of the General Block Exemption Regulation (GBER). Nevertheless, we believe that **more could be achieved by enabling further synergies, and complementarities within policy, programme objectives and design levels.**

Better coordination between research and innovation agendas at local, regional, national, and European level, would further increase the impact of investments and efficient use of funds. In practice, this means **developing and defining synergies and complementarities between different funding programmes**: Horizon Europe, Digital Europe Programme, the Cluster Excellence Programme, and European Structural and Investment Funds.

For example, Horizon Europe offers several opportunities to further work on synergies linked to design and objectives, such as:

- **European Innovation Ecosystems action (Pillar III)**, which could be used as a synergy or a co-funding instrument combining efforts with smart specialisation strategies, ecosystem collaboration and the proposed Interregional Innovation Investment instrument proposed under ERDF.
- **European Partnerships**, which could be more open to embrace local and regional innovation ecosystems, for example through [smart specialisation partnerships](#), involving small and medium sized companies, cluster organisations as well as other innovation actors within those partnerships.

We welcome the opportunity to contribute to the public consultation on the targeted review of the General Block Exemption Regulation (GBER), which is important in the process of **improving synergies at implementation level**. Our key messages to the review are:

1. **Collaborative projects of great European added value** which are not subject to the discretion of a single public authority but respond to a European interest of cooperation should be exempted from State aid rules: the European Territorial Cooperation (ETC) projects as proposed by the Parliament, as well as those selected under Horizon 2020 / Europe which are co-financed by national authorities but where the Member States have had no decisional power (Horizon rules apply for the selection).
2. Considering the *de minimis*¹ rule, we do not think that the **very low amounts allocated in the frame of ETC programmes** have distortion effects in the market, considering in addition the collaborative nature of the projects. However, if these kinds of low amounts will *in fine* be considered as State aid, we suggest that the European Commission **increases the threshold** of such amounts while remaining within the GBER limits.

¹ Aid below 200.000€ during 3 consecutive years per single undertaking (De Minimis Regulation 1407/2014)

3. We advocate for the **application of the Seal of Excellence (SoE) model to other centrally managed programmes**. We believe that the rationale behind the exemption of national funding for SME projects labelled with the SoE under the Horizon 2020/Europe should be extended to other centrally managed European programmes. Also, the potential amounts transferred from shared (ESIF) to centrally managed programmes should be exempt from the State aid rules.
4. The objective of the GBER is to facilitate public investment for job creation and growth whilst preserving competition. The targeted review of the GBER should foster a **change of perspective when considering State aid for initiatives taking place in a collaborative and interregional setting**: Exempting the combination of national/regional funds (including ESIF) with Interregional Innovation Investment for the **co-financing of EU-supported projects** (which would be approved through an independent selection procedure at EU level) would have an important impact on the competitiveness of the EU as a whole and be beneficial for SMEs with limited negative effects on competition. Following the same rationale, regional investments (for example in open innovation infrastructures) supporting the implementation of **collaborative interregional projects** should also be exempted from State aid rules.
5. **Inter-cluster collaboration projects** have demonstrated their strong potential for technology deployment and knowledge circulation, based on the positive experience of the **interregional voucher schemes**. The current provision regarding cluster support should also be clarified and simplified, in parallel to an in-depth reflection on the exemption from State aid rules of future tools supporting the development of interregional smart specialisation partnerships under the current Smart Specialisation thematic platforms.

ERRIN – European Regions Research and Innovation Network

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The present contribution to the targeted review of the General Block Exemption is based on input from our members and especially from the leaders of the [Smart Specialization Working Group](#), in close coordination with the Vanguard Initiative and EARTO.

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