

To whom it may concern,
I would like to submit the following to the SA/GBER consultation.

This simplification of the State Aid rules is welcome. I am in favour of the inclusion of the Seal of Excellence programmes to be part of the state aid block exemptions. This would, for example, avoid potential state aid problems with fellows fully hosted by or spending time on secondment in companies. It is in the national interest that such collaboration between academic institutions and the non-academic sector is facilitated. Of particular strategic importance to Ireland is the MSCA-COFUND. As requested by LERU and others I would be in favour of the Seal of Excellence being applied not just to Individual fellowships but also to COFUND projects which are more strategically important and given their size enable a more significant increase of the national Research and Innovation capacity and enhancement of the “talent pipeline”.

In terms of future synergies across programmes, the underlying rules differ significantly in terms of reporting and auditing. Additionally, the Interreg contracts are very different from those used for MSCA, the Intellectual property rules are also divergent. In order for this to become a reality under Horizon Europe, the Commission must clarify the mechanisms for potential synergies and co-financing under the various schemes, such as ESIF and ERDF. The definitions across all programmes would need to be clarified and the language rendered uniform.

Yours sincerely,
Dr. Geraldine Canny
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