

COMP IPCEI-REVIEW

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Sent: dimanche 18 avril 2021 16:05
To: COMP IPCEI-REVIEW; fpga@colognechip.com; Manuel Altheim
Subject: HT.4892_Reply_from_a_company

Review of the Communication on important projects of common European interest (IPCEI)

Comments from the point of view of an SME:

High application and administrative costs for an SME.

Long uncertainty about funding approval. (nearly 2 years for IPCEI 1)

Suggested Improvements:

1. Allocation of 10% of the funding amount for SMEs.
Only national reporting and simplified accounting for SMEs.
2. For projects where there is no competition in the whole EU, Funding-GAP calculation should be waived.
3. End of the FID phase should only be set when the break-even point of the project is reached; not already when income is achieved.
4. Higher funding rate, as for national R&D projects funding rates for SMEs of 50-80% are common. This is also important because of the difficulties of refinancing the SMEs' own share.
5. No limitation on depreciation for acquisition and investment. There should be fixed funding rate for equipment, possibly different from investments in buildings. This should be granted when the investment is financed no matter how and how long the investment is used.
6. For SMEs, building investments usually make no sense.

7. Rents for business premises eligible as costs. Up to now only increased building rents are funded.
8. Changes in the contractor for external orders should not have to be justified, at least not for orders that are less than 20% of the funding amount.
9. There should be no fixed start or end time. Especially for SMEs it is not easy to adapt to this fixed grid of 4-6 years. Starting an SME project should be possible at any time.

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