

Luxembourg feedback to the proposed amendments of the IPCEI Communication

Overall, Luxembourg welcomes the proposed changes to the IPCEI Communication and in particular the inclusion of the new policy orientations of the European Union. The IPCEI Communication should be one of the instruments enabling the Member States to achieve the European Union's ambitious goals, for instance in terms of transitioning the economy to a more greener and digitalized one.

Nonetheless, Luxembourg would like to stress several points that should be taken into account by the European Commission in the final IPCEI Communication.

➤ Framing the possibility for all Member States to participate

Luxembourg believes that all Member States should have a reasonable opportunity to participate in emerging IPCEI projects and thus welcomes the inclusion of point 18 of the draft text. This is quintessential to support the achievement of aforementioned goals while preserving cohesion at the level of the European Union. However, in order to encourage effective participation in IPCEI projects, Luxembourg also believes that clear rules should exist on the moment until which it is possible to participate.

➤ Enabling the participation of start-ups in IPCEI projects

Luxembourg is of the opinion that the exclusion of start-ups on the ground that they qualify as undertakings in difficulty in the sense of point 10 a) of the draft text is problematic as it hinders innovation that might be beneficial for the European Union as a whole. Luxembourg believes that the exclusion foreseen in articles 1 (4) c) and 22 of the GBER in favor of start-ups aged maximum 5 years should be included in the IPCEI Communication and increased to 7.

➤ Clarification of the notion of “significant co-financing” in view of the special role and situation of SMEs

Luxembourg is strongly in favor of fostering the participation of SMEs in IPCEI projects. Luxembourg thus invites the European Commission to clarify the requirement of “significant co-financing” by the aid beneficiary in point 20 of the draft text in such a way that SMEs are not hindered but rather encouraged to participate in such projects.

➤ Clarification of the notion of “first industrial deployment”

Luxembourg thinks that the definition of “first industrial deployment” contained in point 25 of the draft text is not clear enough. Luxembourg therefore asks the European Commission to provide further clarification on this notion and in particular on the distinction with mass production and commercial activities.