



Review of the communication on important projects of common European interests (IPCEI)

Confederation of Finnish Industries (EK) is the leading business organization in Finland. EK represents the entire private sector and companies of all sizes: 20 member associations, 15 300 member companies across all business sectors (96% SMEs). Member companies employ 900 000 employees.

IPCEIs are important but not the only means to promote European key technologies and strategic value chains. They are relevant tools for addressing market failures and should be equally accessible for companies of different size from all Member States. We highlight the importance of the transparency of IPCEI procedures.

In principle, EK supports the changes and clarifications proposed by the Commission.

It is essential that the state aid rules concerning IPCEIs ensure level playing field for companies in the EU and the European single market to remain as open as possible. Additionally, the state aid rules need to safeguard effective competition in the EU.

In general, EK finds it essential that administrative burdens should be reduced and decision-making speeded-up, especially in fields where innovation cycles are very short. Procedures required to activate the instrument should also be simplified.

It is essential that further preparations regarding the "do no significant harm" principle pay attention to ensuring that the application of the principle does not lead to an unreasonable administrative burden on companies.

SMEs

Special attention to participation of SMEs is a good thing. It is therefore also important to ensure that processes are transparent, and that administrative burden is kept to a minimum. One concrete proposal is for the Commission to maintain a website that describes and reports all the IPCEI projects in preparation and ongoing projects, which would contribute to increasing the transparency of the projects.

The rules for getting involved in a project are complex and burdensome. The Commission should address this so that the bureaucratic effort for participation is kept as low as possible. The role of SMEs in IPCEI projects occurs mostly through partnerships. The Commission and Member States should make SMEs more aware of IPCEIs, for example by setting up a dedicated website (by the Commission) as suggested.

Clawback mechanism

As far as financial returns are concerned, we consider it essential that the principles are predictable and provide sufficient legal certainty. Consideration should be given to waiving financial returns in the event that the market access of the product has occurred more quickly than estimated at the time of the project decision. We find the grounds for financial returns very different compared to other criteria. Therefore, financial returns in this situation should be excluded from the claw-back mechanism.