

The General Secretariat of Telecommunications and Posts of the Greek Ministry of Digital Governance participates in the public consultation regarding the “Targeted review of the General Block Exemption Regulation (State aid): extended scope for national funds to be combined with certain Union programmes (2nd consultation)” with the proposal to amend the wording of article 2.v of the Consultation text.

In particular, concerning submarine cables, on pp. 18 (article 2.v of the consultation document) it is mentioned:

“(v) The following cumulative specific criteria shall apply to investment in crossborder submarine cables:

*– The project consists of cross-border sections as defined under the Regulation XX (CEF2 Regulation) which (i) involve at least two Member States by crossing the border between two or more Member States, or (ii) cross the border of at least one Member State and a European Economic Area country. **Alternatively, the supported infrastructure is a wholesale only network and improves the connectivity of European outermost regions or overseas territories, even within a single Member State.**”*

The Proposal for a Regulation of the European Parliament and of the Council establishing the Connecting Europe Facility and repealing Regulations (EU) No 1316/2013 and (EU) No 283/2014¹ states:

*“(28) The deployment of backbone electronic communications networks, including submarine cables connecting European territories to third countries on other continents or **connecting European islands**, outermost regions or overseas countries and territories,”*

and in Article 9.4 (d)

*“actions supporting deployment of new or significant upgrade of existing backbone networks including submarine cables, **within** and between Member States and between the Union and third countries;”*

The Connecting Europe Facility (CEF2) Digital Programme specifically states (see pp.7 chapter “Submarine connectivity of strategic importance” of the CEF2 non-paper²):

*“This action could be funded on the basis of eligible ‘actions supporting deployment of new or significant upgrade of existing backbone networks including submarine cables, **within** and between Member States and between the Union and third countries’ (Articles 8(3)(d) and 9(4)(d), and point 3 in Annex, Part V).”*

Furthermore, in pp.30, it stated that:

¹ <https://www.consilium.europa.eu/media/38507/st07207-re01-en19.pdf>

² https://ec.europa.eu/newsroom/dae/document.cfm?doc_id=63665

*“Submarine cables play an essential role in ensuring high-capacity and high-performance (in terms of resilience, security, redundancy and latency) digital connectivity throughout the EU, **in particular for islands or states with long coastlines**, the outermost regions, and overseas countries and territories (OCTs).”*

We believe that the wording of the consultation document does not fully capture the scope and reasoning of the CEF2 regulation by not including the case of submarine connections **within islands of the same member state** (as is a common case in Greece). Given that island regions as NUTS level 3 are clearly defined³, we propose to amend the respective wording as follows:

“(v) The following cumulative specific criteria shall apply to investment in crossborder submarine cables:

*– The project consists of cross-border sections as defined under the Regulation XX (CEF2 Regulation) which (i) involve at least two Member States by crossing the border between two or more Member States, or (ii) cross the border of at least one Member State and a European Economic Area country. Alternatively, the supported infrastructure is a wholesale only network and improves the connectivity of European outermost regions or overseas territories **or island regions**, even within a single Member State.”*

³ i.e. as per Eurostat definition (<https://ec.europa.eu/eurostat/web/coastal-island-outermost-regions/methodology>)