



## Position to the proposed amendments to the General Block Exemption Regulation (GBER) (State aid)

### Background

The European Commission invited interested parties to comment on proposed amendments to the General Block Exemption Regulation (GBER) (State aid). The purpose of the proposed revision is to reflect the changes to various sets of State aid Guidelines to facilitate public support for the EU's green and digital transition. It is expected that the new rules will support setting the right foundations for a sustainable economy in the recovery phase of the current coronavirus pandemic.

The aim of the revision of the Guidelines and of the proposed revision of the GBER is to promote public funding for current EU priorities, first and foremost the Green Deal, and the European Industrial and Digital Strategies. Also, State aid rules should reflect the most recent market and technological developments. Therefore, the European Commission proposes changes in the GBER in the following areas: aid for environmental protection and energy; aid for risk finance investment; aid for research, development, and innovation; and regional aid.

### State aid and cluster policy

The European Cluster Policy Forum outlines in section 4 “*State aid topics related to cluster policy*” of its document “*Cluster excellence, mobility schemes for clusters and State aid issues related to cluster policy, Output paper 2<sup>nd</sup> meeting*” from 26 April 2018 (*attached to this document*) that Member States can make use of different GBER articles for measures to support innovation and other activities that are relevant for clusters and that the rules need to be revised according to the new orientations in cluster policy.

The following improvements are cited in the output paper in section 4.1.3:

- More scope for automatic approval of R&D&I aid
- More flexible aid ceilings for large individual aid measures
- Greater legal certainty for public-private R&D-collaboration and for demand-side measures that foster innovation

Continuing, the paper states correctly that “more clarification, different phrasing or even further modernisation may be needed to keep up with constantly evolving technologies and industry, and cluster policies. Any new orientation of the role of cluster policy for industrial modernisation, digitisation and the growth of scale-ups might mean that clarity or even further modernisation of State aid is needed” (p. 29).

Furthermore, the European Clusters Alliance shares the observed State aid issues explained in section 4.2.2 “Issues flagged at the 1<sup>st</sup> European Cluster Policy Forum” (p. 30-31), which include

- “linear aid intensity for innovation clusters”;
- “aid to collaborative ventures”;
- “possible barriers to scale-ups”;
- “different legal basis for cluster policy”; and
- “low *de minimis* threshold”.

Regarding the last point, the output paper explains that the participation of cluster members can be hindered by *de minimis* aid limits since companies may have individually accessed other types of public support, which excludes them from or limits their involvement in cluster activity. Therefore, a “solution could be to create a new category of State aid for this type of activities, covering both the coordinator and cluster members” (p. 34).

## Public endorsement

The European Clusters Alliance publicly endorses the described issues and suggestions expressed by the European Cluster Policy Forum, “Cluster excellence, mobility schemes for clusters and State aid issues related to cluster policy, Output paper 2nd meeting” (26 April 2018), in particular section 4.1.3 “solutions for State aid issues” and 4.2.2 “Issues flagged at the 1st European Cluster Policy Forum” for the revision of the General Block Exemption Regulation (GBER) (State aid).

## About the European Clusters Alliance

The European Clusters Alliance is a bottom-up initiative that gathers 17 National Cluster Associations and ambassador organisations representing more than 800 clusters, where 134,000 of our most innovative businesses collaborate with thousands of universities, research centers and public institutions to boost their competitiveness. Our mission is to be their common voice, facilitating connections and opportunities to meet the challenges they face, and to position industrial clusters as key agent in the European innovative ecosystem for the development and growth of our economy and competitiveness. The European Clusters Alliance is member of the European Commission’s Industrial Forum, the Expert Group on Clusters, the European Economic and Social Committee (CMMI), and the Sounding Board of the European Cluster Collaboration Platform.

## Clusters matter. Why?

According to the report “European Panorama of Clusters and Industrial Change”, European clusters account for 61.8 million jobs, equivalent to 23.4% of total European employment (EOCIC European Panorama of Clusters and Industrial Change 2020). Clusters drive growth in Europe through their high number of innovative and high-growth firms, showing top performance on key social and business competitive indicators, such as 13.5% higher average wage and 77% more high-growth firms in specialized clusters than in other environments without cluster support. They should be considered as entrepreneurial, dynamic, and regional ecosystems of excellence for their industries and key competences.



Source: [EOCIC European Panorama of Clusters and Industrial Change 2019](#)

## European Clusters Alliance

Rue Belliard 40, 1040 Brussels [www.clustersalliance.eu](http://www.clustersalliance.eu) [contact@clustersalliance.eu](mailto:contact@clustersalliance.eu)  
8 December 2021