

European Commission  
DG Comp

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## Response on the European Commission consultation on the revision of the General Block Exemption Regulation

*Relians Corp\* welcomes the initiative by the European Commission of bringing State aid regulation in line with EU's climate commitments and to assess the effectiveness, efficiency, coherence, relevance, and EU added-value of the State aid rules by thacking into account the fitness checks results.*

*We strongly believe that the new state aid regime is required to boost the EU's climate and digital transition and fulfill its commitment under the Paris Agreement.*

### **General Comments**

We would like to point out the importance of a holistic view of the EU regulations in this field. Currently, several other regulations are being revised and the Commission needs to make sure that the different state aid instruments create a coherent rules environment that can deliver the best possible conditions for the EU industry to both develop competitiveness and to tackle the green and digital transition. The scope of the guidelines and the GBER as well and the links between them should be clearly expressed.

Along the same line, we consider that the GBER provisions also need to reflect the fundamental understanding that it is the business community that is and will be the engine of the transition to a sustainable society and will and must be the main driving force to achieve the high-set goals.

Companies invest and innovate to a large extent in more environmentally friendly technologies that involves a considerable financial effort. To this end, it is fundamental that GBER previsions entail more flexibility regarding eligible costs, aid intensities, and maximum State aid thresholds especially in the field of state aid on Research, Development & Innovation, and Energy Infrastructure.

### **Changes to consider**

Therefore, regarding the proposed amendments to the General Block Exemption Regulation (GBER), we would like to address the following suggestions *in order to be more coherent and supportive to the twin green and digital transition*:

\*Relians is a Romanian company established in 2000 that provides consulting services in managing projects with refundable and non-refundable financing, being a market leader in this field. In 2014 Relians received the National Champion of Romania award in the Constantinus European Award competition and was nominated for the European competition final.

### **Increase the aid intensities and thresholds for experimental development and investment aid for testing and experimentation infrastructures**

As the key to leading on the twin transitions towards climate neutrality and digital leadership, experimental development is an indispensable part of the energy sector innovation chain and to fill the gap between research and deployment of digital technologies. The gap between small-scale pilot performance and real-world deployment is making demonstration a critical bottleneck in the overall innovation process.

Not only does experimental development and demonstration enable real-world validation of emerging R&D findings, but when integrated within an effective overall innovation policy, it is also a crucial step towards commercialization and subsequent widespread deployment. Despite its importance, the demonstration is often at risk of neglect. Moreover, the demonstration is highly risky for individual private companies to undertake. Thus, the experimental development activity results bring benefits to society at large, whereas their won benefits may not outweigh the risks and costs incurred by companies.

- Therefore, we consider that the aid intensities and thresholds should be increased. Especially the maximum percentage for experimental developments (since this includes pilots and demonstrations) should be higher for all types of enterprises – at least 50 % from eligible costs and a threshold of 30 million EUR at least.

### **Comments regarding art. 8 GBER – Cumulation of aid**

The revision of State aid rules needs to reflect and support the latest technological developments by allowing and enabling those investments that are essential for achieving the EU's environmental objectives concerning climate change and the energy transition towards achieving the Union's 2030 climate and circular economy targets and complying with the target of EU climate neutrality by 2050 in line with the goals of the Paris Agreement and, among others, the European Green Deal.

To achieve these national and European ambitions will require significant investments in the coming years. For the least developed EU member states, there must be a variety of possibilities to facilitate the transition to climate neutrality. That means, among other things, that the GBER provisions should enable the necessary support for technologies that are crucial for long-term climate neutrality.

- We consider that a company that has reached the maximum threshold in the 2014-2020 programming period should have the possibility to apply integrally for the same or similar type of aid in the programming period 2021-2027, always in line with no overlapping/double funding principles.

For legal certainty, it would be helpful if the European Commission could add a provision mentioning the period that an enterprise can apply for funding considering it already benefited of aid up to the threshold limits in the programming period 2014-2020.