

Comments of the Czech Republic on the draft of revised Guidelines on State aid to promote risk finance investments

The Czech Republic welcomes and strongly supports the Commission's efforts to unify and further clarify all relevant existing formulations and definitions across European legislation, including the General Block Exemption Regulation, the Framework for State aid for R&D&I, the Notice on the Notion of Aid and the Guidelines on State aid to promote risk finance investments ("Risk Finance Guidelines").

Section 4.2.6. Risk Finance Guidelines - Transparency

We disagree to transparency threshold of EUR 100 000 set in point (178) of the presented draft of the Risk Finance Guidelines. Current Risk Finance Guidelines includes in point (166) threshold of EUR 200 000. The amount should be in line with the threshold that is already well established in the general State aid framework, i.e. EUR 500 000 for individual aid awards.

From our perspective, coherence of the EU State aid rules should be maintained and we understand the lower threshold of EUR 100 000 introduced by the Temporary Framework for State aid measures to support the economy in the current COVID-19 outbreak, indeed, purely as a temporary exception for the limited time when dealing with negative impacts of the coronavirus crisis. As we have already mentioned within the previous consultation (RDI Framework) permanently lowering the transparency threshold from EUR 500 000/EUR 200 000 to EUR 100 000 would only significantly increase the administrative burden for the granting authorities. We see no benefit in this step.