

Mr Olivier GUERSENT  
Director-General,  
Directorate-General for Competition (DG COMP)  
European Commission

Via email: [Olivier.Guersent@ec.europa.eu](mailto:Olivier.Guersent@ec.europa.eu)

*Brussels, 29 July 2025*

**Subject: Request to postpone by one year the implementation date for Member States to commence the registration of the *de minimis* aid in their national central registers**

Dear Mister Guersent,

On behalf of the European Association of Guarantee Institutions (AECM) we respectfully request one year postponement - until 1 January 2027 - of the date on which Member States are required to begin registering *de minimis* aid in a central national register, currently set to take effect on 1 January 2026.

AECM members are fully committed to comply with the new reporting obligations and share the Commission's objective of ensuring transparent and efficient monitoring of the *de minimis* aid. However, the current implementation timeline seems to be unlikely to be operationally feasible.

In particular, our members shared that they are facing the following key challenges:

1. **Limited technical insight and short timeline:** In each Member State, a wide range of institutions, including financial institutions, are required to report the *de minimis aid*. These entities need clear and detailed technical specifications in order to develop and integrate the necessary reporting functionality into their own systems. Moreover, with the first test version of the EU register expected only by October 2025, this leaves an extremely short window, less than three months for the design, development, testing, and deployment of the necessary IT adaptations. Such a timeframe is practically impossible to meet without risking accuracy of the data.
2. **System readiness and coordination needs:** The central national register must be designed to record all *de minimis* aid granted by any authority within the respective Member State. In many cases, Member States operate within complex administrative ecosystems, particularly those with federal or decentralised governance structures. These involve multiple public and private stakeholders, each of whom must adapt their own systems and procedures to ensure proper compliance. As a result, additional time is required to allow for coordination, alignment, and effective integration across all levels of administration.
3. **Pilot testing and training:** A minimum lead time is needed to carry out essential pilot testing and staff training to ensure correct and consistent reporting practices across the network.

Given these constraints, we strongly believe that a pragmatic adjustment of the timeline is necessary. We therefore kindly ask for a postponement of one year, until 1 January 2027, to allow for sufficient time for technical implementation, proper testing, and secure integration across Member States.

AECM members remain fully committed to working closely with the European Commission and national authorities to ensure the effective and successful implementation of the central *de minimis* register at national level.

Thank you very much for taking our request into your kind consideration.

Yours sincerely,



Guy Selbherr

- President -



Katrin Sturm

- Secretary General -