

## AECM comments on the application of state aid rules

### 1) Who of you uses Risk Finance Guidelines, and if so, do you face any kind of problems when applying it / would like to propose a change, etc.?

At least 10 AECM members apply the Risk Finance Guidelines.

According to aws, one of our 2 Austrian members, the conditions for measures supporting alternative trading platforms, i.e. provision of business plan demonstrating that the aided platform can become self-sustainable in less than 10 years, are not sufficiently justified.

### 2) Do you face any kind of problems in the monitoring and implementation process when applying state aid rules? (de minimis / GBER / Risk Finance Guidelines, etc.)

So far, AECM members haven't encountered big problems in the monitoring and implementation process when applying state aid rules. Yet, some suggestions for improvement could be made:

- Sometimes, the determination as SME / the interpretation of the SME definition is quite challenging
- Document storage and the monitoring of / compliance with document storage is onerous
- Regarding aid for start-ups under the GBER, the Slovene Enterprise Fund (SEF), one of AECM's 2 members from Slovenia, has a comment concerning aid for start-ups (article 22) concerning eligible undertakings. SEF is active through seed financial instruments for start-ups and in case of support such as equity or quasi equity investment they find the limitation of five years from the moment when the enterprise either starts its economic activity or is liable to tax for its economic activity too restrictive. SEF would suggest that this limitation is updated and allows also inclusion for undertakings that have been operating in any market for less than 7 years following their first commercial sale.

### 3) What are the reasons for using certain state aid rules i.e. *de minimis* regulation over GBER or over Risk Finance Guidelines?

AECM members agree that the *de minimis* regulation has the most simple rules and in the majority of projects of SMEs supported by the *de minimis* regulation the maximum % of the costs of the whole project is covered. Thus, for small amounts AECM members go for *de minimis* because it is easy to apply and for some projects (especially working capital) it is the only way of supporting.

At the same time, GBER can be complicated with different parameters and very specific eligibility criteria.

In case of aws / Austria the general line is to use GBER wherever it is possible, so that the *de minimis* basket of the enterprise is not used (i.e. the enterprise has still the possibility for *de minimis* support from other sources).

**STATE AID RULES applied by AECM members**

<b>Guarantee scheme</b>	<b>de minimis</b>	<b>GBER</b>	<b>Notification</b>	<b>Regional guidelines</b>
aws	x	x	x	x
NÖBEG	x	x	x	x
PMV/z-Waarborgen nv	x			
SOWALFIN	x			
HAMAG-BICRO	x	x	x	x
CMZRB	x	x		
KredEx	x			
Finnvera	x		x	
SIAGI	x			
VDB	x	x	x	
ETEAN SA	x	x	x	x
AVHGA	x (for agriculture)	ABER		
Garantiqa	x	x	x	
SBCI	x			
Assoconfidi	x		x	x
ALTUM	x	x		
Garfondas	x (for agriculture)	ABER	x	
INVEGA	x			x
BGK	x		x	x
SPGM	x			
FGCR	x (for agriculture)			
FRC	x			
Slovene Enterprise Fund	x			
Slovenian Regional Development Fund	x	x	x	x
CESGAR	x			x
Netherlands Investment Agency (NIA)	x	x	x	x
<b>TOTAL</b>	<b>23 + 3</b>	<b>10 + 2</b>	<b>12</b>	<b>10</b>