

Questionnaire - GBER general revision 2025

Fields marked with * are mandatory.

1

Introduction

The current version of Commission [Regulation](#) (EU) No 651/2014 of 17 June 2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty ("General Block Exemption Regulation" or "GBER") entered into force on 1 July 2014 and applies until 31 December 2026. With this questionnaire, the Commission invites stakeholders to provide written input on the purpose and the scope of the revision of the GBER.

As the GBER encompasses many different aid categories, please mention precisely in your replies the specific GBER article or articles concerned.

For each question, please elaborate, if relevant, on the expected impact of the change on the reduction of the administrative burden for undertakings and Member States, competition in the market, legal certainty for undertakings, harmonised application of the competition rules, compliance or enforcement costs, innovation and sustainability. As regards these impacts (and more generally for all your replies), please provide, as much as possible, quantitative evidence underpinning your statements. This will ensure that the review process is based on facts and reliable evidence.

2 About you

* 1 Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian

- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

*2 I am giving my contribution as

- ☐ Academic/research institution
- ☒ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

*3 First name

Felicia

* 4 Surname

Covalciuc

* 5 Email (this won't be published)

felicia.covalciuc@aecm.eu

* 9 Organisation name

255 character(s) maximum

European Association of Guarantee Institutions

* 10 Organisation size

- ☒ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

11 Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

67611102869-33

* 12 Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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<input type="radio"/> Bahrain	<input type="radio"/> French Polynesia	<input type="radio"/> Micronesia	<input type="radio"/> South Africa
<input type="radio"/> Bangladesh	<input type="radio"/> French Southern and Antarctic Lands	<input type="radio"/> Moldova	<input type="radio"/> South Georgia and the South Sandwich Islands
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<input checked="" type="radio"/> Belgium	<input type="radio"/> Germany	<input type="radio"/> Montenegro	<input type="radio"/> Spain
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<input type="radio"/> Bolivia	<input type="radio"/> Grenada	<input type="radio"/> Namibia	<input type="radio"/> Sweden
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| <input type="radio"/> Brazil | <input type="radio"/> Guinea | <input type="radio"/> New Zealand | <input type="radio"/> Tanzania |
| <input type="radio"/> British Indian Ocean Territory | <input type="radio"/> Guinea-Bissau | <input type="radio"/> Nicaragua | <input type="radio"/> Thailand |
| <input type="radio"/> British Virgin Islands | <input type="radio"/> Guyana | <input type="radio"/> Niger | <input type="radio"/> The Gambia |
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| <input type="radio"/> Christmas Island | <input type="radio"/> Italy | <input type="radio"/> Paraguay | <input type="radio"/> United Kingdom |
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| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
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| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena, Ascension and Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* 14 Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☒ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

3 Objectives of the GBER and of the GBER revision

3.1 Objectives of the GBER

15 In its 2012 [Communication](#) on State aid modernisation, the Commission considered that the objectives of State aid modernisation were the promotion of growth, the prioritisation of enforcement on aid with the highest impact on the single market, and the simplification of the State aid rules. Do you consider that the implementation of the GBER has contributed to the achievement of these objectives?

Please rank each objective from 1 to 4 according to the following scale: 1 – Not at all. The implementation of the GBER did not contribute in any meaningful way. 2 – To a small extent. The implementation of the GBER had a noticeable but limited contribution. 3 – To a large extent. The implementation of the GBER contributed significantly to achieving the objective. 4 – Yes, to a very large extent. The implementation of the GBER was instrumental in achieving this objective.

	1 - No, not at all	2 - Yes, to a small extent	3 - Yes, to a large extent	4 - Yes, to a very large extent
Promotion of growth	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Prioritisation of enforcement on aid with the highest impact on the single market ("big on big, small on small")	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Simplification of the State aid rules	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

16 In your view, is the GBER well aligned with the following policy objectives?

Please rank each objective from 1 to 3 according to the following scale: 1 – Not at all. The GBER should not contribute in any meaningful way. 2 – To some extent. The GBER should contribute to achieving the objective. 3 – To a large extent. The GBER should be instrumental in achieving this objective.

	1 – Not at all	2 – To some extent	3 – To a large extent
Encouraging the green transition (including decarbonization)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Fostering the digital transition	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Legal certainty (predictability and ease of understanding) for Member States and undertakings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting R&D and innovation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promoting the economic, social and territorial cohesion of Member States and the Union as a whole, as well as regional development of disadvantaged areas	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting the uptake of private investment in the EU through de-risking	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Protecting a level playing field in the single market and minimising distortions of competition	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Strengthening the resilience of the EU economy against external shocks and dependency on third countries (including mining and processing of critical raw materials and growth of EU key strategic sectors referred to in the Competitiveness Compass)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Supporting social protection measures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Supporting the competitiveness of the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Supporting the just transition	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The prioritisation of enforcement on the most distortive types of State aid, which should be notified to the Commission	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

3.2 Objectives of the revision of the GBER

17 In your view, does the GBER adequately address the following issues?

Please rank each issue from 1 to 4

	1. No	2. Yes, to a limited extent	3. Yes, to some extent	4. Yes, to a large extent
The reduction of the administrative burden of Member States and the Commission	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improving the user-friendliness, readability, consistency and accessibility of the GBER	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing the scope of the GBER to more aid measures	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Simplifying the compatibility conditions to block exempt more aid measures while keeping sufficient safeguards to avoid undue distortions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Adapting the current text to take into account political, economic, technical and social changes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

18 Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting the transition towards a climate neutral, clean and sustainable economy, in particular for SMEs? If not, please explain why.

2000 character(s) maximum

Please explain and provide examples

The current GBER provides an important and flexible framework for implementing state aid measures that support the transition towards a climate-neutral, clean, and sustainable economy. However, in practice, several limitations reduce the GBER's effectiveness in fully supporting this transition: 1. While the GBER aims to simplify procedures, compliance remains administratively demanding, especially for smaller beneficiaries and intermediaries. 2. The existing aid intensities and eligible cost definitions do not always reflect the economic reality of green projects, which often require long payback periods and higher upfront investment. More ambitious thresholds or simplified rules for climate-related projects would help accelerate private sector participation. 3. Many SMEs face limited capacity to navigate complex state aid rules. Further simplification, standardised templates, and guidance—especially for small-scale green investments—would strengthen their access to support. 4. The GBER's current focus on investment-related costs does not sufficiently reflect the financing needs of SMEs during the transition process. Many sustainable projects require working capital to maintain liquidity, especially in periods of restructuring or innovation. Allowing limited support for working capital—when directly linked to green objectives—would significantly enhance the effectiveness and accessibility of promotional finance schemes.

19 Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting a just transition (addressing negative impacts on territories

and communities that are most affected by the transition to a climate-neutral, clean and sustainable economy), especially in view of the retraining and re-employment needs of workers from decarbonized industries? If not, please explain why.

2000 character(s) maximum

Not applicable

20 Digitalisation and new technologies are a key driver of innovation, competitiveness and growth. Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting the transition towards a digitalised economy? If not, please explain why.

2000 character(s) maximum

Please explain and provide examples

The GBER's contribution to achieving a truly digitalised economy remains limited in several important respects:

- The existing provisions mainly target research, development, and innovation activities. They provide less flexibility for supporting the adoption and deployment of digital technologies (e.g., AI, data analytics, automation, cybersecurity) by SMEs that are not R&D-intensive but still need to digitalise their operations.
- The digital transition depends heavily on intangible investments - software, data management, digital platforms - as well as workforce upskilling. These areas are not fully reflected in current eligible cost definitions or aid intensities.
- As in the case of green transition support, the GBER is largely cost-based and does not yet accommodate results-based or blended finance mechanisms that are increasingly used by promotional banks to promote digital transformation and innovation uptake.
- SMEs often struggle to access funding for smaller-scale digital projects or working capital needs linked to digital transition. Broader eligibility for such financing - when clearly linked to digital objectives - would make GBER-based schemes more effective.

21 Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting the resilience of the EU economy, in particular of certain strategic sectors defined in the [EU Competitiveness Compass](#), against external shocks and dependency on third countries? If not, please explain why.

2000 character(s) maximum

Please explain and provide examples

The GBER's capacity to actively foster economic resilience, particularly in strategic sectors identified in the EU Competitiveness Compass, is still limited.

- The GBER is designed primarily to ensure a level playing field and avoid market distortions. While this remains important, it limits the ability of Member States and promotional banks to react swiftly to crises or strategically support key sectors (e.g., semiconductors, critical raw materials, health technologies, clean energy).
- The GBER's focus on cost-based aid does not easily accommodate the types of risk-sharing and supply chain diversification instruments needed to enhance resilience. More room for portfolio-based or guarantee-type schemes would allow financial institutions to channel financing more efficiently into resilience-building investments.
- SMEs play a critical role in supply chain resilience but often lack access to tailored financing under the existing GBER rules. Simplified procedures, higher aid intensities, and recognition of working capital needs in strategic contexts would make the framework more responsive.

22 Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting research, development and innovation activities? If not, please explain why.

2000 character(s) maximum

Please explain and provide examples

• The GBER's RDI provisions are primarily focused on technological R&D. Broader recognition of organisational, process, and service innovation would make it more relevant for SMEs and sectors where innovation is not solely technology-driven. • Current aid intensities may not adequately reflect the financial risks and long development cycles associated with innovation, particularly for deep-tech and climate-related projects. More flexibility in cost categories and higher thresholds for collaborative or high-impact innovation would improve effectiveness. • SMEs and start-ups often face difficulties accessing funding for the transition from R&D to market deployment. Enhanced compatibility of the GBER with financial instruments and risk-sharing mechanisms would help bridge this "valley of death."

23 Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting cohesion objectives (regional development, recognition of territorial specificities) or social objectives? If not, please explain why. Should in particular cohesion policy objectives be better taken into account in the various provisions of GBER (also beyond Section 1 of Chapter III), by including specific support in certain regions?

2000 character(s) maximum

Please explain and provide examples

The GBER's contribution to cohesion and social objectives remains only partially sufficient, for several reasons: • The GBER primarily differentiates by development levels, but it does not adequately capture the specific challenges of territories with structural disadvantages, such as rural, outermost, border, or industrial transition regions. These areas often require more targeted and flexible support measures. • The current framework could better integrate cohesion priorities into the newer policy areas of the green and digital transitions. • Cohesion considerations should not be limited to Section 1 of Chapter III. Introducing higher aid intensities or simplified procedures for lagging regions, across other sections (e.g., RDI, environmental protection, digitalisation) would strengthen policy coherence and ensure that no region is left behind in Europe's transition.

24 Do you consider that the current GBER contributes sufficiently to the competitiveness of the EU economy? If not, please explain why.

2000 character(s) maximum

Please explain and provide examples

The GBER's contribution to competitiveness remains only partially sufficient in the current global context: • The GBER framework was designed for a stable economic environment and may not provide sufficient flexibility to react swiftly to global industrial policy shifts or to match large-scale support offered by third countries. • The Regulation does not yet fully reflect the EU's evolving industrial priorities, such as strengthening strategic value chains, ensuring supply security, and advancing technological sovereignty in key sectors (e.g., semiconductors, clean technologies, digital infrastructure). • The predominance of cost-based aid limits the use of results-based, risk-sharing, or blended finance instruments that promotional banks increasingly employ to stimulate productivity and competitiveness. • While SMEs benefit from simplified access to support, aid intensities and eligible cost definitions could be better tailored to the needs of growth-oriented and scaling firms, which play a critical role in strengthening Europe's industrial base.

25 Do you consider that the current GBER contributes sufficiently to improving the business environment (including access to finance) for SMEs, small mid-caps, startups and scale ups? Please explain in particular whether the possibility of benefitting from block exempted aid improves the business environment for SMEs, for example by facilitating or accelerating the completion of projects carried out by SMEs.

2000 character(s) maximum

The GBER's contribution to improving access to finance and the broader business environment remains only partially sufficient, for several reasons: • Even though procedures are simplified compared to notified aid, the GBER framework can still be complex for SMEs and start-ups to navigate. Clearer guidance, harmonised templates, and greater visibility of available GBER-based schemes would help companies access support more easily. • Many SMEs and start-ups need financing not only for investment but also for working capital, especially during growth or transition phases. The current cost-based focus of GBER aid does not adequately address these needs, limiting its practical impact on financial resilience. • The GBER is not yet fully adapted to modern financial instruments such as blended finance, equity co-investment etc, - tools that NPBI increasingly use to mobilise private capital for SMEs and scale-ups. • Aid intensity ceilings and cost definitions often suit micro and small enterprises but are less adapted to the needs of scaling firms or small mid-caps seeking to expand internationally or invest in advanced technologies.

26 Do you consider that the current GBER contributes sufficiently to supporting integrated investments/projects, such as those combining multiple objectives (and thus possibly multiple articles of Chapter III) and multiple types of costs (related to infrastructure, equipment, personnel, services, etc.)? Please explain and provide examples.

2000 character(s) maximum

• Although theoretically possible, coordinating support under different GBER articles (e.g., infrastructure, R&D, environmental protection) is administratively challenging. SMEs and even larger beneficiaries may face difficulties in complying with multiple eligibility and cost requirements simultaneously. • The GBER generally treats aid based on eligible costs specific to each article. This can limit the ability to finance projects that require a combination of infrastructure, equipment, personnel, and service costs in an integrated manner, especially for innovative or cross-sectoral initiatives. • Integrated projects increasingly rely on blended, or risk-sharing financing models, which are not fully accommodated under the current GBER framework.

27 Do you consider that the current GBER contributes sufficiently to promoting the uptake of private investment in the EU through de-risking? If not, please explain why.

2000 character(s) maximum

• The GBER should be better adapted to facilitate the use of risk-sharing and blended finance instruments, which are crucial for mobilising significant private investment, particularly in innovative, green, and digital projects. • SMEs and start-ups often face liquidity or scale-up constraints. Without the ability to provide targeted working capital or flexible risk coverage, promotional banks cannot fully unlock private investment in these segments.

4 Common compatibility conditions (Chapter I of the GBER)

28 Do you consider that certain articles (or parts thereof) in Chapter III are not or not often used?

- ☐ No
- ☒ Yes, certain articles (or parts thereof) are not or not often used and should be updated.
- ☐ Yes, certain articles (or parts thereof) are not or not often used and should be deleted.
- ☐ I don't know

29 If you replied that some articles should be updated, please indicate which provisions and explain how they should be updated.

3000 character(s) maximum

The current provisions of Article 22 of the GBER exclude significant number of start-ups from accessing aid due to rigid eligibility criteria, which do not reflect the diversity of start-up lifecycles, particularly in technology-intensive or high-growth sectors. More precisely, the time-based limitation to 5 years since entry to the market fails to account for the long development and capitalisation phases typical of R&D-heavy or deep-tech start-ups. In reality, many start-ups, especially in sectors like biotech, cleantech, and software, may require more than 5 years to reach market maturity. It is suggested to extend the maximum age of start-ups to seven years for all sectors and allow up to 10 years for start-ups in R&D-intensive or capital-intensive industries (e.g. biotech, deep-tech, cleantech, industrial automation, space). Further, it is suggested to remove exclusion due to profit distributions. Instead, introduce a principle of proportionality: • Distributions that are modest, infrequent, or made in line with investor agreements should not disqualify a start-up from support. • Only systematic or substantial profit distributions may be considered evidence against a funding need.

4.1 Scope of the GBER

Article 1(1) of Council [Regulation](#) (EU) 2015/1588 of 13 July 2015 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to certain categories of horizontal State aid (the

“Enabling Regulation”) empowered the Commission to block exempt 15 different categories of State aid in favour of (i) SMEs, (ii) research, development and innovation, (iii) environmental protection, (iv) employment and training, (v) culture and heritage conservation, (vi) making good the damage caused by natural disasters, (vii) making good the damage caused by certain adverse weather conditions in fisheries, (viii), forestry, (ix) promotion of food sector products not listed in Annex I of the TFEU, (x) conservation of marine and freshwater biological resources, (xi) sports, (xii) residents of remote regions, (xiii) certain telecommunications infrastructure, (xiv) infrastructure in support of the objectives above, of cohesion, and of other objectives of common interest, (xv) aid that complies with the regional aid maps. The GBER may only block exempt these aid categories from the notification obligation.

31 Do you consider that, within the scope of the Enabling Regulation, there are categories of aid that meet the block exemption criteria and that are not included in the GBER?

- ☐ No
- ☒ Yes
- ☐ I don't know

32 Please indicate, for each new aid category:

- which aid category should be added
- why such aid category should be block exempted, e.g. because there is clear and sufficient case practice from the Commission in this area (showing in particular a market failure i.e. there is an important investment gap and insufficient investment appetite by private sector due to the risk profile of investments needed to develop and grow certain key strategic sectors and technologies needed to boost EU competitiveness and the reshape of its industrial policy); because it would reduce the administrative burden of undertakings, Member States and the Commission and there is no risk of undue distortion of competition
- which conditions would be appropriate for block exemption (e.g. notification threshold, aid intensities, based on Commission practice)

3000 character(s) maximum

In addition, the GBER lacks a specific category for affordable housing. While it permits aid for energy efficiency, there are no provisions tailored to the housing sector.

4.2 Application of the GBER to primary agricultural production and fisheries /aquaculture

The GBER only exceptionally applies to the sectors of primary agricultural production and fisheries /aquaculture (the scope is defined in Article 1(3)(a) and (b)), given that tailor-made Block Exemption Regulations exist for those sectors. This initiative concerns a revision of the GBER, not of the specific block exemption regulations applicable to agriculture, forestry, fisheries and aquaculture (Regulation (EU) 2022 /2472 'ABER' and Regulation Regulation (EU) 2022/2473 'FiBER').

33 Do you think that other GBER articles, which are currently not applicable to the sectors of primary agricultural production/fisheries and aquaculture, should be opened to those sectors, taking into account the existing block-exemptions under ABER and FiBER?

- ☐ No
- ☐ Yes
- ☐ I don't know

35 Is the GBER used to grant aid to the sector of primary agricultural production and /or fisheries and aquaculture? If yes, which provisions of the GBER are used and were there difficulties to apply these provisions?

2000 character(s) maximum

36 Under the current version of the GBER, there are specific aid measures which apply to the fisheries and aquaculture sector but not to primary agricultural production (or the other way around) leading to a difference in treatment between these sectors. Is this problematic in your view or are the exclusions justified by the specificities of the sectors, e.g. because the aid categories would not be relevant for the excluded sectors? Please substantiate your reply and provide relevant evidence.

2000 character(s) maximum

4.3 Definitions

37 Article 2 of the GBER provides a list of definitions of certain terms or concepts.

What is your position regarding the definitions laid down in the GBER?

- ☐ The current list of definitions is fine.
- ☐ Certain concepts should be defined while they currently are not.
- ☒ Certain definitions should be updated.
- ☐ Certain definitions are unnecessary and should be deleted.
- ☐ Certain definitions rather constitute substantial compatibility conditions and should be moved to Chapter III.
- ☐ I don't know.

39 If you replied that some definitions should be updated, please provide a list, the exact suggestion for an update and explain.

3000 character(s) maximum

It is proposed to update the definition of 'own funds' by recognising funds that are economically equivalent to equity as "own funds" when assessing a company's financial situation. These may include, in particular, subordinated loans, silent partnerships, and other equity-like financing instruments, provided that they are available to the company on a long-term basis and are subject to a qualified subordination agreement with pre-insolvency enforcement restrictions.

4.4 Evaluation

42 In 2014, the corollary of the expansion of GBER to new aid categories was the obligation of Member States to conduct an ex post evaluation of large aid schemes. As a result, the GBER does not apply to large aid schemes under certain sections of Chapter III beyond a period of 6 months after their entry into force, unless the Commission has approved an evaluation plan (Article 1(2)(a) GBER). Large aid schemes are defined as those having an average annual budget above €150 million

(certain articles of Sections 1, 2, 3, 4 and 7) or above €200 million (Section 16). What is your position concerning the obligation to submit an evaluation plan for large aid schemes?

- ☐ The evaluation obligation has contributed to the efficiency and effectiveness of large aid schemes and should be maintained as it is.
- ☐ The notion of large aid schemes should be expanded (e.g. lower thresholds, more Sections of Chapter III).
- ☐ The notion of large aid schemes should be restricted (e.g. higher thresholds, fewer Sections of Chapter III, only long-term schemes beyond a certain duration, because it is difficult to carry out an evaluation of short-term schemes, only schemes which were not subject to an evaluation plan carried out in the past).
- ☐ The evaluation obligation should no longer be a requirement for block exemption and could be moved to Chapter 2, by analogy to the conditions on reporting).
- ☐ The evaluation obligation does not add value and should be deleted.
- ☐ Other

43 Please explain your reply as to the evaluation requirement.

2000 character(s) maximum

4.5 Undertakings in difficulty

44 In principle, aid to undertakings in difficulty cannot be block exempted (Article 1(4)(c)) GBER). There are exceptions concerning aid schemes to make good the damage caused by certain natural disasters, start-up aid schemes, regional operating aid schemes, aid schemes to SMEs benefitting from community-led local development projects, and aid to financial intermediaries under certain articles. While the general principle of exclusion should remain because State aid to undertakings in difficulty is among the most distortive types of aid, do you see a need for adaptations of the exceptions to this general exclusion or to the definition in Article 2(18) of the GBER?

- ☐ No

- ☒ Yes
- ☐ I don't know

45 If you consider that adaptations are necessary as regards the exclusion of undertakings in difficulties (or the definition of such undertakings) please explain what issues were encountered so far and consequently what adaptations should be done.

2000 character(s) maximum

Support for innovative start-ups and scale-ups is essential to strengthening the EU's long-term competitiveness. However, many of these companies fall under the definition of an "undertaking in difficulty" (UID) as set out in Article 2(18) of the GBER. This is often the case when companies have existed for more than three years and report significant losses, primarily due to the capital-intensive nature of technology development, especially in sectors such as deep tech or renewable energy. The current UID definition does not adequately reflect the economic realities of start-ups and scale-ups. These companies typically face temporary financial strain as they scale operations and invest heavily in R&D and infrastructure. Despite being on a viable growth trajectory, they risk being misclassified as UIDs, which can unjustly restrict access to public support. To better align state aid rules with innovation policy goals, the definition of UID should be amended to reflect the specific growth model of innovative early-stage companies. This includes: • Adjusting or removing the fixed three-year threshold, and • Incorporating forward-looking financial forecasts or alternative financial indicators that better capture the viability and growth potential of companies in this phase.

4.6 Incentive effect

46 The incentive effect requirement under the GBER is generally met if a written application for the aid has been submitted before the start of works, which covers among others any commitment that "makes the investment irreversible" (Article 6 in combination with Article 2(23) GBER). This is to ensure that an undertaking does not receive aid if it was able to execute the project without it. What is your position on the assessment of the incentive effect?

- ☐ This condition functions well.
- ☒ This condition is complex to apply and could be simplified.
- ☐ This condition is not sufficient and should be reinforced.
- ☐ I don't know

47 Please explain your reply as to the incentive effect requirement and provide specific examples. If you consider that the condition can be simplified, please explain why and how it could be simplified to reduce the administrative burden while preserving this essential compatibility condition.

2000 character(s) maximum

Article 6 of the GBER is designed to ensure that aid granted actually changes the behaviour of the beneficiary, except in certain cases where a presumption is accepted. In practice these requirements are challenging for the following reasons: • Demonstrating a counterfactual / “without aid” scenario often requires complex economic modelling and assumptions. This may discourage smaller aid schemes or burden Member States with heavy administrative costs. • The fact that some aid categories are exempt from incentive effect (or considered to automatically satisfy it) leads to differential treatment, which may be hard to justify or understand, especially in case of SMEs because most SME-targeted aid measures are low risk in terms of competition distortion and they inherently face financing and risk constraints that justify public support. To this end, we propose to harmonise Article 6 of the GBER to treat all SME support measures equally by introducing a presumption of incentive effect for all SME-targeted aid, provided basic compliance steps are taken (e.g. pre-application, transparent scheme). This proposal will be in line with both, Better Regulation Agenda and the State Aid Modernisation goals of transparency, efficiency, and focus on cases with genuine impact.

4.7 Simplified cost options

48 Article 7(1) of the GBER lays down the general possibility of calculating eligible costs in accordance with simplified cost options (SCOs), provided that the operation is “at least partly financed through a Union fund that allows the use of simplified cost options”. Other articles also lay down specific possibilities of using SCOs. What is your position on the use of SCOs under the GBER?

- ☐ The possibilities of using SCOs are sufficient.
- ☐ The possibilities of using SCOs are not sufficient for small enterprises.
- ☒ The possibilities of using SCOs are not sufficient for SMEs.
- ☐ The possibilities of using SCOs are not sufficient for all types of beneficiaries.
- ☐ I don't know

49 Please explain your reply as to the use of SCOs. If you consider that a wider use of SCOs is needed, please explain for which aid categories and under which conditions.

2000 character(s) maximum

We believe that SCOs are not sufficient applicable to SMEs and start-ups. We encourage the possibility of the use of SCOs which will definitely facilitate the implementation of the structural funds.

5 Specific conditions for compatibility (Chapter III of the GBER)

5.1 Complexity of the conditions

50 Which provisions of the GBER are too complex, raise difficulties of interpretation or application, and should in your view be updated or clarified? Please refer to specific provisions and explain why. Please specify how you consider these provisions could be clarified.

3000 character(s) maximum

~~Please refer to specific provisions and explain how these provisions could in your view be clarified~~

While the funding gap methodology can prove useful in setting aid levels in large-scale projects and notified measures, applying this requirement to SMEs, especially micro-enterprises, imposes an excessive administrative burden. In the aid awarding process, the calculation of the funding gap is one of the most resource-intensive and technically demanding steps. This challenge is further complicated when funding gap calculations are linked to claw-back mechanisms, which necessitate long-term monitoring of beneficiaries' financial performance, a requirement that is particularly difficult to manage for smaller aid amounts or limited-capacity beneficiaries. To address these challenges, we suggest greater procedural simplification, like introducing fixed aid intensities as an alternative to funding gap calculations.

51 Apart from aid intensities and eligible costs, Chapter III of the GBER lays down a series of other compatibility conditions, for instance related to the eligibility of the beneficiaries and/or projects. Are any of these other compatibility conditions unnecessary or disproportionate in your view? Why? How should they be updated, relaxed or should they be completely lifted?

3000 character(s) maximum

Please explain and provide examples

52 The amount of aid can be determined in several ways under the GBER: by reference to a maximum aid intensity applied to eligible costs determined with or without a counterfactual scenario, by reference to a funding gap or by reference to a competitive bidding process. What is your position concerning the possibility for Member States of determining State aid by reference to a funding gap (e.g. instead of using a maximum aid intensity)?

- ☐ Funding gap calculations should remain in the GBER, because they are most of the time not mandatory and national authorities may already rely on other methods to demonstrate the proportionality of aid.

- ☒ Funding gap calculations should not be required for small aid amounts, or they should be replaced with other methods (e.g. aid intensity).
- ☐ Funding gap calculations should be removed from the GBER, because they are too complex and not commonly used by granting authorities.
- ☐ Other

53 To the extent you suggested a change in reply to the previous question about funding gap calculations, please explain the reasons for the change. If you consider that funding gap calculations should not be required under some conditions, Please explain, for each relevant GBER article, which alternative methodologies could enable to calculate the maximum aid amount in a simpler manner.

2000 character(s) maximum

Please see the reply to the Q50

54 Some GBER provisions lay down that the eligible costs are the extra costs of a project by comparison to a counterfactual scenario in the absence of aid. The rationale for requiring a counterfactual scenario is the need for calibrating aid and avoiding that the aid covers costs that the beneficiary would have incurred in any event. It aims at ensuring that the aid only covers the extra costs of the green investment. What is your position concerning this condition?

- ☐ This condition is reasonable and does not need to be changed. Member States should have the choice between either determining aid by reference to a counterfactual with higher aid intensities or without counterfactual but with lower aid intensities.
- ☒ This condition is too complex. To simplify, Member States should only have the possibility of granting the aid without reference to the counterfactual based on aid intensities that already take the counterfactual into account.
- ☐ Other

55 Please explain your reply.

2000 character(s) maximum

Counterfactual cost calculations are too complex for small projects and for SMEs. Counterfactual methodology is appropriate for large projects which are notified to the Commission.

56 Certain articles in Chapter III lay down the possibility of carrying out a competitive bidding process as an appropriate way to ensure proportionality of aid and lay down additional conditions compared to the general definition in Article 2(38) GBER. This is because a competitive bidding process ensures that the aid amount is kept to the minimum. What is your position?

- ☐ A competitive bidding process is an efficient way to keep the aid amount limited to the minimum and the current criteria do not involve a particular administrative burden.
- ☐ Some conditions are unnecessary and could be simplified.
- ☒ A competitive bidding process is burdensome especially for small projects and should be replaced with another method such as aid intensities.
- ☐ Other

57 Please explain your reply and provide suggestions or examples.

2000 character(s) maximum

In practice, competitive bidding processes is resource-intensive and time-consuming, particularly for SMEs and start-ups. The requirement should be applied in a risk- and scale-proportionate manner. Simpler procedures, such as transparent eligibility criteria and benchmarking mechanisms, could achieve similar results without imposing excessive administrative complexity.

5.2 Consistency of the conditions (within the GBER, with other EU rules and with the evolution of technology and markets)

58 The GBER sometimes uses conditions or concepts which seem very similar (for instance ‘competitive bidding process’, ‘competitive selection procedure’ or ‘competitive selection process’). The revision will seek to harmonise this terminology. Are there other concepts (or conditions) for which you consider that the terminology used in the GBER should be standardised? Please list them.

3000 character(s) maximum

Terms such as “eligible expenditure,” “eligible cost,” and “eligible investment” are sometimes used interchangeably, which can create confusion in project reporting and audit procedures. Words like “project,” “operation,” and “investment” are used in slightly different ways across articles, affecting interpretation for multi-component or integrated investments. Variations in the way aid intensity is expressed or referenced (“aid intensity,” “maximum aid intensity,” “support intensity”) could be standardised to avoid inconsistencies.

59 Are there concepts and definitions used in the GBER that are not well aligned with other concepts and definitions already laid down in EU law?

3000 character(s) maximum

Please provide specific references

Yes. The 'company in difficulty' is defined differently in the GBER and the Guidelines on State aid for rescuing and restructuring.

60 Does the GBER appropriately reflect technological and market development?

- ☒ No
- ☐ Yes
- ☐ I don't know

62 What do you think about the alignment between the GBER and conditions laid down by support programmes funded or co-funded by the EU budget?

- ☐ The GBER conditions are well aligned
- ☒ Better alignment is needed
- ☐ I don't know

63 The following conditions should be better aligned

between 1 and 7 choices

- ☐ conditions related to the proportionality of the aid (competitive bidding process, aid intensity, aid amounts)
- ☐ conditions related to the eligible costs (cost categories, calculation methodologies, etc.)
- ☐ conditions related to the incentive effect
- ☐ conditions related to the cumulation of EU and national funding

- ☐ conditions related to the parallel procedures (EU funding and State aid) (e.g. requirements related to the selection of projects, project monitoring requirements and timelines)
- ☐ conditions related to the eligibility of the beneficiaries
- ☒ other conditions

64 Please provide specific examples and explain how the rules should be aligned.

3000 character(s) maximum

It is recommended that the GBER explicitly allows for the combination of financial instruments with a grant element within a single operation. While the Common Provision Regulation already foresees this possibility, implementation in practice remains challenging. This is because the GBER currently provides separate provisions for financial instruments and for grants. As a result, aid is often structured either: • under two different GBER articles, or • by applying two distinct legal frameworks (the GBER and the de minimis Regulation), each of which contains different rules on eligible costs.

65 Under the current Multiannual Financial Framework (2021-2027), EU funds can be granted until the end of 2029, while the GBER will expire by 31 December 2026. Should transitional provisions in the GBER be introduced to ensure that measures co-financed under the next Multiannual Financial Framework 2028-2034 remain block-exempted even after the expiry of the validity of the GBER (similarly to the provisions in Article 62(2) of Commission Regulation (EU) 2022/2472)?

- ☒ Yes
- ☐ No
- ☐ I don't know

66 Please explain your reply

5.3 Aid in the form of financial instruments

67 Member States may in some cases provide aid in the form of financial instruments instead of (or in addition to) aid in the form of grants. Financial instruments are a vehicle to deliver support via a multi-layer structure through which financial instruments (e.g. loans, guarantees, equity) are provided to final recipients in order to leverage private investment. The multi-layer structure may involve – apart from Member State authorities providing the aid – also implementing bodies or partners (e.

g. international/multilateral financial institutions, national promotional banks and institutions and financial intermediaries) and private co-investors, and may therefore imply the presence of aid at different levels. Some GBER articles directly cover aid in the form of financial instruments (e.g. Article 39 on investment aid for energy efficiency in buildings in the form of financial instruments). Do current GBER rules sufficiently accommodate the use of financial instruments to provide aid to final beneficiaries?

- ☒ No
- ☐ Yes
- ☐ I don't know

68 If not, please explain. For example, please explain how the GBER currently falls short of supporting the use of financial instruments to provide aid to final beneficiaries and how it could address these shortcomings.

3000 character(s) maximum

Shortcomings could for instance be the absence of provisions setting out the conditions under which aid in the form of financial instruments can be block-exempted in policy domains in which financial instruments are commonly used, already existing GBER provisions setting out the conditions under which aid in the form of financial instruments can be block-exempted which are unclear, overly complex or difficult to implement, or already existing GBER provisions setting out the conditions under which aid in the form of financial instruments can be block-exempted which are outdated or do not reflect recent developments in the design and/or deployment of financial instruments.

We believe that the current GBER rules only partially accommodate the use of financial instruments to provide aid to final beneficiaries. While the inclusion of specific provisions (such as Article 39) is a positive step, the framework remains largely designed for grant-based aid and does not fully reflect the operational and structural realities of financial instruments. • Most GBER articles define aid intensity with reference to eligible costs, which is more difficult to apply to financial instruments where support is provided through guarantees, equity, or subordinated debt rather than reimbursable costs. • The GBER does not sufficiently clarify how to assess and allocate aid across the different levels of a financial instrument (managing authority, implementing body, financial intermediary, and final recipient). This lack of clarity creates administrative complexity and uncertainty, especially where multiple actors or co-investors are involved. • Instruments such as blended finance, or risk-sharing facilities are increasingly used to mobilise private investment but are not explicitly recognised under current GBER provisions. • The GBER framework does not adequately accommodate the use of financial instruments to finance working capital, which is often essential for SMEs, start-ups, and mid-caps undergoing innovation or transition.

69 Do the current GBER rules appropriately accommodate and promote the use of specific type of financial instrument, such as equity?

- ☐ Yes
- ☒ No

70 Please explain your reply

2000 character(s) maximum

The GBER is largely structured around cost-based aid intensities and reimbursable expenditures, which do not align well with the market dynamics of equity financing. As a result, legal uncertainty remains around how to design equity schemes in full compliance with GBER provisions.

71 Should the GBER be simplified to enable participation of financial intermediaries other than banks and involvement of co-investors in financing programmes?

- ☒ Yes
- ☐ No

72 Please explain your reply

2000 character(s) maximum

5.4 Training and employment aid

73 The [Communication](#) on training aid provides guidance on the compatibility assessment of notifiable training aid measures. The Communication dates from 2009 and overlaps to a large extent with the training aid measures now block exempted under Article 31 GBER (Chapter III, Section 5). In light of this, is this Communication still relevant?

- ☐ Yes
- ☐ No
- ☒ I don't know

75 Do you consider that the GBER requirements on training aid are appropriate?

- ☐ No
- ☐ Yes
- ☒ I don't know

77 The [Communication](#) on employment aid provides guidance on the compatibility assessment of notifiable training aid measures. The Communication dates from 2009 and overlaps to a large extent with the training aid measures now block exempted under Article 31 GBER (Chapter III, Section 5). In light of this, is this Communication still relevant?

- ☐ Yes
- ☐ No
- ☒ I don't know

79 Do you consider that the GBER requirements on employment aid are appropriate?

- ☐ No
- ☐ Yes
- ☒ I don't know

81 The definition of disadvantaged workers is provided in Article 2(4) GBER and has not been updated since 2008. Is this definition still relevant?

- ☐ No
- ☐ Yes
- ☒ I don't know

5.5 SMEs and small mid-caps

83 Annex I to the GBER provides a definition of SMEs based on the 2003 [Recommendation](#). Because of their limited size, SMEs generally benefit from more favourable rules under the GBER, such as specific aid categories or higher aid intensities (recitals 40-46 to the GBER). Should the SME definition be clarified?

- ☐ No
- ☒ Yes
- ☐ I don't know

84 Please specify and provide examples.

3000 character(s) maximum

In respect to the SMEs definition, our members face significant challenges in determining the SME status of enterprises — in particular, in establishing whether a company should be considered autonomous, a partner, or a linked enterprise. This often requires detailed research into company registers and/or company statutes. In this context, we strongly support the simplification of the SME definition, as proposed in the second Omnibus proposal, which effectively addresses these difficulties by allowing for: • Reliance solely on staff headcount — setting aside the turnover and/or balance sheet criteria — assessed over the last accounting period rather than over the last two consecutive periods; and • Alignment of the definition of a consolidated group with the data typically available in the financial statements of final recipients (or equivalent documents related to staff headcount), rather than the current complex classification system for partner enterprises. The latter requires manual consolidation of non-controlling participations (above 25% but below 50%) and the legal interpretation of control elements, such as dominant influence or adjacent market activity, to determine linked enterprises. We believe that the Commission's proposal represented a step in the right direction, and we support the horizontal extension of such a simplified definition across EU law.

85 Are the current GBER rules (e.g. Articles 38b and 56e GBER) sufficient to accommodate the needs of small mid caps?

- ☒ No
- ☐ Yes
- ☐ I don't know

86 Please explain why and provide specific examples.

3000 character(s) maximum

Small mid-caps often face similar financing constraints to SMEs, while being excluded from most SME-specific aid schemes. This “missing middle” faces structural challenges that current GBER provisions do not fully address. In particular: • Eligibility and intensity thresholds under Articles 38b and 56e remain too restrictive for small mid-caps undertaking capital-intensive or innovative projects. Their scale of operations and investment risk profiles often exceed the ceilings applicable to SMEs but are still below the capacity of large enterprises. • Aid intensity differentials between SMEs and larger firms discourage participation of small mid-caps in RDI, energy efficiency, and infrastructure projects, even when they play a critical role in national or regional value chains. We therefore strongly support further adaptation of the GBER to explicitly and coherently include small mid-caps across relevant articles, ensuring: • higher aid intensities or simplified access conditions for small mid-caps, • greater flexibility in eligible cost definitions for capital-intensive and RDI-driven investments, and

5.6 Other

87 Should the GBER be updated or simplified for other reasons?

3000 character(s) maximum

Please provide justifications and examples

6 Structure of the GBER

88 The GBER is currently divided into four chapters containing common provisions (Chapter I), monitoring (Chapter II), specific provisions for different categories of aid (Chapter III) and final provisions (Chapter IV). There are also four annexes on the definition of micro, small and medium-sized enterprises (SMEs – Annex I), information sheets (Annexes II and III) and a list of critical raw materials for the purposes of specific compatibility provisions (Annex IV). Do you consider that the current structure of the GBER is satisfactory?

- ☐ Yes
- ☐ No, all provisions in Chapter I (Common provisions) should be moved to Chapter III (Specific provisions for different categories of aid), such that all compatibility conditions would be, for each aid category, laid down in a self-standing chapter or section.
- ☐ No, some provisions in Chapter I (Common provisions) should be moved to Chapter III (Specific provisions for different categories of aid).
- ☒ Other

90 Please explain which other changes of structure are necessary.

3000 character(s) maximum

• Change the structure of the regulation by dividing it into modules, for instance General Module (horizontal rules, definitions, core compatibility conditions), Sector / Aid type Modules (environmental, RDI, regional, SMEs, broadband, etc.), and Procedural Module. Each module should be self contained: one can read the General Module plus the relevant sector module without having to jump too often between modules. • Improve the table of contents and cross referencing by providing an executive summary or roadmap of what aid types are contained, with pointers to where thresholds, definitions, etc. are. Also it would be useful to have a summary table or index mapping each aid category to required conditions, thresholds, definitions, and procedural requirements. • Use standard layout per each aid category, as follows: Scope; Eligible beneficiaries; Eligible costs; Conditions (incentive effect etc.); Aid intensity / amount; Notification thresholds; Procedural/monitoring/reporting obligations; Exclusions. • Separate horizontal from sector specific rules. Horizontal rules (e.g. definitions, general compatibility conditions, transparency, monitoring) should be grouped at the start in the General module. Sector aid type rules should be appended or in separate sector modules, referencing the horizontal rules rather than duplicating them.

91 The current structure of Chapter III of the GBER (Specific provisions for different categories of aid) is based on the list of aid categories laid down in the Enabling Regulation. For example, there are distinct sections within Chapter III on, among others, aid to SMEs (Section 2), aid for R&D&I (Section 4), aid for environmental protection (Section 7), etc. This leads to a situation where distinct GBER articles cover relatively similar activities (e.g. Articles 18 and 49 about consultancy services, Articles 25 and 30 about R&D&I).

- ☒ The current structure of Chapter III of the GBER is sufficiently clear.
- ☐ Chapter III of the GBER should be organised using a different structure which would be more helpful for granting authorities.
- ☐ I don't know

94 The structure of individual articles in Chapter III is not always the same, in that the order of provisions regulating an article's scope, eligibility conditions, compatibility conditions and proportionality is not uniform across all the articles. Do you see a need for harmonisation of the structure of each article in Chapter III?

- ☐ No
- ☒ Yes
- ☐ I don't know

95 If you consider that the internal structure of each article should be harmonised, please explain the order in which compatibility conditions or groups of conditions (general compatibility clause - need to comply with the "common conditions" -; eligibility / scope / exclusions; eligible costs and aid intensity and other ways to ensure proportionality) should be listed. Should there be different articles for operating aid and investment aid or should this be part of the harmonised structure of each article?

2000 character(s) maximum

Our proposal is to use standard layout per each aid category, as follows: Scope; eligible beneficiaries; eligible costs; conditions (incentive effect etc.); aid intensity / amount; notification thresholds; procedural/monitoring/reporting obligations; exclusions. Operating aid and investment aid should be part of the harmonized structure of each article.

7 Guidance on (and interpretation of) the GBER

Since the State aid modernisation, the Commission has provided central national authorities with guidance on the interpretation of State aid legislation, and especially on the GBER, through the e-State aid wiki platform.

96 Should the Commission consider ways of providing guidance on the interpretation of the GBER?

- ☐ No, the current e-State aid wiki system (through which only Member States may ask interpretation questions) works well.
- ☒ Yes, the Commission should provide guidance in a different format in addition to replies on e-State aid wiki
- ☐ I don't know

97 How should the guidance be provided by the Commission?

- ☐ Information sessions
- ☒ Practical guide or Q&As published on DG Competition's website
- ☐ Other

Contact

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