

Second Omnibus package on investment simplification AECM – NEFI – SMEUnited Joint Position Paper

InvestEU is the key EU support mechanism to leverage private finance within the current programming period. The programme ambition and extensive reach have already demonstrated positive results. Yet, all implementing partners and financial intermediaries evaluate that room for simplification exists, allowing also for speedier implementation.

In this respect, AECM, NEFI and SMEUnited very much welcome provisions under the Second Omnibus package on investment simplification, particularly regarding the increased size of the EU guarantee and reduced reporting requirements for smaller transactions.

Based on the experience of members both with direct access and as financial intermediaries of the EIF, and considering the fast-track procedure for this proposal, we would like to offer the following adjustments to further improve the implementation of the InvestEU programme:

- (1) **Aligning the threshold proposed for the simplified reporting obligation with the *de minimis* ceiling** – EUR 300 000 instead of EUR 100 000 – in the amendment to Article 28 paragraph 2.
- (2) **Further simplifying and clarifying reporting obligations, both below and above the threshold**, especially reducing the number of data points to be reported. Based on first experiences, the current reports can contain well over 1000 data points. Such extensive reports increase the costs of using InvestEU, while the added value is not always apparent.

The associations and networks supporting this joint statement as well as their respective members remain dedicated to supporting the legislator in creating well-balanced, targeted, and effective financial instruments that leverage private funding to the benefit of citizens and the European economy as a whole.