

European Commission
DG Competition-D5

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Contribution to the European Commission's roadmap on the State aid rules on risk finance for SMEs

The Danish Chamber of Commerce welcomes the opportunity to provide input on the European Commission's roadmap on the State aid rules on risk finance for SMEs.

The Danish Chamber of Commerce supports the Commission's initiative to conduct a Fitness Check of the State aid rules, including the State aid rules on risk finance for SMEs.

It is the general position of the Danish Chamber of Commerce, that the current state aid rules are sufficiently flexible to allow for risk finance for SME, while at the same time limiting the negative and distortive effects of state aid.

The Danish Chamber of Commerce is therefore very sceptical of any initiative which extends the current reach or criteria of what may constitute legal state aid, and would caution against singling out or defining specific projects, initiatives or company categories as especially worthy of state aid, as this may result in a slippery slope which we do not support.

Similarly, we are very concerned by any amendments or changes to the current state aid rules, which may widen the scope for what member states may legally provide to national companies in state aid. State aid must be granted based on fair and equal terms, to ensure that the state aid rules are not misused or exploited for national goals and protectionist purposes.

The Danish Chamber of Commerce do however firmly support a simplification of both the text and the application process of the current state aid rules, as it is our experience that many small- and medium sized enterprises avoid applying for state aid schemes, including risk finance opportunities, due to high administrative costs.

Consequently, the EU should strive to ease bureaucracy and make it as easy as possible for SMEs to apply for and administer state aid.

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The Danish Chamber of Commerce will of course be available for further consultations as the need may arise and will also be happy to elaborate on the points made in the contribution, as well as engage in further discussion if needed.

Best regards,

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Danish Chamber of Commerce