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## **Contribution to the European Commission's roadmap on the modification of the General Block Exemption Regulation for the Green Deal and the Industrial and Digital Strategies**

The Danish Chamber of Commerce (Dansk Erhverv) welcomes the opportunity to provide input on the European Commission's roadmap on the modification of the General Block Exemption Regulation ("GBER") for the Green Deal and the Industrial and Digital Strategies.

The Danish Chamber of Commerce strongly supports the Commission's objectives and the aims of both the European Green Deal, and the Industrial and Digital Strategies. The Danish Chamber of Commerce further supports the Commission's initiative to assess whether certain targeted adjustments of the existing state aid GBER are necessary in light of the Commission priorities with respect to the European Green Deal as well as the Industrial and Digital Strategies.

While we acknowledge that special care must be taken to ensure that goals the European Green Deal as well as the Industrial and Digital Strategies are supported by regulatory measures, we are concerned by the apparent notion, that specific amendments are needed to accommodate the Priorities.

It is the general position of the Danish Chamber of Commerce, that the current state aid rules are flexible enough to support both the European Green Deal as well as the Industrial and Digital Strategies, while at the same time limiting the negative and distortive effects of state aid.

The Danish Chamber of Commerce is consequently very sceptical of any initiative which extends the current reach or criteria of what may constitute legal state aid. To single out or define specific projects or initiatives as specially environmentally, industrially or digitally beneficial or worthy of state aid and allowing for easier assess or reduced criteria to such projects or initiatives, is 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. Any state aid given within the scope of the Green Deal as well as the Industrial and Digital Strategies, must fulfil the general requirements for legal state aid, and be decided by EU-

organisation 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 and clarification of both the text and the State aid Guidelines, as it is our experience that many small- and medium sized enterprises avoid applying for state aid schemes 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**