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Contribution to the European Commission's roadmap on the review of the Framework for State aid for research and development and innovation

The Danish Chamber of Commerce welcomes the opportunity to provide input on the European Commission's roadmap on the Review of the Framework for State aid for research and development and innovation.

The Danish Chamber of Commerce supports the Commission's initiative to conduct a Fitness Check of the State aid rules, including a review the existing Framework for State aid for research and development and innovation.

It is the general position of the Danish Chamber of Commerce, that the current state aid rules are flexible enough to support and facilitate European research, development and innovation, 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. To single out or define specific projects or initiatives as especially beneficial or worthy of state aid, thereby 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.

The Danish Chamber of Commerce do however firmly support a simplification of both the text and the application process, 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,

Tina Johnsen
Danish Chamber of Commerce