



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR COMPETITION

The Director-General

Brussels, 27 August 2025

COMP/ LMC

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Subject: HT.4404 - Implementation and Review R&R Guidelines 2014

Dear Madam, dear Sir,

The Guidelines on State aid for rescuing and restructuring non-financial undertakings in difficulty (“R&R Guidelines” or “the Guidelines”) currently in use have been adopted in 2014¹ with a validity until 31 December 2020. In 2020, all the Guidelines were subject to a Fitness Check, which concluded that adaptation to the R&R Guidelines may be needed in the medium term, regarding specifically the definition of an undertaking in difficulty

(¹) Communication from the Commission — Guidelines on State aid for rescuing and restructuring non-financial undertakings in difficulty, OJ C 249, 31.7.2014, p. 1.

(“UiD”). In this context, the validity of the Guidelines was extended first until 31 December 2023 and later until 31 December 2025.

The Commission has launched the review process of the Guidelines, which will extend beyond the expiry of the validity of the Guidelines on 31 December 2025. It is necessary to prolong the applicability of the Guidelines to avoid a legal vacuum after their current expiry and to have the necessary time margins to complete the review and to implement the changes that may eventually be retained. This would also give the time to the stakeholders to take them into account in view of future aid notifications.

In the light of the above, the Commission seeks your views on a proposal of extension of the validity of the current Guidelines without change of rules for a period of one year (i.e. until 31 December 2026). The proposed change would mean that, point 135 of the Guidelines would be replaced by the following:

‘135. The Commission will apply these guidelines with effect from 1 August 2014 until 31 December 2026’.

We would be grateful to receive the replies of your national authorities on the draft proposal by date 09/09/2025 at 12:00 Brussels time. Please provide your comments in writing to COMP-E3@ec.europa.eu.

We would like to thank you in advance for your feedback.

Yours faithfully,

Electronically signed

Linsey McCALLUM
Acting Director-General
p.o. Guillaume LORIOT