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Questionnaire - GBER general revision 2025

Fields marked with \* are mandatory.

# 1

Introduction

The current version of Commission [Regulation](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014R0651-20230701) (EU) No 651/2014 of 17 June 2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty (“General Block Exemption Regulation” or “GBER”) entered into force on 1 July 2014 and applies until 31 December 2026. With this questionnaire, the Commission invites stakeholders to provide written input on the purpose and the scope of the revision of the GBER.

As the GBER encompasses many different aid categories, please mention precisely in your replies the specific GBER article or articles concerned.

For each question, please elaborate, if relevant, on the expected impact of the change on the reduction of the administrative burden for undertakings and Member States, competition in the market, legal certainty for undertakings, harmonised application of the competition rules, compliance or enforcement costs, innovation and sustainability. As regards these impacts (and more generally for all your replies), please provide, as much as possible, quantitative evidence underpinning your statements. This will ensure that the review process is based on facts and reliable evidence.

# About you

**\*** 1 Language of my contribution  Bulgarian

 Croatian  Czech

 Danish  Dutch  English

 Estonian

 Finnish  French  German  Greek

 Hungarian  Irish

 Italian  Latvian

 Lithuanian  Maltese

 Polish

 Portuguese  Romanian  Slovak

 Slovenian  Spanish  Swedish

**\*** 2 I am giving my contribution as

 Academic/research institution  Business association

 Company/business

 Consumer organisation  EU citizen

 Environmental organisation  Non-EU citizen

 Non-governmental organisation (NGO)  Public authority

 Trade union  Other

**\*** 3 First name

**\*** 4 Surname

**\*** 5 Email (this won't be published)

**\*** 12 Country of origin

Please add your country of origin, or that of your organisation.

*This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.*

 Afghanistan  Djibouti  Libya  Saint Martin

 Åland Islands  Dominica  Liechtenstein  Saint Pierre and

Miquelon

 Albania  Dominican Republic

 Lithuania  Saint Vincent and the Grenadines

 Algeria  Ecuador  Luxembourg  Samoa

 American Samoa  Egypt  Macau  San Marino

 Andorra  El Salvador  Madagascar  São Tomé and

Príncipe

 Angola  Equatorial Guinea  Malawi  Saudi Arabia  Anguilla  Eritrea  Malaysia  Senegal

 Antarctica  Estonia  Maldives  Serbia

 Antigua and Barbuda

 Eswatini  Mali  Seychelles

 Argentina  Ethiopia  Malta  Sierra Leone  Armenia  Falkland Islands  Marshall Islands  Singapore

 Aruba  Faroe Islands  Martinique  Sint Maarten  Australia  Fiji  Mauritania  Slovakia

 Austria  Finland  Mauritius  Slovenia

 Azerbaijan  France  Mayotte  Solomon Islands  Bahamas  French Guiana  Mexico  Somalia

 Bahrain  French Polynesia  Micronesia  South Africa

 Bangladesh  French Southern and Antarctic Lands

 Moldova  South Georgia and the South Sandwich Islands

 Barbados  Gabon  Monaco  South Korea  Belarus  Georgia  Mongolia  South Sudan  Belgium  Germany  Montenegro  Spain

 Belize  Ghana  Montserrat  Sri Lanka

 Benin  Gibraltar  Morocco  Sudan

 Bermuda  Greece  Mozambique  Suriname

 Bhutan  Greenland  Myanmar/Burma  Svalbard and

Jan Mayen

 Bolivia  Grenada  Namibia  Sweden

 Bonaire Saint Eustatius and Saba

 Bosnia and Herzegovina

 Guadeloupe  Nauru  Switzerland

 Guam  Nepal  Syria

 Botswana  Guatemala  Netherlands  Taiwan

 Bouvet Island  Guernsey  New Caledonia  Tajikistan  Brazil  Guinea  New Zealand  Tanzania

 British Indian Ocean Territory

 British Virgin Islands

 Guinea-Bissau  Nicaragua  Thailand

 Guyana  Niger  The Gambia

 Brunei  Haiti  Nigeria  Timor-Leste

 Bulgaria  Heard Island and  McDonald Islands

Niue  Togo

 Burkina Faso  Honduras  Norfolk Island  Tokelau

 Burundi  Hong Kong  Northern Mariana  Islands

Tonga

 Cambodia  Hungary  North Korea  Trinidad and

Tobago  Cameroon  Iceland  North Macedonia  Tunisia  Canada  India  Norway  Türkiye

 Cape Verde  Indonesia  Oman  Turkmenistan  Cayman Islands  Iran  Pakistan  Turks and

Caicos Islands

 Central African Republic

 Iraq  Palau  Tuvalu

 Chad  Ireland  Palestine  Uganda

 Chile  Isle of Man  Panama  Ukraine

 China  Israel  Papua New Guinea

 United Arab Emirates

 Christmas Island  Italy  Paraguay  United Kingdom  Clipperton  Jamaica  Peru  United States

 Cocos (Keeling) Islands

 Japan  Philippines  United States Minor Outlying Islands

 Colombia  Jersey  Pitcairn Islands  Uruguay

 Comoros  Jordan  Poland  US Virgin Islands  Congo  Kazakhstan  Portugal  Uzbekistan

 Cook Islands  Kenya  Puerto Rico  Vanuatu

 Costa Rica  Kiribati  Qatar  Vatican City  Côte d’Ivoire  Kosovo  Réunion  Venezuela  Croatia  Kuwait  Romania  Vietnam

 Cuba  Kyrgyzstan  Russia  Wallis and Futuna

 Curaçao  Laos  Rwanda  Western Sahara

 Cyprus  Latvia  Saint Barthélemy  Yemen

 Czechia  Lebanon  Saint Helena  Ascension and Tristan da Cunha

Zambia

 Democratic Republic of the Congo

 Lesotho  Saint Kitts and Nevis

 Zimbabwe

 Denmark  Liberia  Saint Lucia

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, ‘business association, ‘consumer association’, ‘EU citizen’) country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

 I agree with the [personal data protection provisions](https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement)

# Objectives of the GBER and of the GBER revision

* 1. Objectives of the GBER
1. In its 2012 [Communication](https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A52012DC0209) on State aid modernisation, the Commission considered that the objectives of State aid modernisation were the promotion of growth, the prioritisation of enforcement on aid with the highest impact on the single market, and the simplification of the State aid rules. Do you consider that the implementation of the GBER has contributed to the achievement of these objectives?

Please rank each objective from 1 to 4 according to the following scale: 1 – Not at all. The implementation of the GBER did not contribute in any meaningful way. 2 – To a small extent. The implementation of the GBER had a noticeable but limited contribution. 3 – To a large extent. The implementation of the GBER contributed significantly to achieving the objective. 4 – Yes, to a very large extent. The implementation of the GBER was instrumental in achieving this objective.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | 1 - No,not at all | 2 - Yes, to a small extent | 3 - Yes, to a large extent | 4 - Yes, to a very large extent |
| Promotion of growth |  |  |  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Prioritisation of enforcement on aid with the highest impact on the single market(“big on big, small on small”) |  |  |  |  |
| Simplification of the State aid rules |  |  |  |  |

1. In your view, is the GBER well aligned with the following policy objectives?

Please rank each objective from 1 to 3 according to the following scale: 1 – Not at all. The GBER should not contribute in any meaningful way. 2 – To some extent. The GBER should contribute to achieving the objective. 3 – To a large extent. The GBER should be instrumental in achieving this objective.

|  |  |  |  |
| --- | --- | --- | --- |
|  | 1 –Not at all | 2 –To some extent | 3 –To a large extent |
| Encouraging the green transition (including decarbonization) |  |  |  |
| Fostering the digital transition |  |  |  |
| Legal certainty (predictability and ease of understanding) for Member States and undertakings |  |  |  |
| Promoting R&D and innovation |  |  |  |
| Promoting the economic, social and territorial cohesion of Member States and the Union as a whole, as well as regional development of disadvantaged areas |  |  |  |
| Promoting the uptake of private investment in the EU through de-risking |  |  |  |
| Protecting a level playing field in the single market and minimising distortions of competition |  |  |  |
| Strengthening the resilience of the EU economy against external shocks and dependency on third countries (including mining and processing of critical raw materials and growth of EU key strategic sectors referred to in the [Competitiveness Compass](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52025DC0030)) |  |  |  |
| Supporting social protection measures |  |  |  |
| Supporting the competitiveness of the EU |  |  |  |
| Supporting the just transition |  |  |  |
| The prioritisation of enforcement on the most distortive types of State aid, which should be notified to the Commission |  |  |  |

* 1. Objectives of the revision of the GBER
1. In your view, does the GBER adequately address the following issues?

Please rank each issue from 1 to 4

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | 1.No | 2. Yes, to alimited extent | 3. Yes, tosome extent | 4. Yes, to a large extent |
| The reduction of the administrative burden of Member States and the Commission |  |  |  |  |
| Improving the user-friendliness, readability, consistency and accessibility of the GBER |  |  |  |  |
| Increasing the scope of the GBER to more aid measures |  |  |  |  |
| Simplifying the compatibility conditions to block exempt more aid measures while keeping sufficient safeguards to avoid undue distortions |  |  |  |  |
| Adapting the current text to take into account political, economic, technical and social changes |  |  |  |  |

1. Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting the transition towards a climate neutral, clean and sustainable economy, in particular for SMEs? If not, please explain why.

*2000 character(s) maximum*

Please explain and provide examples

„Roheinvesteeringute“ saavutamisel on pööratud rohkem tähelepanu SME-dele, samas suurema osa reostusest toodavad suurettevõtted, kelle toetamise tingimused GBERi alusel on äärmiselt piiratud. Sealjuures tuleks ka arvestada, et „roheinvesteeringud“ on nn mittetootlikud investeeringud, mis tähendab, et ettevõtjate huvi nende vastu on üldjuhul madalam.

Viimased aastad on olnud ettevõtjatele eriti rasked (COVID, Ukraina sõda) ja mittetootlike investeeringute tegemine toetuseta on veelgi ebatõenäolisem.

Lisaks on keskkonnaartiklid (7. jagu) GBERis keeruliselt sõnastatud ja tingimused ettevõtjatele raskesti arusaadavad.

1. Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting a just transition (addressing negative impacts on territories and communities that are most affected by the transition to a climate-neutral, clean and sustainable economy), especially in view of the retraining and re-employment needs of workers from decarbonized industries? If not, please explain why.

*2000 character(s) maximum*

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1. Digitalisation and new technologies are a key driver of innovation, competitiveness and growth. Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting the transition towards a digitalised economy? If not, please explain why.

*2000 character(s) maximum*

Please explain and provide examples

GBERis ei ole piisavalt abivahendeid digitaliseerimise toetamiseks.

Digitaliseerimine on kõikides poliitikakujundamise dokumentides (strateegiad, prioriteedid, fondireeglid jms) ühe prioriteetse teemana tõstatatud sh. keskkonna- ja kliimapoliitika eesmärkide saavutamisel valdkonnana, kuhu peab investeeringuid suunama. Seetõttu peaks digitaliseerimine olema eraldi artiklina GBERis ning kasutatav kõikide ettevõtete suurusgruppide poolt, mis omakorda toetaks EU rahvusvahelist konkurentsivõimet.

1. Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting the resilience of the EU economy, in particular of certain strategic sectors defined in the [EU Competitiveness Compass](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52025DC0030), against external shocks and dependency on third countries? If not, please explain why.

*2000 character(s) maximum*

Please explain and provide examples

GBERis ei ole artikleid elutähtsate teenuste toetamiseks, kriisideks ettevalmistumiseks ega varustuskindluse tagamiseks. Eesti eesmärk on tagada toidutööstuse vastupidavus. Strateegia „Eesti 2035“ tegevuskavas on seatud üheks arenguvajaduseks julgeolek ja turvalisus ning parandada kriisideks valmisolekut. Programmi tegevused panustavad sellesse, et toidujulgeolek oleks Eestis tagatud. Euroopa parlamendi ja nõukogu direktiiviga (EL) 2022/2557 määratleti (suuremahuline) toiduainete tootmine, töötlemine ja turustamine elutähtsa teenuse osutamisena, tuues esile toidutööstuse olulisuse.

Samas GBERis puuduvad alused, ettevõtete toetamiseks kriisideks ettevalmistumiseks ja varustuskindluse tagamiseks. Samuti puuduvad alused, millega ettevõtteid kriiside ajal toetada. Sellised artiklid tuleks kas GBERisse lisada või kriisideks ettevalmistumine riigiabi alt välja jätta.

1. Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting research, development and innovation activities? If not, please explain why.

*2000 character(s) maximum*

Please explain and provide examples

Teadus-arendus artikleid on keeruline kasutada projektide korral, kus abisaaja tegeleb osaliselt ettevõtluse ja osaliselt teadusega.

1. Do you consider that the current GBER contributes sufficiently to achieving the objective of supporting cohesion objectives (regional development, recognition of territorial specificities) or social objectives? If not, please explain why. Should in particular cohesion policy objectives be better taken into account in the various

provisions of GBER (also beyond Section 1 of Chapter III), by including specific support in certain regions?

*2000 character(s) maximum*

Please explain and provide examples

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1. Do you consider that the current GBER contributes sufficiently to the competitiveness of the EU economy? If not, please explain why.

*2000 character(s) maximum*

Please explain and provide examples

GBER ei arvesta piisavalt uute arengutega toetustmeetmete koostamisel. Kui on soov toetada ettevõtteid, kes tegelevad mitmes valdkonnas (nt energia ja muu toomine) või investeering täidab mitut eesmärki (energiatootmine ja keskkonnahoid) on tõenäoline, et tuleb kasutada erinevaid artikleid, mis muudab skeemid liiga keeruliseks. Kui abi tuleb anda erinevate artiklite alusel, on ettevõtetel raske kõikide tingimuste täitmist järgida.

Puudu on ka konkreetne alus digitaliseerimisele.

1. Do you consider that the current GBER contributes sufficiently to improving the business environment (including access to finance) for SMEs, small mid-caps, startups and scale ups? Please explain in particular whether the possibility of benefitting from block exempted aid improves the business environment for SMEs, for example by facilitating or accelerating the completion of projects carried out by SMEs.

*2000 character(s) maximum*

Ei, regionaalabi määrad on liiga madalad selleks, et inspireerida taotlejaid toetusi kasutama, mis tähendab, et investeeringud, kas jäävad tegemata või tehakse väiksemas mahus.

Madalate määradega kaasnev bürokraatiahulk ei ole samuti põhjendatud. Regionaalabi määrad peaksid olema vähemalt 50%, et nendega kaasneksid investeeringute tegemise arvukuse kasv. Väiksemate toetuste korral võib taotluste menetlemine olla kulukam kui kaasnevad investeeringud/toetused.

1. Do you consider that the current GBER contributes sufficiently to supporting integrated investments/projects, such as those combining multiple objectives (and thus possibly multiple articles of Chapter III) and multiple types of costs (related to infrastructure, equipment, personnel, services, etc.)? Please explain and provide examples.

Ei, seda laadi projektidele on raske aluseid leida ja kui abi antakse erinevate artiklite alusel on ettevõtjatel raske järgida tingimuste täitmist. Nt toidutoomise ettevõte (suurettevõte), kes soovib reovett ära kasutada energia tootmiseks ja tootmisjääke kasutada uute toodete tootmiseks ning investeerida hoone energiatõhususse. Regionaalabi ei sobi, kuna suurettevõtetele on lisatingimused ja regionaalabi määrad on madalad, lisaks ei oleks võimalik toetada energiatootmist.

Sellisel juhul oleks vaja kasutada mitut keerukat artiklit, mis on ettevõtjate ja rakendajale jaoks koormav.

*2000 character(s) maximum*

1. Do you consider that the current GBER contributes sufficiently to promoting the uptake of private investment in the EU through de-risking? If not, please explain why.

*2000 character(s) maximum*

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# Common compatibility conditions (Chapter I of the GBER)

1. Do you consider that certain articles (or parts thereof) in Chapter III are not or not often used?

 No

 Yes, certain articles (or parts thereof) are not or not often used and should be updated.

 Yes, certain articles (or parts thereof) are not or not often used and should be deleted.

* I don't know
1. If you replied that some articles should be updated, please indicate which provisions and explain how they should be updated.

*3000 character(s) maximum*

Keskkonnakaitsega seotud artiklid (7 jagu) on keerulised ja seetõttu eelistatakse regionaalabi, mille alt on võimalik ainult piiratult keskkonnaeesmärke täita, mistõttu võivad jääda olulised investeeringud tegemata või tehakse väiksemas mahus.

1. If you replied that some articles should be deleted, please indicate which provisions and explain why they should be deleted, for example in the light of market developments or because the provision is not used for other reasons.

*3000 character(s) maximum*

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* 1. Scope of the GBER

Article 1(1) of Council [Regulation](http://data.europa.eu/eli/reg/2015/1588/2018-12-27) (EU) 2015/1588 of 13 July 2015 on the application of Articles 107 and 108 of the Treaty on the Functioning of the European Union to certain categories of horizontal State aid (the “Enabling Regulation”) empowered the Commission to block exempt 15 different categories of State aid in favour of (i) SMEs, (ii) research, development and innovation, (iii) environmental protection, (iv) employment and training, (v) culture and heritage conservation, (vi) making good the damage caused by natural disasters,

(vii) making good the damage caused by certain adverse weather conditions in fisheries, (viii), forestry, (ix) promotion of food sector products not listed in Annex I of the TFEU, (x) conservation of marine and freshwater biological resources, (xi) sports, (xii) residents of remote regions, (xiii) certain telecommunications infrastructure, (xiv) infrastructure in support of the objectives above, of cohesion, and of other objectives of common interest, (xv) aid that complies with the regional aid maps. The GBER may only block exempt these aid categories from the notification obligation.

1. Do you consider that, within the scope of the Enabling Regulation, there are categories of aid that meet the block exemption criteria and that are not included in the GBER?

 No  Yes

 I don't know

1. Please indicate, for each new aid category:

 which aid category should be added

 why such aid category should be block exempted, e.g. because there is clear and sufficient case practice from the Commission in this area (showing in particular a market failure i.e. there is an important investment gap and insufficient investment appetite by private sector due to the risk profile of investments needed to develop and grow certain key strategic sectors and technologies needed to boost EU competitiveness and the reshape of its industrial policy); because it would reduce the administrative burden of undertakings, Member States and the Commission and there is no risk of undue distortion of competition

 which conditions would be appropriate for block exemption (e.g. notification threshold, aid intensities, based on Commission practice)

*3000 character(s) maximum*

Eraldi artiklid võiksid olla:

1. digitaliseerimisele
2. varustuskindluse tagamine, kriisideks valmistumine. Seda laadi investeeringud ei too ettevõtetele kohest kasu, aga on riigi julgeoleku mõttes olulised. Nende jaoks oleks vaja kas eraldi alust või need riigiabi reeglitest üldse välja jätta.
3. toidutööstustele antav abi. Toidujulgeoleku tagamine on nii riigi kui EU seisukohalt oluline. GBERi artiklid ei arvesta toidutööstuse eripäradega – toit on julgeoleku tagamisel üks peamisi prioriteete. Lisaks on toidutootmine väga mitmekesine (osaliselt läheb ELTL I lisa alla), sellest tulenevalt võiks rakendada toidutöötlejatele erandeid ja tagada, et Euroopa Liidu toimimise lepingu I lisa kohta oleks olemas kaasaegne info. Abimäärad toidutööstuste korral võiksid olla samad, mis ÜPP strateegiakavas riikidega kokku lepitud.
	1. Application of the GBER to primary agricultural production and fisheries

/aquaculture

The GBER only exceptionally applies to the sectors of primary agricultural production and fisheries

/aquaculture (the scope is defined in Article 1(3)(a) and (b)), given that tailor-made Block Exemption Regulations exist for those sectors. This initiative concerns a revision of the GBER, not of the specific block exemption regulations applicable to agriculture, forestry, fisheries and aquaculture (Regulation (EU) 2022

/2472 'ABER' and Regulation Regulation (EU) 2022/2473 'FiBER').

1. Do you think that other GBER articles, which are currently not applicable to the sectors of primary agricultural production/fisheries and aquaculture, should be opened to those sectors, taking into account the existing block-exemptions under ABER and FIBER?

 No  Yes

 I don't know

1. If you consider that certain GBER articles should be opened to the sectors of primary agricultural production/fisheries and aquaculture, please provide a list of the relevant GBER articles, and explain why.

*2000 character(s) maximum*

Samadele abikõlblikele kuludele ei ole abi andmine nagunii võimalik, seega ei näe põhjust sektorite välistamiseks. Eestis kasutatakse tihti regionaalabi (artikkel 14) mis esmatootjad/kalanduse kohe välistab ka juhul, kui nende projektid muus mõttes meetmetega sobivad.

1. Is the GBER used to grant aid to the sector of primary agricultural production and

/or fisheries and aquaculture? If yes, which provisions of the GBER are used and were there difficulties to apply these provisions?

*2000 character(s) maximum*

PRIA annab toetust art 44 alusel abi, kuid täiendavaid ettepanekuid selles osas ei ole.

Eestil on lisaks kalanduses ja vesiviljeluses abimeede, mis pakub alternatiivset võimalust anda abi sadamate arendamiseks seoses CLLD-rühmade tegevuste mitmekesistamisega.

1. Under the current version of the GBER, there are specific aid measures which apply to the fisheries and aquaculture sector but not to primary agricultural production (or the other way around) leading to a difference in treatment between these sectors. Is this problematic in your view or are the exclusions justified by the specificities of the sectors, e.g. because the aid categories would not be relevant for the excluded sectors? Please substantiate your reply and provide relevant evidence.

*2000 character(s) maximum*

Sektoreid ei ole mõtet välistada, kui projekt sobib artikliga ja abisaaja ei ole mujalt samade abikõlblike kulude jaoks abi küsinud, siis peaks abi andmine olema võimalik.

GBER oleks arusaadavam, kui abi meetmed põllumajandusele, kalandusele ning vesiviljelusele oleksid samad. Paljud kalanduse või vesiviljeluse ettevõtjad on ka põllumajandustootjad. Mõlemad sektorid on toiduainete esmatootjad.

* 1. Definitions
1. Article 2 of the GBER provides a list of definitions of certain terms or concepts. What is your position regarding the definitions laid down in the GBER?

 The current list of definitions is fine.

 Certain concepts should be defined while they currently are not.  Certain definitions should be updated.

* Certain definitions are unnecessary and should be deleted.
* Certain definitions rather constitute substantial compatibility conditions and should be moved to Chapter III.

 I don't know.

1. If you replied that some concepts should be defined, please provide a list of concepts and definitions and explain

*3000 character(s) maximum*

Artiklites kasutatud väljendid/määratlused peavad olema määratluste all, et vältida ebavajalikke wiki küsimusi. (art 47 punkt 6 “kogu liidus”, “kasumilikuks juurdunud kaubandustava”). Kui sedalaadi sätted jäävad liikmesriigi otsustada, siis see põhjustab ebavõrdsust riikide vahel ja ka riigi siseselt, kui erinevad ametiasutused määrust kasutavad ja erinevalt sätteid tõlgendavad.

Digitaliseerimise määratlus GBER-is puudub, digitaliseerimine on küll määratletud “Teadus- ja arendustegevuseks ning innovatsiooniks antava riigiabi raamistik” joonealustes märkustes, kuid määratlus ise on mitmeti mõistetav. Nt ei ole seletatud kui palju peab toote funktsionaalsust suurendama, selleks et tegemist oleks digitaliseerimisega jne.

Määratleda tuleks „suuremahulise taristu investeering“. Ettepanek kasutada sama definitsiooni mis põllumajandusliku grupierandi puhul ehk piiriks on projekti abikõlblike kulude maksumuse summa 2 000 000 €.

Põhiteenused tuleks määratleda, et vältida määruse valesti kasutamist. Põhiteenused võiksid olla määratletud järgnevalt: põhiteenused on teenused, mida maapiirkonnas elavad inimesed ning seal toimetavad ettevõtjad kestliku tegevuse tagamiseks vajavad. Nendeks teenusteks on muuhulgas tervishoiu-, kultuuri-, vabaaja- ja sotsiaalteenused ning teised kohalike elanike heaolule ja piirkonna ettevõtete konkurentsivõimele kaasa aitavad teenused, sealhulgas maapiirkonnaga seotud kultuuripärandi säilitamine ja ettevõtluse edendamise huvides kasutusele võtmine.

Enamasti tõlgendavad toetuse taotlejad, et põllumajandustoode on põllumajandusliku esmatootmise saadus, riigiabi määrustes kasutatakse määratlusena ELTL lisa I nimetatud toode. ELTL lisa I annab aga toote kategooriad, mistõttu on ettevõtjatel raske määratleda, kas toode on põllumajandustoode.

1. If you replied that some definitions should be updated, please provide a list, the exact suggestion for an update and explain.

*3000 character(s) maximum*

GBER-isse “digitaliseerimise” lisamisel tuleks määratlust, mis on kasutusel “Teadus- ja arendustegevuseks ning innovatsiooniks antava riigiabi raamistikus”, ka uuendada, et määratluse sisu oleks ühtselt arusaadav.

1. If you replied that some definitions should be deleted, please provide a list and explain.

*3000 character(s) maximum*

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1. If you replied that some definitions should be moved to Chapter III, please provide examples and explain.

*3000 character(s) maximum*

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* 1. Evaluation
1. In 2014, the corollary of the expansion of GBER to new aid categories was the obligation of Member States to conduct an ex post evaluation of large aid schemes. As a result, the GBER does not apply to large aid schemes under certain sections of Chapter III beyond a period of 6 months after their entry into force, unless the Commission has approved an evaluation plan (Article 1(2)(a) GBER). Large aid

schemes are defined as those having an average annual budget above €150 million (certain articles of Sections 1, 2, 3, 4 and 7) or above €200 million (Section 16). What is your position concerning the obligation to submit an evaluation plan for large aid schemes?

 The evaluation obligation has contributed to the efficiency and effectiveness of large aid schemes and should be maintained as it is.

 The notion of large aid schemes should be expanded (e.g. lower thresholds, more Sections of Chapter III).

 The notion of large aid schemes should be restricted (e.g. higher thresholds, fewer Sections of Chapter III, only long-term schemes beyond a certain duration, because it is difficult to carry out an evaluation of short-term schemes, only schemes which were not subject to an evaluation plan carried out in the past).

 The evaluation obligation should no longer be a requirement for block exemption and could be moved to Chapter 2, by analogy to the conditions on reporting).

 The evaluation obligation does not add value and should be deleted.  Other

1. Please explain your reply as to the evaluation requirement.

*2000 character(s) maximum*

Halduskoormust suurendavad nõuded tuleks tühistada.

* 1. Undertakings in difficulty
1. In principle, aid to undertakings in difficulty cannot be block exempted (Article 1(4) (c)) GBER). There are exceptions concerning aid schemes to make good the damage caused by certain natural disasters, start-up aid schemes, regional operating aid schemes, aid schemes to SMEs benefitting from community-led local development projects, and aid to financial intermediaries under certain articles. While the general principle of exclusion should remain because State aid to undertakings in difficulty is among the most distortive types of aid, do you see a need for adaptations of the exceptions to this general exclusion or to the definition in Article 2(18) of the GBER?

 No  Yes

* I don't know
1. If you consider that adaptations are necessary as regards the exclusion of undertakings in difficulties (or the definition of such undertakings) please explain what issues were encountered so far and consequently what adaptations should be done.

*2000 character(s) maximum*

*-*

* 1. Incentive effect
1. The incentive effect requirement under the GBER is generally met if a written application for the aid has been submitted before the start of works, which covers among others any commitment that "makes the investment irreversible” (Article 6 in combination with Article 2(23) GBER). This is to ensure that an undertaking does not receive aid if it was able to execute the project without it. What is your position on the assessment of the incentive effect?
* This condition functions well.

 This condition is complex to apply and could be simplified.  This condition is not sufficient and should be reinforced.

 I don't know

1. Please explain your reply as to the incentive effect requirement and provide specific examples. If you consider that the condition can be simplified, please explain why and how it could be simplified to reduce the administrative burden while preserving this essential compatibility condition.

*2000 character(s) maximum*

Tegevuse alustamist võiks täpsemalt määratleda, alustamine peaks olema seotud projekti endaga, millele toetust küsitakse. Erinevate etappide korral on raske määratleda, mis on tegevuse algus.

Nt osteti maa, kus on vundament juba olemas (eelneva omaniku poolt ehitatud või ehitatud sama omaniku poolt, aga mitu aastat varem – siis oli plaan ehitada hotell), nüüd soovitakse sinna ehitada raamatukogu. Abikõlblik peaks olema projektiga seotud ehitustööd.

* 1. Simplified cost options
1. Article 7(1) of the GBER lays down the general possibility of calculating eligible costs in accordance with simplified cost options (SCOs), provided that the operation is “at least partly financed through a Union fund that allows the use of simplified cost options”. Other articles also lay down specific possibilities of using SCOs. What is your position on the use of SCOs under the GBER?

 The possibilities of using SCOs are sufficient.

 The possibilities of using SCOs are not sufficient for small enterprises.  The possibilities of using SCOs are not sufficient for SMEs.

 The possibilities of using SCOs are not sufficient for all types of beneficiaries.  I don't know

1. Please explain your reply as to the use of SCOs. If you consider that a wider use of SCOs is needed, please explain for which aid categories and under which conditions.

*2000 character(s) maximum*

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# Specific conditions for compatibility (Chapter III of the GBER)

* 1. Complexity of the conditions
1. Which provisions of the GBER are too complex, raise difficulties of interpretation or application, and should in your view be updated or clarified? Please refer to specific provisions and explain why. Please specify how you consider these provisions could be clarified.

*3000 character(s) maximum*

* Abimäära sätestamisel võiks kõikides investeeringute artiklites olla alternatiiv juhtudeks, kus taotleja omaosalus on arvestatava suurusega (vähemalt 20%) ja tegemist väikese projektiga (nt alla 5 mlj), sellisel juhul abi andmise tingimused lihtsustatud.
* Kohaliku taristu investeeringuteks antava abi puhul jätta ära tingimus, et investeeringuobjekt peab olema taotleja omandis. See pole alati võimalik. Taotleja võib kasutada objekti ka võlaõigusliku lepingu alusel.
* Alternatiivseid stsenaariume ei peaks kasutama, oluline peaks olema projekti eesmärk.
* Keskkonna artiklite nõude „Käesoleva artikli alusel võib anda abi, millega võimaldatakse ettevõtjatel järgida liidu normatiive, mis on vastu võetud, kuid ei ole veel jõustunud, tingimusel et investeering, mille jaoks abi antakse, tehakse ja viiakse lõpule vähemalt 18 kuud enne kõnealuse normatiivi jõustumise kuupäeva.“ võiks tühistada, kuna tekitab liigset halduskoormust.
* Keskkonnakaitse artikleid võiks ka vähendada ja teha üldisemaks. Kuna keskkonna- ja kliimaeesmärkide täitmiseks tehtavad investeeringud on väga spetsiifilised (sageli ka ettevõtjast lähtuv n. ö eridisain/lahendused), siis võiks olla üldisem artikkel, mille alt abi anda. Lisaks sellele on keskkonnakaitse artiklites väga palju keerukaid nõudeid (nt. alternatiivsed stsenaariumid, spetsiifilised tegevused ja tegevustel erinevad toetuse määrad, toetatakse tegevusi, mis suurendab abisaaja tegevuse keskkonnakaitset liidu kehtivates normatiivides nõutust rohkem jms), mis arvestades investeeringu eesmärki/oodatavat tulemust ei ole põhjendatud. Keskkonnakaitse ehk n.ö roheinvesteeringuteks abi andmisel võiks ka riigiabis lähtuda sellest, et kaasneks ressursi kokkuhoid ning loobutaks keerukatest lisanõuetest. Ettepanek oleks kehtestada mõnevõrra kõrgemad toetuse määrad, kui näiteks on regionaalabi korral (art 14), kuid täiendavaid keerukaid nõudeid ei sätestata.
* Artikkel 14 võiks olla nii suurettevõtete kui VKE-dele sama alginvesteeringu määratlus. Suurettevõtetel (eriti toidutööstusel) on väga raske täita lisatingimust alginvesteeringu osas „uut majandustegevust tekitav“.
* VKE-de käsitlus tuleks üle vaadata ka seetõttu, et on ettevõtteid, kes juriidiliselt on suurettevõtted, kuna seotud kaugel tegutseva suurettevõttega, aga regionaalses vaates väikesed ja olulised tööandjad. Toetust neile suuruse tõttu anda ei saa.
* Innovatsiooniklastrile antava abi võiks kaotada ning klastrite puhul rakendada muud asjakohast abiliiki (regionaalabi, kohaliku taristu abi, teadustaristu toetus), mis oleks abisaajatele ja rakendajatele lihtsam.
* Loobuksime klauslist, et kui on täpsem artikkel, siis ei tohi laiemat artiklit kasutada (nt art 36 lg 1a, sarnane nõue ka teistes artiklites), see teeb määruse kasutamise keeruliseks. Võiks olla vähem artikleid määruses, kuid laiema kasutusega (regionaalabi, keskkonnakaitse, energiatootmine jne).
* Artikkel 56 „Kohalikule taristule antav investeeringuteks ettenähtud abi“ võiks olla selgema sõnastusega, kus toetusemäär ja lubatud kulud on selgelt väljatoodud.
1. Apart from aid intensities and eligible costs, Chapter III of the GBER lays down a series of other compatibility conditions, for instance related to the eligibility of the beneficiaries and/or projects. Are any of these other compatibility conditions unnecessary or disproportionate in your view? Why? How should they be updated, relaxed or should they be completely lifted?

*3000 character(s) maximum*

Please explain and provide examples

Mitmeti tõlgendatavad tingimused eemaldada (nt art 47 punkt 6). Tekitab erinevat rakendamist ning hirmu ettevõtjates toetuse taotlemisel.

Art 14 sama alginvesteeringu määratlus, mis VKE-dele peaks kehtima ka suurettevõtjatele.

1. The amount of aid can be determined in several ways under the GBER: by reference to a maximum aid intensity applied to eligible costs determined with or without a counterfactual scenario, by reference to a funding gap or by reference to a competitive bidding process. What is your position concerning the possibility for Member States of determining State aid by reference to a funding gap (e.g. instead of using a maximum aid intensity)?

 Funding gap calculations should remain in the GBER, because they are most of the time not mandatory and national authorities may already rely on other methods to demonstrate the proportionality of aid.

 Funding gap calculations should not be required for small aid amounts, or they should be replaced with other methods (e.g. aid intensity).

* Funding gap calculations should be removed from the GBER, because they are too complex and not commonly used by granting authorities.

 Other

1. To the extent you suggested a change in reply to the previous question about funding gap calculations, please explain the reasons for the change. If you consider that funding gap calculations should not be required under some conditions, Please explain, for each relevant GBER article, which alternative methodologies could enable to calculate the maximum aid amount in a simpler manner.

*2000 character(s) maximum*

Sätestada kõikides artiklites kindel abimäär (eranditega VKE-dele).

1. Some GBER provisions lay down that the eligible costs are the extra costs of a project by comparison to a counterfactual scenario in the absence of aid. The rationale for requiring a counterfactual scenario is the need for calibrating aid and avoiding that the aid covers costs that the beneficiary would have incurred in any event. It aims at ensuring that the aid only covers the extra costs of the green investment. What is your position concerning this condition?

 This condition is reasonable and does not need to be changed. Member States should have the choice between either determining aid by reference to a counterfactual with higher aid intensities or without counterfactual but with lower aid intensities.

 This condition is too complex. To simplify, Member States should only have the possibility of granting the aid without reference to the counterfactual based on aid intensities that already take the counterfactual into account.

 Other

1. Please explain your reply.

*2000 character(s) maximum*

Kindel toetusemäär projekti kohta alternatiivsete stsenaariumite asemel. Alternatiivsete stsenaariumite nõudmine muudab GBERi rakendamise ebaühtlasemaks ja suurendab eksimise võimalusi.

1. Certain articles in Chapter III lay down the possibility of carrying out a competitive bidding process as an appropriate way to ensure proportionality of aid and lay down additional conditions compared to the general definition in Article 2(38) GBER. This is because a competitive bidding process ensures that the aid amount is kept to the minimum. What is your position?

 A competitive bidding process is an efficient way to keep the aid amount limited to the minimum and the current criteria do not involve a particular administrative burden.

 Some conditions are unnecessary and could be simplified.

 A competitive bidding process is burdensome especially for small projects and should be replaced with another method such as aid intensities.

 Other

1. Please explain your reply and provide suggestions or examples.

*2000 character(s) maximum*

Konkureeriv pakkumismenetlus tuleks asendada kindla abimääraga, et vähendada halduskoormust. Samuti konkureeriv pakkumismenetluse punkt d) muudab keeruliseks selle rakendamise, kui projektil on erinevad eesmärgid. Nt art 36 punkt 9 d) „konkureerivas pakkumismenetluses vähemalt 70 % pakkumuste järjestamiseks ja lõpptulemusena abi andmiseks kasutatavate valikukriteeriumide määratlemisel lähtutakse abist, mis on seotud projekti panusega meetme keskkonnaalastesse eesmärkidesse“. Kui ühel projektil on mitu eesmärki, on seda nõuet raske järgida.

* 1. Consistency of the conditions (within the GBER, with other EU rules and with the evolution of technology and markets)
1. The GBER sometimes uses conditions or concepts which seem very similar (for instance ‘competitive bidding process’, ‘competitive selection procedure’ or ‘competitive selection process’). The revision will seek to harmonise this terminology. Are there other concepts (or conditions) for which you consider that the terminology used in the GBER should be standardised? Please list them.

*3000 character(s) maximum*

1. Are there concepts and definitions used in the GBER that are not well aligned with other concepts and definitions already laid down in EU law?

*3000 character(s) maximum*

Please provide specific references

Kindlasti peavad määratlused olema ühtlustatud.

1. Does the GBER appropriately reflect technological and market development?
* No Yes

 I don't know

1. Please provide examples and explain why technological and market development make it necessary to update these provisions and how they should be updated.

*3000 character(s) maximum*

GBERi raames peab olema lihtsamini võimalik toetada keerukaid, mitme eesmärgiga, uuenduslikke projekte.

1. What do you think about the alignment between the GBER and conditions laid down by support programmes funded or co-funded by the EU budget?

 The GBER conditions are well aligned  Better alignment is needed

 I don't know

1. The following conditions should be better aligned

*between 1 and 7 choices*

 conditions related to the proportionality of the aid (competitive bidding process, aid intensity, aid amounts)

 conditions related to the eligible costs (cost categories, calculation methodologies, etc.)

 conditions related to the incentive effect

 conditions related to the cumulation of EU and national funding

 conditions related to the parallel procedures (EU funding and State aid) (e.g. requirements related to the selection of projects, project monitoring requirements and timelines)

 conditions related to the eligibility of the beneficiaries  other conditions

1. Please provide specific examples and explain how the rules should be aligned.

*3000 character(s) maximum*

Ühise põllumajanduspoliitika strateegiakava raames oleks võimalik toetda toidu töötlejaid kuni 50% abimääraga, selline määr ei ole aga GBERi alusel võimalik.

1. Under the current Multiannual Financial Framework (2021-2027), EU funds can be granted until the end of 2029, while the GBER will expire by 31 December 2026. Should transitional provisions in the GBER be introduced to ensure that measures co- financed under the next Multiannual Financial Framework 2028-2034 remain block- exempted even after the expiry of the validity of the GBER (similarly to the provisions in Article 62(2) of Commission Regulation (EU) 2022/2472)?

 Yes  No

 I don't know

1. Please explain your reply
	1. Aid in the form of financial instruments
2. Member States may in some cases provide aid in the form of financial instruments instead of (or in addition to) aid in the form of grants. Financial instruments are a vehicle to deliver support via a multi-layer structure through which financial instruments (e.g. loans, guarantees, equity) are provided to final recipients in order to leverage private investment. The multi-layer structure may involve – apart from Member State authorities providing the aid – also implementing bodies or partners (e.

g. international/multilateral financial institutions, national promotional banks and

institutions and financial intermediaries) and private co-investors, and may therefore imply the presence of aid at different levels. Some GBER articles directly cover aid in the form of financial instruments (e.g. Article 39 on investment aid for energy efficiency in buildings in the form of financial instruments). Do current GBER rules sufficiently accommodate the use of financial instruments to provide aid to final beneficiaries?

 No  Yes

 I don't know

1. Do the current GBER rules appropriately accommodate and promote the use of specific type of financial instrument, such as equity?

 Yes  No

1. Please explain your reply

*2000 character(s) maximum*

1. Should the GBER be simplified to enable participation of financial intermediaries other than banks and involvement of co-investors in financing programmes?
* Yes No
1. Please explain your reply

*2000 character(s) maximum*

* 1. Training and employment aid
1. The [Communication](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj%3AJOC_2009_188_R_0001_01) on training aid provides guidance on the compatibility assessment of notifiable training aid measures. The Communication dates from 2009 and overlaps to a large extent with the training aid measures now block exempted under Article 31 GBER (Chapter III, Section 5). In light of this, is this Communication still relevant?

 Yes  No

* I don't know
1. Please explain your reply. If you consider that the Communication should remain in force, please explain in particular how this Communication is still useful for granting authorities.

*2000 character(s) maximum*

1. Do you consider that the GBER requirements on training aid are appropriate?
* No  Yes
* I don't know
1. Please explain which conditions should be changed and provide a justification

*3000 character(s) maximum*

1. The [Communication](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj%3AJOC_2009_188_R_0006_01) on employment aid provides guidance on the compatibility assessment of notifiable training aid measures. The Communication dates from 2009 and overlaps to a large extent with the training aid measures now block exempted under Article 31 GBER (Chapter III, Section 5). In light of this, is this Communication still relevant?

 Yes  No

 I don't know

1. Please explain your reply. If you consider that the Communication should remain in force, please explain in particular how this Communication is still useful for granting authorities.

*2000 character(s) maximum*

1. Do you consider that the GBER requirements on employment aid are appropriate?
* No  Yes

 I don't know

1. Please explain which conditions should be changed and provide a justification

*3000 character(s) maximum*

1. The definition of disadvantaged workers is provided in Article 2(4) GBER and has not been updated since 2008. Is this definition still relevant?
* No  Yes

 I don't know

1. Please specify and provide examples. Are the age ranges not relevant? Are categories of workers not included?

*3000 character(s) maximum*

* 1. SMEs and small mid-caps
1. Annex I to the GBER provides a definition of SMEs based on the 2003 [Recommen](https://eur-lex.europa.eu/eli/reco/2003/361/oj/eng) [dation](https://eur-lex.europa.eu/eli/reco/2003/361/oj/eng). Because of their limited size, SMEs generally benefit from more favourable rules under the GBER, such as specific aid categories or higher aid intensities (recitals 40-46 to the GBER). Should the SME definition be clarified?

 No  Yes

 I don't know

1. Please specify and provide examples.

*3000 character(s) maximum*

Sidususettevõtjate korral võiks vaadata nagu partnerettevõtete korral 2 astet. Füüsilisi isikuid, kes tegelevad ettevõtlusega/ osalevad juhtorganistes, võiks arvesse võtta automaatselt, erandid selles osas eemaldada. Perekondlike sidemete kontrollimine ära jätta, kuna esineb eralditoimetavaid sama perekonnanimega isikuid ja erinevate perenimedega lähisugulasi.

Mõisteid lihtsustada/selgemini määratleda – lähiturud, asjaomased turud. Määratlustes on liiga palju tõlgendamise kohti ning ettevõtete struktuurid lähevad aina keerulisemaks. Seetõttu võib riigisiseselt esineda erinevaid tõlgendusi ja see põhjustab raskusi rakendamisel.

1. Are the current GBER rules (e.g. Articles 38b and 56e GBER) sufficient to accommodate the needs of small mid caps?

 No  Yes

* I don't know
1. Please explain why and provide specific examples.

*3000 character(s) maximum*

* 1. Other
1. Should the GBER be updated or simplified for other reasons?

*3000 character(s) maximum*

Please provide justifications and examples

Liiga madalad abimäärad regionaalabis, viimaste aastate turuolukorda arvestades ei ole nii madalad abimäärad põhjendatud.

Idapiiri äärsetele piirkondadele peaksid kehtima eritingimused ettevõtluse võimaldamiseks.

# Structure of the GBER

1. The GBER is currently divided into four chapters containing common provisions (Chapter I), monitoring (Chapter II), specific provisions for different categories of aid (Chapter III) and final provisions (Chapter IV). There are also four annexes on the definition of micro, small and medium-sized enterprises (SMEs – Annex I), information sheets (Annexes II and III) and a list of critical raw materials for the purposes of specific compatibility provisions (Annex IV). Do you consider that the current structure of the GBER is satisfactory?

 Yes

 No, all provisions in Chapter I (Common provisions) should be moved to Chapter III (Specific provisions for different categories of aid), such that all compatibility conditions would be, for each aid category, laid down in a self-standing chapter or section.

 No, some provisions in Chapter I (Common provisions) should be moved to Chapter III (Specific provisions for different categories of aid).

 Other

1. Please specify which provisions should be transferred to Chapter III or should remain in Chapter I (notification thresholds, specific definitions only used in one aid category, specific provisions about incentive effect, transparency or cumulation, other provisions).

*2000 character(s) maximum*

Art 2 määratlused võiksid jääda eraldi, teised nõuded võiksid olla välja toodud artiklites.

1. The current structure of Chapter III of the GBER (Specific provisions for different categories of aid) is based on the list of aid categories laid down in the Enabling Regulation. For example, there are distinct sections within Chapter III on, among others, aid to SMEs (Section 2), aid for R&D&I (Section 4), aid for environmental protection (Section 7), etc. This leads to a situation where distinct GBER articles cover relatively similar activities (e.g. Articles 18 and 49 about consultancy services, Articles 25 and 30 about R&D&I).

 The current structure of Chapter III of the GBER is sufficiently clear.

 Chapter III of the GBER should be organised using a different structure which would be more helpful for granting authorities.

 I don't know

1. If you replied that the structure of Chapter III of the GBER should be different, which options would you favour
* Some articles should be merged or grouped, even if they do not completely overlap (e.g. Article 18 is only for certain beneficiaries – SMEs – but for all consultancy services while Article 49 is for all undertakings but only for certain consultancy services i.e. environmental protection and energy matters)
* Certain GBER articles should be split because they cover different activities.   Other
1. Please explain your reply and provide examples.

*2000 character(s) maximum*

Sarnase sisuga artiklid võiks liita.

1. The structure of individual articles in Chapter III is not always the same, in that the order of provisions regulating an article’s scope, eligibility conditions, compatibility conditions and proportionality is not uniform across all the articles. Do you see a need for harmonisation of the structure of each article in Chapter III?

 No  Yes

 I don't know

1. If you consider that the internal structure of each article should be harmonised, please explain the order in which compatibility conditions or groups of conditions (general compatibility clause - need to comply with the “common conditions” -; eligibility / scope / exclusions; eligible costs and aid intensity and other ways to ensure proportionality) should be listed. Should there be different articles for operating aid and investment aid or should this be part of the harmonised structure of each article?

*2000 character(s) maximum*

Kõik artiklid võiksid olla sama/sarnase ülesehitusega.

# Guidance on (and interpretation of) the GBER

Since the State aid modernisation, the Commission has provided central national authorities with guidance on the interpretation of State aid legislation, and especially on the GBER, through the e-State aid wiki platform.

1. Should the Commission consider ways of providing guidance on the interpretation of the GBER?

 No, the current e-State aid wiki system (through which only Member States may ask interpretation questions) works well.

 Yes, the Commission should provide guidance in a different format in addition to replies on e-State aid wiki

 I don't know

1. How should the guidance be provided by the Commission?

 Information sessions



Practical guide or Q&As published on DG Competition’s website  Other

Wiki vastused võtvad kohati väga kaua aega, eriti kui tekib vajadus esitada lisaküsimusi. Wiki vastustes on aeg-ajalt märgitud, et kui küsimus on konkreetse ettevõtte/juhtumi kohta, siis ei vastata wikis. Sellisel juhul võiks olla algusest peale selge, kuhu küsimus esitada.

**Contact**

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