



## NOTE

17. maj 2021  
2021 - 7904  
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### **Danish response to the Commission's invitation to comment on revised Framework for State aid for research and development and innovation**

The Danish government appreciates the opportunity to comment on the European Commission's draft Framework for State aid for research and development and innovation (R&D&I Framework).

In general, the Danish Government is positive towards the draft R&D&I Framework. We find that the three focus points and connected revisions will make it easier to use and improve the framework. Overall, we find that the revision and the three focus points will help stimulate more research, development, and innovation within the EU.

However, the Danish Government does have some concerns regarding the aid intensities and the transparency threshold. We elaborate below.

#### **Specific comments**

##### *Aid intensities for technological infrastructures*

The Danish Government understands the logic behind having higher aid intensities for research activities than for technology infrastructures since research activities are further from market. However, Research & Technology Organizations (RTOs) may apply technological infrastructures for both commercial and research purposes. It is important to ensure that the updated Framework will help facilitate the development of technological infrastructures that may be used for both purposes – not least as part of our collective efforts to ensure green transition.

Therefore, the Danish Government suggests that the Framework allows for a differentiation of aid intensity in reference to a flexible, optimised usage of technology infrastructures (e.g. in reference to TRL-levels). In our opinion, this would help us to avoid that the Framework becomes a de facto barrier for supporting technology infrastructures and for optimizing added value.

*Provision 101 – Transparency for individual aid awards above 100 000 EUR*

In general, the Danish Government supports State aid transparency and reasonable thresholds for publishing aid granted to individual beneficiaries. However, the Danish Government finds it unnecessary to lower the threshold for publishing individual aid awards on comprehensive national State aid websites from 500,000 EUR to 100,000 EUR since the administrative burden connected to this new and lower threshold is too heavy. Therefore, the Danish Government proposes to maintain the transparency threshold in provision 101 at 500,000 EUR.