# Part III.8 - Supplementary Information Sheet for the notification of an evaluation plan $\,$

Member States must use this sheet for the notification of an evaluation plan pursuant to Art. 1(2)(a) of Regulation (EU) No 651/2014<sup>1</sup> and in the case of a notified aid scheme subject to an evaluation as provided in the relevant Commission guidelines.

Please refer to the Commission Staff Working Document "Common methodology for State aid evaluation" for guidance on the drafting of an evaluation plan.

## 1. Identification of the aid scheme to be evaluated

(1)	Title of the aid scheme: Inovação Produtiva
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(2)	Does the evaluation plan concern:
	(a) \( \sum \) a scheme subject to evaluation pursuant to Article 1(2)(a) of Regulation (EU) No 651/2014?
	(b) a scheme notified to the Commission pursuant to Article 108(3) TFEU?
(3)	Reference of the scheme (to be completed by the Commission):
	SA.107502
(4)	Please list any existing <i>ex-ante</i> evaluations or impact assessments for the aid scheme and ex-post evaluations or studies conducted in the past on predecessors of the aid scheme or on similar schemes. For each of those studies, please provide the following information: (a) a brief description of the study's objectives, methodologies used results and conclusions, and (b) specific challenges that the evaluations and studies might have faced from a methodological point of view, for example data availability that are relevant for the assessment of the current evaluation plan. If appropriate please identify relevant areas or topics not covered by previous evaluation plans that should be the subject of the current evaluation. Please provide the summaries of such evaluations and studies in annex and, when available, the internet links to the documents concerned:
	By decision C(2015) 5825 of 19 August 2015, the European Commission approved the Evaluation Plan for the "Inovação Empresarial" aid scheme (SA.42136), declaring its compatibility with the General Block Exemption Regulation (GBER), approved by Regulation (EU) no. 651/2014, of June 17, 2014, with application until December 31, 2020, which was extended to December 31, 2021 through decision SA.60233 and adjusted by decision SA.102714 with application between April 9, 2022 and December 31, 2023.
1 2	Commission Regulation (EU) No 651/2014 of 17 June 2014 declaring certain categories of aid compatible with the <sup>i</sup> nternal market in application of Articles 107 and 108 of the Treaty (OJ L 187 26.6.2014, p. 1). SWD(2014)179 final of 28.5.2014.

According to the understanding of the national authorities, the "Inovação Empresarial" aid scheme (SA.42136) constitutes, in substantial terms, a predecessor of the "Inovação Produtiva" aid scheme (SA.107502), assuming a character of continuity particularly at the level:

- a) Diagnosis of needs and objectives to be achieved;
- b) The categories of beneficiaries, sectors of activity and the territorial location of the investments to be supported;
- c) The expected impacts on the beneficiaries, including possible negative effects;
- d) The planned annual budgets;
- e) The intended duration;
- f) The nature of eligible expenses and the respective framework within the scope of the GBER;
- g) Eligibility criteria and selection methods for grant beneficiaries;
- h) The constraints or risks that may affect its application of the scheme and the pursuit of its objectives.

In this context, the national authorities consider that the evaluation plan for the "Inovação Produtiva" aid scheme (SA.107502) should correspond to an update of the results of the evaluation plan approved for the "Inovação Empresarial" aid scheme (SA.42136), without, however, changing the essential aspects of the objectives to be evaluated and the evaluation questions, the result indicators, the evaluation methodologies to be adopted, including the data collection and processing methods, using a selected independent evaluation entity based on transparent public procurement procedures and the respective results must be publicized to stakeholders and the general public, as described below.

With regard specifically to the evaluation of the "Inovação Empresarial" aid scheme (SA.42136), following the International Public Tender (announcement of procedure no. 13772/2021 of November 5, 2021), the granting of contract with the external evaluator selected to carry out the evaluation, having produced the following documents and reports:

- In April 2022, a Theory of Change draft was produced and made available;
- On May 13, 2022, a Focus Group was held with the participation of the Assessment Team and the representative members of the assessment Monitoring Group, within which the main conclusions set out in the aforementioned draft of the Theory of Change were discussed;

- The results of the Focus Group discussions are expressed in the Initial Evaluation Report, made available in July 2022, which integrates, as expected, the evaluation methodology with its main specifications;
- In May 2023, an Interim Report was produced, which allows a more comprehensive analysis of: the preliminary response to all evaluation questions; the methodologies used (data analysis, Focus Group, beneficiary questionnaires, case studies, interviews with managing authorities/intermediate bodies responsible for implementing the scheme); the preliminary results obtained and; the specific challenges posed to the evaluation and its methodology;
- In August 2023, a Preliminary Final Report was produced, integrating the response to the evaluation questions, and formulating the respective conclusions and recommendations, which is currently being validated by the evaluation Monitoring Group, after which it may be made available.

The final report will include the answer to all evaluation questions, conclusions and possible recommendations, which, after validation by the Monitoring Group, must be taken into consideration for the operationalization of the "Inovação Produtiva" aid scheme.

## 2. Objectives of the aid scheme to be evaluated<sup>3</sup>

**2.1.** Please provide a description of the aid scheme specifying the needs and problems the scheme intends to address and the intended categories of beneficiaries, for example size, sectors, location, indicative number:

Over the last two decades, Portugal has made progress in its specialization profile and economic growth model, with a strong contribution from European funds. The developments achieved translate into a higher degree of internationalization of companies and a greater opening of the economy to the outside world, mainly due to the private sector, a greater capacity for innovation, productivity gains for Small and Medium Enterprises (SMEs) and improved of the population's qualifications, particularly among the youngest.

Despite this progress, difficulties persist in the integration and rise of Portuguese companies in global value chains, explained by the specialization profile of the Portuguese economy and its business fabric, where small-sized companies predominate, often family-based and with business models that are little

Beyond providing a general description of the objectives and eligibility rules of the scheme, the aim of this section is to assess how the eligibility and exclusion rules of the scheme may be used to identify the effect of aid. In some cases, the precise eligibility rules may not be known in advance. In those cases the best available expectations should be provided.

sophisticated, without a competitive scale at an international level, in labour-intensive sectors, with low levels of productivity, high energy consumption and insufficient environmental sustainability practices. This reality, combined with the high indebtedness of SMEs, which limits their ability to assume increased levels of financial effort, the traditional risk aversion of financial institutions and the lack of a mature capital market, makes it difficult to make investments in areas of greater risk. related to innovation and internationalization processes, conditioning the incorporation of knowledge and technology in companies, and delaying the change in the country's productive structure.

It is, therefore, urgent to correct the differences in productivity and value generation capacity in companies compared to the European Union average, focusing on the implementation of innovative solutions in activities with growth potential and intensive in technology or know-how, thus contributing to the increased integration of companies into global and sophisticated value chains.

In this context, support for productive investments aimed at reinforcing growth, innovation and business competitiveness stands out. The development of new or improved products and processes will be encouraged based on innovation and the incorporation of knowledge and technology, aiming to increase Gross Value Added (GVA) and productivity, and reinforce the external competitiveness of SMEs.

The "Inovação Produtiva" support scheme was created with the aim of addressing the aforementioned constraints, promoting a change in the specialization profile of the Portuguese economy and reinforcing its external competitiveness, through improving the productive capabilities of companies, increasing investment business in the development of innovative, digital and sustainable solutions, mainly based on the results of Research and Development (R&D) and the increase in qualified employment.

As a scheme co-financed by European funds, in addition to complying with the conditions established in state aid regulations (for example, aid for an initial investment), it must also comply with European funds regulations. In this context, the main features of the scheme are as follows:

- Type of operations to support:
- a) The production of new goods and services or significant improvements to current production through the transfer and application of knowledge;
- b) The adoption of new, or significantly improved, manufacturing, logistics and distribution processes or methods, as well as business models, organizational or marketing methods.

This type of operation includes investments of an innovative nature that result in the production of tradable and internationalizable goods and services with high added value and a level of national incorporation, which correspond to an initial investment (as per paragraph 49 of article 2<sup>nd</sup> of the GBER), related to:

- a) The creation of a new establishment;
- b) Increasing the capacity of an existing establishment;
- c) The diversification of an establishment's production to products not previously produced in the establishment; or
- d) A fundamental change in the overall production process of an existing establishment.
- Beneficiaries: SMEs and non-SMEs;
- Application Form: Notices for the submission of applications that may take the form of pre-qualification or public competitions. The selection of all operations is based on criteria defined *a priori* and which are public knowledge;
- Sectoral Scope: All sectors eligible under the GBER, with the exception of the Financial and Insurance, Defense and Lottery and other betting sectors;
- Regional Scope: NUTS II North, Center, Metropolitan Area of Lisbon, Alentejo and Algarve;
- Scheme co-financed by European funds: FEDER, FSE+ and FTJ, through 6 Programs: Innovation and Digital Transition Thematic Program, Northern Regional Program, Central Regional Program, Lisbon Regional Program, Alentejo Regional Program and Algarve Regional Program;
- Form of support: grant or hybrid format (integrating a grant and a loan component).

**2.2.** Please indicate the objectives of the scheme and the expected impact, both at the level of the intended beneficiaries and as far as the objective of common interest is concerned:

The main objective of "Inovação Produtiva" is to promote a change in the specialization profile of the Portuguese economy and reinforce its external competitiveness, by improving the productive capacities of companies, increasing business investment in the development of innovative, digital and sustainable solutions, mainly based on the results of R&D and the increase in qualified employment, namely through:

- Development of innovative solutions based on R&D results and the inclusion and convergence of new technologies and know-how;

- Reinforcement of structuring investment within the scope of intelligent specialization (RIS3) and in new areas with growth potential;
- Reinforcement of the qualification of human resources for business innovation;
- Reinforcement of investment by companies/production in innovative activities that can boost progress in the value chain.

So, the expected results are:

- Increase innovation in companies and the export intensity of the Portuguese economy, investing in products that can be exported internationally;
- Increase investment in sectors with growth potential, taking into account the priorities defined in RIS3;
- Increase, especially in SMEs, business investment in innovation and qualification, which translates into the production of tradable and exportable goods and services, which are differentiated, have quality and high added value, thus creating opportunities to be sold internationally, reinforcing the presence in international markets;
- Promoting the convergence of less developed regions towards the European Union average.

At the microeconomic level, the main expected results are:

- Increase gross added value;
- Create employment, especially qualified;
- Increase the turnover of beneficiary companies;
- Increase export intensity;
- Increase investment in innovation;
- Increase productivity;

**2.3.** Please indicate possible negative effects, on the aid beneficiaries or on the wider economy, that might be directly or indirectly associated with the aid scheme<sup>4</sup>:

The main negative risk to consider has to do with the possibility that the aid scheme will lead to the exclusion of non-recipient private investment.

At this point, it should be noted that the aid scheme aims to concentrate its support exclusively on efficient companies, which intend to operate in the global market, and which present viable business plans. Therefore, companies whose situation has not

Examples of negative effects are regional and sectorial biases or crowding out of private investments induced by the aid scheme.

been regularized with the tax administration and social security, or within the scope of refunds from European funds, companies with outstanding wages, as well as "companies in difficulty", in accordance with point 18 of article 2<sup>nd</sup> of the GBER. A minimum level of financial autonomy is also required.

Taking into account the transversal nature of the scheme, both at the level of sectors and regions, it is not expected that there will be biases in these dimensions. However, it will be up to the evaluation team to confirm, or not, this initial hypothesis.

- **2.4.** Please indicate (a) the annual budget planned under the scheme, (b) the intended duration of the scheme<sup>5</sup>, (c) the aid instrument or instruments and (d) the eligible costs:
  - Annual Budget: 285 million euros;
  - Beginning of the aid scheme: April 13, 2023;
  - End of aid scheme: December 31, 2026;
  - GBER: Projects will comply with articles 13 and 14 (aid for regional purposes) in the case of assisted areas of mainland Portugal, as well as articles 28 (aid for innovation for SMEs) and article-31 (aid for professional training) throughout mainland Portugal (assisted and non-assisted regions);
  - Other Regulations: Projects may also comply with the guidelines on state aid for regional purposes for 2022-2027 (projects that exceed the notification limit provided for in the GBER) and the *de minimis* Regulation (in the case of projects located in NUTS II of the Algarve and the Lisbon Metropolitan Area); in the case of territories not included in the regional aid map, they comply with article 17 of the GBER or the *de minimis* Regulation;
  - Eligible Expenses: Tangible assets, including the acquisition of machinery and equipment, costs directly attributable to placing them in the location and conditions necessary for them to be able to function, as well as the acquisition of computer equipment, including the software necessary for their operation; Intangible assets, including the transfer of technology through the acquisition of national and international patent rights, licenses, technical knowledge not protected by patents, and standard software or software developed specifically for a specific purpose; other expenses related to consultancy (engineering services, studies, diagnoses,

Aid schemes defined in Article 1(2)(a) of Regulation (EU) No 651/2014 are excluded from the scope of the Regulation six months after their entry into force. After having assessed the evaluation plan, the Commission may decide to extend the application of the Regulation to such schemes for a longer period. Member States are invited to precisely indicate the intended duration of the scheme.

audits, marketing plans and architectural and engineering projects) and human resources training.

- **2.5.** Please provide a summary of the eligibility criteria and the methods for selecting the aid beneficiaries. In particular, please describe the following: (a) the methods used for selecting beneficiaries (e.g. such as scoring), (b) the indicative budget available for each group of beneficiaries, (c) the likelihood of the budget being exhausted for certain groups of beneficiaries, (d) the scoring rules, if they are used in the scheme, (e) the aid intensity thresholds and (f) the criteria the authority granting the aid will take into account when assessing applications:
  - The eligibility criteria are as follows:
    - From the candidate entities and beneficiaries (article 14 of Decree-Law no. 20-A/2023 of March 22):
    - a) Be legally constituted and duly registered, including in the Central Registry of Effective Beneficiaries (RCBE) in relation to the persons who control them, when applicable;
    - b) Have the tax and contributory situation regularized before, respectively, the tax administration and social security, to be verified when approving the operation and the respective payments;
    - c) Having the situation regularized in terms of refunds within the scope of European funds, including the support granted by the Recovery and Resilience Plan, to be verified when approving the operation and the respective payments;
    - d) Be legally qualified to carry out the respective activity;
    - e) Have or be able to secure their own human resources, as well as the technical and material resources necessary to carry out the operation;
    - f) Present a balanced economic and financial situation and demonstrate capacity to finance the operation, under the terms to be defined in the specific regulations or, in the cases provided for in paragraph 6 of article 12, in the call for submission of applications;
    - g) Be, within the scope of training activities, certified or resort to certified training entities, in the training areas for which they request financial support, under the terms of national legislation on the certification of training entities, when required;
    - h) Have a bank account opened in an institution legally authorized to operate in the national territory;
    - i) Do not hold, or have held in the last three years, by themselves or their spouse, separated or not from persons and assets, or by their ascendants and descendants

up to the first degree, capital in a percentage greater than 50%, in entities with non-regularized situation regarding refunds within the scope of European funds;

- j) Not being prevented or restricted from accessing support under the terms of article 16;
- k) There is no pending injunction process for the recovery of illegal aid, in accordance with European regulations;
- I) Not be in insolvency proceedings.
- Candidate entities and beneficiaries (article 6 of Ordinance no. 103-A/2023 of April 12)
- a) Not be a company in difficulty, in accordance with the definition set out in point 18 of article 2 of Regulation (EU) no. 651/2014, of the Commission, of 17 June, in its current wording;
- b) Present a balanced economic-financial situation and demonstrate the ability to finance the operation, as defined in Annex III, which forms an integral part of this Regulation;
- c) Present, when applicable, an Electronic Certification that proves the SME status, under the terms set out in Decree-Law no. 372/2007, of November 6, in its current wording, at the time of approval;
- d) Declare that you have no outstanding wages.
- Operations (article 19 of Decree-Law no. 20-A/2023 of March 22):
- a) Be in compliance with the approved programs, including the respective programming conditions;
- b) Be in compliance with the sectoral and territorial policies in force in the respective area of incidence, when applicable;
- c) Be in compliance with applicable legal and regulatory provisions, namely specific regulations;
- d) Demonstrate compliance with the minimum requirements established by the managing authority in specific regulations or in notices for the submission of applications, including, where applicable, the conditions arising from the measurement of the "do no significant harm" principle, as well as environmental, energy and social criteria;
- e) Justify the need, opportunity and results to be achieved by carrying out the operation;

f) Include achievement and result indicators that make it possible to assess the operation's contribution to the respective objectives.

#### - Operations (articles 7 and 18 of Ordinance no. 103-A/2023 of April 12):

- a) Demonstrate compliance with the incentive effect, as provided for in paragraph d) of article 3;
- b) Demonstrate, through a declaration signed by the beneficiary, that they have not obtained financing through any other type of instrument, or, when including activities supported by other instruments, demonstrate the non-existence of overlapping financing, allowing the identification of the necessary segregation of these costs.
- Operations must be supported by a strategic analysis of the company that identifies critical areas of competitiveness and supports the investment options considered.

#### - Beneficiary selection methods:

The methodology for selecting operations is based on the Project Merit (PM) indicator, determined by the weighted sum of the scores obtained in the following selection criteria (1st level):

A. Suitability for the Strategy: Projects will be scored based on "A.1. Level of framework in the Regional RIS3" taking into account the degree of alignment/pertinence of the operation in relation to the domains defined in the regional RIS3, through specific matrices for each NUTS II and depending on "A.2. Adequacy of the operation with public policy objectives and measures in the initiative's area of intervention" taking into account the degree of alignment of the operation with relevant public policy strategies and the response to thematic/societal challenges, which may include the contribution to the indicators of implementation and results of the Programs.

<u>B. Quality</u>: Projects will be scored based on "B.1. Coherence and adequacy of the operation and the investment plan in view of the diagnosis of needs and the objectives sought", taking into account the quality of the operation and its importance in the strategy and reinforcement of the company's competitiveness, namely the coherence and budgetary reasonableness of the plan structure of investments and the adequacy and necessity of the investments to be made in view of achieving the objectives of the operation and in accordance with "B.2. Innovative character of the operation" taking into account its degree of differentiation (newness and diffusion, only for the company, national or global market), as well as the degree of innovation (technological, marketing and/or organizational).

<u>C. Execution Capacity</u>: Projects will be scored based on "C.1. Capacity to manage and implement the operation" taking into account the technical feasibility of the operation, as well as the suitability of the entity's profile to the nature of the operation.

<u>D. Impact</u>: Projects will be scored based on "D.1. Impact of the operation on the economy" taking into account the project's contribution to the creation of wealth and the contribution to qualified employment and the propensity for international markets and according to "D.2. Contribution of the operation to regional convergence" taking into account the impact of the operation on regional competitiveness and for the development of the region, taking into account the specificities of each region.

As a rule, criteria scores are assigned on a scale between 1 and 5.

For selection purposes, operations are considered eligible if they obtain a final PM score as defined in the Notice for submission of applications, which cannot be less than 3.00.

In the context of tender procedures, in addition to absolute merit, eligible operations are prioritized in descending order of PM (relative merit) and selected up to the limit of the budget allocation defined in the Notices for submission of applications, thus setting the threshold of contest selection.

#### - Indicative budget available for each group of beneficiaries:

There is no provision for establishing indicative budgets by groups of beneficiaries.

## - Likelihood of the budget being exhausted for certain groups of beneficiaries:

The selection of operations within the scope of tender processes is defined according to the merit of the Project, up to the budget threshold established in the Notice for the submission of applications, it is not expected that the budget will run out for certain groups of beneficiaries. However, it will be up to the evaluation team to confirm, or not, this initial hypothesis.

## - Notation rules:

As mentioned, as a rule, the scores of the selection criteria are assigned on a scale between 1 and 5, with the Project's Merit being determined by the weighted sum of the scores obtained in the 1<sup>st</sup> level criteria, according to the following formula:

$$PM = {\alpha_1 \over A} A + {\alpha_2 \over B} B + {\alpha_3 \over C} C + {\alpha_4 \over D} D$$

where A. Suitability for the Strategy, B. Quality, C. Execution Capacity and D. Impact are the 1<sup>st</sup> level criteria and ,  $\alpha_1$ ,  $\alpha_2$ ,  $\alpha_3$ ,  $\alpha_4$ , are the respective weights, which can assume values in the following weighting ranges:

1st Level	Weig	hts (%)
Criteria	Minimum	Maximum
Α	10	30
В	30	50
С	10	20
D	30	50

For selection purposes, operations are considered eligible if they obtain a final PM score as defined in the Notice for submission of applications, which cannot be less than 3.00.

#### - Aid intensity thresholds:

- . Aid for regional purposes Investment aid (article 14 of the GBER) Scheme: Aid intensity: 30%, which can be increased up to a maximum rate of 75%;
- . Investment aid for SMEs (Article 17 of the GBER): Aid intensity: 20%;
- . Innovation aid for SMEs (Article 28 of the GBER): Aid intensity: 50%;
- . Training aid (Article 31 of the GBER): Aid intensity: 50%, which can be increased up to a maximum rate of 70.5%.
- Criteria that the granting authority will apply when assessing applications:

As described above in the points "eligibility criteria", and "beneficiary selection methods" and "notation rules".

**2.6.** Please mention specific constraints or risks that might affect the implementation of the scheme, its expected impacts and the achievement of its objectives:

The main risk associated with meeting the objectives of the "Inovação Produtiva" scheme concerns the macroeconomic context, which tends to affect companies at different levels, according to the type of companies, namely:

- The difference in access to bank financing, especially for SMEs, compared to foreign companies with significantly lower interest rates;
- The difficulty of accessing private financing (self-financing and banking), especially for small companies, due to the difficulties of the national banking system;
- The country's macroeconomic risk, which may condition the attraction of foreign direct investment;
- The volatility of the markets targeted by supported companies (domestic market, intracommunity market, PALOP Portuguese-speaking African countries, and so on);

- The decrease in the active population, namely due to the migration of highly qualified young professionals to more developed countries, in an aggravated context of demographic ageing.

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#### 3. Evaluation questions

3.1. Please indicate the specific questions that the evaluation should address by providing quantitative evidence of the impact of aid. Please distinguish between (a) questions related to the direct impact of the aid on the beneficiaries, (b) questions related to the indirect impacts and (c) questions related to the proportionality and appropriateness of the aid. Please explain how the evaluation questions relate to the objectives of the scheme:

The evaluation must answer the following questions:

- Direct impact on beneficiaries:
- 1. Performance of Beneficiaries / Incentive Effect: Did the support contribute to improving the performance of supported companies (e.g. GVA, Turnover, creation of jobs, productivity)? Is your evolution different from non-supported companies? Was the support decisive for the completion of the project (incentive effect)? To what extent (size, scope or term of investment)?
- Indirect impact of support granted (positive and negative externalities):
- 2. Spill-over Effect: What is the impact (knock-on effect) of the supported investment projects (especially larger projects), namely on employment; the socioeconomic development of the territory and regional cohesion; the creation of value in upstream and downstream activities and through the use and valorisation of inputs, especially when provided by SMEs; interaction with non-business entities of the R&I System, in the development of innovation in terms of products and/or processes, through R&D or technology transfer; the development of Clusters?
- 3. Impact on Competition: What are the impacts on the main competitors (not supported) of the supported companies? Have there been bankruptcies of competitors due to the distorting effect on competition? Was there reinforcement of clustering dynamics with general benefit for companies in the sector? Was there a crowding out effect on the investment due to the support granted?
- 4. Response to public policy objectives: Did the support contribute to the pursuit of the initially established public policy objectives)? Did the aid scheme fit into the region's development strategy? Did the scheme contribute to changing the national production profile, namely through RIS3?

#### 5. Proportionality and adequacy of the scheme:

- Proportionality of support: Were the support given the most suitable for the objectives achieved? Would it be possible to leverage the same investment grade with a lower support level? Would it be possible, through a higher level of support, to obtain much better results?

In addition to the previous questions, some additional questions are listed below, which the evaluation exercise may seek to answer:

- What is the net effect of the state aid granted?
- What is the sustainability of the results achieved by the supported companies?
- Do support rates (limited to the regional aid map) effectively contribute to the location of structuring foreign direct investment, compensating for Portugal's peripheral location in Europe? or with another type of public policy instrument?
- Do the results achieved by the supported companies correspond to those predicted when their projects were approved? What are the main reasons for possible deviations (positive or negative)? Is there regional/sectoral differentiation in the results achieved, particularly considering the different smart specialization strategies?

#### 4. Result indicators

**4.1.** Please use the following table to describe which indicators will be built to measure outcomes of the scheme, as well as the relevant control variables, including the sources of data, and how each result indicator corresponds to the evaluation questions. In particular, please mention (a) the relevant evaluation question, (b) the indicator, (c) the source of data, (d) the frequency of collection of data (for example, annual, monthly, etc.), (e) the level at which the data is collected (for example, firm level, establishment level, regional level, etc.), (f) the population covered in the data source (for example, aid beneficiaries, non-beneficiaries, all firms, etc.):

Evaluation question	Indicator	Source	Frequency	Level	Population
	GAV variation	Information Custom			
	Turnover variation	Information System (supported applications)			Supported applications
	Net job creation	National Statistics	Annual	National Statistics	non-candidates
	Increased work productivity	(non-candidates and applications		Companies	Applications not selected for
Performance of Beneficiaries /	Variation in investment expenses	not selected for support)			support
Incentive Effect	Companies that introduced 'new to market' products (binary variable)	Information System (supported applications)	Annual		Supported applications
	Companies that introduced "new to the company" products (binary variable)	Survey (non- candidates and applications not selected for support)	Two steps (before- after)	SMEs	non-candidates Applications not selected for support
	Indirect job creation;		For		Supported applications non-candidates Applications not selected for support
2. Spill-over Effect	GVA generated in the region and in upstream and downstream activities;	Survey	evaluation purposes, this data will be collected	Companies	Supported applications
	Collaboration with non- business entities in the R&D&I System and intensity of clustering dynamics, assessed by the number of new services provided by R&D&I institutions (knowledge transfer).		on an <i>ad-hoc</i> basis.		non-candidates
	Evolution of birth, death and survival rates of companies;	National Statistics	Annual	Companies/ Relevant Market	Total business population
3. Impact on Competition	Evolution of market share;	Survey	Two steps (before- after)	Companies	Supported applications
	Evolution of the concentration indicator for	National Statistics	For evaluation purposes,	Market	non-candidates

	the relevant market;		this data will be collected on an ad-hoc basis.		
	Innovation activities that would be carried out in the absence of aid.	Survey	Two steps (before- after)	Companies	Applications not selected for support
	GAV variation	Information System			
	Turnover variation	(supported applications)			Supported applications
4.	Net job creation	National Statistics		National	non-candidates
Response to public policy	Increased work productivity	(non-candidates and applications not selected for	Annual	Statistics Companies	Applications not selected for
objectives	Variation in investment expenses	support)		companies	support
	Change in the profile of national production.	National Statistics			Total business population
5. Proportionality and adequacy of the scheme	Level of leverage of investments made compared to financial support granted	Information System	Annual	Companies	Supported applications

Please explain why the chosen indicators are the most relevant for measuring the expected impact of the scheme:

The results of "Inovação Produtiva" will be measured with a set of indicators, complemented with qualitative conclusions arising from the multi-method approach.

With regard to question 1 – Performance of beneficiaries/Incentive Effect, the indicators used should assess the evolution of companies (beneficiaries and the control group) in areas such as the creation of added value, the improvement of skills, the level of penetration in the market, and innovation, which are strategic objectives of the instrument to be evaluated.

To measure innovation, Portuguese authorities will use two indicators. Although "Inovação Produtiva" is built on a broader concept of innovation (following the international standards of the Oslo Manual), the Portuguese authorities will use two indicators of binary variables to address innovation activities: if the company has introduced new products for the company and whether the company has introduced new or new products to the market. These indicators are the same as those used for the Community Innovation Survey (CIS). Data on successful candidates (treatment group) are available through the information system. Data from unsuccessful candidates (control group) must be collected through a survey (cross-sectional data).

The following indicators will be calculated for companies, comprising intermediate and final results:

- Variation in GVA
- Variation in turnover
- Net job creation
- Increased work productivity
- Variation in investment expenses
- Companies that introduced 'new to market' products (binary variable)
- Companies that introduced "new to the company" products (binary variable)

In question 2 – the spill-over effect will measure the impact of financial aid on the value chain, namely whether it increases upstream and downstream activities, which will be reflected, in effective terms, in the creation of jobs and an increase in added value of the region. As these are investments of considerable size and mobilizing effect, it is also important to know whether aid schemes increase the clustering of activities, including coordination with non-entrepreneurial entities in the R&I System, providers of know-how-intensive services. Overcoming differences in development between regions and enhancing clustering are ultimate objectives of financial aid for Productive Innovation, so results at this level are crucial to assess the success of the instrument. Therefore, the following indicators will be calculated:

- Indirect job creation;
- GVA generated in the region and in upstream and downstream activities;
- Collaboration with non-business entities of the R&D&I System and intensity of clustering dynamics, assessed by the number of new services provided by R&D&I institutions (knowledge transfer).

Question 3 – Impact on the Competition & Crowding-out effect, aiming to assess whether there are positive or negative externalities on the bidders of the beneficiary companies, which allows determining whether the positive effects of "Productive Innovation" outweigh the possible distortion effects of competition. Therefore, it is important to analyse the evolution of the productive structure and the company renewal process, namely to understand whether the support gave rise to the birth and/or death of companies, and to evaluate possible changes in the pace of creation of added value in the region (especially in companies non-beneficiaries). The indicators to be used are the following:

- Evolution of birth, death and survival rates of companies;
- Evolution of market share;

- Evolution of the concentration indicator for the relevant market;
- Innovation activities that would be carried out in the absence of the aid.

Question 4 – The response to public policy objectives aims to assess whether "Inovação Produtiva" is contributing to public policy objectives in terms of competition and internationalization, especially to change the production profile in favour of an economy based on production of tradable and exportable goods and services that are differentiated and of quality, and with a high level of national incorporation that is more open and directed to the foreign market. Therefore, it is important to analyse the evolution of macroeconomic aggregates, not only at national level, but also at regional level, seeking to assess the impact on regional cohesion and the changes seen in the change in the productive profile, particularly taking into account the impact of smart specialization strategies .

- Macroeconomic analysis of the indicators foreseen for question 1 (Variation in GVA; Variation in Turnover; Net job creation; Increase in labour productivity; Variation in investment expenses);
- Change in the profile of national production.

Question 5 – The proportions of the aid scheme must assess whether the aid granted has a relevant impact on the level of investment carried out by companies.

- Degree of leverage of investments made compared to financial support granted

To calculate the indicators mentioned above, data from the financial tables of companies registered in the IES – Simplified Business Information will be used, both for beneficiaries, whose data will be available in the Information System of Programs, such as for group control, whose information will be obtained from the National Statistics System.

#### 5. Envisaged methods to conduct the evaluation

**5.1.** In light of the evaluation questions, please describe the envisaged methods to be used in the evaluation to identify the causal impact of the aid on the beneficiaries and to assess other indirect impacts. In particular, please explain the reasons for choosing those methods and for rejecting other methods (for example, reasons related to the design of the scheme)<sup>6</sup>:

The evaluation plan includes two types of impact assessment methods: quantitative (i.e. counterfactual) and qualitative. The Portuguese authorities intend to apply the most robust methodology whenever possible but using alternative methods whenever

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Please make reference to SWD(2014)179 final of 28.5.2014.

necessary. Therefore, quantitative assessment must be complemented with qualitative research to understand why the scheme was or was not successful.

The diversity of proposed methodological approaches is in line with the need to offer reliable causal inferences for both the direct and indirect effects of aid. The counterfactual approach is selected to evaluate direct impacts on beneficiaries, indirect effects, and effects on competition. The Portuguese authorities seek to measure the results of supported companies in comparison with the counterfactual scenario. To establish a reasonable scenario that captures what would likely have happened to beneficiaries if they had not received support and to resolve the problem of selection effects, a robust control group must be defined, controlling for other relevant factors. This group of companies should be as similar as possible to the group of companies that received support in all aspects except the aid itself. Thus, the treatment group will be compared with the control group.

The case study approach may also be necessary as it allows you to focus on a specific relevant market, industry, supply chain and region. The analysis will be based on the use of different types of data, such as microdata on aid beneficiaries and non-recipients, for a given region, cluster, or industry. Secondary data may be complemented with primary data, collected from in-depth interviews and surveys. The case study approach will allow you to isolate and/or detail impacts, targeting a specific supply chain or industry.

Furthermore, to assess whether the aid scheme can respond to public policy objectives, the analysis of microdata can be complemented with macrodata.

The assessment of aid proportionality will require different types of evidence and will be based on economic theory and modelling and a benchmarking approach.

In short, the proposed framework will analyse different types of data and sources of information, such as:

- Secondary microdata provided by the National Statistical System (non-candidates and non-selected candidates)
- Aggregated or macro secondary data provided by the National Statistical System (i.e. by region or by country)
- Secondary data stored by the Information System (approved candidates)
- Surveys aimed at beneficiaries, non-candidates and unsuccessful candidates (when necessary)
- Benchmarking approach to compare the proportionality of the aid scheme with those adopted in the EU.

The Portuguese authorities intend to use a mixed approach (quantitative and qualitative) to account for all impacts under assessment.

The Table below summarizes the anticipated methods that are proposed to carry out the evaluation.

Evaluation Questions	Expected methods
Beneficiary Performance / Incentive Effect	Counterfactual Analysis  Difference in Differences; instrumental variables; discontinuous regression
2. Spill-over Effect	Counterfactual Analysis  Difference in Differences; instrumental variables; discontinuous regression  Case studies (complementary)
3. Impact on Competition	Counterfactual Analysis  Difference in Differences; instrumental variables; discontinuous regression  Case studies (complementary)
4. Response to public policy objectives	Theory-based assessment
5. Proportionality and adequacy of the scheme	Theory-based assessment Benchmarking

**5.2.** Please describe precisely the identification strategy for the evaluation of the causal impact of the aid and the assumptions on which the strategy relies. Please describe in detail the composition and the significance of the control group:

The Portuguese authorities predicted that the treatment group will include around 1000 SMEscompanies.

Selection of a credible control group is crucial to ensure comparability and validate assessment results.

The control group will be selected from among non-beneficiary entities (because they did not apply or because they did not meet the access or eligibility requirements) contained in the National Statistical System or Information System databases. They must correspond to the beneficiaries in terms of several observed characteristics, namely: region, sector, size, productivity, balance sheet data and financial indicators.

When selecting the control group, possible impacts on multiple aid schemes (companies with other public financing, namely the remaining PT2030 aid schemes and tax benefits) should also be considered.

Companies with unsuccessful applications, despite being eligible (due to budgetary constraints), may form a control group if they allow direct effects to be estimated using a discontinuity regression framework with sufficient degrees of freedom.

In terms of the econometric approach, different approaches can be used to take into account potential observable and unobservable sources of heterogeneity.

The analysis should focus mainly on the "difference in differences" approach. This method provides a tractable and intuitive way to explain the selection of unobserved features. At this point in the program, Portuguese authorities believe that there is unobserved heterogeneity; however, such factors may be time-invariant. This component can be differentiated with data from participants and non-participants before and after the program. The difference-in-differences approach in many research contexts could be combined with other approaches, such as propensity score matching, to account for potential sources of selection bias. Additionally, cross-section and panel repeat methods are available. The instrumental variable approach should be considered if at any stage of the procedure the Portuguese authorities conclude that there are risks of selection bias arising from unobserved characteristics that vary over time. It could be fixed by finding a variable that is correlated with participation but not correlated with unobserved characteristics that affect outcomes.

For outcome indicators collected through National Statistics, the control group will be the same size as the treatment group. Whenever sampling procedures are used (i.e. results indicators collected by survey), the sample size must consider a confidence level of 95% and an error rate of 5%.

The Portuguese authorities confirm that the necessary data will be systematically collected on all candidates (both successful and unsuccessful candidates) to allow comparisons. In fact, most of the data will be collected for both groups through the IES – Simplified Business Information, which is completed annually by companies to fulfill part of their reporting obligations to public entities.

The regression discontinuity design exploits exogenous program rules to compare program participants and nonparticipants in a close neighbourhood around the eligibility threshold. This approach considers participants and non-participants within a given neighbour of the eligibility threshold as the relevant sample for estimating impact. Because effects are estimated at discontinuity, a reasonable number of observations are needed to avoid estimating local average impact effects (which are not always

generalizable). Therefore, the success of the regression discontinuity will depend on the number of applications that were not approved despite being eligible.

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**5.3.** Please explain how the envisaged methods address potential selection bias. Can it be claimed with sufficient certainty that observed differences in the outcomes for the aid beneficiaries are due to the aid?

The causal impact of aid is defined as the difference between the outcome for firms receiving aid and the outcome in the absence of aid. Therefore, it is necessary to construct a reasonable scenario that captures what would likely have happened to aid beneficiaries if they had not received it. This requires identifying a control group and ensuring its quality for the validity of the assessment. To compare the results of companies receiving aid with those of the control group, the results will be segmented by relevant variables, such as region, sector, size, productivity, balance sheet data and financial indicators. This approach will allow you to control for observable differences. Furthermore, the difference-in-differences approach, the instrumental variables approach, or the regression discontinuity will allow the PT authority to deal with possible unobservable differences between the two groups. The PT authority will carry out robustness checks to ensure that the differences between the two groups are stable over time and that both groups are affected identically by common shocks during the period under review.

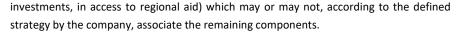
If it is not methodologically viable to carry out a counterfactual analysis (for example, when there is no other company with the same characteristics), a complementary qualitative methodology should be used.

**5.4.** If relevant, please explain how the envisaged methods intend to address specific challenges related to complex schemes, for example schemes that are implemented in a differentiated manner at regional level and schemes that use several aid instruments:

The aid scheme, despite having different budgets according to the size and location of the project (see point 9), will be implemented with similar rules for all regions and Programs.

As mentioned previously (point 14), the "region" variable is essential for creating a control group. Thus, the control group will be able, if justified, to differentiate the less developed regions (North, Center and Alentejo), which are financed by the Thematic Program and the Regional Program and, therefore, with a greater financial contribution, from the regions of Lisbon and Algarve.

Although the aid scheme uses various aid instruments (regional aid/consulting/training), the supported projects will essentially be productive innovation projects (initial



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#### 6. Data collection

**6.1.** Please provide information on the mechanisms and sources for collecting and processing data about the aid beneficiaries and about the envisaged counterfactual. Please provide a description of all the relevant information that relates to the selection phase: data collected on aid applicants, data submitted by applicants and selection outcomes. Please also explain any potential issue as regards data availability:

"Inovação Produtiva" scheme is supported by a robust Information System that contains complete information on the beneficiary companies, with economic and financial data from the "Informação Empresarial Simplificada" - IES (Simplified Business Information), allowing its detailed characterization. These data can be provided by applicants in the pre and post-project phases, as well as by competent national authorities between the pre and post-project phases.

The information system also contains detailed pre-project information about companies that applied but were not supported.

The control group data will be collected from official statistical information made available by the "Instituto Nacional de Estatística" - INE (National Statistics Institute), within the scope of the Integrated Companies Accounts System, collected through the IES

Following the partnership with the INE within the scope of counterfactual assessments relating to business support schemes developed in the period 2014-2020, the aim is to deepen this close cooperation, particularly in the collection of data for control groups.

Thus, comparability is guaranteed, as the source of information is the same for all companies (beneficiaries and non-beneficiaries).

The national authorities consider that the data collection mechanisms that will allow the future implementation of the methods provided for in this document are assured.

The Evaluation Team must treat confidentially all information and data, technical or non-technical, commercial, or otherwise, of which it is aware, in function of or related to the fulfilment of the contract to be signed. This information and documents are bound to

Please note that the evaluation might require sourcing of both historical data and data that will become progressively available during the deployment of the aid scheme. Please identify the sources for both types of information. Both types of data should preferably be collected from the same source as to guarantee consistency across time.

	confidentiality and cannot be disclosed to third parties or used for purposes other than those set out in this Evaluation Plan.
5.2	Please provide information on the frequency of the data collection relevant for the evaluation. Are observations available on a sufficiently disaggregated level, that is to say at the level of individual undertakings?
	For beneficiary companies, the information available results from filling out the application form and was collected from the IES.
	As for the companies that make up the control group, the information will also be collected from the IES, efforts are being made with the national statistical bodies so that it can be made available to the evaluation team, in the form of microdata. If this access is not possible, due to factors related to the secrecy of statistics and confidentiality, INE will be asked (as in previous evaluation exercises, as per point 4) to proceed with the selection of the control group in accordance with the characteristics of point 14, being, in this case, the data provided to the evaluation team with some level of aggregation, but without jeopardizing the results of the exercise.
	The analysis may be complemented with surveys of the companies under analysis.
5.3	6. Please indicate whether the access to the necessary data for conducting the evaluation might be hindered by laws and regulations governing confidentiality of data and how those issues would be addressed. Please mention other possible challenges related to data collection and how they would be overcome:
	The principle of statistical secrecy is provided for in Portuguese Law and guarantees the authenticity of respondents' responses and is also synonymous with trust in the National Statistical System ("Sistema Nacional de Estatística"-SNE). However, there are exceptions to this rule, and the INE may disclose information, particularly for scientific reasons or for the purposes of economic planning and coordination, through negotiations with the requested entity.
	Therefore, immediate efforts will be made with INE to retrieve the necessary statistical data, preferably in the form of microdata.
	The evaluation team will respect the rules in terms of confidentiality and statistical secrecy, in the meantime agreed with INE $$

**6.4.** Please indicate whether surveys of aid beneficiaries or of other undertakings are foreseen

In accordance with the methodological approach specified in question 5, this evaluation plan foresees the use of counterfactual methods. Therefore, surveys and in-depth

and whether complementary sources of information are intended to be used:

interviews can be used as a complementary source of data and to collect data from non-candidates/unsuccessful candidates. Furthermore, the case study approach allows you to focus on a specific region, industry or supply chain and isolate the analysis

## 7. Proposed timeline of the evaluation

**7.1.** Please indicate the proposed timeline of the evaluation, including milestones for data collection, interim reports and involvement of stakeholders. If relevant, please provide an annex detailing the proposed timeline:

The Evaluation will produce the following Reports:

- Initial Report, containing more in-depth evaluation methods, with method specifications preliminarily presented as a proposal particularly with regard to data collection instruments, the definition of samples or the cases in which these instruments will be applied;
- Interim Report, containing the first conclusions, and allowing their discussion within the Monitoring Group and the Evaluation Team, for further analysis in the Final Report;
- Final Report, presenting the answer to all evaluation questions, as well as the conclusions and possible recommendations of the evaluation team.

The Evaluation Plan Calendar is as follows:

- 12<sup>nstd</sup> Semester of 20265: Consolidation of the information system for direct collection of data from candidates and beneficiary companies;
- $1^{st}$  Semester of  $202\underline{57}$ : Consolidation of data to be collected in the National Statistical System;
- <u>1<sup>st</sup> Semester of 2025</u><del>2<sup>nd</sup> Semester of 2027</del>: Launch of a Competition to choose the Evaluation Team;
- <u>2<sup>nd</sup> Semester of 2025</u>1<sup>st</sup> <u>Semester of 2028</u>: Award of the Evaluation Contract to the chosen Evaluation team;
- <u>1st Semester of 2026-2nd Semester of 2028</u>: The Assessment team presents the Initial Report;

- 1st Semester of 20296: The Evaluation team presents the Interim Report;
- 2<sup>nd</sup> Semester of 202<u>6</u>9: The Assessment team presents the Final Report;
- 2<sup>nd</sup> Semester of 2029: Additional Report.

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<b>7.2.</b> Please indicate to	he (	date by	which	the	final	evaluation	report	will	be	submitted	to	the
Commission:												

National authorities undertake to submit the final report to DG Competition by December 31, 2029, as well as the initial and interim reports after they are made available by the evaluation team.

**7.3.** Please mention factors that might affect the envisaged timeline:

Bearing in mind the aforementioned plan, there is no substantial risk of non-compliance with deadlines arising from factors that usually delay the delivery of reports, such as:

- Delays in awarding contracts relating to monitoring a public procurement process;
- Delays in the delivery of reports by the evaluation team.

#### 8. The body conducting the evaluation

**8.1.** Please provide specific information on the body conducting the evaluation or, if not yet selected, on the timeline, procedure and criteria for its selection:

The proposals to be submitted will be analysed according to the following criteria:

- 1 Technical quality of the proposal:
- Adequacy and overall coherence of the proposal: the proposals will all be analysed, according to their internal logic and coherence and the adequacy they present in accordance with the Evaluation Plan. This plan will take into account, in particular, the articulations between the scope and objectives of the evaluation, the evaluation questions, the strategy and methodology for responding to each question, the sources of information, the products and the temporary and budgetary framework of the evaluation.
- Design of the Evaluation Methodology: Proposals will be analyzed according to the clarity, robustness, focus and in-depth approach of the method to the evaluation questions and the objectives announced in the Evaluation Plan. In this context, objectivity and synthesis capacity in the presentation of the evaluation to be implemented.
- 2 Quality of the Technical Team:
- The experience of the elements that make up the technical team will be evaluated, particularly in terms of their curriculum vitae, as well as the use of the methods foreseen in this plan. Therefore, evaluation teams that do not have sufficient experience in using the expected methods (e.g. counterfactuals) will not be selected.
- 3 Price for providing the evaluation service.

**8.2.** Please provide information on the independence of the body conducting the evaluation and on how possible conflict of interest will be excluded during the selection process:

In accordance with the principles of transparency and independence, minimum conditions of independence to be demonstrated by the proposals will be established, ensuring that evaluation teams that have independence problems will not be selected.

Evaluators must be functionally independent from the authorities responsible for preparing and implementing the aid scheme (which excludes teams responsible for implementing the state aid scheme, such as management teams and intermediate bodies). The level of independence must be such that there is no doubt that the work is carried out objectively and that evaluation judgments are impartial and not subject to an agreement by the services responsible for designing the aid scheme.

To promote the principles of transparency and independence, the evaluation team will be chosen through public procurement procedures. These procedures guarantee that the required levels of independence will be met and that the best evaluation team will be chosen.

**8.3.** Please indicate the relevant experience and skills of the body conducting the evaluation or how those skills will be ensured during the selection process:

The evaluation team will be selected in accordance with public procurement procedures and must demonstrate that it meets the minimum requirements in terms of technical capacity, namely the experience and skills of the members of the technical team and the technological and organizational capacity to carry out the evaluation.

The evaluation team must also demonstrate that it has the financial capacity to carry out the assessment.

**8.4.** Please indicate which arrangements the granting authority will make to manage and monitor the conduct of the evaluation:

The Evaluation will be supported by a Monitoring Group, made up of public entities involved in the implementation of "Inovação Produtiva".

Its main competence is to monitor the reports to be prepared, independently, by the evaluation team, thus ensuring the availability of all the necessary information, technical support and the necessary clarifications on the aid scheme and the assessment of the compatibility of the reports. presented with what is established in the terms of reference.

When presenting the reports, the Evaluation Team will offer to participate, with its analysis, in meetings with the Monitoring Group, with the obligatory presence of its coordinator.

**8.5.** Please provide information, even if only of an indicative nature, on the necessary human and financial resources that will be made available for carrying out the evaluation:

The preparation of this study will be monitored by technical teams specialized in evaluation issues, within the scope of the managing authorities and the coordinating body of the Structural Funds, in addition to the Monitoring Group.

### 9. Publicity of the evaluation

**9.1.** Please provide information on the way the evaluation will be made public, that is to say, through the publication of the evaluation plan and the final evaluation report on a website:

In accordance with the provisions of the Partnership Agreement, the dissemination of evaluation results contributes to the development of a culture of evaluation and accountability and to enhancing results in political decision-making. Article 44 of Regulation (EU) no. 1060/2020, provides that all evaluations are published on the funding Programs' website.

Assessment reports are the main product of assessment processes. Therefore, they must disclose information based on criteria of usefulness, credibility and relevance/added value.

For dissemination purposes, the Final Report will include an executive summary (in Portuguese and English) and a graphic summary with the main conclusions and recommendations of the evaluation exercise.

Within the scope of the principles of transparency and responsibility, in addition to the stakeholders involved, namely the European Commission and the members of the Program Monitoring Committee, the recipients of the evaluation results are citizens in general. Therefore, the Initial, Interim and Final Reports, as well as the respective summary of the Final Report, will be published and made available to the public, namely through the websites of the Management Authorities involved in the implementation of the instrument.

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<b>9.2.</b> Please indicate how the involvement of stakeholders will be ensured. Please indicat whether the organisation of public consultations or events related to the evaluation envisaged:
Interested parties are duly represented on the Funding Programs Monitoring Committee meaning they will have access to the presentation of the results of this study.
A public session will be held to present the results of the final study, in addition to making the evaluation available and publicized on the Funding Programs page.
<b>9.3.</b> Please specify how the evaluation results are intended to be used by the grantin authority and other bodies, for example for the design of successors of the scheme or for similar schemes:
The conclusions of the different reports will have subsequent monitoring, through the monitoring of the recommendations made by the evaluation team, allowing the introduction of possible adjustments to "Productive Innovation" resulting from the interim report, also being a relevant contribution to the implementation of similar ais schemes after 2030.
<b>9.4.</b> Please indicate whether and under which conditions data collected for the purpose or use for the evaluation will be made accessible for further studies and analysis:
The raw data used in the evaluation exercise cannot be used for other studies for reason
of statistical confidentiality, as established in point 6.3.
of statistical confidentiality, as established in point 6.3.  Thus, the evaluation team is forbidden to use the disclosed information for purpose
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of statistical confidentiality, as established in point 6.3.  Thus, the evaluation team is forbidden to use the disclosed information for purpose other than this evaluation.  9.5. Please indicate whether the evaluation plan contains confidential information that should not be disclosed by the Commission:

## 10. Other information

**10.1.** Please indicate here any other information you consider relevant for the assessment of the evaluation plan:

	Courtesy translation
10.2. Please list all documents attached to the notification and provinternet links to the documents concerned:	ride paper copies or direct