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**Subject: State Aid SA.102933 (2022/EV) – Greece
Evaluation plan of the General Entrepreneurship and
Entrepreneurship for Small and Micro Enterprises schemes of
Development Law 4399/2016**

Excellency,

1. PROCEDURE

- (1) The Commission under the State aid case number SA.47412 (2017/EV) assessed the evaluation plan of the General Entrepreneurship scheme and approved by decision C(2018)4206 final of 6 July 2018 (hereinafter “the 2018 evaluation plan decision”) the prolongation of the exemption of the scheme under the General Block Exemption Regulation (“GBER”)¹ until 31 December 2020. By electronic notification of 28 January 2021, Greece submitted a summary information sheet pursuant to Article 11(a) of the GBER on the General Entrepreneurship scheme, prolonging this scheme until the end of 2021 and increasing its average annual budget to EUR 400 million. This submission was registered as SA.61579 (2021/X).
- (2) The Commission under the State aid case number SA.61580 (2021/EV) assessed the inclusion of the Entrepreneurship for Small and Micro Enterprises scheme

¹ Commission Regulation (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, OJ L 187, 26.6.2014, p. 1.

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under the approved evaluation plan for the General Entrepreneurship scheme and approved by decision C(2021)3588 final of 27 May 2021 (hereinafter “the 2021 evaluation plan decision”) the prolongation of the exemption of the Entrepreneurship for Small and Micro Enterprises scheme under the GBER until 31 December 2021.

- (3) By electronic notification of 30 December 2021, Greece submitted a summary information sheet pursuant to Article 11(a) of the GBER on the General Entrepreneurship scheme prolonging the scheme until 30 June 2022. This submission was registered as SA.101367. By electronic notification of 30 December 2021, Greece submitted a summary information sheet pursuant to Article 11(a) of the GBER on the Entrepreneurship for Small and Micro Enterprises scheme prolonging the scheme until 30 June 2022. This submission was registered as SA.101368. In a letter of 17 December 2021, registered by the Commission on 21 December 2021, Greece explained that those prolongations were necessary to complete the assessment of the applications already received and not concluded in 2021.
- (4) By electronic notification of 10 May 2022, Greece further prolonged both schemes until 31 December 2022 by a summary information sheet pursuant to Article 11(a) of the GBER registered as SA.102933. Greece submits that the prolongation of both schemes is necessary to issue decisions granting aid that was already applied for in 2021.
- (5) Pursuant to Article 1(2)(a) of the GBER, the GBER does not apply to aid schemes with an average annual budget exceeding EUR 150 million from six months after their entry into force. However, the Commission may decide that the GBER shall continue to apply for a longer period to such aid schemes following the assessment of an evaluation plan of the scheme to be notified by the Member State concerned.
- (6) In order to obtain the prolongation of the application of the GBER to both schemes until 31 December 2022, Greece notified an evaluation plan on 10 May 2022 (hereinafter “the 2022 consolidated evaluation plan”), registered by the Commission on the same day as SA.102933.EV. This evaluation plan is a consolidated version of the evaluation plan already assessed by the Commission.
- (7) Greece provided supplementary information on 23 May 2022.
- (8) By letter of 23 May 2022, Greece exceptionally agrees to waive its rights deriving from Article 342 of the Treaty on the Functioning of the European Union (“TFEU”), in conjunction with Article 3 of Regulation 1/1958² and to have this Decision adopted and notified in English.

² Regulation No 1 determining the languages to be used by the European Economic Community, OJ 17, 6.10.1958, p. 385.

2. DETAILED DESCRIPTION OF THE KEY ELEMENTS OF THE 2022 CONSOLIDATED EVALUATION PLAN

- (9) As required by Article 2(16) of the GBER and in line with best practices³, the 2022 consolidated evaluation plan contains the description of the following main elements: the objectives of the aid scheme to be evaluated, the evaluation questions, the result indicators, the envisaged methodology to conduct the evaluation, the data collection requirements, the proposed timing of the evaluation including the date for submission of the final evaluation report, the approach for the selection of the independent body conducting the evaluation, and the modalities for ensuring the publicity of the evaluation.

2.1. Objectives of the aid schemes to be evaluated

- (10) Both schemes are important Greek regional investment aid schemes and aim to close the investment gap and increase employment in the country. The aid granted under the General Entrepreneurship scheme is directed towards enterprises of all sizes. The aid granted under the Entrepreneurship for Small and Micro Enterprises scheme is directed towards small and micro enterprises⁴. Both schemes apply in all regions of Greece and in terms of sectors, focus on manufacturing and internationally traded services and products allowed by the GBER.
- (11) The objectives of the General Entrepreneurship scheme are summarized in more detail in recitals (5) to (14) of the 2018 evaluation plan decision. The objectives of the Entrepreneurship for Small and Micro Enterprises scheme are summarized in more detail in recitals (13) to (20) of the 2021 evaluation plan decision.
- (12) The maximum aid intensity available to aid beneficiaries takes into account the different levels of economic development of the individual areas, as they were defined in the regional aid map 2017-2020 for Greece⁵, as prolonged until 31 December 2021⁶. The maximum aid intensities under the schemes therefore range from 25% to 35% for ‘a’ areas and from 10% to 20% for ‘c’ areas. Greece submitted however that all granting decisions issued after 31 December 2021 will respect the new regulatory framework in force as of 1 January 2022 which includes the regional aid map 2022-2027 for Greece⁷. Therefore, no regional aid will be granted in non assisted areas and the maximum aid intensities of the regional aid map will be respected. They range from 30% to 50% for ‘a’-areas and from 15% to 25% for ‘c’-areas. Greece clarified however that the “aid amount deemed necessary” identified in the aid application will not be amended retroactively after the start of works on the project to justify a higher aid intensity.

³ See Commission Staff Working Document on Common methodology for State aid evaluation, Brussels, 28.5.2014, SWD(2014) 179 final.

⁴ As defined in Annex I of the GBER.

⁵ SA.46230 Mid-term review of the Greek Regional Aid Map 2017-2020, OJ C 36, 3.2.2017, p.5.

⁶ SA.58433 Prolongation of the Greek regional aid map for the period 1.1.2021-31.12.2021, OJ C 430, 11.12.2020, p.8.

⁷ SA.100372 Regional aid map for Greece (1 January 2022 – 31 December 2027), OJ C 60, 4.2.2022, p. 19.

- (13) The 2022 consolidated evaluation plan covers the measures' duration until 31 December 2022

2.2. Evaluation questions and result indicators

- (14) The evaluation questions and result indicators are the same for both schemes, as confirmed in recital (22) of the 2021 evaluation plan decision, and are summarized in recitals (15) to (20) of the 2018 evaluation plan decision. In addition to those questions, the Greek authorities will add questions to the surveys of aid beneficiaries to evaluate how and to what extent the COVID-19 pandemic has affected firms in general and the implementation of their projects under the schemes in particular (see recital (22) of the 2021 evaluation plan decision).

2.3. Envisaged methodology to conduct the evaluation

- (15) The envisaged methodology to conduct the evaluation is are the same for both schemes, as confirmed in recital (23) of the 2021 evaluation plan decision, and summarized in recital (21) of the 2018 evaluation plan decision.

2.4. Data collection requirements

- (16) The data collection requirements are the same for both schemes, as confirmed in recital (24) of the 2021 evaluation plan decision, and summarized in recitals (22) to (24) of the 2018 evaluation plan decision.

2.5. Proposed timing of the evaluation, including the date of submission of the final evaluation report

- (17) According to the Greek authorities, the envisaged schedule for the evaluation is composed of the following phases:

Task	Deadline
Surveys and stakeholder consultation	June-November 2022
1 st interim report	November 2022
Collection and preparation of secondary (enterprise) data	November 2022-January 2023
Data analysis	January-March 2023
Final evaluation report	April 2023

2.6. Independent body selection to conduct the evaluation, or criteria for its selection

- (18) Details of the independent body selected to conduct the evaluation are provided in recital (28) of the 2018 evaluation plan decision and are applicable for both schemes, as confirmed in recital (27) of the 2021 evaluation plan decision.

2.7. Modalities for ensuring the publicity of the evaluation

- (19) The modalities for the publicity of the evaluation are summarized in recitals (29) and (30) of the 2018 evaluation plan decision and are applicable for both schemes, as confirmed in recital (28) of the 2021 evaluation plan decision.

3. ASSESSMENT OF THE 2022 CONSOLIDATED EVALUATION PLAN

- (20) The correct application of the GBER is the responsibility of the Member State. The present decision on the 2022 consolidated evaluation plan does not assess whether the aid schemes to be evaluated were put into effect by the Member State in full respect of all applicable provisions of the GBER. It does therefore neither create legitimate expectations, nor does it prejudge the position the Commission might take regarding the conformity of the aid schemes with the GBER when monitoring them, or assessing complaints against individual aid granted under those schemes.
- (21) Pursuant to Article 1(2)(a) GBER, certain aid schemes⁸ in the meaning of Article 2(15) GBER⁹, if their average annual State aid budget exceeds EUR 150 million, should be made subject to evaluation. The Commission notes that the average annual budget of both aid schemes concerned currently exceeds EUR 150 million as set in Article 1(2)(a) GBER.
- (22) As the Commission explained in recital (8) of the GBER, the evaluation of large schemes is required *"in view of the greater potential impact of large schemes on trade and competition"*. The required *"evaluation should aim at verifying whether the assumptions and conditions underlying the compatibility of the scheme have been achieved, as well as the effectiveness of the aid measure in the light of its general and specific objectives and should provide indications on the impact of the scheme on competition and trade."* State aid evaluation should in particular allow the direct incentive effect of the aid on the beneficiary to be assessed (i.e. whether the aid has caused the beneficiary to take a different course of action, and how significant the impact of the aid has been). It should also provide an indication of the general positive and negative effects of the aid scheme on the attainment of the desired policy objective and on competition and trade, and could examine the proportionality and appropriateness of the chosen aid instrument.¹⁰
- (23) In light of these considerations, Article 2(16) of the GBER defines as evaluation plan *"a document containing at least the following minimum elements: the objectives of the aid scheme to be evaluated, the evaluation questions, the result indicators, the envisaged methodology to conduct the evaluation, the data collection requirements, the proposed timing of the evaluation including the date of submission of the final evaluation report, the description of the independent*

⁸ Schemes under Sections 1 (with the exception of Article 15), 2, 3, 4, 7 (with the exception of Article 44), and 10 of Chapter III of this Regulation (Article 1(2)(a) GBER).

⁹ 'Aid scheme' means any act on the basis of which, without further implementing measures being required, individual aid awards may be made to undertakings defined within the act in a general and abstract manner and any act on the basis of which aid which is not linked to a specific project may be granted to one or several undertakings for an indefinite period of time and/or for an indefinite amount (Article 2(15) GBER).

¹⁰ See the Staff Working Document cited in footnote 3.

*body conducting the evaluation or the criteria that will be used for its selection and the modalities for ensuring the publicity of the evaluation."*¹¹

- (24) The Commission considers that, as described in section 2 of this decision, the 2022 consolidated evaluation plan contains these minimum elements.
- (25) The Greek authorities provided a concise description of the key objectives of both schemes. The 2022 consolidated evaluation plan provides sufficient information to understand the underlying 'intervention logic'. As stated in recital (36) of the 2018 evaluation plan decision, the scope of the evaluation is defined in an appropriate way. As stated in recital (34) of the 2021 evaluation plan decision, this also applies with the addition of Entrepreneurship for Small and Micro Enterprises scheme to the scope of that evaluation. The evaluation plan also identifies and justifies pertinent result indicators that integrate the evaluation questions and explains the data collection requirements and availabilities necessary in this context. As stated in recital (34) of the 2021 evaluation plan decision, the addition of the COVID-19 related questions to the surveys of the aid beneficiaries is considered as appropriate and not significantly affecting the content of the approved evaluation plan under the 2018 evaluation plan decision. Those conclusions are not affected by the prolongation of the schemes.
- (26) As stated in recital (37) of the 2018 evaluation plan decision, the evaluation plan sets out and explains the main methods that will be used in order to identify the impacts of the schemes, and discusses why these methods are likely to be appropriate for the schemes in question. The proposed evaluation methodology sufficiently allows identifying the causal impact of the schemes itself. Those conclusions are not affected by the prolongation of the schemes.
- (27) The proposed timetable is reasonable in view of the characteristics of the schemes concerned and the relevant implementation periods for projects supported under the schemes. This timeline is considered reasonable in line with the workload to produce the reports as well as the availability of data to carry out the evaluation.
- (28) As stated in recital (39) of the 2018 evaluation plan decision, the selected evaluation body meets the independence and skills criteria. That conclusion is not affected by the prolongation of the schemes.
- (29) As stated in recital (40) of the 2018 evaluation plan decision, the proposed modalities for the publication of the evaluation results are appropriate and ensure transparency. That conclusion is not affected by the prolongation of the schemes. In particular, the Commission takes note of the commitment to make publicly available the results of the evaluation report and underlying data to stimulate research and assessment of the functioning of the schemes.
- (30) In view of the above, the Commission considers that the 2022 consolidated evaluation plan meets all requirements laid down in the GBER, is established in line with the common methodology proposed in the Staff Working Document, and is suitable given the specificities of the large aid schemes to be evaluated.
- (31) The Commission notes the commitment made by the Greek authorities to conduct the evaluation according to the plan described in the present decision and to

¹¹ Further guidance on evaluation plans is given in the Staff Working Document cited in footnote 3.

inform the Commission of any element that might seriously compromise the implementation of the plan. The Commission also notes the commitment by the Greek authorities to fulfil the obligation to submit the final evaluation report by April 2023.

- (32) Therefore, pursuant to Article 1(2)(a) of the GBER, the Commission decides that the exemption for the aid schemes for which the 2022 consolidated evaluation plan was submitted is prolonged beyond the initial six months until 31 December 2022.
- (33) Alterations to these schemes, other than modifications which cannot affect the compatibility of the schemes under the GBER or cannot significantly affect the content of the approved evaluation plan, are pursuant to Article 1(2)(b) of the GBER excluded from the scope of the GBER.

4. CONCLUSION

After having assessed the 2022 consolidated evaluation plan notified by Greece, the Commission has accordingly decided:

- to prolong the exemption of the schemes under the GBER until 31 December 2022;
- to publish this decision.

If this letter contains confidential information which should not be disclosed to third parties, please inform the Commission within fifteen working days of the date of receipt. If the Commission does not receive a reasoned request by that deadline, you will be deemed to agree to the disclosure to third parties and to the publication of the full text of the letter in the authentic language on the Internet site:

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Your request should be sent electronically to the following address:

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Directorate-General Competition
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B-1049 Brussels
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Yours faithfully,

For the Commission

Margrethe VESTAGER
Executive Vice-President