

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 Article 1(2)(a) of Regulation (EU) No 651/2014 and in the case of a notified aid scheme subject to an evaluation as provided in the relevant Commission¹ guidelines. Please refer to the Commission Staff Working Document 'Common methodology for State aid evaluation'² for guidance on the drafting of an evaluation plan.

1. Identification of the aid scheme to be evaluated

1) Title of the aid scheme:

Subsidieregeling Nationaal Groeifonds ('National Growth Fund Subsidy Scheme')³

2) Does the evaluation plan concern:

- a) 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) of the TFEU?

3) Reference of the scheme (to be completed by the Commission):

.....

4) Please list any existing *ex-ante* evaluations or impact assessments for the aid scheme, as well as *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 the availability of data 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:

No *ex ante* evaluations or impact assessments are available, nor has any predecessor scheme been evaluated.

2. Objectives of the aid scheme to be evaluated⁴

¹ Commission Regulation (EU) 651/2014 of 17 June 2014 declaring certain categories of aid compatible with the internal market in pursuance of Articles 107 and 108 of the Treaty (OJ L 187, 26.6.2014, p. 1).

² SWD(2014) 179 final of 28.5.2014 [also available in Dutch at: http://ec.europa.eu/competition/state_aid/modernisation/state_aid_evaluation_methodology_nl.pdf].

³ <https://zoek.officielebekendmakingen.nl/stcrt-2022-18250.html>

⁴ The aim of this section is not only to provide a general description of the objectives and compatibility rules of the scheme, but also to consider how rules for inclusion in or exclusion from the scheme can be used to determine the impact of the aid. In some cases, the precise eligibility rules may not be known in advance. In such cases the best available predictions should be provided.

SA.106094

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

General

- With the National Growth Fund (NGF), between 2021 and 2025 the government is investing €20 billion in projects and programmes that contribute to increasing the sustainable earning capacity of the Netherlands. The fund was legally established as a temporary budget fund in 2022 with the temporary National Growth Fund act.
- Targeted investments are made in coherent programmes in the areas of (a) Research, Development and Innovation and/or (b) Knowledge Development.
- This takes place along two routes:
 - Departmental investment proposals for policies and policy programmes are funded by transferring the budget from the NGF budget to departmental budgets (the so-called departmental route);
 - Investment proposals from 'field parties' (companies, knowledge institutions, regional authorities and other organisations) are directly subsidised on the basis of the National Growth Fund Subsidy Scheme (the so-called subsidy route).
- The scope of projects and programmes should aim at a minimum contribution from the fund of €30 million, as stipulated in the National Growth Fund Subsidy Scheme.

The National Growth Fund Subsidy Scheme thus forms a part of the National Growth Fund which, as a supporting measure, makes use of Regulation (EU) No 651/2014, the General Block Exemption Regulation (hereinafter referred to as 'the GBER').

Scope of the evaluation plan

The National Growth Fund will be evaluated in its entirety. This evaluation plan therefore considers the whole, i.e. both the departmental route and the subsidy route. Within the evaluation the efficiency and effectiveness of the National Growth Fund Subsidy Scheme (also a support measure with the application of the GBER) will be separately identified, thus providing separate insight into these aspects. This section can be regarded as the evaluation plan required under Article 1(2)(a) of the GBER.

Following this is a discussion of the National Growth Fund as a whole, and specific reference to the National Growth Fund Subsidy Scheme (hereinafter referred to as 'the subsidy scheme') where appropriate.

National Growth Fund - Background

The Netherlands has one of the most competitive economies in Europe. This does not alter the fact that the Netherlands faces major challenges, such as declining productivity growth, an increasingly ageing population, a changing geopolitical context and climate change. Without further action, our prosperity will be compromised or an increasing share of our wealth will be spent on public services. This requires an increase in economic growth.

Economic growth is not an end in itself, but a means to promote social goals and prosperity in a broad sense. Economic growth ensures that the Netherlands can continue to benefit from high-quality collective arrangements and invest in transitional tasks (such as the climate transition). In addition, the government would like households to notice progress in their wallets.

In the long-term economic growth strategy for the Netherlands the Dutch government notes that additional investments in such areas as (a) knowledge development and (b) research, development and innovation (RDI) are likely to increase productivity.⁵ The National Growth Fund is aimed at increasing the sustainable earning capacity of the Netherlands through additional investments in these two fields. The principles of the National Growth Fund were further elaborated in a

⁵ Parliamentary Papers II 2019/20, 29696, no. 7.

SA.106094

parliamentary letter of September 2020 on the establishment of the National Growth Fund⁶, after which the implementation of the fund was begun.

Objective of the National Growth Fund

The fund aims to provide financial resources to increase sustainable earning capacity by making investments in the areas of:

1. knowledge development;
2. research, development and innovation (RDI).⁷

Sustainable earning capacity refers to the gross domestic product (GDP) that the Netherlands can generate on a sustained basis in the long term, with a view to an economically, socially and environmentally sustainable future for the Earth and for current and future generations. The term 'long term' should be taken to mean a time horizon of 20 to 30 years.⁸

The investment area of knowledge development (1) comprises the area of education and skills, or investment in human capital. The field of research, development and innovation, RDI, (2) comprises the conduct of research and the research-based development of a new product, process or service including intangible items such as software, including the dissemination of the knowledge thereby acquired insofar as this contributes to increasing GDP. The field of research, development and innovation should be considered in a broad sense. This field includes fundamental, industrial and applied research, experimental development, research infrastructure and the further development of new innovations, knowledge and technologies.

In practice, large, coherent programmes related to RDI/knowledge development are supported, focusing on activities that include the following:

Knowledge development

- Research/Data Collection/Information Provision
- Regional/Sectoral plans
- New educational products/programmes
- Support/training of education professionals
- Strengthening of digital and other education infrastructure and educational resources
- (key competences, digital skills and lifelong learning)

RDI

- RDI (independent research by research organisations, fundamental research, industrial research, experimental development)
- Pilot and demonstration projects
- Construction and upgrading of research infrastructure
- Construction, upgrading and operation of innovation clusters
- Innovation aid to SMEs
- Process and innovation organisation

In this way the National Growth Fund aligns with European Union policies and related reference documents such as the Horizon Europe 2021-2024 programme in particular for research, development and innovation and the Recommendation of the Council on key competences for lifelong learning (OJEU 2018, C 189);

Under the subsidy scheme support can be provided for activities for:

- a. research, development and innovation with the application of Articles 25 to 29 of the GBER in respect of proposals in the field of RDI;

⁶ Parliamentary Papers II, 2020/21, 35300, no. 83.

⁷ Temporary National Growth Fund act, Article 2, second paragraph.

⁸ Temporary National Growth Fund act, Article 1

SA.106094

b. training aid with the application of Article 31 of the GBER in respect proposals in the field of knowledge development. See also section 2.4.

Target group of the National Growth Fund

The direct target group of the departmental route consists of departments whose investment proposals seek to develop and implement policies and policy programmes. In general, departmental investment proposals also indirectly involve field parties or consortia thereof (large, medium-sized and small enterprises, knowledge institutions including research organisations, government agencies and other organisations). Departments strengthen their own implementation capacity, provide calls/subsidy regulations to stimulate knowledge development or RDI or, in conjunction with other policy instruments, provide subsidies or assignments to field parties or consortia thereof with the departmental NGF funds.

The target group of the subsidy scheme consists of field parties or consortia thereof (large, medium-sized and small enterprises, knowledge institutions including research organisations, government agencies and other organisations) that aim to realise projects in the field of knowledge development or RDI. The scheme is open to all sectors and is not aimed at field parties in specific regions.

2.2. Please state the objectives of the scheme and its expected impact, both on the level of intended beneficiaries and in respect of the objective of common interest:

See section 2.1. The objectives of the subsidy scheme correspond to those of the National Growth Fund.

2.3. What possible negative effects - on aid beneficiaries or the economy more generally - are directly or indirectly related to the aid scheme⁹?

The aid scheme is aimed at supporting specific activities (in the fields of research, development and innovation and knowledge development). No specific sectors, companies of certain sizes or regions are favoured. The National Growth Fund explicitly targets investments with a public interest that benefit the sustainable earning capacity of the Netherlands, but on which there is insufficient private return to be financed through regular channels. Each investment proposal will be examined for 'private additionality', that is to say it will be examined whether the proposal can also be financed from the market. If that is the case then the proposal will not be eligible for funding from the National Growth Fund. This includes a consideration of what level of public funding is appropriate for each activity and phase. It will also be examined whether the proposal is additional to existing public investment and does not fall within an existing government scheme (public additionality).

2.4. Please provide: a) the annual budget allocated to the scheme; b) the duration of the scheme¹⁰; c) the aid instrument(s), d) and the eligible costs:

(a) Approximately €2 billion per year is available for the National Growth Fund Subsidy Scheme, roughly half of the total annual budget of the National Growth Fund (the remaining €2 billion is in principle available for departmental investment proposals). In principle, the €2 billion for the subsidy scheme will be divided equally between the fields of knowledge development and research,

⁹ Examples of negative effects brought about by the aid scheme are regional or sectoral preferences or the displacement of private investments.

¹⁰ Aid schemes within the meaning of Article 1(2)(a) of Regulation (EU) no. 651/2014 are excluded from the scope 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 should precisely specify the intended duration of the scheme.

SA.106094

development and innovation. For each investment round of the National Growth Fund, the opening for applications and setting of the budget (the 'subsidy ceiling') is undertaken (separate regulations associated with the subsidy scheme).

(b) The National Growth Fund is for the time being a temporary investment fund. In principle, the duration of the National Growth Fund Subsidy Scheme is 2023 to 2026. During this period the subsidy scheme will be made available three times, during which the budget will also be determined (budget per opening period: €2 billion).

(c) Aid may be granted with the application of Articles 25 to 29 of the General Block Exemption Regulation (in respect of proposals in the fields of research, development and innovation activities).
(c) Aid may be granted with the application of Article 31 of the GBER (in respect of proposals in the fields of research, development and innovation activities).

Subsidy applications can also cover non-economic activities within these two fields (no aid) such as independent research.

(d) Reasonably incurred costs that are directly related to the implementation of an activity or a coherent set of activities that increase sustainable earning capacity and that relate to knowledge development and/or research, development and innovation are eligible for subsidy.

In respect of research, development and innovation, the following types of activities are eligible for funding, with the application of the GBER (Articles 25 to 29):

- 1°. research and development projects;
- 2°. the construction or upgrading of research infrastructure;
- 3°. the construction, upgrading or operation of innovation clusters;
- 4°. innovation of small and medium-sized enterprises; or
- 5°. process and organisational innovation.

In respect of knowledge development, with the application of the GBER (Article 31), the following types of activities are eligible for subsidy:

- educational support.

The conditions, eligible costs and percentages of the GBER will be adhered to when granting subsidies under the National Growth Fund Subsidy Scheme.

2.5. Please provide an overview of the compatibility criteria and methods for selecting aid beneficiaries. In particular, please describe the following points: a) the methods for selecting beneficiaries (for example scoring); b) the indicative budget available for each group of beneficiaries; c) the likelihood that the budget for certain groups will be exhausted; d) the scoring rules, if used in the scheme; e) the maximum aid intensities; and f) the criteria the aid-granting authority will take into account when assessing applications:

a.

Process for the granting of subsidies under the National Growth Fund Subsidy Scheme

A submissions round takes place annually for investment proposals for both the departmental route and the subsidy route. The application and review process for a subsidy application under the National Growth Fund Subsidy Scheme is broadly as follows:

SA.106094

1. Interested parties can apply for a Quick Scan before the opening via the Netherlands Enterprise Agency (*Rijksdienst voor Ondernemend Nederland* - RVO) implementation organisation of the Ministry of Economic Affairs and Climate (*Ministerie van Economische Zaken en Klimaat* - EZK) and the website RVO.nl. This allows them to obtain feedback on the first outline of their proposal using the National Growth Fund Subsidy Scheme. This is a non-obligatory step in the process that is open to all.
2. Parties elaborate on the proposal and submit a subsidy application to the Netherlands Enterprise Agency from the time of opening.
3. The Netherlands Enterprise Agency tests the subsidy application against the general formal minimum requirements and the grounds for rejection.
4. In assessing applications, advice is sought from the independent National Growth Fund advisory committee (NGF advisory committee). The NGF advisory committee advises on the extent to which a project contributes to sustainable earning capacity, and may also advise on some grounds for rejection or eligible costs.
5. The NGF advisory committee then issues a recommendation on the ranking of the subsidy applications that were not rejected.
6. Discussion of NGF advisory committee recommendation in the Council of Ministers.
7. Decision-making by the Minister of Economic Affairs and Climate if there is no adverse recommendation. Available funds are distributed on the basis of ranking. Grants are awarded to grant recipients by decision, and advances may be made on the basis of that decision.

Minimum criteria for National Growth Fund proposals

Proposals should meet a minimum number of criteria to be considered for funding from the National Growth Fund. These are stipulated in the temporary National Growth Fund act, the National Growth Fund Subsidy Scheme (subsidy route) and the National Growth Fund administrative agreements (departmental route). In addition, the General Administrative Law Act also applies as a general legal framework for granting subsidies. The criteria concern, among other things:

1. The proposal being aimed at increasing sustainable earning capacity and falls within at least one of the following fields:
 - a. Knowledge development; and
 - b. Research, development & innovation.
2. The proposal being focused on investments that are non-structural.
3. The proposal concerning investments that are supplementary to private investments.
4. The proposal being supplementary to existing public investments, and not falling within any existing government scheme.
5. The balance of social costs and benefits of the proposal being positive.
6. The proposal satisfying the test of subsidiarity in relation to funding opportunities that can be provided by the European Union or decentralised authorities.
7. The proposal not being inconsistent with government policy.

A size to be further determined may be identified as necessary to have a substantial impact on sustainable earning capacity. The National Growth Fund Subsidy Scheme states that the proposal requires at least €30 million in funding from the National Growth Fund.

Evaluation criteria

SA.106094

As an independent advisory body, the NGF advisory committee evaluates the sustainable merit of NGF proposals that meet these minimum criteria. In doing so, it considers both the economic and social impact of the proposals. This is carried out on the basis of an analysis using four evaluation criteria:

- the contribution of a proposal to increasing sustainable earning capacity;
- the strategic rationale of the proposal;
- the quality of the plan;
- the quality of the collaboration and governance.

These evaluation criteria are further explained and detailed in the NGF advisory committee's analysis framework. This framework has been made public.¹¹

Under the National Growth Fund Subsidy Scheme, a maximum of ten points can be scored on each of these criteria. A proposal must score at least six points on each of these criteria to be eligible for funding from the fund under the National Growth Fund Subsidy Scheme (if five or fewer points are scored on any of the criteria then the proposal will be rejected).

If there are more proposals than score at least a six on all evaluation criteria for which budget is available, then the proposals will be ranked on the basis of points and the budget applicable for that investment round (the 'subsidy ceiling') will be distributed on the basis of that ranking. If the budget is exceeded then a proposal will be rejected and no subsidy will be granted. There will be a separate ranking within the subsidy scheme for the RDI pillar and for the knowledge development proposals, with corresponding determination of budgets per pillar.

b) See answer to question 2.4(a). No distinction is made between groups of beneficiaries, only between the fields of knowledge development and research, development and innovation.

c) It is possible that there will be insufficient budget to honour all good proposals. In that case only the best proposals will be considered, based on ranking. See point a).

d) See a.

e) See 2.4(d). This is done in line with the aid intensities specified in the GBER (Articles 25 to 29 and 31).

f) The requirements set out in the GBER in both section 1 and the applicable Articles 25 to 29 and 31 of the GBER have been incorporated into the subsidy scheme, such as cumulation, the types of costs eligible for support and a number of obligations for beneficiaries arising from the GBER.

¹¹ [Third round analysis framework | Guideline | National Growth Fund](#)

SA.106094

- 2.6.** Please indicate here any specific constraints or risks that may adversely affect the implementation of the scheme, its expected impact and the achievement of its objectives:

Large-scale investment proposals in research, development and innovation and knowledge development are supported from the National Growth Fund. Proposals must be of high quality to be eligible for consideration. It is however inherent in the type of proposals that they by definition support high-risk activities, so it is expected that in practice not every proposal will be entirely successful. They also involve proposals consisting of several interrelated components with a long duration, meaning that project results and objectives can only be achieved in the longer term. Those results will therefore often be achieved after the investment from the National Growth Fund as subsidy funding is completed.

3. Evaluation questions

- 3.1.** What specific issues should the evaluation address in more detail by providing quantitative evidence of the impact of the aid? In answering this question, please distinguish between: a) issues concerning the direct impact of the aid on the beneficiaries; b) issues concerning the indirect impact; and c) issues concerning the proportionality and appropriateness of the aid. Please also explain how the evaluation questions are related to the objective of the scheme:

General

See the policy theory of the National Growth Fund in Appendix 1. On the basis of the policy theory, evaluation questions have been formulated that address the characteristics and progress of the investment proposals (intermediate outcomes), the effectiveness of the aid (both the first-order effects or direct impact, the second-order effects or indirect impact and the side-effects of the National Growth Fund) and the effectiveness of the aid (the proportionality and appropriateness of the aid).

The evaluation also includes some more general questions that address the coherence, relevance, implementation and administrative burden of the National Growth Fund.

Evaluation questions

Question 1 is concerned with the progress of the funded investment proposals.

Intermediate outcomes

1. Please clarify the characteristics and progress of the investment proposals:
 - a. How many proposals have been submitted? How many of these were fully or partially granted, and how many were rejected?
 - b. What were the main reasons for rejecting proposals?
 - c. What amounts have been allocated so far from the National Growth Fund, and how much public and private co-financing has been made available for the investment proposals in question?
 - d. What amounts were actually paid? (For the subsidy route, this means by means of advance payment and/or subsidy determination. For the departmental route, it is relevant to know what part of the funds was transferred to the departments through budget transfer, and what part of it was paid by the departments through commissioning/subsidy provision).
 - e. To which pillar and to which activities within that pillar do the awarded proposals relate?
 - f. Which route (departmental or subsidy) do the awarded proposals fall under?

SA.106094

- g. What part of the subsidy will on the basis of the GBER?
- h. Within the departmental route: what is the relationship between activities aimed at refinancing (calls, subsidy programmes), activities carried out by departments themselves and activities for which customised subsidies are provided to field parties?
- i. What societal challenges are the proposals aimed at resolving? To what extent do the NGF proposals align with the missions of the Mission-Driven Top Sectors and Innovation Policy?
- j. What are the characteristics of the direct and indirect beneficiaries of the National Growth Fund (type of organisation, sector, region, etc.)? How many parties are involved in a proposal?
- k. What is the duration of the proposals?
- l. What is the progress of the proposals?

Questions 2 to 17 are concerned with the effectiveness, side-effects and effectiveness of the National Growth Fund. These questions (except question 14) should be answered in general terms, but also specifically for:

- The knowledge infrastructure pillar:
 - i. Departmental route
 - ii. Subsidy route
 1. Aid on the basis of the GBER
- The RDI pillar:
 - iii. Departmental route
 - iv. Subsidy route
 1. Aid on the basis of the GBER

Effectiveness

2. To what extent do the resources deployed from the National Growth Fund contribute to increasing sustainable earning capacity?
 - a. To what extent do the funds contribute to increasing the GDP that the Netherlands can generate on a long-term structural basis?
 - b. To what extent does this address an economically, socially and environmentally sustainable future for the Earth and for current and future generations?

This question can be answered by identifying the following links in policy theory:

Questions concerning the first-order effect (effects on treatment group):

3. To what extent does the National Growth Fund lead to more public and private RDI?
4. To what extent does the National Growth Fund lead to new and improved RDI ecosystems?
5. To what extent does the National Growth Fund lead to improvement in the quality of education?
6. To what extent does the National Growth Fund lead to an increase in investments in human capital?
7. To what extent does the National Growth Fund lead to a stronger link between education and the labour market?

Questions concerning the second-order effect:

8. To what extent does the National Growth Fund lead to increasing the innovation capacity of the Netherlands?
9. To what extent does the National Growth Fund lead to strengthening the innovation system?

SA.106094

10. To what extent does the National Growth Fund lead to reducing public costs in addressing societal challenges?
11. To what extent does the National Growth Fund lead to learning gains (in knowledge, attitudes and skills)?
12. To what extent does the National Growth Fund lead to a better match between supply and demand in the labour market?

In addition, the following question must be answered:

13. To what extent are the first and second order effects permanent in nature?

Side-effects

14. Specifically in respect of aid on the basis of the GBER: what effect (positive or negative) has the aid had on trade and competitiveness?
15. What other positive or negative side-effects does the National Growth Fund have?

Policy effectiveness (proportionality and appropriateness)

16. Is there an optimal relationship between costs and policy impacts?
17. Can the effectiveness of the policy be improved, and if so how?
 - a. Can the same results be achieved with lower costs?
 - b. Are other instruments or other types of policy interventions better suited to achieving the objective of the National Growth Fund?

Questions 18 to 29 are concerned with the coherence, relevance, implementation and administrative burden of the National Growth Fund.

Coherence

18. To what extent is the National Growth Fund complementary to other (regional, national and European) instruments in connection with RDI and knowledge development?

Relevance

19. Are the objectives of the National Growth Fund clearly formulated, realistic and achievable?
20. To what extent do the aims and the design of the National Growth Fund respond to needs identified by participants and stakeholders?
21. How is the National Growth Fund perceived and rated by stakeholders?

Implementation

22. Effectiveness of implementation: How high are the costs of implementing the National Growth Fund? How do these correspond to the performance delivered?
23. How is the implementation perceived and rated by stakeholders?
24. To what extent is the National Growth Fund's target group reached? Please distinguish between types of organisations, such as companies, knowledge institutions, governmental and semi-governmental agencies.
25. How can the implementation (by the Netherlands Enterprise Agency and the National Growth Fund staff directorate) be improved?
26. Are sufficient 'lessons learned' drawn from each submission round (through fund management and implementation) for improving the implementation of the fund in subsequent rounds?

SA.106094

Administrative burden

- 27. How high is the administrative burden of the National Growth Fund for the applicants for and recipients of funds? How does this correspond to the success rate and to the funding possibly obtained from the National Growth Fund?
- 28. How is the administrative burden perceived by users?
- 29. How can the administrative burden be reduced, if necessary?

4. Outcome indicators

4.1. Please use the table below to describe which indicators will be developed to measure the outcomes of the scheme, as well as the relevant control variables (including data sources) and how each outcome indicator will address the evaluation questions. Please indicate in particular: a) the evaluation question concerned; b) the indicator; c) the data source; d) the frequency with which data are collected (e.g. annually, monthly); e) the level at which the data are collected (e.g. at enterprise level, at business location level, at regional level); and f) the population covered in the data source (e.g. aid beneficiaries, non-beneficiaries, all enterprises).

Evaluation questions	Indicator	Source	Frequency	Level	Population

Please explain why the chosen indicators are most relevant for measuring the impact of this scheme.

See the table in Appendix 2. The overview of data sources in this table is based on an initial internal analysis, and will be further supplemented by Statistics Netherlands (*Centraal Bureau voor de Statistiek* - CBS) by January 2023 with relevant data sources that are available to it. To this end Statistics Netherlands will prepare a data assessment that will further explore the availability and characteristics of the data sources.

After the data assessment is delivered by Statistics Netherlands, it will be assessed whether on the basis of the identified data sources we have sufficient data for the indicators and for the performance of the evaluation, or whether it is necessary to request additional data (key performance indicators - KPIs) from the subsidy recipients/beneficiaries of the subsidised NGF projects under the National Growth Fund Subsidy Scheme (in the context of the monitoring of these projects or the general information requirement). This may be the case for indicators for which Statistics Netherlands has no data at all, but also when the underlying data files do not lend themselves well to timely impact measurement, for example when the source is a survey with a relatively limited sample or when the statistics are not sufficiently up to date. In such cases, at least in connection with subsidy recipients/beneficiaries, KPIs can be collected to monitor their progress on key indicators.

SA.106094

The indicators in the table concern the National Growth Fund as a whole. The indicators refer back to the economic activities (as far as the National Growth Fund Subsidy Scheme is concerned, this relates to state aid activities as referred to in Articles 25 to 29 and 31 of the GBER) as well as the non-economic activities that can be financed from the subsidy route and the departmental route. Although the indicators in the table cannot currently be unambiguously attributed to economic and non-economic activities, public education is expected to finance mainly non-economic activities. Activities of universities and research organisations, such as training and independent research and development, can also be non-economic in nature.

5. Methods considered for the performance of the evaluation

5.1. In the light of the evaluation questions, please describe the methods whose use is envisaged to evaluate the causal impact of aid on beneficiaries and to measure other indirect effects. In particular, please explain why those methods were chosen and other methods were rejected (e.g. for reasons related to the design of the scheme)¹²:

Ideally, it is preferable to use methods for natural experimentation as far as possible to establish causal effects. This means conducting microeconomic research on good data and carefully constructed control groups using techniques such as regression discontinuity, propensity score matching and difference-in-difference. In practice, however, it is expected that there will be practical difficulties in achieving this, and so the following approach is proposed as an alternative method:

- In the **short term** (the evaluation that is scheduled before 2026), these practical challenges lie mainly in the timing of the evaluation. In view of the start-up, duration and long-term nature of the projects in the National Growth Fund, no effects of the projects can be expected at that time.
- For this reason the approach in this short term will mainly focus on carefully monitoring the individual National Growth Fund projects with reference to the KPIs and how they contribute to the intermediate and ultimate goals. In the case of the National Growth Fund Subsidy Scheme, this means monitoring individual projects on the basis of the subsidy awards. This takes explicit account of the descriptions of the projects as included in the application (activity plan and budget), their objectives, planning and milestones, the concrete initial results to the extent that these have been achieved, whether the projects are on track and whether there are any problems that need to be rectified. This concerns the ability to substantiate that the steps taken are also the steps that should be taken to realise the policy theory.
- The KPIs are of course only collected from the subsidy recipient/beneficiaries, but the evaluation can also explicitly consider the subsidy applications that were rejected: did these activities/ projects go ahead anyway, which parties were involved, how were they financed and what is their progress?
- The proposal is to apply the methods of contribution analysis, process tracing and possibly also benchmarking. In this way the progress towards the intermediate targets can be measured. These methods are particularly important in short-term evaluations, but can also prove useful in later evaluations;
- In the **medium/long term** (the evaluations after 2026), natural experiments

¹² In doing so, please make reference to SWD(2014) 179 final of 28.5.2014.

SA.106094

seem more promising (provided the projects are at a sufficiently advanced stage by then), but there are still practical challenges in assembling suitable control groups. This is mainly due to the considerable heterogeneity in projects as well as their implementers and parties involved in them, but also to the size and nature of the projects, which are often composed of several interrelated components, a chain approach and intersecting themes. It is therefore appropriate to carry out evaluations at the level of individual projects, always using an individual evaluation approach best suited to that particular project.

- In doing so, the ambition is to carry out quantitative impact measurement as far as possible, making causal relationships as robust as possible using natural experimentation techniques. For projects where this is not possible, methods for evaluating system and transition policies will be applied, such as the contribution analysis and process tracing mentioned earlier.
- In their implementation, individual project evaluations will be clustered as far as possible around issues such as theme, aim or appropriate evaluation method. In doing so, however, the aim is always to make statements concerning those individual projects. Ultimately, the individual evaluations will always be compiled into a meta-analysis for the fund evaluation, analogous to the approach used in a policy review.

5.2. Please precisely describe the identification strategy for evaluating the causal effect of support and the assumptions on which that strategy relies. Please describe in detail the composition and importance of the control group.

As indicated in section 5.1, it is preferable to use methods for natural experimentation as far as possible to establish causal effects. In the short term of the initial fund evaluation in 2026 (i.e. the final evaluation in the context of the National Growth Fund Subsidy Scheme support measure) it will not yet be possible to measure causal effects, simply because they will not have occurred by then due to the timing of the start-up, lead time and the long duration of projects in the National Growth Fund.

For the 2026 evaluation, the intention is to request research agencies to use techniques in the field of system and transition policy evaluation with as much attention as possible to the assumed causality in the operation mechanisms and formulated hypotheses. This includes detailed analyses on the level of individual projects (case studies) and the testing of hypotheses based on policy theory in the form of process tracing. Both are regarded as methods for making judgements concerning the causality of policies, in qualitative and quantitative terms respectively¹³.

The 2026 evaluation is likely to primarily rely on these techniques, and later evaluations will also provide indispensable insights into the operation and causality of projects in the National Growth Fund. In these later evaluations it will also become possible for some of the evaluations of individual projects to test causal relationships using methods with control groups for natural experiments. These techniques will be used where possible.

For each project it will have to be determined whether the design of that project and the composition of its implementers and the parties involved in it lend themselves to setting up a good control group. As examples, consider two projects from the second round of the National Growth Fund:

¹³ An external advisory committee was commissioned by the Dutch Ministry of Economic Affairs and Climate (*Ministerie van Economische Zaken en Klimaat* - EZK) to prepare a report on the applicability of evaluation techniques for evaluating system and transitional policies. See the report *Durf te leren, ga door met meten: Op zoek naar kaders en methoden voor de evaluatie van systeem- en transitiebeleid* ('Dare to learn, continue measuring: In search of frameworks and methods for the evaluation of systems and transition policies') of October 2022, by the Ter Weel committee.

SA.106094

1. The **Einstein Telescope** project takes place in the pioneering new scientific field of gravitational wave research, and consists of the establishment of a project office, expansion of the site research and technology and innovation research. The Ministry of Education, Culture and Science is responsible for this project. The parties implementing the project are mainly government agencies: the ministries of Education, Culture and Science and Economic Affairs and Climate and the Province of Limburg. Also involved are the Limburg regional development company LIOF and the Dutch National Institute for Subatomic Physics Nikhef;
2. The **PharmaNL** project aims to provide a sustainable impetus to the entire Dutch value chain of drug development in order to maximise the economic potential of innovative pharmaceutical products and production technologies in the Netherlands. The Ministry of Health, Welfare and Sport is responsible for this project. The parties implementing the project are a national public-private consortium consisting of Leiden University, Leiden University Medical Center, Campus Groningen, LIFE Cooperative, and Pivot Park, in close collaboration with FAST and the Lygature foundation.

Both the nature and the implementers of these projects are widely different from each other. The nature of these projects is so unique that it would be extremely difficult to find similar projects that have come about without funding from the National Growth Fund. Moreover, the nature of those involved (e.g. ministries and universities) makes it very difficult to establish control groups of similar parties who did not participate in the National Growth Fund.

- 5.3.** Please explain how the intended methods address possible selection biases. Can it be explained with sufficient certainty that observed differences in outcomes for beneficiaries are attributable to the aid?

See section 5.2.

- 5.4.** Please explain (where applicable) how the intended methods intend to address specific challenges of complex schemes (e.g. schemes that are implemented in a regionally differentiated manner or schemes that use different aid instruments):

See section 5.2 regarding the challenges in relation to the great heterogeneity in the nature of projects and implementers/involved. In the case of the National Growth Fund subsidy scheme, this concerns the subsidy recipients/beneficiaries.

6. Data collection

- 6.1.** Please provide information on the mechanisms and sources for collecting and processing data on aid beneficiaries and the envisaged baseline scenario¹⁴. Please describe all relevant information in connection with the selection phase: data collected on aid applicants, data submitted by aid applicants and outcomes of the selection. Please also explain any possible problems in connection the availability of data.

The characteristics and progress of investment proposals are identified as standard. See also question 4.1. In addition, a standard set of KPIs is requested and maintained for each NGF project for the purpose of monitoring the proposals. These data are by definition only available from the implementers/stakeholders in an NGF project. It is important to have as much data as possible available from the implementers/stakeholders, but also from non-submitters and those submitting proposals/subsidy applications that were rejected. Research agencies will therefore be asked to use available microdata from Statistics Netherlands as far as possible. On the basis of the data

¹⁴ 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, so as to guarantee consistency over time.

SA.106094

assessment by Statistics Netherlands (see also question 4.1), it will be considered whether additional KPIs should be monitored for evaluation purposes. This data are by definition only available from the implementers/stakeholders in an NGF project. Rejected proposals/subsidy applications will still be monitored: will these projects still go ahead and how will they be funded?

- 6.2.** Please provide information here on the frequency with which data relevant to the evaluation will be collected. Are observations available at a sufficiently desegregated level, i.e. at the level of individual companies?

The KPIs formulated for participants in NGF projects are collected annually. These are at the level of the project as a whole, which is generally implemented by consortia of collaborating parties.

See the Appendix to point 4.1 for the frequency of the data sources from Statistics Netherlands that can be used for some indicators. This data are available at a business unit level. A consortium will consist of several business units.

- 6.3.** Is access to the data required to carry out the evaluation hindered by data confidentiality laws and regulations? How will these issues then be resolved? Are there any other problems in connection with data collection, and how will they be overcome?

In order to work with microdata from Statistics Netherlands, an institution must be authorised to do so. Institutions that are not authorised can apply for authorisation, or work together with an authorised party in the evaluation.

Data that do not appear or are insufficiently covered in Statistics Netherlands statistical sources are additionally requested in the KPIs for project participants within the National Growth Fund, but are consequently only available to those participants.

- 6.4.** Are any surveys of aid beneficiaries or other enterprises planned? Is it intended to use additional sources of information?

Beneficiaries report annually on the progress of investment proposals. Information and data relevant to the evaluation of the proposals ensue from this. In addition, in selecting an evaluation design, research agencies are free to approach participants in both approved and rejected projects with surveys in order to gain additional insights. Especially for participants in rejected projects this could prove to be an important means of gathering information.

7. Proposed timeframe for the review

- 7.1.** What is the proposed timeframe for the evaluation, with milestones for data collection, interim reports and the involvement of stakeholders? Please attach, where relevant, an appendix with a detailed timeframe.

See Appendix 3 for an overall schedule for the evaluation to be delivered in the first quarter of 2026 for decision-making on possible renewal of the subsidy scheme, as well as the schedule for the evaluation in 2023 and additional evaluations from 2031 onwards. The expectation is that the research agency that conducts the 2026 review will need approximately six months to do so. This research agency will prepare a detailed schedule of the implementation of the evaluation itself in due course.

- 7.2.** By when will the final evaluation report be submitted to the Commission?

See Appendix 3. Once the evaluations are completed they can be shared with the Commission.

SA.106094

7.3. What factors could possibly influence the intended timeframe?

Possible factors that could affect the planning include issues such as difficulty in scheduling interviews with discussion partners, gaining access to the data at Statistics Netherlands, analyses turning out to be more complex than estimated beforehand (and therefore taking longer), more comments from the supervisory committee than estimated beforehand, etc. Sufficient time will therefore be allocated for the evaluation period.

8. The evaluating body

8.1. Please provide specific information on the evaluating body or, if not yet selected, on the timeframe, procedure and criteria for selecting the evaluating body:

The evaluating body will not be selected until 2025, at the time when the evaluation is carried out. The evaluation is expected to be put out for tender Europe-wide.

8.2. Please provide information on the independence of the evaluating body. How will any possible conflicts of interest be avoided during the selection process?

This will be ensured through the tendering process.

8.3. What is the relevant expertise and know-how of the evaluating body, or how is such know-how guaranteed during the selection procedure?

During the selection process a selection will be made according to the expertise required for the evaluation. The evaluating body will thus need to have demonstrable knowledge and experience in conducting policy evaluations/data analyses (preferably related to research, development and innovation), as well as knowledge and experience in project management.

8.4. What arrangements will the aid agency make to manage and monitor the implementation of the evaluation?

The Ministry of Economic Affairs and Climate will commission the review in consultation with the Ministry of Finance. For the purpose of the evaluation the problem-setting memorandum will be submitted to the Ministry of Economic Affairs and Climate policy evaluation committee in advance. External evaluation experts will also take part in this committee. The conduct of the evaluation will be assisted by a guidance committee, as is usual for central government policy evaluations. This guidance committee will in principle include the Ministries of Economic Affairs and Climate, Education, Culture and Science and Finance, the Netherlands Enterprise Agency, a representative of the secretariat of the NGF advisory committee and one or more independent experts. The supervisory committee will have an independent chairperson.

8.5. Please provide information (even if only indicative) on the required human and financial resources that will be made available to carry out the evaluation.

Two employees from the Ministry of Economic Affairs and Climate are expected to prepare and lead the evaluation (part-time). Approximately ten people will sit on the supervisory committee. The evaluation will be coordinated internally at regular intervals (including with management and the policy evaluation committee). A number of employees of the Netherlands Enterprise Agency and the secretariat of the NGF advisory committee will also be closely involved, among other things to provide the data needed for the evaluation and to provide insight into the operation and results of the fund.

9. Publication of the evaluation

- 9.1.** How will the evaluation be made public, e.g. by publishing the evaluation plan and the final report on a website?

The evaluation will be sent to parliament, including the cabinet's response. After the review is sent to parliament it will be published on the rijksoverheid.nl and parlement.nl websites.

- 9.2.** How will the involvement of stakeholders be guaranteed? Is consideration being given to holding public consultations or events in connection with the review?

Some of the evaluation questions concern the perception and relevance of the National Growth Fund for stakeholders of the National Growth Fund. It would seem reasonable to use round-table discussions, in-depth interviews and/or surveys to answer these questions. Stakeholders may also be involved in answering other evaluation questions where appropriate.

- 9.3.** How will the outcomes of the evaluation be used by the aid-granting authority and other authorities, for example to develop follow-up or similar schemes?

One element of the evaluation is that the research agency will make recommendations to improve the National Growth Fund, including in particular recommendations for the National Growth Fund Subsidy Scheme. The cabinet response to the evaluation will reflect on the recommendations and how they will be used for a possible next tranche of the National Growth Fund and/or for amending the National Growth Fund Subsidy Scheme.

- 9.4.** Will the data collected or used for the evaluation be made accessible for further study and research? Under what conditions?

The Ministry of Economic Affairs and Climate has set up a linking programme whereby data from the Netherlands Enterprise Agency's implementation administration are linked to the business register of Statistics Netherlands as standard wherever possible. This data can then be enhanced with all business statistics available from Statistics Netherlands. The implementation records, including KPIs, of the National Growth Fund will also be linked and made available in this way.

This data will be made available in pseudonymised form in the secure Remote Access (RA) analysis environment for accredited policy researchers from authorised institutions. The statistical output based on these files must comply with the rules formulated by Statistics Netherlands to preclude disclosure of the parties in the microdata, and the research results must always be published. The files will also be stored as 'restriction files', which in this case means that a research body may only work with the data after receiving permission from the Ministry of Economic Affairs and Climate.

- 9.5.** Does the evaluation plan include confidential information that the Commission may not disclose?

No.

10. Other information

- 10.1.** Here you can provide any other information that you consider important for the assessment of the evaluation plan:

N/A

Courtesy translation - not official text

SA.106094

10.2. Please list here all documents attached to the application. Please also include hard copies of the relevant documents or provide direct internet links to those documents:

Appendices:

1. Policy theory
2. Draft overview of data and indicators
3. Timeframe

Links to relevant background information:

- [National Growth Fund website](#)
- [Growth strategy](#)
- [Parliamentary letter establishing the National Growth Fund](#)
- [Temporary National Growth Fund act](#)
- [National Growth Fund Subsidy Scheme](#)
- [National Growth Fund advisory committee regulations](#)
- [National Growth Fund administrative agreements, departmental route](#)
- [National Growth Fund advisory committee analysis framework](#)
- [Manual National Growth Fund \(for submitters of investmentproposals\)](#)