



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES
UNIONE EUROPEA DELL'ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

Comments on Temporary framework for State aid measures to support access to finance in the current financial and economic crisis

UEAPME, the European organisation representing Crafts and SMEs, thanks the European Commission for the possibility to comment on the draft temporary framework for State aid.

UEAPME fully agrees with the analysis made in chapter 1 of the draft document and especially emphasises the urgent need for additional aid provision to help SMEs as regards their access to working capital.

The current State aid rules allow guarantees for working capital only under the "de minimis" regulation and in case of regional aid. This can be accepted in normal economic times, but is not sufficient to deal with the current crisis. Therefore, UEAPME welcomes the proposed regulation to provide during the crisis guarantees up to the amount of the annual wage bill and to allow reduced guarantee fees compared to Commission notice on guarantees from earlier this year.

Furthermore, UEAPME prefers this solution compared to an untargeted increase of the de minimis thresholds, which would only lead to an increase of State aid provided in an uncontrolled manner. This is not in the interest of SMEs, because it will lead to unfair competition and will be misused for hidden aid even towards large enterprises.

However, UEAPME proposes to improve the current text on three issues:

1. The draft framework limits all temporary measures by end of 2009, which is understandable as we do not know how long the crisis will persist. However, it would be an important contribution to increase confidence if the Commission could declare that the measures will be prolonged in case the crisis will continue in 2010.

2. Paragraphs 4.2.2.(h) and 4.3.2.(j) state rightly that firms in difficulties are excluded from these provision, but UEAPME asks for a similar definition of SMEs in difficulties as the Commission has provided in the framework of the GBER, which excludes start-ups and provides simplified calculations for SMEs.
3. Paragraph 4.3.2.(b) states that aid must be necessary for the launch of a new project, without explaining how to prove this. UEAPME propose the same solution the Commission has provided in other guidelines and regulations, where in cases of SMEs the need can be assumed as being proved if the SME applies for State aid before a project has been started.

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