

# SME access to Finance: Questionnaire to Member States

Fields marked with \* are mandatory.

## Introduction

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This targeted consultation is part of the fitness check of State aid rules. While the overall fitness check covers a range of topics, this questionnaire is only relevant for the evaluation of the small and medium-sized enterprises' (SMEs) access to finance rules, which are the [Risk Finance Guidelines](#) and the corresponding rules in the [General Block Exemption Regulation](#) (Section 3 of GBER). More information of the fitness check can be found on the website of the [Directorate-General for Competition](#).

The following questions are addressed to Member States and shall enable the Commission to better understand Member States' experiences with the application of the specific rules referred to above. Should you wish to comment on aspects related to the risk finance rules or the rules applicable to SME access to finance in general that are not covered explicitly in this questionnaire, please do so in the space provided in the final section labelled "Final comments and document upload".

### Duration of the consultation and technical details

This targeted consultation will be open until **19 June 2019**. The questionnaire is available in all official EU languages. You can submit your responses in any official EU language. Please note that the last two versions of Internet Explorer, Mozilla Firefox and Google Chrome are supported by EUSurvey. Using other browsers might cause compatibility problems. If you are unable to use the online questionnaire, please contact us as soon as possible using the email address below.

Please ensure to take the views of all competent ministries or other services involved in designing relevant SME support schemes or measures into account when replying to the questions. This may include also the views of national promotional banks and other national institutions that may be relevant. Please submit **only one contribution per stakeholder** (Member State). In order to allow the Commission to fully understand your position, you are welcome to elaborate on your answers in the free text boxes dedicated for this purpose. For your information, you have the option of saving your contribution as a "draft" and finalizing your response at a later time. In order to do this you have to click on "Save as Draft" and save to your PC or e-mail to yourself the link to your draft contribution in order to be able to edit and/or finalize your answers at a later time. Please note that without this new link, generated and e-mailed to you by EUSurvey, you will not be able to access the "draft" again and continue replying to the questionnaire. **Important note:** please remember that the system requires a "Save" before every 60-minute mark. Thus we advise to "Save as Draft" frequently, otherwise you risk losing the data you have already entered in the questionnaire.

The results of this targeted consultation will feed into a Staff Working Document planned for adoption during the first quarter of 2020. In addition to this targeted consultation, the Commission will launch a

public consultation in the second quarter of 2019. Additional information regarding the public consultation and further details about the overarching fitness check is available on the [Better Regulation Portal](#).

### Personal data and privacy

The European institutions are committed to protecting and respecting your privacy. Please refer to the document entitled "Protection of your personal data" uploaded under "Background Documents", which explains the reason for the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you may exercise in relation to your data (the right to access, rectify, block etc.).

### Contact details

In case of questions, you can contact us via the following functional mailbox: COMP-RISKFINANCE-EVALUATION@ec.europa.eu

Thank you very much for participating in this consultation!

## General Information and Background

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\* 1 Which Member State of the EEA do you represent?

- |                                |                               |  |   |
|--------------------------------|-------------------------------|--|---|
| <input type="radio"/> Austria  | <input type="radio"/> Finland | <input type="radio"/> Latvia                 | <input type="radio"/> Portugal                          |
| <input type="radio"/> Belgium  | <input type="radio"/> France  | <input type="radio"/> Liechtenstein          | <input type="radio"/> Romania                           |
| <input type="radio"/> Bulgaria | <input type="radio"/> Germany | <input type="radio"/> Lithuania              | <input type="radio"/> Slovakia                          |
| <input type="radio"/> Croatia  | <input type="radio"/> Greece  | <input type="radio"/> Luxembourg             | <input type="radio"/> Slovenia                          |
| <input type="radio"/> Cyprus   | <input type="radio"/> Hungary | <input type="radio"/> Malta                  | <input type="radio"/> Spain                             |
| <input type="radio"/> Czechia  | <input type="radio"/> Iceland | <input checked="" type="radio"/> Netherlands | <input type="radio"/> Sweden                            |
| <input type="radio"/> Denmark  | <input type="radio"/> Ireland | <input type="radio"/> Norway                 | <input type="radio"/> UK                                |
| <input type="radio"/> Estonia  | <input type="radio"/> Italy   | <input type="radio"/> Poland                 | <input type="radio"/> EFTA Surveillance Authority (ESA) |

\* 2 Do you give us permission to contact you in case of follow-up questions?

- Yes  
 No

\* 3 First name

Dutch authorities: Interdepartementaal Staatssteun Overleg (ISO)

\* 4 Last name

Dutch authorities: Interdepartementaal Staatssteun Overleg (ISO)

\* 5 Name of organisation/ministry

Dutch authorities: Interdepartementaal Staatssteun Overleg (ISO)

\* 6 E-mail address



7 Please briefly explain the State aid measures to support access to finance for SMEs (and potentially also small or innovative mid-caps) that are currently in place in your country and identify if they fall under Section 3 of the GBER or the Risk Finance Guidelines.

*3000 character(s) maximum*

## Relevance

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8 Please explain to what extent there are specific difficulties, barriers, or other issues (i.e. situations of "market failures") for SMEs and small or innovative mid-caps in your country to get appropriate access to finance. In particular, please specify any issues related to financing that prevent SMEs, small mid-caps or innovative mid-caps from growth and expansion. Please also specify on what basis you have identified any such difficulties.

*3000 character(s) maximum*

Voor met name jonge, innovatieve en snelgroeiende ondernemingen is het lastig om financiering aan te trekken. Voorts zijn kleine kredieten moeilijk te verkrijgen in het bancaire circuit. Bron: regulier onderzoek zoals de financieringsmonitor, zie Kamerbrief Financieringsbeleid met bijlagen (TK 2018-2019, 32 637, 344) van 4 februari 2019 ([https://www.tweedekamer.nl/kamerstukken/brieven\\_regering/detail?id=2019Z01928&did=2019D04260](https://www.tweedekamer.nl/kamerstukken/brieven_regering/detail?id=2019Z01928&did=2019D04260)), en signalen uit de markt.

If relevant: Are the specific difficulties for SME, small or innovative mid-caps with regard to access to finance in your country reflected by the current EU State aid rules? If not, please specify why (please distinguish between SME, small mid-caps and innovative mid-caps).

9 As regards the eligibility criteria and maximum amounts or caps as defined in Article 21 of the GBER and Section 3 of the GBER in general?

*3000 character(s) maximum*

In geval van interventie via een ministeriële regeling zien we geen beperkingen. Echter daar waar een ad hoc constructie, zijnde niet een min regeling een meest adequate aanpak is lopen we aan tegen het vereiste van "Risicofinancieringssteunregelingen" in het eerste lid van art. 21 AGVV.

10 As regards the eligibility criteria and maximum amounts as defined in the Risk Finance Guidelines?

*3000 character(s) maximum*

Zie antwoord onder vraag 9, idem.

11 Based on your experience, how well adapted are the EU State aid rules on SME access to finance (i.e. Section 3 of the GBER and the Risk Finance Guidelines) to the current development of SME financing in your country? To what extent do they allow to cover new and innovative ways of providing finance to SMEs?

*3000 character(s) maximum*

Tot op heden zijn we niet tegen belemmeringen aangelopen bij nieuwe vormen van financiering.

## Coherence

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12 Based on your own experience with SME access to finance measures, is the scope of application of Article 21 of the GBER and Section 3 of the GBER in general sufficiently clear to cover the relevant measures you have implemented?

- Yes  
 No

14 Based on your own experience with SME access to finance measures that are not covered by Section 3 of the GBER, is the scope of application of the Risk Finance Guidelines (or any other State aid rules) sufficiently clear?

- Yes  
 No

16 Do you see any advantages or disadvantages to design SME access to finance measures under Article 21 of the GBER as opposed to other provisions in the GBER?

- Yes  
 No

17 If "Yes", please explain the specific advantages or disadvantages of Article 21 of the GBER from your own experience and specify with which alternative GBER provision you would see potential overlaps.

*3000 character(s) maximum*

Het ontwerpen en uitvoeren van maatregelen binnen het kader van AGVV kent het mede technische nadeel dat dit relatief ingewikkelder tot stand is te brengen aangezien het veel voorwaarden zoals vereiste externe partijen (intermediairs) omvat, in vergelijking met relatief eenvoudiger uit te voeren bepalingen zoals artikel 17 investeringssteun. Hiermee samenhangend zijn directe investeringen in eindbegunstigden niet mogelijk.

18 Please explain if and to what extent you perceive EU State aid rules on access to finance for SMEs to be consistent with other applicable EU rules and guidance, such as "[De Minimis Notice](#)", "[Notice on Guarantees](#)", "[Reference Rate Communication](#)", etc.?

*3000 character(s) maximum*

Wij vinden deze samenhangend met de andere toepasselijke EU-regels en richtsnoeren aangezien de basis principes zoals de berekening van het steunelement overeen komen.

19 Please explain if you have encountered any specific situation where you had perceived potential divergences between EU State aid rules on access to finance for SMEs and the dedicated EU policy goal to promote SME growth.

*3000 character(s) maximum*

Nee

20 Please explain if you have encountered any specific situation where you had perceived potential divergences between EU State aid rules on access to finance for SMEs and EU financed support measures in the area of SME access to finance.

*3000 character(s) maximum*

Ja. Aangezien de EIB groep geen lidstaat is en daarom in beginsel niet is gebonden aan de commune staatssteunregels, heeft zij bij de uitvoering van programma's meer ruimte dan de lidstaten. Naar onze mening is het aan te bevelen dat lidstaten onder gelijke voorwaarden als EIB Groep toegang tot financiering voor het MKB mogen bevorderen. Voorbeeld: bij de uitvoering van het EFSI programma. Bovenstaande heeft ook betrekking op voor lidstaten vereiste goedkeuringstrajecten voor een maatregel die EIB Groep ook uitvoert.

21 Please explain if you have encountered any specific difficulties with EU State aid rules when combining national support measures with EU financial support.

*3000 character(s) maximum*

Ja. Er zijn signalen ontvangen dat bij ondersteuning vanuit het EFSI programma nationale steunmaatregelen zijn ontmoedigd/ niet mogelijk bleken te zijn.

## Effectiveness

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22 Do the State aid measures you have in place effectively address difficulties of SMEs (and potentially small or innovative mid-caps) with regards to access to finance in your country (i.e. do the measures you have in place effectively address a specific "market failure")?

- Yes  
 No

23 Please explain why or why not:

*3000 character(s) maximum*

Recente evaluaties wijzen dit uit. Een voorbeeld is de Seed Capital regeling, zie de in het antwoord onder vraag 8. genoemde Kamerbrief met evaluaties.

24 Have you encountered any difficulties in attracting the minimum level of private financing required under Article 21 (10) of the GBER?

- Yes  
 No

26 To what extent have the current EU State aid rules on SME access to finance helped to design the measures you have implemented in a way to bridge the specific financing gaps (please distinguish between SMEs, small mid-caps and innovative mid-caps if relevant)?

*3000 character(s) maximum*

Deze hebben inderdaad geholpen, met name bij innovatieve kmo's aangezien hier de definities goed ontworpen en toepasbaar zijn om over te nemen in regelingen.

27 To what extent have the current EU State aid rules on SME access to finance provided relevant guidance to effectively limit support measures to specific areas of concern (like lack of specific types of financing, limiting the number of applicable beneficiaries, etc.) while minimising any potential negative impact on competition?

*3000 character(s) maximum*

Het benutten van de leidraad leidde niet tot negatieve gevolgen.

28 In general, do you perceive the current rules to be appropriate to address specific market gaps identified in your country in relation to access to finance measures, while ensuring to minimise any potential impact on competition?

*3000 character(s) maximum*

Ja, tot op heden is het door ons gewenste instrumentarium er onder te brengen.

29 In general, do you perceive the current rules to be sufficiently flexible to address specific market gaps identified in your country in relation to access to finance measures?

*3000 character(s) maximum*

Wij wijzen u graag op onze reeds eerder gewisselde bezwaren over de naar onze mening te ruime definitie van 'onderneming in moeilijkheden' in de steunkaders waardoor investeringen in gezonde en veelbelovende bedrijven geen doorgang kunnen vinden.

30 From your own experience, please explain which types of measures have worked particularly well and less well to address a market gap affecting access to finance for SMEs, small mid-caps or innovative mid-caps?

*3000 character(s) maximum*

Een voorbeeld voor zeer effectief: Co-investeren op fondsniveau samen met financiële intermediairs in private vc fondsen: Seed capital regeling. Zie de in antwoorden onder 8. en 22. genoemde evaluaties.

## Efficiency

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31 Is Section 3 of the GBER sufficiently understandable and clearly written? Please consider for your answer also the interpretative guidance provided by the Directorate-General for Competition via the IT-tool eState aid WIKI.

- Yes  
 No

33 Are the Risk Finance Guidelines sufficiently understandable and clearly written?

- Yes  
 No

35 Do you consider the current pre-notification practice of measures that may fall under the Risk Finance Guidelines to be generally efficient for measures to support SMEs' or small or innovative mid-caps' access to finance that do not fall under GBER?

- Yes

No

36 Please explain why or why not:

*3000 character(s) maximum*

Geen standpunt, want Nederland heeft onder de richtsnoeren inzake risicofinanciering 2014-2020 geen steunmaatregelen genotificeerd. De ruimte onder de AGVV bleek voldoende. Overige risicofinancieringsmaatregelen zijn marktconforme regelingen die als zodanig door de Europese Commissie zijn goedgekeurd waarbij financiële intermediairs door middel van marktconforme overheidsgaranties werden geholpen. Zie bijv. de Groeifaciliteit ( SA. 48197).

Please explain your own experience with the requirement under Section 3.2.1. of the Risk Finance Guidelines to provide an ex-ante assessment:

37 Is it sufficiently clear why this type of assessment is required and what the assessment should include?

*3000 character(s) maximum*

Zie antwoord bij vraag 36.

38 Do you feel that specific ex-ante assessments have helped you to tailor a specific measure to a specific market failure? Please explain why or why not:

*3000 character(s) maximum*

Zie antwoord bij vraag 36.

39 Based on your own experience, have ex-post assessments or other forms of continuous monitoring already helped you to readjust or otherwise improve specific access to finance support measures? Do you expect to improve any measures based on these assessments and monitoring once they become available?

*3000 character(s) maximum*

Nee.  
Kan thans niet worden ingeschat.

## Final comments and document upload

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40 Are there any other issues or experiences in relation to EU State aid rules on SME access to finance that you would like to share?

*3000 character(s) maximum*

Nee.

41 If you wish to do so, you can attach a relevant supporting document.

The maximum file size is 1 MB

## Useful links

[Fitness check - dedicated website of DG Competition \(http://ec.europa.eu/competition/state\\_aid/modernisation/fitness\\_check\\_en.html\)](http://ec.europa.eu/competition/state_aid/modernisation/fitness_check_en.html)

[Better Regulation Portal \(https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2018-6623981\\_en\)](https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2018-6623981_en)

[General Block Exemption Regulation \(https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02014R0651-20170710\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02014R0651-20170710)

[Guidelines on State aid to promote risk finance investments \(https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52014XC0122\(04\)\)](https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52014XC0122(04))

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## Background Documents

[Protection of your personal data](#)

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## Contact

COMP-RISKFINANCE-EVALUATION@ec.europa.eu

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