

# Greek State aid modernisation - Strengthening the institutional set- up for State aid control in Greece

Final event and final report

**Technical Support Instrument**

*Supporting reforms in 27 Member States*



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## Definitions and Abbreviations

<b>Abbreviation/Definition</b>	<b>Meaning</b>
<b>CeSAnet</b>	Central Information System of State aid
<b>COVID-19</b>	Coronavirus Disease of 2019
<b>CSAU</b>	Centralized State aid Unit
<b>GDPR</b>	General Data Protection Regulation
<b>DG REFORM</b>	Directorate General for Structural Reform Support
<b>Deliverable 1</b>	Inception Report
<b>Deliverable 2</b>	Report assessing the current national State aid control system and identifying the procedures to be included in the SAPM
<b>Deliverable 3</b>	State aid Procedures Manual (SAPM)
<b>Deliverable 4</b>	Training Map
<b>Deliverable 5</b>	Organisation of training sessions
<b>Deliverable 6</b>	Model State aid report
<b>Deliverable 7</b>	Final Event and Final Report
<b>EC</b>	European Commission
<b>ELSTAT</b>	Hellenic Statistical Authority
<b>ESIF</b>	European Structural and Investment Funds
<b>EU</b>	European Union
<b>EY Team</b>	Contractors
<b>EYKE</b>	Ministry of Development and Investment
<b>KoF</b>	Kick - off Meeting which took place on 30.11.2021
<b>MS</b>	Member State
<b>Parties</b>	Steering Committee, Project Management Team and any other parties involved in the Project
<b>Project</b>	Greek State aid modernisation - Strengthening the institutional setup for State aid control in Greece - REFORM/SC2021/087
<b>SAPM</b>	State aid Procedure Manual
<b>SARI</b>	State aid Annual Report Procedure
<b>SC</b>	Steering Committee
<b>SGEI</b>	Services of General Economic Interest
<b>State aid Network</b>	CSAU, DSAUs and the other bodies involved in the adoption or implementation of State aid measures
<b>TAM</b>	Transparency Award Module
<b>Technical Offer</b>	REFORM/SC2021/087
<b>ToT</b>	Train of the Trainer
<b>We</b>	The EY Team

## 1. Introduction

### 1.1 Objective and contents of the Deliverable

The final deliverable ("Deliverable 7") aims to summarize the Project experience and to communicate to all stakeholders the results of the Project's activities. Based on the work performed and the relevant feedback from stakeholders, Deliverable 7 provides a comprehensive overview that presents all the critical findings of deliverables 1-6, including the background, the process followed, the challenges encountered, the recommendations and the implementation guide for these recommendations.

The tasks carried out in this Deliverable are the following:

- Organize a final event in collaboration with the Project's Steering Committee.
- Prepare the Project's final report, which summarizes all activities across deliverables 1-6; includes an outline of the process followed and the issues identified; a short overview of the findings; a summary of the recommendations; and high-level advice for next steps. The report will include feedback from the final event, which will be used as a future reference for any potential ongoing work as a result of this Project.
- Prepare a short separate presentation, using simple and illustrative text (i.e. PowerPoint) with the key takeaways from the Project, that could be useful and relevant for implementing similar initiatives in other EU Member States.
- Prepare a factsheet of up to three (3) pages that can be used for presentation to third parties

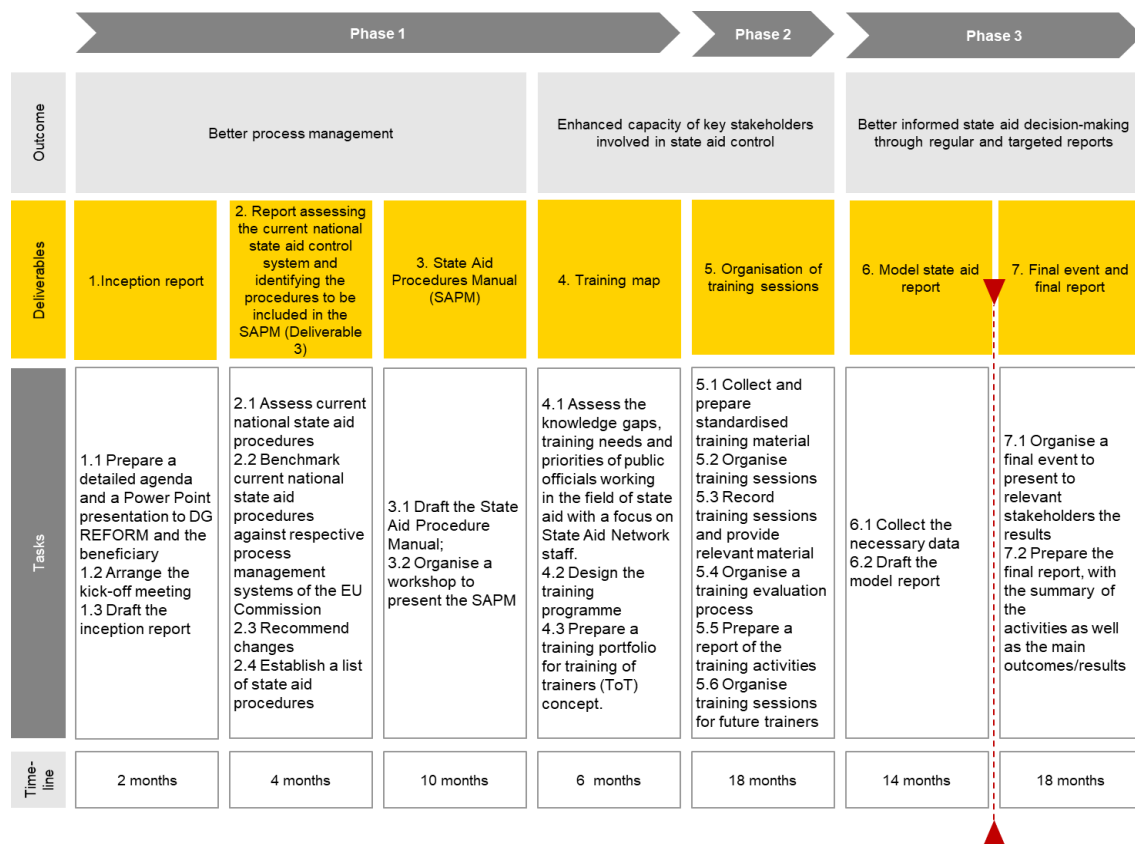
## 2. Overview and objectives of the Project Deliverables

Throughout the Project, the following Deliverables were produced:

- Deliverable 1: Inception Report
- Deliverable 2: Report assessing the current national State aid control system and identifying the procedures to be included in the SAPM
- Deliverable 3: State aid Procedures Manual (SAPM)
- Deliverable 4: Training Map
- Deliverable 5: Organisation of training sessions
- Deliverable 6: Model State aid report

After the completion of all tasks and Deliverables, this final report, *Deliverable 7: Final Deliverable and Final Report*, was produced, which includes a summary description of the work carried out and the Deliverables produced throughout the Project.

The graph below gives an overview of the approach and activities per Deliverable:



## 2.1 Objective & tasks of Deliverable 1: Inception Report

The objective of Deliverable 1 was to align the key stakeholders (the EC, the CSAU and the EY Team) in critical matters and ensure mutual understanding and agreement on the targets of the Project, the key teams, the methodology, the Deliverables, the milestones and time plan, the means of communication, the risks, the Project indicators and the next steps.

The 1<sup>st</sup> deliverable included the following sub-tasks and activities:

- Task 1.1 – Prepare and circulate a detailed agenda and a Power Point presentation to DG REFORM and the beneficiary prior to the kick-off meeting (KoM)
- Task 1.2 – Arrange KoM, in coordination with the DG REFORM and the beneficiary.
- Task 1.3 – Draft the inception report

The EY Team sent the relevant agenda on 29.11.2021 and the Kick-Off Meeting took place on 30.11.2021 via Videoconference, in which the Parties discussed and deliberated on the Project Objectives. The Inception Report, which was structured in 8 sections, captured in detail the common agreement and understanding of the Parties on the Project and included: a) a brief summary and scope of the Project; b) objectives and desired outcomes; c) results, actions and resources planned, including indicators; d) outputs with detailed work plan; d) difficulties

encountered; e) communication and visibility; and f) annexes containing: i) a list of documents that have been shared and reviewed by the EY Team and the Power Point presentation used during the KoM; and ii) a table of Key Performance Indicators (KPIs).

Overall, the first deliverable was a significant milestone for the Project as it contained the proposed methodological approach, organization and planning in order to lay the foundation for its successful completion and positive impact. The first draft of deliverable 1 was submitted by the EY Team on 21.12.2021. After receiving comments by CSAU and DG REFORM, two (2) updated versions of the deliverable were drafted, and the final document was submitted on 19.04.2022.

## 2.2 Objective & tasks of Deliverable 2: Report assessing the current national State aid control system and identifying the procedures to be included in the SAPM

Deliverable 2 focused on four main pillars:

- 1)** Mapping and assessment of the current State aid procedures established in the domestic legal and regulatory framework and followed by the Greek State aid Institutional Network, i.e. the CSAU, the DSAUs and the other granting authorities and public agencies involved in the granting or implementation of State aid measures; and assessment of the respective requirements stemming from the Recovery and Resilience Facility and European Structural and Investment Funds (ESIF);
- 2)** Benchmarking these domestic procedures against respective process management systems of the European Commission (to the extent possible and applicable) and of other, selected, Member States;
- 3)** Identification of key problems and challenges faced and recommendation of possible changes in the structure and procedures of the State aid Network, also based on insights from business process management theory;
- 4)** Establish a list of State aid procedures to be included in the State aid Procedures Manual (SAPM).

The **1<sup>st</sup> part** contained an analytical presentation of the Greek regulatory framework regarding all State aid domestic processes. We referred to Law 4152/2013 on the establishment of the CSAU and the DSAUs and their respective competences and operation, Ministerial Decision No Δ6Α 1110484/ 2013 further specifying the strategic targets of the CSAU and its competences and Presidential Decree 142/2017 (as recently amended by Presidential Decree 47/2021). We also referred to the competences of the DSAUs and of the Inter-Ministerial Committee on State aid and assessed how the CSAU and the DSAUs cooperate and interact. Furthermore, the Report included a brief description on how the system should typically operate, with the DSAUs having a “first-line” role in order to collect the necessary material



and forward (timely) to the CSAU a complete application for the issuance of a recommendation by the latter. We conducted interviews with the CSAU and the DSAUs, from which we identified the main challenges encountered (e.g. delayed submissions by DSAUs, incomplete files, submissions by the leadership of the Ministries directly to the CSAU by-passing the DSAU of the Ministry, imposition of strict deadlines that make the in-depth review by the CSAU difficult etc), which we presented in the report.

**Part 2** contained a benchmarking exercise: In particular, the Report included presentations of the respective legal framework and procedures in France, Germany, Belgium, Spain, Portugal, Italy and Estonia. We presented the basic national schemes and highlighted the pros and cons of each national system examined. Furthermore, the Report contained a brief reference to key European Commission legal documents on the procedure of handling State aid cases. EY Team also drafted a memo presenting the key characteristics and the pros and cons of each national system. Two workshops took place, one with the CSAU (on 08.02.2022) and one with the DSAUs (on 10.2.2022) in which: a) the Memo was presented, and useful feedback and insights were provided by participants. Finally, we summarized good practices identified in the benchmarking exercise, with a view to formulate a corresponding strategy.

**Part 3** described the key problems that the State aid Network in general and the CSAU in particular have to deal with (failure to follow the timetables, by-passing/ non-involvement of the DSAUs, incomplete case-files forwarded to the CSAU, lack of know-how, insufficient training and lack of training material, lack of adequate human resources, volume of cases to be addressed). The Report identified weaknesses and proposed various measures that could address the existing issues. The EY Team made several proposals, among others the amendment of the regulatory framework; the organizational restructuring of CSAU; the imposition of fines. The adoption of these proposals was expected to result in the improvement of the organizational structure of the competent authorities, the proper functioning of the organizations and prevent deviations from the procedure. Following multiple consultations with the CSAU, concerns were raised on certain proposals and therefore the report was updated accordingly.

**Part 4** included an indicative list of State aid procedures to be included in the SAPM.

The final version of the report was submitted on 19.01.2023, following two previous submissions on 21.02.2022 and 15.06.2022.

### 2.3 Objective & tasks of Deliverable 3: State aid Procedures Manual (SAPM)

The objective of this deliverable concerned the preparation of the State aid Procedures Manual, which is expected to become an effective and practical working tool for State aid officials providing them with guidance on the procedure to be followed for the granting of State aid.

For the completion of Deliverable 3, the following tasks were carried out:

► **Task 3.1** – Draft the State aid Procedures Manual

► **Task 3.2** – Organize a workshop to present the SAPM

More specifically, to complete this task the EY Team reviewed the available material (circulars, procedures, working instructions, guidelines, EU and MS regulatory framework) and documents identified via the EY Team’s research and/or provided by stakeholders with the ultimate aim to develop a guidance document presenting the detailed actions that must be carried out by the officials who work in the field of State aid, in order to comply with the applicable national and EU legislation. The SAPM has the following structure:

Part 1 of the SAMP summarized the basic principles to be followed for the most efficient assessment process of each planned measure.

Part 2 provided a summary of the substantive part of State aid. In particular, it analyzed basic concepts and definitions such as the incompatibility principle, the concept of State aid based on the relevant criteria (state origin, advantage, selectivity, effect on trade and competition) the concept of undertaking and of the Services of General Economic Interest (SGEI). Part 3 described the procedure of assessment of the proposed measure, the provision of advice and the notification to the European Commission, a procedure which aims at the early identification of aid granted in any form by the Greek State or through State resources which distorts or threatens to distort competition by favoring certain undertakings or the production of certain goods and is therefore incompatible with the internal market in so far as it affects trade between Member States. Part 3 analyzed the individual actions of the competent authorities (granting authorities, DSAUs, CSAU) by category of action (transfer of resources that does not constitute State aid, measures falling under the de minimis rule, aid falling under the General Block Exemption Regulation, measures that constitute State aid that must be notified to the Commission) and set out the proposed procedural flow.

Part 4 set out the procedure for the recovery of unlawful State aid. The procedure applies to State aid, which has been found to be incompatible with the internal market by virtue of a decision of the European Commission or a decision of the Court of Justice or the General Court of the European Union and must be recovered. The purpose of the recovery procedure of unlawful State aid is to eliminate the distortion of competition caused by the granting of a competitive advantage.

Part 5 presented the European Commission's Approvals Registration Procedure in the Transparency Award Module (TAM). According to the current EU State aid regulatory framework, all Member States are obliged to publish on a freely accessible website for citizens, information on individual State aid granted in the country - under an approved aid scheme or an exempting regulation of the European Commission - that exceeds certain thresholds. This data is entered in the TAM (Transparency Award Module) information system and relates to aid approvals, not expenditure.

Part 6 discussed the State aid Annual Report Procedure (SARI system). On an annual basis, Member States are required to submit an annual State aid report, which analyses the State aid granted (expenditure) in the previous year. The report is submitted and transmitted to the European Commission via the SARI (State aid Reporting Interactive) system.

At the end of each chapter the relevant legal framework, summary tables, flow charts were provided for an overview and overall understanding of the procedures.

Finally, SAMP was concluded with (a) Annex I, which included a guide to understanding the flowcharts; (b) Annex II, which discussed the method for calculating interest and determining interest rates during the recovery process, (d) Annex III, which set out the criteria for defining an enterprise as a small or medium (e) Annex IV, which presented certain specific categories of State aid; and (f) Annex V, which referred to the procedure for ex post evaluation of the effectiveness and efficiency of State aid measures.

Following the first draft, which was submitted on 20/07/2022, the team participated in several meetings and consecutive discussions with CSAU to present the SAPM and discuss potential amendments. The EY Team proposed the adoption of certain key measures, such as a) the shortening of deadlines; and b) the provision of an explicit competence to the DSAUs to assess categories of measures (e.g. measures that do not constitute State aid, de minimis aid or measures falling within the ambit of the GBER) and submit a synoptic opinion to CSAU with the later having a 10-day deadline to reassess this opinion and revert if required. Under the EY Teams initial proposal, the passing of this 10-day deadline would result in the opinion of the DSAU - as regards the characterization of the proposed measured - being considered as approved. Under this proposed scheme, CSAU's main competence would be to: a) deal with measures that do constitute notifiable State aid and draft the respective opinions; and b) assess the above opinions of DSAUs and (if necessary) intervene within the relevant deadline.

However, following the submission of the above EY Team's proposal, there were multiple consultations with CSAU, and the SAPM was adjusted several times, for the purposes of addressing, to the extent possible, comments and expressed concerns of CSAU. In addition, during the Project and after the submission of the first drafts of the SAPM, important parts of the main regulatory framework for the State aid in Greece were amended. In particular, law 4152/2013 was replaced by law 5000/2022, which introduced changes, including changes and/ or clarifications as regards the process to be followed and the allocation of competences. Therefore, following review of the new law, the draft SAPM was adjusted again in order to reflect the new provisions. Overall, we have prepared and sent five different drafts (20/07/2022, 29/09/2022, 13/01/2023, 13/02/2023, 03/03/2023) until the submission of the final version, taking into consideration the new regulatory framework and the input and comments received by CSAU. After concluding the final version, we organized a workshop with the CSAU and the DSAUs on 08/03/2023, in order to present the major components of the SAPM.

#### **2.4 Objective & tasks of Deliverable 4: Training Map**

The purpose of the 4<sup>th</sup> deliverable was to develop a training program, structured in three (3) proficiency levels (Beginner, Intermediate and Advanced), which would be the main tool for the upcoming trainings for State aid officials.

The 4<sup>th</sup> deliverable included the following sub-tasks and activities:

**Task 4.1** – Assess the knowledge gaps, training needs and priorities of public officials working in the field of State aid with a focus on State aid Network staff.

**Task 4.2** – Design a structured sequence of training activities for the aforementioned officials (around 120 people) structured around three (3) proficiency levels.

**Task 4.3** – Prepare a training portfolio for training of trainers (ToT) concept.

For the purposes of deliverable 4, the EY Team, reviewed all existing documentation and organized teleconferences with key stakeholders, in order to i) define the training material, ii) discuss the challenges and iii) deepen its understanding of the learning priorities, and accordingly it prepared a questionnaire in order to determine the training expectations and needs of the stakeholders.

In the 3<sup>rd</sup> Steering Committee dated 18/04/2022, the Parties agreed that the first draft would be prepared on the basis of contents and the full report would be prepared after concluding deliverable 3 and after receiving the feedback to the above questionnaires. Since knowledge assessment, in order to determine each official's technical skill levels was not possible to be conducted in an anonymous basis and the officials may not have wanted to participate in a knowledge assessment, it was agreed that the levels would be determined based on the years of experience of each official. Therefore, the first draft of deliverable 4 was delivered on 20/04/2022. In addition to the training map, deliverable 4 also included a gap analysis report, in which current gaps were identified, in order to define knowledge requirements. Following the drafting of deliverable 3 and after the completion of questionnaires from State aid officials, the training map was adjusted and resubmitted on 27/03/2023. After the conclusion of the trainings the final consolidated version of the training map was delivered to all the stakeholders on 05/04/2023.

The Training portfolio was presented in the ToT, which took place on 25/04/2023.

## 2.5 Objective & tasks of Deliverable 5: Organisation of training sessions

Deliverable 5 was a benchmark for the Project, since it is the beginning of an ambitious, but yet realistic journey, which aims at enhancing the operational performance of the State aid system network, through a better trained and highly skilled staff. To accomplish this objective, the EY Team followed the tasks designated in the Technical Offer, which were as follows:

- ▶ Task 5.1 – Collect and prepare standardized training material that will be shared with trainees of each proficiency level.
- ▶ Task 5.2 – Organise at least 2 training sessions per proficiency level (minimum 6 training sessions).
- ▶ Task 5.3 – Record training sessions and provide relevant material to CSAU.

- ▶ Task 5.4 – Organise a training evaluation process and adjust/refine training material accordingly.
- ▶ Task 5.5 – Prepare a short report of the training activities.
- ▶ Task 5.6 – Based on feedback collected from trainees and the needs assessment (Deliverable 5), prepare and organise at least 2 dedicated training sessions for future trainers on the basis of the ToT concept.

The training material was prepared in three (3) proficiency levels to cover different knowledge gaps; however, some sections were repeated since they were considered significant for all levels. The training sessions took place on 29/03/2023, 30/03/2023 and 31/03/2023 (two sessions of two to three hours each day). Overall, the participation was significant as there were attendees from CSAU, DSAUs and many granting authorities, whereas apart from the EY Team there were also speakers from the EU Commission (DG COMP and Legal Service) and from the Recovery and Resilience Facility.

The training seminars were conducted in a hybrid way, both in person at the premises of EY Greece in Maroussi and online through Microsoft teams. Most participants have chosen to participate online.

On 29<sup>th</sup> March 2023, 137 participants attended the training session for Beginner's level. 30 participants attended the training seminar in person while 107 participants attended the training seminar online. On 30<sup>th</sup> March 2023, the participants who attended the training session for Intermediate level were 104 in total. 25 participants attended the training seminar in person while 79 participants attended the training seminar online. Finally, on 31<sup>st</sup> March 2023, 86 participants attended the training session for the Advanced level, 25 of whom attended in person and 61 online.

As mentioned above, trainers in the training seminars were both experts from the Project Team as well as executives from the European Commission and the Recovery and Resilience Facility.

The seminars were attended by executives/officials from the entire State aid Network. Indicatively, in the training seminars participated executives/officials from CSAU, DSAU of the Ministry of Finance, DSAU of the Ministry of Development and Investment (EYKE), DSAU of the Ministry of Environment, DSAU of the Ministry of Infrastructure and Transport, DSAU of the Ministry of Digital Governance, DSAU of the Ministry of Shipping and Island Policy, DSAU of the Ministry of the Interior, the DSAU of the Ministry of Immigration, the DSAU of the Ministry of Labor, the DSAU of the Ministry of Education, Research and Religious Affairs, the DSAU of the Ministry of Culture and Sports as well as the State aid Unit (MoKE) which operates at the Center for International and European Economic Law (KDEOD) in Thessaloniki. Finally, a large number of executives/ officials from Units/ Authorities acting as granting authorities participated, such as Regulatory Authority for Energy (RAE), the ADMIE (electricity system operator) group, the General Directorate of Strategic Investments of the Ministry of Development and Investments, the Directorate of Energy Policies and Energy Efficiency of the Ministry of Environment and Energy, the National Centre of Audiovisual Media and Communication (EKOME), the Special Recovery Fund Coordination Service (EYSTA) under the

Ministry of Finance, the General Directorate of Fiscal Policy & Budget of Ministry of Finance, the General Directorate of Economic Policy of Ministry of Finance, Enterprise Greece etc.

Among the topics covered were the notion of State aid (Art. 107 par. 1 TFEU), services of General Economic Interest (SGEI), Altmark criteria, exceptions from the principle of incompatibility (Art. 107 par. 2 and par. 3), de minimis aid, aid under the General Block Exemption Regulation (GBER), recovery of illegally granted and incompatible State aid, case law on State aid, State aid evaluation, guidelines on State aid for climate, environmental protection and energy, the market economy operator principle, the important Projects of common European interest (IPCEI) and the funding gap analysis.

During the training seminars there was active participation by the trainees, while a significant number of interesting questions were raised, which led to a productive discussion and exchange of views in a variety of State aid matters (by way of indication, on issues concerning the recovery of illegally granted and incompatible State aid, of issues regarding the principle of private investor on the repercussions of recent case-law developments etc). Furthermore, after the conduct of the training seminars, the Project team received a lot of inquiries by the participants on whether and when they would receive the training material because they considered it very useful for their day-to-day work.

As per the Technical Offer a short report of the training activities was prepared, including the results from the training evaluation process. The short report was presented to the CSAU during the first ToT session on 25/04/2023. On the same day, the EY Team delivered the report of the training activities to the DG Reform and the CSAU.

In addition, as per the Technical Offer, the EY Team prepared the General Data Protection Regulation (GDPR) forms in order to record the training sessions and create a file to be used as future material along with the training map. However, on 30/03/2023 and following concerns raised by the beneficiary it was agreed that the recording should not take place and therefore the recording from the first session was deleted.

Finally, the dedicated sessions for selected CSAU officials who will become trainers focused on the training content and the methodology to be used in order to materialise the ToT concept. These sessions took place on 25/04/2023. Specifically, 9 officials from the CSAU attended the ToT sessions and were trained to become future trainers. The first ToT session was focused on the provision of guidance to the futures trainers and training tips, to the presentation of the sections of the SAPM and to the presentation of the short report of the training activities. The second ToT session focused on the run through of the slide deck presentation of the training material, and the provision of answers to questions raised. The ToT sessions were conducted by the EY team with the coordination and guidance of Ms Alexia Robertson, who has extensive experience in people operations and advisory services as well as in training activities and development of best practices.

## 2.6 Objective & tasks of Deliverable 6: Model State aid report

The aim of this deliverable was to provide to the State aid network (CSAU, DSAUs, granting authorities and other bodies involved), to policy makers (at national and local level) and other external stakeholders with a comprehensive and user-friendly report as regards the allocation of State aid grants in Greece over time. This model report was of paramount significance not only for transparency reasons, but also as a guiding tool for all policy/decision-makers in order to facilitate better-informed State aid decision making and thus contribute to a better and more efficient use of public funds.

The deliverable included the following tasks:

► Task 1–Collect the necessary data

► Task 2–Draft the model report

The Model State aid Report included: a) a brief summary of the sources from which the data was collected as well as the general scope of the report; b) presentation of the data collected in easily understood tables/ figures based on the following indicators; aid provided per business sector as % of Gross Domestic Product (GDP), aid by type of cases as % of GDP, aid by main objectives as % of GDP, aid by aid instruments as % of GDP and aid under block exemption as % of GDP; c) analysis of the data and identification of any variations from year to year and the reasons why these variations have occurred; d) presentation of the data in comparison with the EU benchmark/ average and with the corresponding data of MS with economies similar to that of Greece (this part was also presented per the above indicators and in easily understood tables/ figures); e) analysis of this comparison and identification of the reasons due to which any significant deviation is detected; and f) guidelines and recommendations on how to source future data for the CSAU to easily update the report on an annual basis.

The first version of Deliverable 6 was submitted by the EY Team on 21/12/2022. After receiving comments by CSAU an updated draft was delivered on 10/02/2023 and then the final version with the addition of data regarding de minimis measures (as provided by EYKE) was submitted on 06/04/2023.

## 2.7 Objective & tasks of Deliverable 7: Final Event

The aim of Deliverable 7 was to provide an overview of the Project and the challenges encountered, define key findings and lessons learned, and provide clear, tailor-made and practical recommendations and guidance for the future. Deliverable 7 included the drafting of a report, the preparation of a presentation and a factsheet and the organization and conduct of the Final Event. The Final Event took place on 26/04/2023. It was attended by the Director General of DG Reform Mr Mario Nava, as well as representatives from the DG Reform, the CSAU, the General Secretariat of Economic Policy, the General Secretariat for Coordination - Presidency of the Government and the EY team. During the Final Event, a constructive and fruitful discussion between the participants took place. Mr. Mario Nava highlighted the importance of the Project and the Deliverables for a more efficient and effective State aid Network. The EY team presented an overview of the challenges and the problems identified during the Project such as the lack of adequate and experienced human resources, lack of trainings especially for the newly appointed staff, the substantial differences between the

professional qualifications of the DSAUs and the practice of no full engagement of the DSAUs when submitting a draft measure for consultation. Also, the representatives of the CSAU presented the main difficulties and challenges faced by the Unit i.e. lack of personnel, unexperienced DSAUs, heavy workload, significant number of personnel (experienced and well-trained) in CSAU that does not hold a permanent post in this department and may need to leave the Unit, once the secondment period is over, thus creating discontinuity of the operation and the added value improvements achieved. Finally, the EY Team presented feasible recommendations for the future (i.e the strengthening of the responsibilities of the employees/executives of the DSAUs, who will have signature authority), which could be implemented by Greek public authorities and expressed the need, to map the needs and categorize the employees of the DSAUs.

### 3. Outline of the process followed

The EY team conducted frequently meetings and calls with the key stakeholders (notably the representatives of DG Reform, the direct beneficiary authority-CSAU and the DSAUs) in order to ensure mutual understanding and agreement on the approach to be followed for each task, the methodology, the timeline of the deliverables, the provision of regular status updates, and to highlight the challenges faced during the Project. The EY team ensured that the Project was delivered timely according to the highest quality requirements and that the expectations of all parties involved were met.

#### 3.1 Timeline of Deliverables

<b>Deliverable 1: Inception Report</b>	
Submission of 1 <sup>st</sup> Edition	21/12/2021
Submission of 2 <sup>nd</sup> Edition	15/03/2022
Submission of 3 <sup>rd</sup> Edition	19/04/2022
<b>Deliverable 2: Report assessing the current national State aid control system and identifying the procedures to be included in the SAPM</b>	
Submission of 1 <sup>st</sup> Edition	21/02/2022
Submission of 2 <sup>nd</sup> Edition	15/06/2022
Submission of 3 <sup>rd</sup> Edition	19/01/2023
<b>Deliverable 3: State aid Procedures Manual (SAPM)</b>	
Submission of 1 <sup>st</sup> Edition	20/07/2022
Submission of 2 <sup>nd</sup> Edition	29/09/2022
Submission of 3 <sup>rd</sup> Edition	13/01/2023
Submission of 4 <sup>st</sup> Edition	13/02/2023
Submission of 5 <sup>th</sup> Edition	03/03/2023



<b>Deliverable 4: Training Map</b>	
Submission of 1 <sup>st</sup> Edition	20/04/2022
Submission of 2 <sup>nd</sup> Edition	27/03/2023
Submission of 3 <sup>rd</sup> Edition	05/04/2023
<b>Deliverable 5: Organisation of training sessions</b>	
Trainings	29-31/03/2023
<b>Deliverable 6: Model State aid report</b>	
Submission of 1 <sup>st</sup> Edition	21/12/2022
Submission of 2 <sup>nd</sup> Edition	10/02/2023
Submission of 3 <sup>rd</sup> Edition	06/04/2023

### 3.2 Steering Committee

A Steering Committee was established for the Project which consisted of representatives of EY, DG REFORM and CSAU.

The Steering Committee met on a quarterly basis in order to oversee the planned activities, ensure effective coordination and engagement of all parties involved. The Steering Committee tracked the progress of the Project, decided on the Project's course aligned and managed stakeholders' expectations.

Specifically, the following Steering Committee Meetings were held:

<b>Steering Committee Meeting</b>	<b>Date</b>
<b>1<sup>st</sup></b>	30/11/2021
<b>2<sup>nd</sup></b>	21/01/2022
<b>3<sup>rd</sup></b>	18/04/2022
<b>4<sup>th</sup></b>	27/7/2022
<b>5<sup>th</sup></b>	7/11/2022
<b>6<sup>th</sup></b>	1/02/2023
<b>7<sup>th</sup></b>	6/04/2023

After every Steering Committee Meeting, the EY Team provided the participants with written minutes drafted both in Greek and English language.

### 3.3 Progress Reports

The EY Team prepared monthly progress reports, which contained the progress status of each deliverable, actions carried out, the next steps to be followed, potential risks and the decisions to be made.

The progress reports were delivered to the representatives of DG Reform and stakeholders (CSAU).

Progress Reports	
1 <sup>st</sup> Progress Report	22/11/2021
2 <sup>nd</sup> Progress Report	22/12/2021
3 <sup>rd</sup> Progress Report	21/01/2022
4 <sup>th</sup> Progress Report	22/02/2022
5 <sup>th</sup> Progress Report	22/03/2022
6 <sup>th</sup> Progress Report	21/04/2022
7 <sup>th</sup> Progress Report	20/05/2022
8 <sup>th</sup> Progress Report	21/06/2022
9 <sup>th</sup> Progress Report	21/07/2022
10 <sup>th</sup> Progress Report	26/08/2022
11 <sup>th</sup> Progress Report	22/09/2022
12 <sup>th</sup> Progress Report	24/10/2022
13 <sup>th</sup> Progress Report	24/11/2022
14 <sup>th</sup> Progress Report	21/12/2022
15 <sup>th</sup> Progress Report	20/01/2023
16 <sup>th</sup> Progress Report	21/02/2023
17 <sup>th</sup> Progress Report	22/03/2023
18 <sup>th</sup> Progress Report	21/04/2023

### 3.4 Project Management

The graph below describes the overall structure of the team concerning the management and the implementation of the Project as well as the roles assigned to the Experts.

The Project was supervised by one (1) Project Manager, one (1) Engagement Partner and one (1) Quality Assurance Expert

The key responsibilities of the Project Manager and the Quality Assurance Expert were the following:

- Supervising the preparation of the Quality Plan and its supporting tools;
- Applying quality control measures on the final deliverables;

- Monitoring any potential risks that arise in the context of this Project that could impact on the results and activities;
- Seeking for client feedback in a timely way, and
- Ensuring that the know-how of EY is transferred to this Project.

The Engagement Partner represented the Team and was responsible for EY's overall engagement. The key responsibilities of the Engagement Partner were the following:

- Responsible for the overall management, review and sign-off of the Project outcomes;
- Overall supervision and responsibility for reviewing all deliverables and other legal and procedural aspects of the Project to ensure conformity with the national and EU law;
- Acting as the intermediary between the EY Team, the SC, CSAU and DG Reform;
- Participating in all SC meetings and stakeholder engagement;
- Day to day point of contact for the Project for all stakeholders

#### 4. Challenges encountered

##### ***Deliverable 1 –Inception Report***

No significant challenges arose during the drafting of Deliverable 1. One issue that the EY team had to encounter was the process of aligning the key stakeholders (the EC, the CSAU, the DSAUs and the EY Team) in critical matters and ensuring mutual understanding and agreement on the targets of the Project. As usually anticipated in similar Projects, -there was no absolute consensus at the initial stage on all potential areas of focus and interest . The Project team made the necessary efforts to accommodate the concerns raised and to cover to the extent possible any additional areas requested.

##### ***Deliverable 2 - Report assessing the current national State aid control system and identifying the procedures to be included in the SAPM***

In the context of the 2<sup>nd</sup> Deliverable, the first challenge was the mapping of the current State aid procedures established in the domestic regulatory framework. The main legislation on State aid in Greece is spread across several legal texts (Law 4152/2013 on the establishment of the CSAU and the DSAUs and their respective competences and operation -as this Law has been amended by Law 5000/2022 during the implementation of the Project, Ministerial Decision No Δ6A 1110484/2013. further specifying the strategic targets of the CSAU and its competences, and Presidential Decree 142/2017 (as recently amended by Presidential Decree 47/2021).

Significant challenges were faced and identified during the assessment of the current State aid procedures and how these procedures do operate in practice. According to the findings of our interviews with the CSAU and the DSAUs, the typical intrastate State aid process as provided in the Greek regulatory framework is not followed in quite a number of cases

(delayed submissions by DSAUs, provision of incomplete files, direct submissions of measures by the Ministries by-passing the competent DSAU of the Ministry, imposition of strict deadlines by the political leadership that make the in-depth review by the CSAU extremely difficult etc). Furthermore, following the initial findings of certain interviews we have identified a different perception of certain stakeholders about the roles and competences of the CSAU and the DSAUs within the network. This different approach did rely on an (acceptable) interpretation of the then applicable legal framework, given that this framework did not clarify the competencies within the network on certain, crucial aspects.

EYKE for example, which is the DSAU of the Ministry of Development and Investments, competent to assess and review a significant number of Projects that may involve State aid, has been reviewing de minimis measures and other measures that do not constitute State aid without further forwarding the case files to CSAU.

Therefore, we have thoroughly reviewed the above regulatory framework and present in this Report our findings on this subtle issue that caused concerns and different approaches on the matter as regards the handling of cases.

This may, for example, concern the handling of de minimis measures and/ or measures that are forwarded by the granting authority to the competent DSAU (such as EYKE) and the latter opines that they do not constitute State aid at all.

Another challenge was the benchmarking of these domestic procedures against respective process management systems of the European Commission and of other, selected, Member States. Between the 27 Member States of the EU, we chose MS of comparable size in terms of population (e.g. Belgium/ Portugal) and/or MS that have gone through Fiscal Consolidation Programmes (e.g. Spain and Portugal) and/or MS with more sophisticated systems (e.g. Germany/ France). In many cases it was not an easy task to find valid and verifiable sources of information, mainly, due to the absence of up-to-date national websites on State aid procedures and published reports describing the internal processes within these MS. Also, the absence of a central State aid authority, like the CSAU, in almost all EU MS did not facilitate the drawing of directly applicable conclusions. Nevertheless it has been made possible to include certain recommendations based on good practices incorporated in other EU MS.

A major challenge of the 2<sup>nd</sup> Deliverable was the identification of key problems and challenges faced and recommendation of possible changes in the structure and procedures of the State aid Network, and the establishment of a list of State aid procedures to be included in the State aid Procedures Manual (SAPM).

Changes should mainly focus on procedural aspects, yet they should also reflect the structure of the competent bodies. For that purpose, the Project team set up successive workshops with CSAU personnel and with key DSAU personnel to present and discuss the initial recommendations, so as to cover unexplored areas and address potential concerns, arising from the proposed recommendations.

Lastly, in order to complete the task of identifying which State aid procedures should be included in the SAPM, it was a challenging task to involve actively the key stakeholders (i.e. CSAU, DSAUs, GAO, IAPR, General Secretariat for Public Investments and NSRF). In order to

facilitate the assessment and obtain a complete view of the current regime and how it is applied in practice, the Project team had to: a) collect material through requests for information, b) organise a set of interviews, c) organise workshops with the CSAU and workshops with DSAU's staff. The communication with all these parties and the successful planning of the workshops were a challenge that the EY Team met.

### ***Deliverable 3 - State aid Procedures Manual (SAPM)***

The 3<sup>d</sup> Deliverable was arguably the most important Deliverable of the Project. During its drafting, the biggest challenges for our Project team were also presented.

Issues we had to deal with were the following:

- a. The need for several meetings with the key stakeholders in order to gain a deeper understanding of the organization and identify the key processes;
- b. The collection of all available material (such as terms of reference, policies, circulars, procedures, working instructions, guidelines, EU and MS regulatory framework) through a Request For Information file. Access to certain categories of documents was not provided to us (e.g. Opinions in past completed cases) due to issues of confidentiality. This created an obstacle to the work of the Project team, since we could not assess and review actual case-files (requests for CSAU opinions etc.) and be in a better position to identify impediments faced by the actual operation/workflow of the State aid network;
- c. The drafting of the Manual of Procedures in a way that would allow its constant updating based on the developments of the primary and secondary law of the European Union as well as of the domestic law on procedures and competences within the State aid network;
- d. The drafting of the SAPM both in process narratives and process flowcharts, including a number of elements such as: i. process boundaries (start and end points), ii. process inputs and outputs, iii. key activities, sequence/flow and decision points, iv. roles and responsibilities, v. any interactions between the processes etc.;
- e. The amendment of the relevant legislative framework for State aid with the new L. 5000/2022, an amendment that was put into effect after our team has submitted the first draft of the SAMP. As a result, the draft SAMP had to be updated at critical points based on the new Law;
- f. The presentation of the draft SAPM to all stakeholders in order to receive feedback to be incorporated in the final SAPM. The draft SAMP had to be updated several times based on this feedback and the significant number of comments/ concerns and proposals;
- g. The different perception of certain stakeholders about the roles and competences of the CSAU and the DSAUs and the fact that the regulatory framework would allow for differing interpretations regarding the handling of cases. Foreexample, cases that may constitute de minimis measures and/ or measures that are forwarded to a DSAU (for example EYKE), but the latter opines that they do not constitute State aid. The aim of the Project team was to promote cooperation between granting authorities, the

DSAs and the CSAU and to ensure a complete, timely and effective control of actions involving the transfer of State resources, highlighting the monitoring role of the DSAs on the one hand and the executive role of the CSAU on the other hand.

#### ***Deliverable 4 –Training Map***

The 4<sup>th</sup> Deliverable involved the preparation of educational material for the training of the officials working in the relative field in Greece. There was no adequate and/ or updated material on which the Project team could rely. As expected, several challenges were identified and addressed:

First, it was crucial to define stakeholder groups and their needs, expectations and engagement level and explore learning priorities. In order to achieve this, the Project team organized questionnaires /interviews/ workshops with key stakeholders and discussed the challenges, the learning priorities, the current gaps and the current workforce capabilities in order to make the training bespoke to the needs. Secondly, the Project team reviewed all existing documentation, circulars and relative information and material. As mentioned, there was not a broad range of such material. Thirdly, it was a challenge for the Project team to define future knowledge requirements per proficiency levels (Beginners, Intermediate and Advanced), by taking the output of the above deliverables in terms of the future-state processes and digitalization into consideration. Furthermore, the Project team faced difficulties in proceeding with skills assessment in order to determine each employee's technical skill levels (self-assessment was not considered a workable option). For this reason, the division into levels was made based mainly on the years of experience of each employee in the specific subject.

Regarding the design of the training activities for the officials (around 120 people), the challenge was to structure the training material in three different (3) proficiency levels, to include the multitude of legal texts, to be as concise as possible, due to time constraints, but also to include interesting topical issues. Some sections were seen as particularly important for all levels, hence some repetitions of the material in the training seminars could not be completely avoided.

#### ***Deliverable 5***

The 5<sup>th</sup> Deliverable was one of the most important Deliverables of the Project. During the preparation of the training material of each proficiency level and the holding of the training seminars the following issues arose:

- a. From the drafting of Deliverable 4 to the implementation of Deliverable 5, one year has passed. A number of EU legislative texts was amended or repealed and new legal texts have been introduced (e.g. the new GBER). Due to that the corresponding updating of the educational material had to be carried out.
- b. As aforementioned, some sections were seen as particularly important for all levels. Therefore, some repetitions could not be avoided.

- c. The EY team provided its own space to hold the seminars.
- d. The large number of participants led to an increased administrative workload. Many officials from the granting authorities also participated. The Project team drafted a participant list, which was constantly renewed, and selected the most preferable dates by the trainees in order to schedule the trainings, in coordination with CSAU, and organized the training sessions.
- e. The shaping of the seminar in such a way as to integrate the different expectations between stakeholders. A challenge to this was the fact that the trainees came from different academic backgrounds and had different professional experience in the field of State aid.

### ***Deliverable 6 –Model State aid report***

No significant challenges arose during the drafting of Deliverable 6. The main database (SARI) and the State aid Scoreboard were user-friendly for the purpose of enabling statistical conclusions to be drawn. On the other hand, drawing conclusions from other databases, such as the Transparency Award Module (TAM) and the Hellenic Statistical Authority (ELSTAT), was not possible due to the large amount of uncategorized data. Furthermore, full access to the Information System for the Cumulation of State aid (Sorefsis.gr) is not public. At first, this was an obstacle for the Project team in its aim to include in the report data on the allocation of de minimis aid grants in Greece over time. For the resolution of this problem, the contribution of EYKE, that has forwarded to us the relevant data, was decisive, therefore it has been made possible to also include tables with useful data on de minimis measures.

## **5. Overview of findings**

1. The **Greek State aid Network**, i.e. the CSAU, the DSAUs and the other granting authorities and public agencies involved in the granting or implementation of State aid measures has been operating under its current form since the enactment of Law 4152/2013.
2. While this Network has to date functioned (to an extent) rather efficiently and it has managed to handle (draft) measures potentially involving State aid elements, significant challenges remain.
3. These challenges concern:

a) the lack of adequate human resources and the need to train the newly appointed staff of the CSAU on the one hand and the lack of adequate and experienced staff of a number of DSAUs on the other hand. We have identified substantial differences between the professional qualifications of the officials of the CSAU and of some DSAUs. We note that as regards the lack of human resources, during the last 2 years the number of CSAU personnel has increased and the Unit is now better placed to exercise its competences;

b) notification to CSAU of draft measures with incomplete or inadequate data;

c) submission of draft measures by the Ministries and/ or by other granting authorities with strict deadlines, that make the in-depth review by the CSAU extremely difficult;

d) vague provisions in the law as regards the intra Network allocation of competences between the CSAU and DSAUs (especially as regards measures that do not constitute State aid and/ or fall within the de minimis exemption);

e) The fact that the main legislation on State aid in Greece was spread across several legal texts (Law 4152/2013 on the establishment of the CSAU and the DSAUs and their respective competences and operation -as this Law has been recently amended by Law 5000/2022-, Ministerial Decision No Δ6Α 1110484/ 2013, further specifying the strategic targets of the CSAU and its competences, and Presidential Decree 142/2017 (as recently amended by Presidential Decree 47/2021), contributes to the above lack of specific rules on allocation of competences. Indeed, this different approach did rely on an (acceptable) interpretation of the legal framework.

EYKE for example, which is the DSAU of the Ministry of development, competent to assess and review a significant number of Projects that may involve State aid, has been reviewing de minimis measures and other measures that do not constitute State aid without further forwarding the case files to CSAU.

4. This issue on competencies has to a significant extent been resolved by the recent introduction of Law 5000/2022. The new Law 5000/2022 is clearer and more precise and clarifies the managerial, supervisory, advisory and coordinating role of CSAU between the DSAUs and the European Commission;
5. The SAPM will be an effective and useful tool that will enable all stakeholders of the Network:

a) to have a clear view of their roles and competencies,

b) to manage the workload and identify at an early stage problematic issues that need to be addressed, so that any draft measure containing elements of possible State aid is reviewed timely and appropriately,

c) to address the recovery of unlawful State aid whenever required.

6. The benchmarking exercise which was carried out against respective process management systems of the European Commission and other, selected, Member States revealed the following: The absence of a central State aid authority, like the CSAU, in almost all EU MS did not facilitate the drawing of fully applicable conclusions. Nevertheless, it has been made possible to include recommendations based on good practices incorporated in other EU MS. These best practices could be:

a) the preparation of an annual or three-year planning of the measures to be granted, in order for CSAU to be able to carry out an initial estimate of the amount of work and a division of tasks at an early stage (Spain);

b) the establishment of a digital, centralized information system containing all data on State aid (Estonia, Italy, Portugal);

c) to the extent that the nature of the process/measure allows the involvement of the beneficiary (and mainly this is important for complex Projects), the active involvement of the



beneficiary in the preparation of the measure notification to the Commission (Belgium, Portugal).

7. As regards training and know-how: During the last years some training sessions have been sporadically held, in order to provide public officials and key staff with knowledge on EU State aid rules as well as the procedures for their implementation. However, these seminars were not carried out as regularly as needed. In addition, the existing educational material is neither updated (e.g. MOKE guide) nor complete.
8. Staff of all stakeholders (CSAU, DSAUs and granting authorities) highlighted the importance of a) having training seminars on a regular basis and b) being provided with updated information on important case-law developments and other developments in the field of State aid.
9. Certain members of DSAUs expressed the need to be better acquainted with the check - lists of CSAU.
10. We also identified that direct contact / interaction between all key stakeholders (staff of CSAU and DSAUs) is crucial. This could involve workshops and seminars on a regular basis, everyday direct communication for the provision of advice to DSAUs at an early stage etc.
11. As regards statistics: According to the published State aid Scoreboards, the largest decrease in total expenditure in State aid over the period 2013-2019 has been observed in Greece, which is the Member State most severely affected by the European sovereign debt crisis. Nevertheless, the highest increase in expenditure in EU between 2018 and 2019 was also recorded in Greece (+0.22 p.p. of GDP). This increase came following a period (2013-2018) during which Greece has had a very significant reduction in State aid measures, inter alia because of the sovereign debt crisis and the fiscal measures introduced under the three Memoranda. Finally, Greece was the Member State with the second largest share of COVID-19 State aid expenditure relative to 2020 national GDP (3.6%).

## **6. Summary of the recommendations & high-level advice for next steps**

This is the EY Team's summary of recommendations and high level advice for officials working in the field of State aid in Greece:

### **A. SAPM**

1. It is important for all stakeholders involved to follow a systematic and coherent procedure when assessing measures that may contain elements of State aid.
2. The EY Team, via a constructive process that included useful insights and remarks by stakeholders (mainly by the CSAU), has drafted the SAPM.
3. The SAPM can become an effective and practical working tool for State aid officials providing them with guidance on the procedure to be followed for the granting of State aid measures.
4. The SAPM will allow officials:
  - a) to have clear view of their roles and competencies,

b) to manage the workload and identify at an early stage problematic issues that need to be addressed, so that any draft measure containing elements of possible State aid is reviewed timely and appropriately.

5. By adhering to the basic guidelines of the SAPM it is expected that most of the key problems and challenges currently faced in the Greek State aid Network could be addressed and resolved.

#### **B. Cooperation within the Network**

1. For the efficient operation of the Greek State aid Network direct contacts and communication between CSAU and DSAUs are also of crucial importance.
2. Such cooperation will enable the key stakeholders to build personal relations and trust, leading to faster and more efficient handling of any State aid case-files. This would facilitate the establishment of an actual day-to-day Network enabling all officials to share their technical expertise and human resources more efficiently.

#### **C. Training and educational material**

1. The organisation of workshops and training seminars on a regular basis, both for current and newly appointed staff of the CSAU and DSAUs and the provision of updated information on important case-law developments and other developments in the field of State aid is also of utmost importance. Such workshops and seminars should be provided by experienced members of the Network as well as by personnel of the European Commission and third experts.
2. For that purpose the EY Team, as part of the Project, has prepared and organized dedicated training sessions for future trainers which included a run-through of the training material, the detailed training agenda, description of the sequence of activities and methodology, including a script for the trainers in order to support the ToT concept when delivering training.
3. Training material should be updated at least every 2 years.
4. Legal alerts with important legislative and case-law developments should also be provided (in cooperation with MOKE that already offers similar advice).

#### **D. Adequate staffing**

1. The issue of the inadequate number of CSAU and DSAUs personnel is a constant problem within the Network.
2. During the last 2 years new staff has joined CSAU and the total number of CSAU personnel is now 23 (as compared to less than 7 in the past). However, many of these employees are seconded by other public services and their secondment period may end. Thus, measures should be taken in order to allow for these employees to have a permanent post in CSAU.
3. Measures should also be taken to increase the number of personnel serving in DSAUs.

#### **E. Central Information System of State aid**

1. Access to information and data sharing on State aid is of paramount importance both for reasons of efficiency and of transparency.
2. Therefore, the operation of the Central Information System of State aid (CeSANet), a digital, centralized information system containing all data on State aid, is a key milestone.
3. Centralizing data sources for State aid measures in Greece can ensure that the key stakeholders (CSAU, DSAUs, granting authorities) have access to a common source of trusted data, allowing for increased productivity, optimized collaboration and more confident decision-making. Especially, centralizing all data on State aid eliminates data silos by integrating all information into a single, shareable source. This minimizes the time spent reconciling competing data sets, reduces the inefficiencies caused by inaccurate or incomplete data and increases the opportunities for collaboration and shared problem-solving across the State aid network.

## 7. Key project indicators to monitor quality

As a final remark, it is noted that our Team identified key project indicators that have been monitored throughout the Project, in order to guarantee its successful completion. In particular, our Team ensured the delivery of high-quality project products, by qualitative management of the Project. The review of every Deliverable was allocated to Senior Experts of our Team in order to obtain the best possible result. The substantial progress made in cooperation and exchange of information between stakeholders was achieved by utilising internal networks and previous experience, and by undertaking regular discussions and workshops with all the state-aid network members. It was appropriate to organise an exchange of information with all the relevant stakeholders about the progress of the Project in order to assess the potential need for supplementary measures or modification of them. For that purpose, a progress report was delivered once a month (see 3.3 above), enabling us to ensure that the Project was on time and within its scope of work.

Indicatively some key indicators are set out below:

Nr.	Indicators	Target value
1	Number of laws and regulations and circulars reviewed	>50
2	Number of Key experts mobilized	>10
3	Number of man-days used	> 380
4	Number of participants in the working group	>10
5	Level of attendance of the convened working group	>75%
6	Number of realized EY added value proposals	4-5
7	Number of meetings/workshops held	>10
8	Number of legal articles reviewed	>300
9	Number of Case Studies prepared	>10
10	Share of deliverables reviewed for quality control	100%
11	Share of deliverables submitted with delay (without the agreement of DG REFORM)	0%
12	Share of deliverables proofread by native speakers (EN)	100%

Some of these indicators should also be the milestone after the conclusion of the Project, in order to keep monitoring the outcomes and impact of the Project, provided that our recommendations as set in chapter 6 will be implemented.



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