**Question:**

1. In order to comply with the envisaged notification threshold, according to Art. 4, para.1 point (n) of Regulation (EU) No 651/2014, for training aid: EUR 2 million  per training project, please confirm whether  it is necessary to check the type of enterprise as an "autonomous enterprise", a "Partner enterprises" or a "Linked enterprises" according to Art. (3) of Annex I to the Regulation, or we would consider an undertaking within the meaning of Art. 4 only the beneficiaries, without taking into account the ‘Linked enterprises’ and the "Partner enterprises"?

2. Provided that it is necessary to take into account the received state aid for the same eligible costs of the beneficiaries and those with which it forms a "Partner enterprises" and "Linked enterprises", how to calculate the percentage of aid received by "Partner enterprises" and " Linked enterprises" that will form the cumulative amount?

3. Can the Commission confirm, before granting the new state aid for training, for what period back in time shall be considered the aid granted?

4. Can the Commission explain what does the term “training project” accordiong to art. 4, para. 1, point (n), mean? Does the granted State aid for training under Regulation (EC) No 800/2008 mean one training project and the granted State aid under Regulation (EU) No 651/2014 - another training project? Should the granted state aid for training under Regulation (EC) No 800/2008 be cumulated with the state aid granted under Regulation (EC) No 651/2014?

**Answer:**

1. & 2. Article 4(1)(n) GBER lays down the notification threshold for training aid. Unlike for many other Articles, the notification threshold for training aid is not defined as a maximum amount per undertaking, but rather by a maximum amount "per project". As such, the decisive element is whether a certain project received more than EUR 2 million in aid, irrespective of whether that aid was paid to one single undertaking, or linked or partner enterprises or even completely independent undertakings carrying out a training project together. The maximum aid intensity also has to be calculated as a percentage of the eligible costs per training project and are, therefore, also not defined by undertaking but rather the costs of the project in question.

3. As stated above, the notification thresholds and aid intensities are defined per project. The period in time to be taken into account is, therefore, dependant on the duration of a given training project. There is, therefore, no specific time period, any individual training project can only get up to EUR 2 million in aid.

4. A training project means any individual training project. Each individual training project can be distinguished from other training projects as it is, e.g., subject to an individual training plan, pursues a specific objective (such as that participants should acquire a specific skill), is subject to an individual decision to be carried out by the beneficiary or is targeted at a specific defined group of participants. In any event, the legal basis on which aid was granted is not relevant for determining a training project. If, however, aid for the same project was granted under Regulation 800/2008 and Regulation 651/2014, the total amount of aid received for that project must not exceed EUR 2 million.

Disclaimer: This reply does not represent a formal and definite position of the European Commission but is only an informal guidance provided by the services of DG Competition to facilitate the application of the GBER. It is therefore not binding and cannot create legal certainty or legitimate expectations.