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**Subject: State Aid SA.57375 (2020/N) – Hungary
COVID-19 Compensation scheme related to the recovery of the
Hungarian economy**

Excellency,

1. PROCEDURE

- (1) By electronic notification of 18 May 2020, registered by the Commission on the same day, Hungary notified an aid scheme for the compensation of companies for the damage caused by the COVID-19 outbreak and the related containment and lock-down measures (“the measure”). The measure was notified in compliance with Article 108(3) TFEU. By electronic communications of 27 May and 3, 9, 12, and 19 June 2020 the Hungarian authorities provided further information and a revised notification.
- (2) Hungary exceptionally agrees to waive its rights deriving from Article 342 of the TFEU, in conjunction with Article 3 of Regulation 1/1958¹ and to have this Decision adopted and notified in English only.

2. DESCRIPTION OF THE MEASURE

2.1. COVID-19 outbreak in Hungary and the official reaction of the Hungarian authorities

- (3) The COVID-19 crisis is affecting the entire Hungarian economy. According to the Hungarian authorities, early data on the economic impact of the COVID-19 outbreak already showed a significant negative effect. In March 2020, industrial

¹ Regulation No 1 determining the languages to be used by the European Economic Community, OJ 17, 6.10.1958, p. 385.

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output was 10.4% below the level of the previous month, industrial export had dropped 8.1% year-on-year, the volume of total orders in manufacturing fell by 10.1% compared to March 2019, and the value of exports and imports fell by 7.3% and 5.5% respectively compared to the same month in 2019. The outbreak and the containment measures taken by the Hungarian authorities caused a disruption in economic activity which affected all sectors.

- (4) In response to the COVID-19 outbreak, the Hungarian government has taken a number of measures aiming to slow the Covid-19 outbreak, starting with the imposition of a state of emergency on 11 March 2020, ordering the shutting of colleges and universities (with teaching continued only on-line), banning large gatherings and restricting visits to hospitals and retirement homes. The first travel restrictions were introduced on 12 March 2020 and public authorities were allowed to impose home quarantine measures when necessary. On 16 March 2020, schools were shut down and on 17 March 2020, Hungary closed its borders to most passenger travel. On 28 March 2020, the Hungarian government announced the imposition of a curfew and allowed individuals to leave home for work and basic needs only.
- (5) A first easing of restrictions was announced on 29 April 2020 and a gradual reopening of shops started on 4 May 2020, but measures such as the wearing of masks and social distancing rules continue to apply.
- (6) Those restrictions led to a slowdown and in some instances a total halt of economic activity and significant perturbations in supply chains. The imposition of mandatory containment measures had a direct and significant impact on most companies' ability to operate. For example, the obligation to maintain social distancing led to logistical difficulties in transporting employees to the workplace and in organizing work in shifts in factory lines, leading to significant disruptions especially for large companies applying just-in-time production methods. The mobility restrictions hindered the transport of not only people but also goods and raw materials, leading to production and operation issues. The loss of revenues caused by the COVID-19 pandemic and the lockdown measures are affecting many sectors of the Hungarian economy and undertakings of all sizes.
- (7) Therefore, the Hungarian authorities developed a scheme to provide compensation for the damage suffered from the COVID-19 outbreak. The notified measure aims to ensure that the disruptions caused by the outbreak do not undermine the viability of large undertakings.
- (8) The compatibility assessment of the measure is based on Article 107(2)(b) TFEU.

2.2. Objective of the measure

- (9) As explained in recitals (4) to (6), the spread of COVID-19 and the containment measures has resulted in revenue losses affecting many sectors of the Hungarian economy, and in particular large companies, many of which depend predominantly on long, complex, and highly intertwined value chains.
- (10) The objective of the measure therefore is to compensate the affected undertakings for the damage caused by the COVID-19 outbreak and containment measures adopted to limit the spread of the virus. The damage consists in the difference between the profit/loss incurred under the new circumstances (after the COVID-19

outbreak and the adoption of containment measures by public authorities) – “factual scenario” – and the profit/loss incurred before those events – “counterfactual scenario” – (net losses).

2.3. The nature and form of aid

- (11) The measure provides aid in the form of direct grants.
- (12) The measure will be financed from the general budget of Hungary.

2.4. The national legal basis

- (13) The legal basis for the measure is the amendment to the Decree of the Ministry of Foreign Affairs and Trade No. 7/2020 on aid measures for increasing competitiveness of undertakings in relation with the COVID-19 outbreak.

2.5. Administration of the measure

- (14) The aid will be granted by the Hungarian Ministry of Foreign Affairs and Trade and the measure will be managed by the Hungarian Investment Promotion Agency (HIPA).

2.6. Budget of the measure

- (15) The estimated budget of the measure is HUF 50 billion (EUR 145 million).
- (16) The aid may not be granted before the Commission has adopted a decision declaring the measure compatible with the internal market.

2.7. Beneficiaries and eligibility conditions

- (17) The final beneficiaries of the measure are large enterprises² operating in any sector of the economy except primary agriculture and fisheries and aquaculture.
- (18) Only companies that suffer a minimum decline in turnover or order volume of 25% as a consequence of the COVID-19 outbreak and the related containment measures will be eligible for compensation under the scheme.
- (19) Given the limited budget of the scheme, the Hungarian authorities will rank the applications for aid on the basis of several criteria, including: the relative size of the damage incurred by the beneficiary due to the COVID-19 outbreak and the containment measures taken by public authorities, the number of staff the beneficiary agrees to maintain, and the size of the future investment the company commits to implement by 31 December 2021. The criteria will receive equal weighting in the ranking of the applications received.
- (20) Aid may not be granted under the measure to undertakings that were already in difficulty within the meaning of the General Block Exemption Regulation (“GBER”)³ on 31 December 2019.

² Defined in line with Annex I of Commission Regulation (EU) No 651/2014 of 17 June 2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty (OJ L 187, 26.6.2014, p. 1).

- (21) Hungary estimates that approximately 50-100 undertakings will benefit from the scheme.

2.8. Sectoral and regional scope of the measure

- (22) The measure applies on the entire territory of Hungary and is open to undertakings operating in all sectors except primary agriculture and fisheries and aquaculture.

2.9. Basic elements of the measure

- (23) As explained in recital (10), the objective of the measure is to compensate the affected undertakings for the damage caused by the COVID-19 outbreak and containment measures taken by public authorities to limit the spread of the virus.

2.9.1. The compensation period

- (24) On the basis of the methodology described in section 2.9.2, the damage will be calculated for the compensation period (the period when the beneficiary suffers a minimum 25% decline in turnover or order volume) compared to a reference period in the past. That decline in turnover or order volume⁴ must be directly caused by the COVID-19 outbreak and relevant containment measures taken by public authorities (i.e. they must affect the beneficiary's capability to operate at normal capacity).
- (25) The duration of the compensation period will be expressed in days and will be linked to containment measures affecting the beneficiary. The beneficiary will be required to meet at least one of the following conditions, which must affect directly its capability to operate at normal capacity:
- (a) The beneficiary is subject to or affected by an administrative decision or recommendation related to sanitary or public health restrictions aimed at counteracting the COVID-19 disease;
 - (b) The beneficiary or its employees is/are under partial or full quarantine as a result of the occurrence of the COVID-19 disease among its employees;
 - (c) The beneficiary is affected by a partial or entire restriction of business activity resulting from the unavailability of key deliveries of goods, materials or services in connection with broken supply chains as a result of the COVID-19 outbreak;
 - (d) The beneficiary is affected by the loss of income caused by the entire or partial inability to carry out sales of ordered goods or services because its clients are not able to collect them or did not make payment as a direct and proven result of the COVID-19 outbreak.

³ As defined in Article 2(18) of Commission Regulation (EU) No 651/2014 of 17 June 2014 declaring certain categories of aid compatible with the internal market in application of Articles 107 and 108 of the Treaty, OJ L 187, 26.6.2014, p. 1.

⁴ The proof of the order decline will be based on the data in the Enterprise Resource Planning ('ERP') system of the given beneficiary. HIPA may review the purchase order list before the start of the compensation period and then for a subsequent period.

- (26) The maximum compensation period cannot exceed the period running from 12 March 2020 until 31 August 2020 at the latest. The conditions of recital (25) must be met for the entire duration of the compensation period.
- (27) In its application for compensation, the applicant must solemnly declare and describe how it suffered its losses due to measures taken by public authorities and submit documentation that proves that there is a causal link between those measures and the damage suffered. It must explain and provide supporting evidence to define the length of the claimed compensation period.
- (28) The managing authority (HIPA) will be responsible for verifying and, when necessary, adjusting the length of the compensation period proposed in the application for aid based on the explanation and evidence submitted by the applicant. The Hungarian authorities consider that those safeguards will ensure that only the damage that is a direct consequence of the COVID-19 outbreak and containment measures taken to prevent the spread of the virus will be compensated.

2.9.2. *Quantification of the damage*

- (29) The damage is calculated as the difference between the operating result⁵ obtained during the compensation period under the new circumstances (after the COVID-19 outbreak and the adoption of containment measures by public authorities) – “factual scenario” – and the operating result incurred before those events during the reference period – “counterfactual scenario” (i.e. net losses). That calculation can take place before the damage is incurred based on the beneficiary’s estimation of the operating results during the compensation period, and will be verified ex-post on the basis of the audited financial accounts of the company.
- (30) The beneficiary will be required to declare in its application for aid whether its business is affected by seasonality⁶. For beneficiaries not subject to seasonality, the operating result for the reference period is calculated by multiplying the daily average operating result⁷ of the year preceding the COVID-19 outbreak by the length of the compensation period. For beneficiaries subject to seasonality, the operating profit for the reference period will be the operating profit incurred by the beneficiary during the same calendar period as the compensation period in the previous business year.
- (31) An ex-post evaluation of the damage by a certified independent auditor for each aid application verifying the calculation of the damage and the underlying assumptions

⁵ The operating result is defined by the Hungarian Act on Accounting as an element of the profit and loss statement. The indicator is similar to EBIT (‘Earnings before Interests and Taxes’) and is calculated as (Total net sales + Work performed by the company for its own purposes and capitalized + Other income) – (Material costs + Staff costs + Depreciation + Other operating charges).

⁶ The Hungarian authorities consider that an undertaking is affected by seasonality when the daily average revenues for a given period in the last three consecutive business years deviates by more than 25% from the daily average revenues for the entire year.

⁷ The Hungarian authorities consider that using a mathematical average for the calculation of the operating result for the reference period helps to balance seasonal and single item effects potentially occurring in a specific calendar period which might skew the results. Furthermore, the calculation of the reference operating result for the same calendar period as the compensation period, in the preceding business year, would create unnecessary administrative burden and audit costs for the beneficiaries as companies typically do not have monthly reports made in accordance with (Hungarian) accounting standards.

will be mandatory and must be submitted to the granting authority by 31 March 2021.

2.9.3. Aid intensity and application procedure

- (32) The aid in the form of compensation for the damage incurred due to the COVID-19 outbreak and containment measure taken by public authorities will not exceed 100% of the damage calculated based on the methodology presented in section 2.9.2.
- (33) The Hungarian authorities explained that once the scheme is approved by the Commission and the national legislation is adopted, the beneficiaries will be allowed to submit their application for aid. Based on the information submitted in the application, the managing body will decide if the beneficiary fulfils the minimum criteria necessary. Beneficiaries will be able to apply for aid until 30 September 2020.

2.9.4. Measures to avoid overcompensation

- (34) The Hungarian authorities explained that they will carry out controls in order to verify that the aid granted does not exceed the damage actually suffered by each beneficiary as a result of the COVID-19 outbreak. To that end, as explained in recital (31), an ex-post evaluation of the damage verified by an independent auditor will be required from the beneficiary by 31 March 2021.
- (35) The Hungarian authorities commit to ensure that beneficiaries repay any overcompensation, should the ex post assessment show that the total aid received by an individual beneficiary exceeds the total amount of damage suffered by the beneficiary. The data used in the ex-post calculation of the damage will be based on the audited financial accounts of the beneficiary.
- (36) The Hungarian authorities will ensure that aid granted to beneficiaries will be net of any amount obtained from insurance, litigation, arbitration or any other source for the same damage. If the aid is paid out before the insurance, the authorities will recover the insurance amount from the beneficiary to avoid overcompensation.
- (37) Finally, the benefit of the aid is excluded for any applicant who is responsible for the damage suffered, or did not conduct its activities with due diligence or in compliance with applicable legislation, or did not take appropriate measures to mitigate its damage.

2.10. Cumulation

- (38) The Hungarian authorities confirm that aid granted under this measure cannot be cumulated with other State aid granted for the same eligible costs.

2.11. Monitoring and reporting

- (39) The Hungarian authorities committed to provide a report on the State aid granted from the scheme no later than 1 year after the date of the Commission decision, specifying the amount of compensation granted per company and overcompensation recovered, as the case may be.

3. ASSESSMENT

3.1. Lawfulness of the measure

- (40) By notifying the measure before putting it into effect, the Hungarian authorities have respected their obligations under Article 108(3) TFEU.

3.2. Existence of State aid

- (41) For a measure to be categorised as aid within the meaning of Article 107(1) TFEU, all the conditions set out in that provision must be fulfilled. First, the measure must be imputable to the State and financed through State resources. Second, it must confer an advantage on its recipients. Third, that advantage must be selective in nature. Fourth, the measure must distort or threaten to distort competition and affect trade between Member States.
- (42) The measure is taken by the State, since it is granted by the Ministry of Foreign Affairs and Trade and administered by HIPA (see recital (14)) and it is based on legislative acts as set out in recital (13). It is financed through State resources, since it is financed by public funds (see recital (12)).
- (43) The measure confers an advantage on its beneficiaries in the form of direct grants (for damage compensation paid under the measure (see recital (10) and (11))). The measure thus relieves those beneficiaries of costs that they would have had to bear under normal market conditions.
- (44) The advantage granted by the measure is selective, since it is awarded only to certain undertakings that meet the conditions set out in recitals (17) to (20), with exclusion of the business activities as listed in recital (22).
- (45) The measure is liable to distort competition, since it strengthens the competitive position of its beneficiaries. It also affects trade between Member States, since those beneficiaries are active in sectors in which intra-Union trade exists.
- (46) In view of the above, the Commission concludes that the measure constitutes aid within the meaning of Article 107(1) TFEU. The Hungarian authorities do not contest that conclusion.

3.3. Compatibility assessment

- (47) Since the measure involves aid within the meaning of Article 107(1) TFEU, it is necessary to consider whether that measure is compatible with the internal market.

The notion of exceptional occurrences within the meaning of Article 107(2)(b) TFEU

- (48) Article 107(2)(b) TFEU provides that aid to make good damage caused by natural disasters or exceptional occurrences shall be compatible with the internal market. Neither the TFEU nor other Union legislation contains a precise definition of the notion of exceptional occurrence. As they constitute exceptions to the general prohibition of State aid within the internal market laid down in Article 107(1)

TFEU, the Commission, in line with the settled case-law of the Court of Justice⁸, has consistently held that the notions of ‘natural disaster’ and ‘exceptional occurrence’ referred to in Article 107(2)(b) TFEU must be interpreted restrictively.

- (49) The Commission assesses whether an event qualifies as an exceptional occurrence on a case-by-case basis, having regard to its previous decision-making practice⁹. For an event to be regarded as an exceptional occurrence, it needs to meet the following cumulative criteria: (i) be unforeseeable or difficult to foresee¹⁰; (ii) have significant scale/economic impact¹¹, and (iii) be extraordinary¹².

The COVID-19 outbreak as an exceptional occurrence

- (50) Following the first reports of cases of acute respiratory syndrome (COVID-19) in the Chinese Wuhan municipality at the end of December 2019, the Chinese authorities identified a novel coronavirus (SARS-CoV-2) as the main causative agent, which had not been previously identified in humans. The outbreak has rapidly evolved, spreading not only to other parts of China but also to the majority of countries worldwide. Specific sectors and areas are particularly affected by the outbreak, be it because of national outbreak control measures, travel restrictions or supply chain disruptions.
- (51) The declaration of the World Health Organization of a pandemic¹³, associated with the public health risk deriving from the absence of therapeutics or vaccines for the novel COVID-19, determine the exceptional nature of the circumstances. The rapidity of the spread can cause enormous consequences both in terms of fatal

⁸ Judgments of the Court of Justice of 11 November 2004, *Spain v Commission*, C-73/03, EU:C:2004:711, paragraph 37, and of 23 February 2006, *Atzeni and others*, Joined Cases C-346/03 and C-529/03, EU:C:2006:130, paragraph 79.

⁹ Exceptional occurrences that have been accepted by the Commission in the past include war, internal disturbances and strikes, and, with certain reservations and depending on their extent, major industrial accidents which result in widespread economic loss. See Guidelines for State aid in the agricultural and forestry sectors and in rural areas 2014 to 2020, paragraph 330 (OJ C 204, 1.07.2014, p. 53).

¹⁰ Commission Decision of 1 August 2008, case SA.32163, Remediation of damage to airlines and airports caused by seismic activity in Iceland and the volcanic ash in April 2010, Slovenia, recital 31.

¹¹ Elements taken into account by the Commission to consider that the occurrence reached a significant scale include: (i) the fact that negative consequences cannot be contained (Commission Decision of 4 October 2000 on case NN 62/2000, Régime temporaire d'aides aux entreprises victimes des intempéries et de la marée noire – France); (ii) the significant number of dead or injured people (Commission Decision of 11 April 2012 on case SA.33487, Agricultural and fisheries aid to compensate for damage due to exceptional occurrence (red mud "Aluminium accident"), Hungary, recital 35; Commission Decision of 2 May 2002 on case N241/2002, Régime en faveur des entreprises victimes de la catastrophe industrielle de Toulouse, France, recital 19); (iii) the occurrence of immense ecological and economic damage (Commission Decision of 11 April 2012 on case SA.33487, recital 36); (iv) the amount of material damage, despite the local character of the industrial accident (Commission Decision of 2 May 2002 on case N 241/2002, recital 19).

¹² In its Decision of 19 May 2004 in Case C-59/2001 (OJ L 62, 2007, p. 14), the Commission considered that the (alleged) fall in sales of poultry meat in a Member State not directly affected by the dioxin contamination, did not constitute in itself an exceptional occurrence. In fact, it was an unforeseeable event but formed part of the normal commercial risks to which an undertaking is exposed.

¹³ WHO Director-General's opening remarks at the media briefing on COVID-19 on 11 March 2020, <https://www.who.int/dg/speeches/detail/who-director-general-s-opening-remarks-at-the-mediabriefing-on-covid-19---11-march-2020>.

outcomes in high-risk groups and in terms of economic and societal disruption¹⁴. The necessity to adopt and encourage the respect of measures aimed at interrupting transmission chains stems from that acknowledgement. Such measures can result in far-reaching disruption of various economic sectors, which is clearly outside the normal functioning of the market.

- (52) In view of the above, this event qualifies as an exceptional occurrence because: (i) it was not foreseeable; (ii) it clearly distinguishes itself from ordinary events by its character and effects on both the undertakings directly affected and the economy as a whole; and (iii) it lies outside of the normal functioning of the market.
- (53) In that context, the COVID-19 outbreak can be regarded as an exceptional occurrence within the meaning of Article 107(2)(b) TFEU.

Causal link between the COVID-19 outbreak and damage compensated by the measure

- (54) The Court has held that only damage caused by natural disasters or exceptional occurrences may be compensated for under Article 107(2)(b) TFEU. It follows that there must be a direct link between the damage and the exceptional occurrence for which the State measure provides compensation, and that as precise an assessment as possible must be made of the damage suffered by the beneficiary concerned. The COVID-19 outbreak qualifies as an exceptional occurrence (see recital (53)).
- (55) As an immediate consequence of the COVID-19 outbreak in Hungary, the Hungarian authorities have adopted various strict containment measures to limit the spread of the virus (see recital (4)). Those measures have made it impossible for businesses in a broad range of sectors to carry on their normal activities. The restrictions introduced by the Hungarian authorities are expected to lead to, or have already resulted in, significant reductions of turnover of the large companies in many sectors, and are ultimately expected to result in significant losses.
- (56) As described in recital (25), compensation under the scheme is strictly limited to the period when the beneficiaries of the scheme or their clients and suppliers were affected by strict containment measures which resulted in significant consequences on the beneficiary's ability to conduct its business activity. In light of the fact that large companies are particularly dependent on long, complex, and highly intertwined value chains, the Commission considers that this ensures that the compensated damage is directly linked to the exceptional occurrence, since the causal chain starts directly from the governmental measures imposing strict restrictions on economic activity of either the beneficiary companies or their main clients and suppliers that are part of closely interlinked value chains, rather than from lower overall demand which is to be expected to follow the COVID-19 outbreak.
- (57) In view of the above, the Commission considers that the measure proposed by the Hungarian authorities comprises sufficient safeguards to ensure that compensation will be available only to beneficiaries that can establish a direct link between the damage suffered and mitigation measures taken by public authorities related to the COVID-19 outbreak.

¹⁴ ECDC's Rapid Risk Assessment, Outbreak of novel Coronavirus disease 2019 (COVID-19): increase transmission globally – fifth update, 2 March 2020.

Proportionality of the aid measure

- (58) In order to be compatible with Article 107(2)(b) TFEU, the aid must be proportional to the damage caused by the exceptional occurrence. Aid must not result in overcompensation of damage; it should only make good the damage caused by the exceptional occurrence.
- (59) As described in recital (29), the actual damage incurred by the beneficiaries is the difference between the operating result obtained during the compensation period and the operating result incurred before those events during the reference period.
- (60) In light of the exceptional circumstances, the uncertainty regarding the duration of the COVID-19 outbreak and the relevant containment measures, and the urgent need for a support measure to support the affected companies, the Commission can accept, as a transitory solution, that the amount of the compensation can be calculated *ex ante* based on the available elements at the date of the application for aid (see recital (29)), namely the estimation of the operating results expected to be incurred by the beneficiary for the period it can establish a link between its damage and the COVID-19 outbreak and related containment measures taken by public authorities (a period that cannot in any event cover more than the period from 12 March 2020 until 31 August 2020 at the latest) as compared to the results obtained during the reference period.
- (61) The Commission notes that the Hungarian authorities have put in place certain safeguards to ensure that the compensation under the measure does not exceed what is necessary to make good the damage caused by the exceptional occurrence:
- (a) First, as described in recital (32), the amount of compensation cannot exceed the damage calculated based on the methodology presented in section 2.9.2.
 - (b) Second, as described in recital (36), the aid granted to the beneficiaries are net of any amount obtained from insurance, litigation, arbitration or any other sources, which compensates for the same damage. If the compensation under the measure is paid before the insurance, Hungary will recover the corresponding amount from the beneficiary.
 - (c) Third, as explained in recital (37), the benefit of the aid is excluded for any applicant who is responsible for the damage suffered, or did not conduct its activities with due diligence or in compliance with applicable legislation, or did not take appropriate measures to mitigate its damage.
 - (d) Fourth, the Hungarian authorities have set up an *ex post* system to verify that no beneficiary is overcompensated. As explained in recitals (31), (34) and (35), that system will enable the Hungarian authorities, once the actual damage (i.e. net losses) suffered by each beneficiary due to the COVID-19 outbreak is calculated, to compare it with the amount of compensation already paid. Should overcompensation be detected, Hungary will recover the amount of the overcompensation.
- (62) The Commission notes that Hungary will give priority under the schemes to beneficiaries on the basis of several equally-weighted criteria, including: the relative size of the damage incurred, the number of staff the beneficiary commits to maintain, and the size of the future investment that the undertaking commits to undertake by 31 December 2021 (recital 19). Since the latter criterion is not a condition for eligibility but only one of the elements used to rank the applicants

that will receive compensation under the scheme, the Commission can accept such a prioritisation mechanism.

- (63) The Commission takes note of the fact that Hungary has introduced measures aimed at addressing the economic effects of the COVID-19 outbreak¹⁵, which may be available to the same undertakings that are eligible under the notified measure. In that respect, the Commission notes that support granted under those measures is based on different eligible costs and pursues objectives other than the compensation of the damage suffered due to the COVID-19 outbreak. The Commission, in light of the safeguards listed above, and taking into account the limited period covered by the compensation (from 12 March 2020 until 31 August 2020 at the latest), considers the compensation proportionate.

4. CONCLUSION

The Commission has accordingly decided not to raise objections to the aid on the grounds that it is compatible with the internal market pursuant to Article 107(2)(b) of the Treaty on the Functioning of the European Union.

The decision is based on non-confidential information and is therefore published in full on the Internet site: <http://ec.europa.eu/competition/elojade/isef/index.cfm>.

Yours faithfully,

For the Commission

Margrethe VESTAGER
Executive Vice-President

¹⁵ Reference is made, for instance, to the Hungarian measure to increase competitiveness of undertakings in relation to the COVID-19 outbreak approved by the Commission decision on the case SA.56926 (2020/N).