

Small Member States - Pillar Assessment

- **We wholly support the EIB delivery of the majority of the Invest EU guarantee.**
- **We also recognise the benefit of opening new options for the delivery of the InvestEU guarantee in the next MFF through direct access.**
- **A new MFF calls for new approaches and the opportunity to explore new solutions.**
- **Pillar Assessment** is currently used for National Promotional Banks/Institution's (NPB/I's) who wish to avail of the European Fund for Sustainable Development for risk enhancing investments in the context of international aid and development. E.G. KfW and CDP have passed this assessment.
- **Invest EU proposes to use the pillar assessment to qualify new implementing partners.** The pillar assessment costs up to €100,000 with third party audit firms contracted to complete the a process, which will take circa 6-9 months to complete.
- From the **small NPBI perspective** we recognise **the relative cost associated** with this assessment and the **resource demands** that may be placed on a small team.
- We also recognise that the process may be shorter by comparison to that required by **large NPBI's**, who would have a **substantial breadth of operations** and the audit scope would likely be more broad.

InvestEU proposal : 3 State Rule

- Under the current drafting of InvestEU, the NPBI window will allow for direct funding, where at least 3-member states are covered.
- On a positive note, this presents an opportunity to collaborate with other NPBIs in the development of appropriate products
- However, almost all NPIs would require a change in mandate to operate outside their member state.
- The opportunities for cross border collaboration vary depending on the geography of the member state. Ireland has no neighbours left in the EU!
- We understand this element is under review and would advocate that if required it is made as flexible as possible.

EIB Group – Smaller Members Perspective

- **All NPIs enjoy close relationships with the EIB Group and none more so than smaller NPIs.**
- **Smaller members rely heavily on the EIB Group** in terms of knowledge sharing, know how and consequent product development as well as a valued source of finance and risk sharing support on behalf of the European Commission.
- We recognise the **interdependence of NPBI's and the EIB Group**. The NPBI's have strong local knowledge and serve as value added conduits for EU SME supports supplied by the EIB Group.
- Valued and proven existing delivery structures such as the **COSME and Innovfin Guarantee Programmes need to be retained**
- **EFSI** has been instrumental in **unlocking additional risk capacity**
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