User Manual

State Aid Notifications Interactive (SANI)
Updated for Version II of SANI

Introduction

State Aid Notifications Interactive (SANI) has been developed in order to facilitate the electronic transmission of notifications as required by Regulation 794/2004.
This Web application has been developed based on the same principles as ECN-Interactive, which experience has shown works well.

SANI now has a new address: https://webgate.ec.europa.eu/competition/sani. The address change was necessary due to the change of domain name for the Commission as a whole.

The second version of the application has (amongst others) the following improvements:

1) SANI is now multilingual. You will thus be able to view the forms in your own language. To the right at the top of the screen you will find the different language buttons. Click on the language button you want and the screen will change to that language. As previously, you can of course fill in the notification forms in the language of your choice.

2) As before, the button with the question mark can be used for downloading the SIS (Supplementary Information Sheet, Part III of the notification) and the User Manual in all languages.
The Supplementary Information Sheets are now in Word format, so that you can easily download them, fill them in and then attach them to point 14 of the general notification form.

3) Your access rights to SANI are now determined by your user profile.

1. USER PROFILES

Each user can have one of eight profiles defined for SANI[1]:

(1) General System Administrator (Commission):

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[1] For a detailed access rights matrix, please refer to Annex 1.

- Manages the Local System Administrators and Validators, i.e. grants the passwords and logins to the local administrators and the validators
- Manages the reference tables.

(2) Local System Administrator (MS):

- Manages the users and signatories for his/her own Member State (MS). Can also sign notifications.

(3) Commission User (Commission):

- Works in the Commission;
- Can see all the notifications validated by the MS.

(4) Restricted user (MS):

- Can create draft notifications;
- Can update these drafts.

(5) User (MS):

- Can create draft notifications;
- Can update these drafts;
- Can finalise drafts.

(6) Read-Only User (MS):

- Can only read the notifications (either draft or final) of his/her MS.

(7) Signatory (MS):

- Can create draft notifications;
- Can update draft notifications;
- Can finalise draft notifications;
- Can sign the finalised notifications.

(8) Validator (MS):

- Can validate signed notifications in order to send them to the Commission.

2. USER STATUS

The different user statuses can be divided into two groups:

a) **Commission internal users**: these can only be **effective** or **disabled**. There is no intermediate status.

b) **Member State users**: Four statuses exist:

a) Open: a user has been created, but cannot yet access SANI;

b) Initialised: The Local System Administrator (MS) or the General System Administrator (Commission) has sent the default password to the user. The user can log on with this default password but will be asked by the system to change it immediately;

c) Effective: status after the user has changed the default password, i.e. (s)he can now fully use the system according to his/her user profile;

d) Disabled: this means that the user no longer has access to SANI.

3. USER ADMINISTRATION

a) The different user profiles are managed at Commission level for the different users within the Commission in DG COMP, AGRI, TREN and FISH.
b) In the Member States, users are managed by the Local System Administrator(s). Member State users are created and managed by the Member States themselves, so that they can grant the various user profiles in the manner that best corresponds to their internal administrative organisation[2] and, where necessary or possible, can decentralise the management of access rights.

4. CASE TEAMS

Version II of SANI now requires Member States to create "case teams" for the preparation of notifications. All team members must have access rights to SANI. SANI will recognise all persons in the "Case Team" box at the top of the first page of the notification form.

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[2] Except for the Local System Administrators and Validators, who are managed by the Commission for security reasons.

The team normally remains the same throughout the whole notification procedure. However, team members can be added or removed as long as the notification is still subject to change — remember it cannot be changed after being sent to the validator.
The notification can pass to the next workflow step only if at least one of the persons in the case team has the corresponding profile function, i.e. the team must have members with the profiles necessary to update, finalise, sign and validate the notification.

5. USER GROUPS

For those Member States where the group of people dealing with the preparation of notifications remains mainly the same over a certain period of time, the possibility of creating user groups has been introduced.
The user groups are set up by the Local System Administrator and each need a group name. The group name may be entered in the case team, which means that all persons in that group have access to the notification, although they can only perform the steps allowed by their user profile. This facilitates administration since entering a group name in the case team removes the need to introduce all the individual users of the group.

6. WHAT TO DO IN ORDER TO SET UP THE SYSTEM IN THE MEMBER STATES

a) The Member State administration responsible for State aid sends the name and the contact details of the Local System Administrator to the General System Administrator within DG COMP at the European Commission. The General System Administrator will then grant a password and login to the Local System Administrator.
Requests to be addressed to: COMP–SA-support @cec.eu.int

b) The Member State also communicates to the General System Administrator the name and contact details of the validator(s), who should be a person/persons acting on behalf of the Permanent Representative, in accordance with Article 3(1) of Regulation 794/2004[3]. Each validator will also receive a login and password from the General System Administrator and will then be able to validate notifications. This action is equivalent to the sending of a notification by the Permanent Representative.

[3] OJ L 140 of 30. 4. 2004 , p. 2.

The Commission recognises a notification validated by a person with the corresponding login and password as a notification from the Member State in question.

Requests to be addressed to: Annette.Matthias-Werner@ec.europa.eu or to SANI@ec.europa.eu

c) The main task of the Local System Administrator is to manage the various access rights of the other Member State users. He/she does not deal with the substance of a notification, but may now sign notifications in the new version of SANI.
The same users may have different logins if they perform different tasks for their Member State with regard to the notification of State aid measures. The Local System Administrator therefore needs to make sure that such users have logins and passwords corresponding to the user profile required in each individual case.

d) Example: Member State A with a decentralised structure:

The internal organisation is such that state aid measures are often initiated by municipalities. They have to send their notifications to the Ministry of Finance or the Ministry of the Economy. After scrutiny, the Ministry sends them to the Permanent Representation, which in turn forwards them to the Commission.

e) User profiles might be assigned as follows:

The municipalities get a login with the "**User" profile**: they may therefore fill in the notification form as a draft, save it as a draft, update the draft and finalise it.

They may on the other hand receive the "**Restricted User" profile:** in that case they may not finalise the drafts.

They have to "send" the draft notification to the Ministry indicating who should finalise and sign.

New finalisation step: the notification must be finalised before it is signed.

The finalised notification is signed by the person responsible at the Ministry, who must be a member of the case team. This person will therefore have the user profile **Signatory**. This includes the possibility to perform all previous steps, so the signatory will be able to draft, finalise, sign and "send" the notifications to the Permanent Representation. In version II of SANI, when signing a notification, signatories will now see a window asking them to sign or to refuse and return the notification to the previous user. Once the signatory has opened the notification and signed it, no-one else can sign it.

In this way, Member States can ensure that all the hierarchical levels currently involved remain so in line with their different tasks and responsibilities.

f) The notification is then “sent” to the Permanent Representation and can be validated by any user with the Validator profile who is on the case team. Validators can exercise only this function, i.e. they cannot modify the notification themselves, but can **refuse validation and add a comment**. In this case, the notification is returned to the signatory.

Validators can only view those notifications for which they are on the case team as validator, plus all the notifications that have been validated.

g) The same rule applies as for signatories: the first validator to open a notification validates it and thereby precludes others from doing so.

h) Validation means that the notification is sent to the Commission. The notifying Member State will then receive an acknowledgement of receipt from State Aid Greffe and will be informed of the deadline by which the Commission proposes to carry out a preliminary assessment of the notification.
The deadline will depend on whether the notification has followed the normal procedure or the simplified procedure (Article 4 of Regulation 794/2004).
An email alert is sent when a draft has been finalised, signed or refused for validation.

6. THE LOCAL SYSTEM ADMINISTRATOR

The Local System Administrator’s task is to administer the logins and passwords of the different users, i.e. he/she can create access rights for users and deactivate them so as to take into account changes in personnel, changes to the internal organisation of the Member State, etc.

To assign logins and passwords:

Open the site

Go into User Administration

Click on the button on the left: “Add national handlers”

A new page opens with a form to fill in the details of the national handler, including the login, which you may choose yourself.

Select the profile of the national handler from the corresponding dropdown menu (user, restricted user, signatory, etc.)

Save by clicking on the button at the bottom of the page.

Then press the button to the right: “Initialise password”

You will be asked to confirm the operation and the user email address given in the form. The password will then be created and sent to the user in an automatic email. The user will subsequently have to log in and replace the default password with a new password of his/her own choice.

The Local System Administrator is also responsible for creating user groups:

Open the site
Go into Group Administration

A page opens with the details for creating a group.

You must first enter the group name along with the Member State and then save it. You can then choose the members of the group from users already registered with SANI.
Press “Save” to create the group.
As mentioned earlier, you may then enter the group name in the case team for a notification instead of introducing all the members of the case team individually. The system will then recognise the case team and send email alerts to its members.

7. NOTIFICATION PROCESS

Once users have received their login and provisional password they need to log on to SANI and change the provisional password. They will then be able to create a notification and fill in the notification form, comprising Part I (General information), Part II (Summary information for publication in the Official Journal) and Part III (Supplementary Information Sheet depending on the type of aid).

a) Creation of a draft notification

Log on to SANI

- Click on “Add new notification” (Required profile: restricted user, user, (possibly) signatory)

- Select the procedure (general, simplified or block exemption notification).

- Create the case team, i.e. include all users who may have to deal with the notification and have the required profiles.
Only users on the case team will have access to the notification.

- Fill in the notification form. All questions and fields marked with a double red star must be filled in before the draft can be saved.
- Click on the “Save” button: the draft notification is now ready for finalisation, and available to one of the finalisers in the case team.

b) Finalisation of a notification

Required profile: User (also Signatory)

Each user on the case team with the required profile will have access to the draft notification.

To finalise:
- Click on the “Modify” button to the right of the draft notification to be finalised.
- Check, modify or fill in the fields in Parts I, II and III of the general form. Make sure that all mandatory fields (marked with a single or a double red star) are filled in.
-As the case team has already been created, it is no longer necessary to designate a person to sign the notification: any signatory on the case team can do this.

-Click on “Save” then on “Finalise”.

A window will open with a print preview of the finalised notification. You can save this print preview as a Word document, which you can then circulate for consultation if necessary.
An email alert will automatically be sent to all members of the case team with the signatory profile, telling them that a new notification is ready for signature.
A Print Preview button is now also available for all the different stages in the preparation of the notification, so the notification can be saved and its history followed back.

c) Signature of a notification

Required profile: “Signatory” only. At least one person on the case team must have the signatory profile. If this is not the case, the notification cannot be finalised.
After receiving an email alert, the signatory will have access to the finalised notification to be signed. Once the signatory has opened the notification and signed it, no-one else can sign it.
When you open a notification for signature, a window will open asking you to sign, to refuse or to cancel. The window also has a box where you can make comments on the notification. You **must** enter a comment if you refuse to sign the notification.
Refusal returns the notification to the finaliser, who should make the necessary changes before finalising it again and sending it for signature.

To sign:
-Click on the “Modify” button to the right of the finalised notification to be signed.
-Check and, if necessary, modify the notification (Parts I, II and III).
-Select from the dropdown menu the person who is to validate the notification.
-Click on “Save” and then on the “Sign” button

If information still needs to be added or changed, click on “Modify” and the original notification form will open up again. You can then fill in the missing information or change details as necessary.
An email alert will automatically be sent to the validator(s) on the case team informing them that a notification is ready for validation.

d) Validation of a notification

Required profile: “Validator” only

On receiving the email alert, the validator will have access to the signed notification to be validated. (The validator can only view those notifications for which he is on the case team as validator, plus all notifications that have been validated).

- Click on the “Modify” button to the right of the signed notification to be validated.
- Click on the “Validate” Button.

> At this point, you may refuse validation and return the notification, with comments, to the initial user and/or the signatory for modifications. However, you cannot modify the notification yourself.
>
> Following validation, the notification process is complete and the notification is transmitted to the Commission. This will trigger an acknowledgement of receipt from COMP STATE AID GREFFE, indicating the case number and the deadline by which the Commission intends to carry out a preliminary assessment of the case. The deadline will depend upon whether the notification has followed the normal procedure or the simplified procedure (Article 4 of Reg. 794/2004) or has been made under a block exemption regulation, in which case the Commission will only have to check whether the information on the summary information sheet is plausible and consistent. The Commission will then contact the Member State only if the summary information sheet does not seem to be correct.

The notification will then follow the usual procedures within the Commission. It is saved on a server in Luxembourg.

From the moment of validation, the notification is visible only to the Commission and to other users within that same Member State, but not to other Member States.

7. APPLICATION SCREEN

(a) Once you have logged in as a user, you will see three tabs at the top of the screen:
i) “Notifications list”: this allows you to see all the notifications you can access with your user profile:
In version II of SANI, all members of the case team have access to the notifications of their case team:

After validation, notifications will be visible to all users of the Member State concerned, i.e. once they have been officially dispatched to the Commission and can longer be modified.
However, they will not be visible to users in other Member States.

ii) “What’s new”: this provides information on modifications and improvements to the system, which will evolve over time as SANI is gradually modified and improved.

iii) “Logout”: click on this if you want to log out of SANI, either because you wish to interrupt work on the current notification for the moment or you want to exit the system completely. Make sure you have saved the work you have done so far.

b) On the “Notifications list” tab, there are four radio buttons you can click on to view notifications at different stages: all notifications, all validated notifications for your country, all signed notifications and all draft notifications to which you have access.

c) In the search fields below the radio buttons, you can search for notifications by:
- validation date (for validated notifications),
- what the notification concerns, from a dropdown menu:
    - Art 88(3): whether the notification concerns all categories of aid,
    - Unlawful: potentially unlawful aid, if granted before notification, or
    - Non-aid: a measure that the Member State does not consider to be aid, but is notified for reasons of legal security,

- Member State, from a dropdown menu,
- the title of the aid,
- primary objective, from a dropdown menu

d) Press the Search button on the right to view all notifications that correspond to the criteria you entered and for which you have access rights.

e) Pressing the button with the question mark at the top of the page opens a window with the SIS forms in all languages and in Word format, which you can download in your language, fill in and attach to point 14 of the notification form.

f) On the far right you will find a button "Add new notifications", which opens a window asking you to choose the type of notification: a general notification, a simplified notification or a block exemption notification.

8. GENERAL NOTIFICATION FORM

a) The general notification form is divided into three parts, but Parts 2 and 3 only open once you have filled in Part 1.

In Part I of the notification form you will see a number of questions marked with two red stars. These must be filled in before you save the form for the first time. They contain the information needed to identify the notification in the system, so that you can find it again when you want to continue working on it.

Other fields are marked with a single red star. These must be filled in before you send the notification to the Commission.
The reason for this is that it is in the interest of both the Member States and the Commission to avoid as far as possible any subsequent correspondence with requests for further information. Such correspondence may considerably delay the assessment of the notified measure.

b) The form has three different types of fields:
- alternative fields: where the answer given leads to different options. Under point 2.3.1, for example, if you answer "yes" to the first question, a new field opens with some additional questions. Moreover, you cannot answer "yes" to question 2.3.2 unless you accept that your answer to question 2.3.1 will be deleted.

- dropdown menus (or lookup fields with binoculars): fields where you may choose only one or more of the options listed. In question 4.2, for instance, clicking on the binoculars displays the whole range of possible NACE codes with the possibility to refine your choice. Click on the plus sign in front of each line to expand another subgroup of NACE codes and so on.

- free fields: fields that allow you to enter free text up to 2000 characters long. If this is not enough, you should attach a Word or PDF document to your notification. For very large files we recommend that you burn them to a CD-ROM for transfer.

c) **Points 3.1 and 3.2** are free fields,

d) **Points 4 and 5** require information on the category of the beneficiary company and the amount of aid.

e) **4.2** contains lookup fields with binoculars to choose the NACE codes. If you click on the plus sign in front of the NACE codes, a further window will open to allow you to further refine the NACE codes applicable to the aid measure.

f) **5 – 7** are self explanatory with free fields

g) **Point 8** is essential for assessing compliance with the cumulation rules.

h) Please note that if you answer "no" to **point 9**, the Commission will publish the information provided, unless agreed otherwise at a later stage in the proceedings.

i) In **point 10**, there are lookup fields with binoculars for the Community frameworks, guidelines and block exemption regulations that you want to use as a basis for your state aid measure. For example, click on the plus sign in front of a block exemption regulation to choose whether the measure is large individual aid to one single company or whether the notification is made for reasons of legal certainty.

j) Under **point 12**, you may enter all the information you believe is useful or necessary for the assessment of the measure.

k) Under **point 13**, you can attach various documents (preferably in Word or PDF format).

Part III of the electronic notification system contains the supplementary information sheets. They are not part of the Web application, but can be downloaded and filled in on screen. In version II, the PDF format has been changed to Word format for easier use by the Member States. These forms then need to be attached to the general notification under Point 13.

Part III is not required only where the notification is based on the Treaty itself. In this case, you need to delete the first line in the box under point 10 (Compatibility of the aid) and click on the checkbox underneath.

l) When you save the draft, a “Finalise draft” button will appear at the top and the bottom of the form, which should be used by the person finalising the draft.

m) If you click on this button, a window opens asking whether the draft should be finalised.

n) Click on “Yes” to finalise the draft and send it to the signatory for signing and forwarding to the validator.

o) If the signatory finds any problems, (s)he still has the opportunity to make changes to the form.

p) The validator may also refuse validation and return the draft to the initial user for modification. However, validators cannot themselves modify the notification.

q) Following validation, the notification is transmitted to the Commission. This will trigger an acknowledgement of receipt from COMP STATE AID GREFFE, indicating the case number and the deadline by which the Commission intends to carry out a preliminary assessment of the case.

9. SIMPLIFIED NOTIFICATION FORM

If you choose a “simplified notification”, a page will open with a number of questions, but it is much shorter than the general notification form.

Main features:

Since the simplified notification form can only be used for measures that have been previously approved, you will be asked for the registration number of this previous case, i.e. the N number. Make sure that you type the number in the correct way, with a space between the N and the number, otherwise it will not be accepted.
You will then see a much shorter set of questions compared with the general notification form.

a) Using the search fields in the Notifications list, you can first search for the number of the state aid measure you would like to re-use for the simplified procedure.
b) In the notification form, you need to state the number of the previously approved scheme, the title of the scheme and the date of approval (DD/MM/YEAR).
You have to state whether the decision approving the scheme has been published in the OJ or not.
The primary objective has to be chosen from the dropdown menu in 1.5.
The legal basis can be introduced as free text.
The overall budget should be given in national currency.
The duration should be as in the previous decision.
Under 2, you have to choose one of the three conditions for simplified notification, as set out in Article 4(2) of Regulation 794/2004.
Finally, you should enter the web link to the legal basis or attach a copy in Word or PDF format.
Then press “Save” and, if all mandatory fields have been filled in, the page will re-appear with the “Finalise” button.

Once the simplified notification has been finalised, the signature button will appear.
After signature, you will be asked to fill in Part II containing the summary information for publication in the O.J.

Both finalisation and signature will trigger an email to the case team, informing them that the draft is ready for signature/validation. Those members of the case team with the required user profile can then open the notification for further action.

Following validation, the simplified notification is sent to the Commission.

This ends the notification procedure with SANI. The notification will then follow the usual procedures within the Commission. It is saved on a server in Luxembourg.

10. BLOCK EXEMPTION FORM

If you select a block exemption notification, a window will open with a list of the relevant block exemption regulations. Click on the regulation you want to use for the measure in question. Be careful to choose the correct regulation, because your choice will determine the DG to which your summary information sheet will be sent. This applies in particular to aid measures for SMEs active in the processing and marketing of agricultural products: such measures are now included in Regulation 70/2001, but should nevertheless be handled by DG AGRI.

11. CONFIDENTIALITY

a) The case team approach both extends and limits the visibility of notifications.
All users on the case team have access to the notification throughout the procedure, but all others are excluded. The idea is to allow Member States to select the case team according to who should have access.

Other Member States are informed of the state aid measure at the earliest when the summary information is published in the OJ.

b) For sending highly sensitive material in connection with the notification, Member States can make use of encrypted email via the PKI-secured email system. They are not obliged to use this system, but if they do not use it, they run the risk of their information being intercepted.
Since the PKI-secured email system follows different rules and is a separate system, its functioning will be dealt with separately.

11. PRINT PREVIEW AND “READ ONLY” PROFILE

A Print Preview button is available at the top of the form for all stages of the notification. This allows you to copy and paste the notification text into a Word document which you may — if necessary or desirable — circulate for consultation.
The same effect can be achieved if the Local System Administrator assigns a Read-only profile to those persons who should be consulted on the draft. They may all read the draft and send their comments to the author or the signatory.
The Read-only profile also allows management to keep track of what is happening with state aid notifications without being able to change anything in the draft notification themselves.

This manual will be under constant revision in line with the further development of SANI.