The role of state aid in the maintenance of institutions for disabled people

A case study on Germany and Portugal by the European Network on Independent Living – ENIL, December 2023

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1. Introduction

The European Union and all its Member States are party to the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD) and thus obliged to implement its provisions and comply with the jurisprudence of the Committee on the Rights of Persons with Disabilities (CRPD Committee). The CRPD Committee is the monitoring body established by the UN to monitor the implementation of the Convention.

Article 19 of the Convention establishes the right to live independently and being included in the community. Namely, it recognises 'the equal right of all persons with disabilities to live in the community, with choices equal to others'. This includes 'the opportunity to choose their place of residence and where and with whom they live on an equal basis with others', and not being 'obliged to live in a particular living arrangement'. In conjunction with General Comment No 5, as adopted by the CRPD Committee, Art. 19 obliges state parties to end the confinement of disabled people to institutions and to engage in the process of deinstitutionalisation.

General Comment No 5 also states that "no new long-term institutions should be built and that older long-term care residential institutions should not be renovated beyond the most urgent measures necessary". In addition, "state parties should ensure that public or private funds are not spent on maintaining, renovating, establishing, building or creating any form of institutions or institutionalisation"

The Treaty on the Functioning of the European Union (TFEU) grants the EU extensive powers to adopt and enforce legislation on the usage of state aid by member states. State aid can comprise subsidies, grants, capital injections or tax exemptions granted to undertakings.

In recent years, the European Network on Independent Living - ENIL has been informed that in certain Member States, state aid plays an important role in the financing of institutions. Allegedly, the EU polices this source of financing strictly, but only looks at the compatibility with the internal market. Compatibility with the obligations under the UN CRPD is not considered.

When it comes to the financing of institutions, the EU has a system in place (albeit not very effective) to monitor the use of EU funds, like the European Structural and Investment Funds. However, to ensure compliance with the CRPD and its General Comment 5, State Parties are obliged to monitor all types of financing, to prevent and sanction investments in institutions.

The following case study sheds some light on the financing of institutions through state aid in the European Union.

> Firstly, it explains the meaning of state aid, referencing the Treaty on the Functioning of the European Union (TFEU).
>
> Secondly, it presents a state aid investigation against PostNord AB to demonstrate the Commission´s powers in action.

Thirdly, the study presents evidence on the financing of institutions through state aid from Germany and Portugal.

Fourthly, the conclusions suggest avenues for further research and advocacy work.

2. State aid in EU legislation

The Treaty on the Functioning of the European Union (TFEU) establishes the creation of an internal market as one of the main missions of the EU. In the preamble, the signatory states recognise that “the removal of existing obstacles calls for concerted action in order to guarantee steady expansion, balanced trade and fair competition.” Article 3 stablishes that the EU shall have exclusive competence in creating the competition rules necessary for the functioning of the internal market. Title VII on Common Rules on Competition, Taxation and Approximation of Laws lays down primary rules. Chapter 1 “Rules on Competition” contains section 2 in aids granted by states. This chapter lays down the basic definition of state aid (European Union 2016).

Article 107, 1 defines state aid as “any aid granted by a Member State or through State resources in any form whatsoever which distorts or threatens to distort competition by favouring certain undertakings or the production of certain goods”. State aid is not permissible “in so far as it threatens trade between Member States”. In such cases it is judged to be “incompatible with the internal market” (European Union 2016).

Article 108 grants the European Commission the power to monitor and enforce the rules on state aid: “The Commission shall, in cooperation with Member States, keep under constant review all systems of aid existing in those States.” “If … the Commission finds that aid granted by a State or through State resources is not compatible with the internal market … or that such aid is being misused, it shall decide that the State concerned shall abolish or alter such aid”. Article 108 grants the European Commission far reaching implementation competences (European Union 2016).

In practice, the European Commission considers a measure state aid if the following four cumulative conditions are met:

a) The measure must confer a selective economic advantage upon an undertaking;
b) The measure must be imputable to the State and financed through State resources;
c) The measure must distort or threaten to distort competition;
d) The measure must have the potential to affect trade between Member States.

The European Court of Justice has defined undertakings as entities engaged in an economic activity, regardless of their legal status and the way in which they are financed. According to the ECJ, an economic activity is any activity consisting in offering goods and services on a market.

3. State aid competences in action

The case against PostNord AB, Denmark and Sweden

This section intends to demonstrate what the state aid competences of the European Commission entail in practice. To this end, one concrete case of a state aid investigation is presented. All the information on state aid investigations are publicly available through a database. All information presented in this section has been retrieved from the document European Commission document 2021. The details of this source, including a link, can be found in the references.

In October 2017, the governments of Sweden and Denmark signed an agreement according to which both countries were to provide capital injections into PostNordAB which would forward the funds to Post Denmark. Sweden agreed to pay EUR 39,6 million and Denmark EUR 26,4 million.

In 1995, the Danish government founded Post Denmark as an independent public enterprise. In 2009, Post Denmark merged with the Swedish postal operator Posten AB. Post Nord AB was created as a holding company to administrate both postal enterprises. Denmark and Sweden agreed that they would co-own PostNord AB. Denmark would hold 40% of the shares and Sweden 60%.

After its foundation, Post Denmark's main business activity was the posting of letters and parcels within the Danish territory. From 2006, rapid digitisation led to a fast decline in the number of letters handled by Post Denmark. In the period 2009 to 2019, the volume of letters fell by more than 80% and the enterprises' revenues by 55%. From 2012 onwards, the company generated annual deficits. To turn things around, PostNord AB developed an ambitious restructuring plan, which would reduce administrative costs and result in leaner and more efficient distribution networks. The plan also proved to be expensive. To provide financing, the governments of Denmark and Sweden decided to provide the mentioned capital injections.

The European Commission investigation

The European Commission became involved when several competitors of PostNord AB and Post Denmark, among them UPS, complained. The capital injections, it was claimed, constituted state aid.

In September 2021, the Commission rendered its decision. PostNord AB and Post Denmark were found to be business undertakings, since they sell services on the market in competition with other companies. Both the Danish and Swedish governments had fully acknowledged that the enterprises carried out activities of an economic nature. The Swedish and the Danish governments had provided the capital injections from the national budget, thus there could be no question that the financing was imputable to the state. Through a lengthy analysis, the Commission came to the conclusion that the subsidies had given PostNord AB and Post Denmark an advantage which their competitors could not have achieved on their own. The support was thus not in line with normal market conditions. PostNord AB owns enterprises active in various European markets. Various European postal companies provide services in Denmark.

The capital injections were found to be a potential threat to fair competition in the single market.

Since all cumulative criteria were fulfilled, the European Commission concluded that the financing provided by the governments of Denmark and Sweden constituted State Aid within the meaning of Article 107(1) TFEU. Due to the potential to distort competition, the State Aid was also found to be incompatible with the internal market. The ruling reminded both governments that the Treaty and the Union Courts have granted the Commission the competence to decide that a Member State might have to alter or abolish aid when it has found that is incompatible with the internal market. The European Commission made use of these powers and ruled that both governments had to recover the capital injections, altogether EUR 66 million, from PostNord AB and Post Denmark and the sums recovered had to bear interest. Denmark and Sweden were obliged to implement the decision within four months following the notification of the decision.

4. State aid and institutions

This section presents several state aid cases against providers of institutions. All information was retrieved from the same European Commission database. For the case against Pro.objekt and SenVital, the document European Commission 2017a served as primary source. For the case against the Social Welfare Organisations in Niedersachsen the information was retrieved from the documents European Commission 2017b and Land Niedersachsen 2014a, 2014b.

4.1 The case against Pro.objekt and SenVital

In 2005, the St. Josef Hospital, located in Dahn, a town in south-west Germany, was closed down by the owner and operator. For two years, the owner searched for an investor which would buy the vacant building, until in 2007 a private individual purchased the former hospital. In 2011, the same individual set up a company, Pro.objekt GmbH, with the purpose of converting the building into a nursing home with connected facilities, among them assisted living apartments. The City of Dahn found it had many reasons to support the project and decided to grant aid. The municipality concluded an urban development agreement with Pro.objekt, laying down several objectives the conversion project would serve. First, the large vacant building in the centre of Dahn would have a new purpose and also revitalise the town. Second, the new nursing home would bring 90 jobs to the area. Given the city was considered to be economically underdeveloped, the jobs were seen as greatly needed. Third, it would cover the needs for long-term care services.

It became clear that to undertake all renovation and modernisation works, an investment of EUR 15 788 737,73 would be required. To ensure the investor would implement the project, various public authorities decided to contribute to the investment costs. The City of Dahn, Dahn county, the district Southwest Pfalz and the Land (Federal-state) Rheinland-Pfalz, together provided a grant of EUR 5 500 000 to PRO.objekt. The company was allowed a profit of 5,38% upon its investment, which is considered to be a low rate, but apparently necessary to keep the investor on board.

After the conclusion of the renovation works, PRO.objekt leased the nursing-home to SenVital GmbH, a company running seven nursing homes in Germany, with a total capacity for 950 residents. SenVital benefited from the grant supplied to the investor, enabling it to rent a fully modernised building suitable for nursing home operations.

Under the concluded lease agreement, SenVital had to pay an initial rent of EUR 413 415 per year. SenVital refinances its costs pursuant to the provisions of the German Federal Social Code. To cover the costs of nursing care services, the company receives a fee per resident from the public care insurance scheme. This fee includes a profit margin. The costs for accommodation and catering have to be paid be the clients. The expenses necessary to operate the nursing home facilities, including the leasing costs, may be passed on to the residents too. There is a legal maximum limit to the costs imposed on the tenants.

The case came to the attention of the European Commission when a competitor filed a complaint in 2012, claiming the grant of EUR 5 500 000 constituted state aid in the sense of article 107 TFEU.

After many rounds of consultations and exchanges with the German Federal government, the claimant and the beneficiary, the European Commission presented its decision in 2017. The Commission ruled that PRO.objekt was an economic undertaking, the grant had provided a selective advantage, the funding was imputable from the state and that a distortion of competition was indeed possible. Thus, according to the ruling, the grant provided might have been state aid.

To decide whether the possible state aid was legal, the Commission applied additional criteria, foreseen in article 107, 3. The measure had led to a better supply of long-term care services, the creation of 90 jobs in an economically underdeveloped and rural area, providing public health, employment and territorial cohesion. Because only by offering public support in shouldering the investment costs could an investor be convinced to convert the old hospital building into a nursing home, the grant was seen as appropriate and necessary. The Commission also saw evidence that the grant of EUR 5 500 000 was the absolute minimum to make the investment beneficial to the investor, keeping PRO.objekt on board. Thus, the measure was proportional. The single purpose nature of PRO.objekt and the limited extent of the grant made the Commission conclude that any adverse effect on trade would be limited.

The Commission concluded that the possible state aid was compatible with the internal market and therefore legal. At no points were international obligations under the UN CRPD factored into the analysis.

4.2 State aid and the German Social Welfare Organisations

To understand the role of state aid in the maintenance of institutions for disabled people in Germany, it is essential to take a look at the work of the largest non-profit welfare organisations. In Germany, the contribution of private non-profit organisations in the provision of social services is substantial.

The six most important non-profit organisations are the Workers´ Welfare Organisation (Arbeiterwohlfahrt, AWO), the German Caritas Association, the Red Cross (Deutsches Rotes Kreuz, DRK), the Protestant Aid Organisation (Diakonie), the Jewish Welfare Organisation (Zentralwohlfahrtsstelle der Juden in Deutschland) and the Parity Welfare Organisation (Paritätischer Gesamtverband).

Together, they employ 1,9 million people and are supported by 3 million volunteers. The provision of services for disabled people makes up a significant part of the portfolio of social services offered (BAGFW 2023). Without state aid, those organisations would not have the size they have.

The non-profit providers are organised according to the principles of federalism and subsidiarity. Facilities are owned and run by local and regional member organisations, which are legally and financially independent (BAGFW 2023). The local and regional Worker´s, Caritas, Red Cross, Protestant, Jewish and Parity charities form umbrella organisations. For each of the six groups of charities, there is one umbrella per federal state and one for the national level. In each federal state and on the national level, the umbrella organisations cooperate through a general umbrella organisation. The national umbrella is called Bundesarbeitsgemeinschaft der Freien Wohlfahrtspflege (BAGFW), which is translated into English as the German Social Welfare Organisations.

Traditionally, the private non-profit providers receive generous financial support from the state. The core of the provision of social services is financed through the four branches of the social security system: the health, unemployment, pension and care insurance schemes. The schemes are financed through membership contributions deducted from wages or other sources of income. Membership in an insurance scheme is mandatory. When it comes to health insurance, private schemes exist. Civil servants are covered by a specialised pension scheme.

The German social law allows for non-profit providers to be paid for their services from the social insurance schemes under which the service is offered. For example, if a provider runs a residential facility for disabled people, it will receive a fee for each disabled person living in this place. Providing institutions for disabled people is a service eligible for funding under chapter IX of the social code on the rehabilitation and inclusion of persons with disabilities. Fees which are dispersed contain a profit margin.

The private non-profit providers benefit from additional financial support, for example in the form of subsidies or tax benefits. Different types of subsidies are provided by all levels of government. For example, the Federal Government provides funding so the providers can hire staff to do political work. The funding is regulated by law. Competitive applications are not foreseen. Due to the many sources of funding, German Caritas runs a Secretariat with 300 staff members in charge of lobby work. Due to their non-profit status, those providers are exempt from corporate tax, trade tax and property tax.

The German Social Welfare Organisations, provide a large variety of services:

- Services for children and young people, such as kindergartens, childcare coaching for parents and free time activities
- Support for families and single parents, such as marriage and pregnancy coaching, life-coaching, family care and maternal recovery
- Support for older people, such as senior meetings, lunch and visiting services and **elderly care and nursing homes**
- **Services for people with disabilities and people with 'psychiatric disorders', such as early education, special kindergartens and schools, vocational training centers, day care centres and residential homes**
- Care for sick people, such as in hospitals, day clinics, day care centres, support through sanatoriums and advisory offices
- Support for refugees and migrants, such as migration advisory services for adults, youth migration services, asylum procedures advice, psychosocial centres, integration projects
- Support for people in social deprivation, such as homeless shelters, debt coaching, station mission and telephone counselling
- Vocational training for young people in training, re- and upskilling facilities for social and care professions (BAGFW 2023).

The main areas of activity of the local and regional organisations are the provision or nursing homes, hospitals and residential facilities for disabled people, as those are the most financially beneficial services. Because local and regional organisations typically own and run a substantial number of facilities, they often have a turnover of more than EUR 100 million. For example, the Caritas Association of the Diocese Limburg has a tur-over of EUR 40 million and is referred to as a small organisation.

4.2.1 The case against the German Social Welfare Organisations in Niedersachsen

In February 1956, the Land Niedersachsen adopted the Law on the Funding of Welfare Services. This law states that the Social Welfare Organisations are to receive an annual grant of at least EUR 21 252 000 per year. If the Land's revenues from gambling fees surpass the amount of EUR 147 300, the Organisations receive 18,63% of the money as a top up. In 2016, the grant received amounted to EUR 23 346 000. Some of this funding goes into the provision of disability services, which consist to a large extent of institutions.

The Social Welfare Organisations in Niedersachsen distribute the funding among themselves according to a distribution key, depending on the organisation's size, the number of members, the number of institutions and the number of full time employees and volunteers.

Caritas, the Red Cross and Diakonia in Niedersachsen do not have a Federal State-wide umbrella, but consist of three regional associations. The organisations making up Diakonia have more than 3000 organisational members. The Workers' welfare organisations operate in Niedersachsen with three regional organisations, which together have 41 member organisations at county level. The 41 organisations at county level have 411 member organisations at municipal level, which have 39 500 individual members.

In June 2015, the European Commission received a complaint concerning alleged state aid granted by the Land (Federal-State) of Niedersachsen to the social welfare organisations operating there. According to the complainant, the grant allowed the Social Welfare Organisations to offer their services below market price and to remunerate their employees above the standard salary level.

After several exchanges of information with the German authorities, the Commission rendered its decision in November 2017.

The Commission decided that the subsidies paid might constitute state aid, but were to be classified as existing aid within the meaning of Article 1 (b) (i) of Regulation EC No 2015/1589 and therefore legal.

The aid measure was introduced for the first time in February 1956. It entered into force before the TFEU, which was enacted in January 1958 and it is still applicable. Therefore, the aid measure is classified as existing aid. According to the Commission, the law has not undergone substantive changes since 1956. Thus, the grant retains its status as existing aid. In addition, the German authorities agreed to make the measure compliant with the 2012 SGEI decision.

4.2.2 State aid for the Stephanus-Foundation

The German Ministry of Social Affairs and the European Social Fund jointly financed the Rückenwind-Program (‘tailwind programme’), which came up to more than 74 million for the funding period 2021-2027 (BAGFW 2023b). The Rückenwind programme is open only to members of the German Social Welfare organisations. The European Commission was notified in 2008 by Germany about the state aid measure as foreseen by Commission Regulation No 800/2008, declaring the aid compatible with the common market under the General Block exemption regulation (European Commission 2016).

One beneficiary of the ESF Rückenwind-Programm is the Stephanus-Foundation (BAGFW 2023c). The Foundation is one of the largest providers of facilities for disabled people in Berlin and Brandeburg. It runs 100 facilities and employs 4000 staff members.

The ESF funded project, which the Foundation is involved in, supports the Foundation and its employees in the digital transformation. A total of 12 to 15 facilities participate. The business division “living and assistance” provides homes to approximately 1000 disabled people, living in small living arrangements (Stephanus-Foundation 2023a).

According to the website, the Stephanus Foundation provides care for disabled people in residential settings, assisted living arrangements, but also supports transitions to living in ones own apartment.

For example, the Stephanus Foundation runs a group home in the small town of Templin. Eight disabled people live together in three apartments. According to the Foundation, residents are supported in having self-determination. Every resident has a counsellor who coordinates with legal guardians. In proximity to the apartments there are sheltered workshops where the residents work (Stephanus-Foundation 2023b).

The Foundation also maintains group homes for children and young people and for autistic adults. Residents are allowed to decorate their rooms as they wish (Stephanus Foundation 2023c, 2023d).

The Foundation has a division specialized in sheltered workshops, called Stephanus-workshops, where "persons with disabilities and psychiatric disorders find employment." There are 16 facilities in Berlin and Brandenburg. More than 2000 disabled people work at the Stephanus-Workshops. (Stephanus Foundation 2023e)

4.2.3 Welfare Facilities St. Georg (Sozialwerk St Georg)

The Welfare Facilities St. Georg are a provider of services for disabled people from Nordrhein-Westfalen. According to the annual report, St. Georg is a decentralized social enterprise with headquarters in Gelsenkirchen (Sozialwerk St Georg 2022).

St. Georg runs 150 facilities with the objective "to provide people with needs of assistance of life of self-determination". The key service provided is the management of different types of living arrangements. 65% of the turnover is generated by the division providing "special living arrangements" for disabled people.

The clients have "psychiatric disorders, disabilities, addiction issues, autism or social difficulties". In 2021, St. Georg had 4 733 clients; 1 733 were living within "the special living arrangements" and 1 500 were living in assisted living. In 2021, St Georg had 2.532 staff members

In 2020, the turnover stood at EUR 145,2 million and at EUR 145,9 million in 2021. In 2020, staff expenditure stood at 114,8 million, compared to EUR 115,1 in 2021. In 2021, St. Georg invested EUR 7.9 million, of that EUR 5 million went into real estate. A new residential facility was built and a another one renovated.

The welfare facilities St Georg are a gGmbh, a non-profit undertaking. As such, they are exempt from the corporate income tax, trade tax and property tax. In 2010, the Commission ruled that these tax exemptions might be state aid, but decided they are legal.

4.3 State aid and institutions in Portugal

The information about the following case was retrieved from document European Commission 2012.

In 2009, the Portuguese authorities decided to support a project of the Instituto Piaget, Cooperativa para o Desenvolvimento Humano, Integral e Ecológico CRL (the Piaget Institute) to create a medium and long-term mental health unit in the municipality of Macedo de Cavaleiros in northern Portugal. The Piaget Institute is a cooperative and thus a non-profit entity under Portuguese law.

The plans foresaw the provision of 50 beds distributed over the three types of care facilities and the employment of 26 staff members.

The total cost of construction amounted to EUR 3 046 976, out of which EUR 1 897 833, approximately 62%, were to be provided by the European Regional Development Fund. The Portuguese government decided to grant the funding through the Thematic Territorial Enhancement Programme.

The European Commission became involved when the Portuguese government provided a notification about the measure. The Commission ruled that, due to the low number of placements offered, a distortion of competition in the internal market was unlikely. Thus, the subsidy was declared legal state aid.

5. Conclusions

This case study presented mounting evidence on the financing of institutions for disabled people through state aid. The evidence suggests that significant amounts of funding flow into institutions through this channel every year. The research into this topic should continue by gathering further evidence.

Providers of institutions do not publicize the receipt of state aid, which is a challenge for empirical research. This case study relied heavily on investigations conducted by the European Commission. In such cases, reliable information is available through public databases. The Commission only launches investigations when there is a complaint, which does not happen often.

To gather more evidence, ENIL would require the help of its members and other experts present on the ground, who might hear of subsidies or other advantages granted to providers of institutions.

Disability rights advocates need to start entering the state aid policy scene to create awareness about the EU and Member States obligations under the UN CRPD. Since considerations about the rights of disabled people are new to this policy area, convincing people about its importance might take time. Because of the high amounts of state aid spent on institutions, this work is important and must be undertaken.

When they hear about subsidies given to providers of institutions, disability rights advocates should start filling complaints to the Commission about the possible presence of state aid. That way, providers can be put under pressure and new evidence be generated.

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