

## Appendix A: Methodology

- A.1 This Appendix summarises our evidence gathering methodology. We had two areas of focus as outlined in the Act (see Section 2 Introduction), namely:
- (a) the effectiveness of the operation of the Act; and
  - (b) its impact on competition and investment within the UK.
- A.2 Further information on our evidence gathering activities can be found in separate Appendices as indicated below.

### Evidence Gathering Activities

#### Determining our Approach

- A.3 We consulted on our proposed methodology (see the [Approach to monitoring consultation - GOV.UK](#)) from 1 February to 28 March 2024. Sixteen responses were taken into account when launching the evidence and information gathering activities ([Subsidy Advice Unit: Proposed approach to monitoring under the Subsidy Control Act 2022 - GOV.UK](#)).

#### Call for Inputs (Appendix B)

- A.4 On 15 April 2025 we published a call for information ([Review of the effectiveness and impact of the UK's Subsidy Control Act: call for inputs - GOV.UK](#)) on the effectiveness and impact of the Act, which closed 24 June 2025. We received 18 responses from:
- (a) Argyll and Bute Council;
  - (b) Browne Jacobson LLP;
  - (c) Clifford Chance LLP;
  - (d) the Department for Environment, Food and Rural Affairs;
  - (e) policy team A in the Department for Energy Security and Net Zero (DESNZ);
  - (f) policy team B in DESNZ;
  - (g) Dumfries and Galloway Council;
  - (h) a lawyer;
  - (i) Joint Working Party of the UK Bars and Law Societies on Competition Law;

- (j) London Borough of Barnet Council;
- (k) the National Trust;
- (l) a local authority;
- (m) Pinsent Masons LLP;
- (n) an academic from the London School of Economics and Political Science;
- (o) Slaughter and May LLP;
- (p) TLT LLP;
- (q) a civil servant; and
- (r) Womble Bond Dickinson LLP.

### **Letters from devolved governments**

A.5 We received letters setting out views on the regime from:

- (a) the Welsh Government Cabinet Secretary for Finance and Welsh Language;  
and
- (b) the Scottish Government Minister for Business and Employment.

A.6 We note that both letters were sent under previous administrations, and do not necessarily reflect the views of the current Welsh and Scottish governments.

A.7 While these are not formal responses to our Call for Inputs, for convenience we have published these letters in Appendix B.

### **Roundtables**

A.8 We held a series of roundtables across the UK to which we invited a wide range of interested parties to attend to provide their views on the regime.

A.9 We held a roundtable in Edinburgh on 30 July 2025, including 12 attendees from:

- (a) Argyll and Bute Council;
- (b) the British Chambers of Commerce;
- (c) Brodies LLP;
- (d) the Confederation of British Industry Scotland;
- (e) Dundee City Council;

- (f) DWF Law LLP;
- (g) Highlands and Islands Enterprise;
- (h) A lawyer;
- (i) Pinsent Masons LLP;
- (j) Prosper (Scottish Council for Development and Industry);
- (k) Scottish National Investment Bank; and
- (l) South Lanarkshire Council.

A.10 On 13 August 2025, we held a roundtable in Belfast with 10 attendees from:

- (a) A&L Goodbody LLP;
- (b) Causeway Coast and Glens Borough Council;
- (c) the Department of Agriculture, Environment and Rural Affairs;
- (d) the Department for Communities;
- (e) the Department for the Economy;
- (f) Invest Northern Ireland;
- (g) NI Food and Drink;
- (h) the Ulster Farmers Union; and
- (i) the Utility Regulator.

A.11 On 19 August 2025, we held a roundtable in Cardiff with 9 attendees from:

- (a) Cardiff University
- (b) Geldards LLP;
- (c) Medr;
- (d) Neath Port Talbot County Borough Council;
- (e) Pembrokeshire County Council;
- (f) Powys County Council;
- (g) Wales Council for Voluntary Action; and
- (h) the Welsh Local Government Association.

A.12 We held two roundtables in London. The first took place on 28 August 2025, with 8 attendees from:

- (a) Arts Council England;
- (b) Browne Jacobson LLP;
- (c) DWF Law LLP;
- (d) Linklaters LLP;
- (e) A local authority; and
- (f) Slaughter & May LLP.

A.13 The second was held 3 September 2025 with 15 attendees from:

- (a) Allen Overy Shearman Sterling LLP;
- (b) DWF Law LLP;
- (c) Grant Thornton LLP;
- (d) Hogan Lovells LLP;
- (e) Oxera Consulting LLP;
- (f) Pinsent Masons LLP;
- (g) Macfarlanes LLP;
- (h) the National Trust;
- (i) NERA Economic Consulting;
- (j) New Media Law LLP;
- (k) An academic from the University of East Anglia; and
- (l) VWV LLP.

### **Meetings with key government and public bodies**

A.14 We met with the subsidy case teams from the UK and devolved governments and with the Competition Appeal Tribunal to hear their views on the regime:

- (a) the Department for the Economy (Northern Ireland) on 13 August 2025;
- (b) the Welsh Government's Subsidy Case Team on 19 August 2025;

- (c) the Scottish Government's Subsidy Case Team on 21 August 2025;
- (d) the Department for Business and Trade's Subsidy Control and Policy Case Team on 8 October 2025; and
- (e) the Competition Appeal Tribunal on 9 October 2025.

### **Case Studies (Appendix C)**

- A.15 We conducted case studies on 6 stand-alone subsidies and 2 subsidy schemes. We sought to understand the effect of the Act on the process of granting subsidies, and the subsequent impact that these subsidies had on competition and investment. The purpose of the case studies was not to judge the appropriateness of the award, or investigate specific subsidies or schemes. The case studies were chosen based on pre-determined criteria to ensure there was a diverse view of a range of subsidies and schemes.
- A.16 Information requests were sent to the public authorities granting the funds, beneficiaries, and related or interested third parties. As well as sending questionnaires, we held 12 meetings with the beneficiaries and public authorities related to each of the subsidies, and we held three sessions for beneficiaries under schemes and other interested parties related to the design of subsidies under it. Four meetings took place with relevant third parties.

### **Market Research (Appendix D)**

- A.17 We engaged Revealing Reality, a market research company, to conduct independent market research on the effectiveness of the operation of the Act from the perspective of public authorities.
- A.18 A pilot involving 25 public authorities was carried out to examine whether the methodology was likely to generate robust insights about the experience of public authorities. Upon receiving successful results, the project was extended to a further 25 public authorities.

### **Analysis of SAU Referrals and Post-Referral Questionnaires (Appendices E and F)**

- A.19 We conducted a review of the 107 reports published by the SAU during the reporting period to seek insights into public authorities' abilities to conduct an assessment.
- A.20 Following the publication of an SAU report, the SAU issues a Post-Referral Questionnaire to the referring public authority to obtain views on how it found:
  - (a) the overall regime, in particular the process of completing the assessment;
  - (b) the SAU process and engagement;

- (c) the SAU's Public Authority Portal; and
- (d) the report, in terms of clarity, usefulness, and whether changes were made to the subsidy or the assessment upon receipt.

A.21 We undertook both a quantitative and qualitative analysis of the responses received to this questionnaire to understand public authorities' experiences of referrals. 46 responses were received during the review period.

### **Quantitative Analysis (Appendices G and H)**

A.22 We undertook quantitative analysis of the [subsidy database](#) to understand how subsidies have been granted during the review period. This considered data on, among other things, subsidy frequency and values, economic sector, public authority and beneficiary location.

A.23 To help consider the impact of the operation of the Act on competition and investment, we analysed various competition and investment indicators compared against the value of subsidy spend in different economic sectors. We sought to identify any broad sector-level relationships, but the results were not able to provide direct evidence on the impact of the regime.