



Brussels, 10/02/2026  
COMP.B3/MBL/HA/comp(2026)1626609

Permanent Representation of  
Estonia to the EU  
Rue Guimard 11/13  
1040 Brussels

**Subject: Monitoring of block-exempted aid measures**  
**SA.103299 (2025/MX) – Erimärgistatud diislikütuse aktsiisisoodustus**  
**põllumajandussektoris (muutmine)**

Dear Madam, dear Sir,

I thank you for the letter dated 26 January 2026 in which your authorities provided information on the above-mentioned scheme.

On the basis of the information sent by your authorities, DG Competition considers that the scheme under reference and the individual aid granted by your authorities on the basis of this scheme are, *prima facie*, in line with the provisions of the General Block Exemption Regulation (GBER)<sup>1</sup>.

At the same time, we would like to draw your authorities' attention to the fact that there is no reference to any cumulation rules in the legal basis.

Estonia should include all conditions of the scheme in the legal basis. Experience has shown that a complete national legal basis helps avoiding irregularities and the grant of unlawful aid. Therefore, Estonia is encouraged to have a complete legal basis in order to ensure that interested parties have no doubt as to the conditions on which aid can be granted. We will also remind Estonia that it is the Member State's responsibility to ensure that all conditions are complied with.

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<sup>1</sup> Commission Regulation (EC) No 800/2008 of 6 August 2008 declaring certain categories of aid compatible with the common market in application of Articles 87 and 88 of the Treaty (now Articles 107 and 108 TFEU) OJ L 214, 9.8.2008, p. 3, as from 1 July 2014 replaced by 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.

In particular, we recommend Estonia to expressly include the condition on cumulation in the legal basis. We would also suggest that the condition on companies in difficulties is verified by the granting authorities *ex post*, as well as the condition on cumulation.

In this context, DG Competition has decided not to ask your authorities for any additional information regarding the above measures.

However, please note that the aid scheme concerned, or its successor may be subject to subsequent monitoring.

The officials in charge of this file in DG Competition are Hannes Ackert, Hannes.ACKERT@ec.europa.eu, +32 229-83396, and Magdalena Brenning Louko, Magdalena.BRENNING-LOUKO@ec.europa.eu, +32 229-84051.

Please mention the reference to this case file, as provided in the subject **SA.103299 (2025/MX)**, in any future correspondence.

Yours sincerely,

Peer Ritter  
Head of Unit