



EUROPEAN COMMISSION

DG Competition

State aid: General Scrutiny and Enforcement
R&D&I, IPCEI and Environment

Brussels, 03/07/2025

COMP/H3/SH/bsz

comp(2025)7611322

Permanent Representation of
Estonia to the EU

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1040 Bruxelles

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**Subject: Monitoring of block-exempted aid measures
SA.106808 (2025/MX) – Support for mapping and developing
cybersecurity levels**

Dear Madam, dear Sir,

Pursuant to Article 108(1) TFEU¹ *"The Commission shall, in cooperation with Member States, keep under constant review all systems of aid existing in those States"*. Consequently, DG Competition carries out an *ex post* monitoring of a sample of aid measures implemented by Member States.

The above-mentioned aid scheme "Support for mapping and developing cybersecurity levels" has been chosen for monitoring. The monitoring of this aid scheme covers the years that the scheme was applicable during the period 2022-2023 ("reference period"). It is registered as SA.106808.MX.

DG Competition will examine whether the selected aid scheme respected the provisions of the General Block Exemption Regulation (GBER)² applicable during the reference period.

According to the GBER³, in order to enable the Commission to monitor the aid scheme exempted from notification, Member States shall maintain detailed records with the information and supporting documentation necessary to establish that all the conditions laid down in the GBER are fulfilled, and provide such records to the Commission upon its request.

¹ Treaty on the Functioning of the European Union.

² 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, as amended.

³ Article 12 of Regulation 651/2014.

1. Legal basis

Your authorities are requested to provide the following information concerning the legal basis of the selected State aid scheme:

- (1) To confirm that the legal basis published on the website referred to in the summary information sheet (https://ec.europa.eu/competition/state_aid/cases1/202312/SA_106808_C03C0987-0500-C62F-8C4F-A11F920F2F52_7_1.pdf) is the legal basis of the scheme as it applied during the reference period. If this is not the case, your authorities are requested to provide the applicable legal basis. Your authorities are also requested to provide a copy of the secondary law provisions implementing the scheme;
- (2) To complete the annexed table, indicating where in the text of the legal basis the relevant conditions and provisions of the aid measure can be found; and
- (3) To indicate whether the scheme is still being applied or whether and when it expired or was replaced by a successor scheme; in such instance, please indicate the reference number of the successor scheme and provide the text of the legal basis.

We would also recall that in case of non-compliance with the provisions of the GBER, your authorities have the duty to recover any unlawful aid granted in line with the case law of EU courts⁴.

Please provide us the contact details of the person(s) in case of questions with respect to the reply to this request for information, including the e-mail address(es) and the phone number(s).

The above mentioned information should reach the Commission **within 20 working days** of the date of this letter.

In any correspondence, please mention the reference to this monitoring case, as provided above in the subject SA. 106808.MX.

In order to facilitate the correspondence in relation to this monitoring case, we propose to use English as the working language. Should Estonia agree to this, we kindly invite you to complete the attached language waiver template and return a signed copy of it as soon as possible.

The official in charge in DG Competition is Saskia HENDRIKS, saskia.hendriks@ec.europa.eu, + 32 229 54614.

Yours sincerely,
e-signed
Demos SPATHARIS
Head of Unit

⁴ Judgment of the Court of 5 March 2019, C-349/17, *Eesti Pagar AS v. Ettevotluse Arendamise Sihtasutus*, ECLI:EU:C:2019:172; Judgment of the Court of 7 April 2022, joined cases C-102/21 and C-103/21, *Autonome Provinz Bozen*, ECLI:EU:C:2022:272.

Enclosure 2 annexes: Table regarding the legal basis and language waiver template