



EUROPEAN COMMISSION

DG Competition

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

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COMP/H23/HS/bsz

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**Permanent Representation of
Estonia to the EU**
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Subject: Monitoring of Block Exemption Measures
SA. 106808 (2025/MX) - Support for mapping and developing
cybersecurity levels

Dear Madam, dear Sir,

I thank you for the letter dated 10 November 2025 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 is, *prima facie*, in line with the provisions of the General Block Exemption Regulation (GBER)¹.

At the same time, we would like to draw your authorities' attention to the fact that the rules relating to cumulation of aid (as set out in Article 8 of the GBER) are not included in the “*Conditions and Procedure for Supporting the Mapping and Development of Cybersecurity Level*” but only indirectly mentioned via references to the GBER or the *de minimis* Regulation. Please note that for the sake of clarity, it is preferable for future aid scheme to fully incorporate criteria, such as those related to cumulation of aid, into the legal basis of an aid measure, rather than simply referring to the source of the definition and its associated criteria.

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

¹ 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.

We however would like to draw your attention to the fact that the monitoring was limited to the assessment of the compliance of the national legal basis with the GBER. Therefore, the closure of this case does not contain any conclusions beyond that assessment and the aid scheme concerned, or its successor may be subject to subsequent monitoring.

The official in charge of this file in DG Competition is Saskia HENDRIKS (saskia.hendriks@ec.europa.eu).

Please mention the reference to this case file, as provided in the subject **SA.106808 (2025/MX)**, in any future correspondence.

Yours sincerely,

e-signed

Demos SPATHARIS
Head of Unit