EUROPEAN COMMISSION
DG Competition
State aid: general scrutiny and enforcement
H3: IPCEI, Environment and Innovation II

Brussels, 06/11/2026
DG COMP H3/GS/bsz

comp(2026)11517741

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

permrep.eu@mfa.ee
stateaid.est@fin.ee

Subject: Monitoring of Block Exemption Measures
SA.107952.MX – EE – Ettevõtja rakendusuuringute toetus (alates 02.06.2023)

Dear Madam, dear Sir,

I thank you for all the information your authorities provided on the above-mentioned scheme in the framework of the 2026 monitoring exercise.

On the basis of the information submitted by your authorities, DG Competition considers that the scheme under reference **SA.107952 – EE – Ettevõtja rakendusuuringute toetus (alates 02.06.2023)** is, *prima facie*, in line with the provisions of the General Block Exemption Regulation (GBER)[1]**.**

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

Nevertheless, in the case at hand, it is noted that with respect to some of the compatibility conditions, namely *i.* that all figures used shall be taken before deduction of taxes and other charges (Art. 7 (1) GBER), *ii.* that aid payable in the future shall be discounted (Art. 7 (3) GBER) and *iii.* aid cumulation rules (Art.8 GBER), the national legal basis merely makes a general reference to the GBER, without outlining the requirements of the relevant GBER provisions in the national legal basis itself.

We would like to draw your authorities' attention to the fact that it is important to outline the relevant GBER requirements in the text of the national legal basis, in order to ensure that interested parties have no doubts as to the conditions on which aid can be granted.

[1] 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.

Therefore, the Estonian authorities should consider reflecting the relevant GBER requirements more explicitly in any future GBER schemes (e.g. by copying the text of the relevant GBER provisions in the national legal basis).

Yours sincerely,

e-signed

p.o. Rodrigo PEDUZZI

Max LIENEMEYER

Head of Unit