



EUROPEAN COMMISSION

DG Competition

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

Brussels, 02/07/2026  
COMP/H23/GS/bsz

comp(2026)7175216

Permanent Representation of  
Estonia to the EU  
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1040 Bruxelles  
E-Mail: permrep.eu@mfa.ee

**Subject: Monitoring of block-exempted aid measures  
SA.107952 (2026.MX) – Ettevõtja rakendusuringute toetus (alates  
02.06.2023)**

Dear Madam, dear Sir,

Pursuant to Article 108(1) TFEU <sup>(1)</sup> *"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 randomly selected sample of aid measures implemented by Member States.

Aid scheme "SA.107952 Ettevõtja rakendusuringute toetus (alates 02.06.2023)" has been chosen for monitoring. The monitoring of this aid scheme covers the period that the scheme was applicable during the period 2023-2024 ('reference period'). The monitoring is registered as SA.107952.MX.

DG Competition will examine whether the selected aid scheme respected the provisions of the General Block Exemption Regulation ('GBER') <sup>(2)</sup> applicable during the reference period <sup>(3)</sup>.

According to the GBER <sup>(4)</sup>, in order to enable the Commission to monitor the aid scheme exempted from notification, Member States shall maintain detailed records with the

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<sup>(1)</sup> Treaty on the Functioning of the European Union.

<sup>(2)</sup> 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.

<sup>(3)</sup> This is without prejudice to the possibility to apply subsequent versions of that block exemption regulation to individual aid granted before the respective provisions of that regulation have entered into force.

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.

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://www.riigiteataja.ee/akt/117022023002>) 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 courts <sup>(5)</sup>.

In order to facilitate the correspondence in relation to this monitoring case, we propose to use English as the working language. Should your authorities 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.

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. 107952.MX.

The official in charge in DG Competition is Guillaume SCHWALL, [guillaume.schwall@ec.europa.eu](mailto:guillaume.schwall@ec.europa.eu), + 32 2 2952544.

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<sup>(4)</sup> According to Article 12 of Regulation 651/2014, in order to enable the Commission to monitor the aid 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; in case of approved aid.

<sup>(5)</sup> Judgment of the Court of 5 March 2019, C-349/17, *Eesti Pagar AS v. Ettevõtjuse 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.

Yours sincerely,

*(e-signed)*

Rodrigo Peduzzi  
Deputy Head of Unit

Enclosure: Table regarding the legal basis

Enclosure: Template for language waiver