

HT.6507 - Estonia's opinion on the Commission's draft SGEI *de minimis* aid Regulation

Estonia supports the draft regulation and the proposed increase of the aid ceiling to 650 000 euros.

We also support the alignment of SGEI *de minimis* aid regulation with the general *de minimis* aid regulation.

We propose to supplement the definition of “single undertaking” in Article 2(2) of the draft Regulation by an explicit reference to the possibility of links through natural persons, e.g. by stipulating the last sentence of the Article 2(2) as follows: “*Enterprises having any of the relationships referred to in points (a) to (d) through one or more other enterprises, including through a natural person or persons engaged in an economic activity, shall also be considered to be a single undertaking*”.

It is clarified in recital 7 of the draft that when defining a single undertaking, the links arising through natural persons must also be taken into account if such a natural person is an undertaking. However, there is no clear reference to this in the notion of ‘single undertaking’. For the sake of clarity, it is necessary to include such clarification in Article 2(2).

Tallinn,

31.05.2023