# SAF

#### 09.2025 Defence investments & EU Regulation 2025/1106 (SAFE) EU financial assistance











**Objective** 







Stark deterioration in the Union's security context (threats posed by Russia) + length of time needed to develop products and ensure the ramp-up of the corresponding industrial production capacity throughout the Union

Providing financial assistance to Member States enabling them to carry out urgent and major public investments in support of the European defence industry so that they can place orders very rapidly and invest, in the very short term, in the strengthening of production capacities

#### **Key Takeaways**

Companies cannot "apply" to SAFE - only Member States may require such financial assistance.

#### 1. Limited to the acquisition of specific defence products

- category one: ammunition and missiles; artillery systems; ground combat capabilities and their support systems; small drones (NATO class 1) and related anti-drone systems; critical infrastructure protection; cyber; and military mobility including counter-mobility;
- category two: air and missile defence systems; maritime surface and underwater capabilities; drones other than small drones (NATO class 2 and 3) and related anti-drone systems; strategic enablers; space assets protection; artificial intelligence and electronic warfare.

#### 2. Limited to common procurements

• Financial assistance for activities, expenditures and measures carried out through common procurements (at least 1 MS receiving financial assistance + 1 additional MS or EEA state or Ukraine)

#### 3. Eligibility requirements

- Contractors & subcontractors: established and with executive management structure in the EU/EEA/Ukraine + no control by a 3rd country
- Infrastructure, facilities. assets resources EU/EEA/Ukraine
- Cost of non-EU components shall not be > than 35% of estimated cost of the components of the end-product
- No component from a 3rd country contravening the security & defence interests of the EU
- If category 2 products: principle of authority-of-conception

#### **Target Audience**

- EU Defence companies who may act as contractor/subcontractor in a defence common procurement
- Member States' competent authorities wishing to obtain EU financial assistance

#### Financial aspects



Loan granted by the EU to a MS

Max amount: EUR 150 000 000 000

Pre-financing payment of up to 15% of the loan support may be requested

Payment in instalments

#### **Key Dates**



29.05.25: Entry into force

30.11.25: Deadline for Member States to send a request for financial assistance

### To Do







- Member States → develop the investment plan required to be sent along with your request
- Defence companies  $\rightarrow$ be demonstrate the absence of control by a 3rd country (in terms of intellectual property, export control, operational use of the end-item) and the fulfillment of all other eligibility criteria (threshold of non-EU components, EU executive management structure etc.)

## Support 💃



Non-exhaustive examples

- D-Wise Strategy: Detailed memorandum on eligibility criteria and conditions for using SAFE; Supply chain mapping
- D-Wise Consult: what is the definition of a subcontractor? Is there any derogations to the eligibility requirements?
- D-Wise Implementation: checklist to assess the absence of control by a 3rd country
- **D-Wise Academy**: on-site seminar
- D-Wise News: regulatory monitoring of SAFE

