16 July 2026

Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the fourth payment request submitted by Estonia on 31 March 2026, transmitted to the Economic and Financial Committee by the European Commission

Executive summary

In accordance with Article 24(2) of Regulation (EU) 2021/241, on 31 March 2026, Estonia submitted a request for payment for the fifth instalment of the non-repayable support. The payment request was accompanied by the required management declaration and summary of audits.

To support its payment request, Estonia provided due justification of the satisfactory fulfilment of the 21 milestones and targets of the fifth instalment of the non-repayable support as set out in Section 2 of the Annex to the Council Implementing Decision of 29 October 2021 on the approval of the assessment of the recovery and resilience plan for Estonia as amended by Council Implementing Decision of 16 June 2023, 13 November 2025 and 10 March 2026[1].

For three targets covering a large number of recipients, in addition to the summary documents and official listings provided by Estonia, Commission services have assessed a statistically significant sample of individual files. The sample size has been uniformly set at 60, corresponding to a confidence level of 95% or above in all cases.

In its payment request, Estonia has confirmed that measures related to previously satisfactorily fulfilled milestones and targets have not been reversed. The Commission does not have evidence of the contrary.

Upon receipt of the payment request, the Commission has assessed on a preliminary basis the satisfactory fulfilment of the relevant milestones and targets. Based on the information provided by Estonia, the Commission has made a positive preliminary assessment of the satisfactory fulfilment of all 21 milestones and targets.

The milestones and targets positively assessed as part of this payment request demonstrate significant steps in the implementation of Estonia's Recovery and Resilience Plan. They notably highlight the continuation of the reform momentum in key policy areas. This includes, among others, a reform aiming at supporting children with higher care needs and a reform boosting the green transition in the energy economy. The milestones and targets also confirm progress towards the completion of investment projects related to the construction of the hospital and health care centre in Viljandi, sustainable transport (covering a new tramway in Tallinn), and 18 bicycle and walkways around the country.

By the transmission of this positive preliminary assessment and in accordance with Article 24(4) of Regulation (EU) 2021/241, the Commission asks for the opinion of the Economic and Financial Committee on the satisfactory fulfilment of the relevant milestones and targets.

[1] ST 12532/21 INIT, ST 12532/21 ADD 1, ST 12532/21 ADD 1 COR 1 and ST 12532/21 ADD 1 COR1 REV1, as amended by ST 9367/23 INIT, ST 9367/23 ADD 1 REV 1, ST 14442/25 INIT, ST 14442/25 ADD 1, ST 6468/26 INIT, ST 6468/26 ADD 1, ST 6468/26 COR 1

Contents

Preliminary Assessment – M/T specific section:

Non-repayable support

Number and name of the Milestone: EE-C[A]-I[1-2-.1-2-]-M[4], Introduction of a construction data classification system

Related Measure: EE-C[A]-I[1-2-.1-2-], Development of e-construction

Qualitative Indicator: Publication of guidelines and online database

Time: Q4 2024

1. Context:

The objective of the measure is to contribute to the acceleration of the digital transformation of the construction sector. The measure consists in the publication online describing the construction data classification system and online database of average emission factors of materials; and the support to projects linked to the use of digital construction tools by private and public entities.

Milestone 4 requires that published guidelines describe the construction data classification system; a database of average emission factors of materials is available online and that building permits and design specifications, and building registry (logbook) are accessible from the e-construction platform.

Milestone 4 is the first target or milestone of the investment. It is accompanied in this same payment request by target 6, related to the number of confirmations by the authorities accepting the final project implementation report for projects on digital construction tools of private and public entities, selected through an open call for proposals.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	A database of average emission factors of construction materials that is necessary for the calculation of CO2 footprint in construction	Location on the website of the ministry of Climate: https://kliimaministeerium.ee/hoone-susinikujalajalje-tooriistad#materjalide-heiteteg, in Estonian and in English, enabling to download xls file with the database.
3	Website for the processing of building applications, design specifications and other documents.	https://livekluster.ehr.ee/ui/ehr/v1/ The building logbook is open to the public and can be accessed through the map on the e-construction platform.
4	Guidelines that describe the construction data classification system	e-ehituse juhendid - CCI ja ÜBN juhised Published online by the Estonian Land and Spatial Development Board and accessible as pdf.

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the milestone.

Published guidelines shall describe the construction data classification system.

Estonia provided a weblink to the CCI [construction data classification system] and ÜBN [uniform BIM-requirements] guidelines for digital submission of construction projects (evidence 4), which in turn, contain a weblink to the published guidelines on construction data classification system. The Commission services accessed the links provided on 27 March 2026 to verify that the published guidelines describe the construction data classification system. The referenced guidance is the published document "Guidance material on the nature and use of the classification system Construction Classification International – Estonia", dated November 2021 (p.2 of the document). It is specified that the guidance document was prepared on commission from the Ministry of Economic Affairs and Communications, and is intended for use by all stakeholders in the construction and real estate sector, and covers all stages of a building's lifecycle (p.6 of the document). This check was completed successfully, confirming that the requirement is satisfactorily fulfilled.

A database of average emission factors of materials shall be available online.

Estonia provided a weblink of the Ministry of Climate (evidence 2) to the "Estonian material emissions data" database, which provides data for calculating the carbon footprint of construction works in Estonia. The Commission services accessed the link provided by the authorities on 24 March 2026 to verify that the database published online shows standardised values that express how much greenhouse gas (GHG) emissions are associated with a unit of a material or product, expressed as amount of CO_2-equivalent (CO_2e) emissions per unit of material. The database can be downloaded in xls format, in both Estonian and English. This check was completed successfully, confirming that the requirement to publish online a database of average emission factors of materials is satisfactorily fulfilled.

Building permits and design specifications, and building registry (logbook) shall be accessible from the e-construction platform.

Estonia provided a link to the website for the processing of building applications, design specifications and other documents ("e-construction platform", evidence 3). The Commission services accessed the link provided by the authorities on 24 March 2026 to verify that the building registry (logbook) is accessible from that platform. The e-construction platform indeed contained a publicly accessible map (available in 2-D and 3-D) and a search engine that allows finding buildings by location, address, building registry code, or cadastral code. It also links buildings to the Buildings registry (Kinnisvararegister) logbook, which can be accessed directly from the map. The logbook contains records from the registry and other data such as building usage, location and components; technical characteristics; energy performance certificates; archival data; documents. This check was completed successfully, confirming that the requirement for a building registry (logbook) to be accessible from the e-construction platform is satisfactorily fulfilled.

The Commission services accessed the link provided in evidence 3 on 30 March 2026 to verify that the building permits and design specifications are accessible from the e-construction platform. For a randomly selected address (Kalaranna 8, Tallinn), it was possible to see the registry number (120865356), and from the building registry logbook to see under "Documents" the building permit (ehitusluba) number 191271/26265 associated with that property, issued on 26 September 2019. Using the search engine of the platform, the Commission services then performed search on design specifications (projekteerimistingimused, in Estonian). For randomly selected case, design specifications issued on 30

March 2026 and registered under number 2611802/01233 were selected. It was verified that these design specifications were associated with the building number 121451789, and found under ‘Documents’ in the registry logbook. The check was completed successfully, confirming that the requirement for building permits and design specifications to be accessible from the e-construction platform was satisfactorily fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: EE-C[A]-I[1-2-.1-2-]-T[6], Projects for digital construction tools

Related Measure: EE-C[A]-I[1-2-.1-2-], Development of e-construction

Quantitative Indicator: Number of projects completed

Baseline: 0

Target: 102

Time: Q4 2025

1. Context:

The objective of the measure is to contribute to the acceleration of the digital transformation of the construction sector. The measure consists in the publication online describing the construction data classification system and online database of average emission factors of materials; and the support to projects linked to the use of digital construction tools by private and public entities.

Target 6 consists in at least 102 confirmations by the authorities accepting the final project implementation report for projects on digital construction tools of private and public entities, selected through an open call for proposals.

Target 6 is the second and final target or milestone of the investment, and is accompanied in this payment request by milestone 4 related to the introduction of a construction data classification system and the activation of e-construction platform.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	List of completed projects	A list of 102 funded and completed projects presented in xls table providing details regarding project number, dates, project title etc. The list is created by the State Shared Service Centre.
3	Extract of the IT system (SFOS)	Extract of the Structural Fund Operating System listing completed projects corresponding to real time view of the SFOS system.
4	SFOS Extract of the IT system (SFOS)	Extracts of Structural Fund Operating System with final project reports accepted by the authorities indicating the name of the project, the reference to the funding programme for e-construction, and the confirmation by the authority accepting the final project report.
5	Regulation of the Minister of Climate "Conditions and Procedure for Granting e-Construction Leap Support"	Regulation of the Minister of Climate (original name "Kliimaministri määrus „Ehituse e-hüppe toetuse andmise tingimused ja kord–Riigi Teataja", published in the State Gazette (RT I, 26.10.2023, 8), in force since 29 October 2023.

6	Information page related to e-Construction programme	https://rtk.ee/ehituseehupe webpage that provides legal acts and other information related to the RRF-funded project on e-Construction provided by the State Shared Service Centre.
7	Regulation of the Ministry of Economy and Communication "Conditions and Procedure for Granting e-Construction Leap Support"	Regulation of the Ministry of Economy and Communication n.70 (original name "Majandus- ja Kommunikatsiooniministeeriumi määrus n.70 „Ehituse e-hüppe toetuse andmise tingimused ja kord", dated 13 September 2022.

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the target.

At least 102 confirmations by the authorities accepting the final project implementation report for projects on digital construction tools of private and public entities, selected through an open call for proposals.

The legal basis for granting investment support to projects under measure 1.2 "Development of e-construction" is set out in the regulation of the Minister of Climate (evidence 5) and the regulation of the Ministry of Economy and Communication (evidence 7), hereinafter referred to as "the Regulations". According to paragraph 1 of the Regulations, it is intended for the implementation of the support programme "Development of e-construction" (in Estonian, "Ehituse e-hüpe"), under the investment "Development of e-construction" within reform 1 "Supporting the Digital Transformation of the Economy in Enterprises" of component 1 "Digital Transformation of Enterprises" of the Recovery and Resilience Plan.

According to paragraph 2(2) of the Regulations, the support programme consists of grants awarded through calls for proposals for construction sector projects focused on developing, prototyping, or deploying innovative digital solutions, either based on the e-construction platform or operating as standalone solutions.

According to paragraph 10 of the Regulations, support may be applied for by a legal person registered in Estonia that operates in the construction sector or provides services or products to the construction sector, by a local government unit and its administered institution, or by a sole proprietor entered in the commercial register. This corresponds to the measure description that the supported projects are linked to the use of digital construction tools by private and public entities.

Paragraph 12(3) of the Regulations requires the intermediary body to publish on its website information on the launch of the call for proposals, the budget allocated to the call, and the opening and closing dates for the submission of applications. According to paragraph 4 of the Regulations, the intermediary body is the State Shared Service Centre.

Estonia provided a link to the State Shared Service Centre webpage (evidence 6) which provides information about the calls for proposals. The Commission services accessed the referenced link (evidence 6) on 29 March 2026 to verify that it contained information related to the RRF-funded project on e-construction, and to the 3 calls for projects. The Commission services were able to verify that there were

3 calls for projects announced on 4 October 2022, 4 November 2023, and 10 December 2024. The Commission services were able to verify that the 3 calls for projects were open in the periods, respectively, 4 October 2022 – 3 November 2022, 20 November 2023 – 15 January 2024, and 10 December 2024 – 20 January 2025. Each call was related to the e-construction programme and provided information about the budget allocated for each call. The Commission services were able to access legal documents and other documents related to the programme and the three calls. Namely, for the 2022 call, the Commission services were able to access the text of the Regulation of the Ministry of Economy and Communication "Ehituse e-hüppe toetuse andmise tingimused ja kord" (evidence 7), and for the 2023 and 2024 call, the regulation of the Minister of Climate (evidence 5). The website (evidence 6) also contained links to the lists of supported projects following the conclusions of each call. The check was completed successfully, confirming that the requirement for projects on digital construction tools selected through an open call for proposals was satisfactorily fulfilled.

According to paragraph 2(4) of the Regulations, applications for support, as well as information, documents, and reports related to the use of the support, shall be submitted through the e-support environment of the structural support register (Structural Fund Operating System, hereafter SFOS). Estonia provided extracts from the SFOS to illustrate that projects with the "completed" ("lõpetatud", in Estonian language) status in the system contain final project implementation reports that have been accepted by the authorities (evidence 4). These extracts show that the number of the project related to the open calls for the e-Construction projects (number 20.1.1.22 in the SFOS system), and that the "completed" status in SFOS is assigned when the final project report is submitted by the beneficiary. The system shows the administrative confirmation by the authorities accepting the final report (report status "kinnitatud"). When the final project report is accepted, the final payment is forwarded for disbursement. Once the grant has been paid out, the project is marked as completed in the system. Thus, projects are marked as completed in the SFOS only after these steps are taken. All audit trail documentation, including the final report, is stored in the SFOS for each project.

A list of 102 completed projects ("lõpetatud" in Estonian) was presented as evidence of achievement of the target (evidence 2). These projects are related to the calls for projects under the programme on e-Construction.

Following the selection of a random sample of 60 units from the list, Estonia submitted evidence 6, which is a digital document representing the real time view of the SFOS , filtered to select all completed projects related to the open calls for the e-Construction projects (20.1.1.22). For each completed project, the document indicated the project number related to the open call, name of the project, name of the beneficiary, dates of beginning and end of the project, amount of grant received, and the status of the project as 'completed'. All 60 randomly selected projects were on that list, demonstrating their status as completed in the SFOS.

The Commission services conducted an on-the-spot check on 30 March 2026 to verify that the evidence submitted (evidence 3) corresponded to the real time view of the SFOS system for e-Construction projects with the status 'completed'. The Commission services were able to confirm that evidence 6 was identical to the real-time representation of the SFOS once the system was filtered to show completed projects for calls related to e-Construction programme. This confirms that the supported projects are linked to the use of digital construction tools by private and public entities. In addition, for randomly selected projects, the Commission services asked the authorities to show the audit trail documents. The Commission services were able to verify that the system contained the audit trail documentation related to the projects, including the final project reports, identified by the relevant project number related to the open call, and bearing the status “completed” by the authorities. Finally, it was verified that the beneficiaries included both private and public entities, in line with the measure description.

The evidence provided for a sample of 60 units confirmed that the requirement of the target of having at least 102 confirmations by the authorities accepting the final project implementation report has been satisfactorily fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[A]-R[1-4-.1-4-]-T[14], Number of curriculums of training registered and qualification standards for ICT specialists registered

Related Measure: EE-C[A]-R[1-4-.1-4-], Skills reform for the digital transformation of businesses

Quantitative Indicator: Number of curriculums registered and qualification standards registered

Baseline: 0

Target: 10

Time: Q4 2024

1. Context:

The objective of the reform is to increase the digital capacity of businesses and to ensure the availability of ICT professionals. The measure consists of the support for ICT skills for businesses.

Target 14 requires five curriculums of training to be registered in Estonia's Adult training information system (JUHAN) and five new or updated qualification standards for ICT specialists to be registered in the national register of qualification standards.

Target 14 is the third milestone or target of the reform, and it follows the completion of milestone 11 related to the entry into force of legislation setting out the terms of support for the development of digital skills and target 12 related to enrolment in training activities. It will be followed by target 13, related to the number of certificates of graduation or certificates of participation issued for training activities supported under this measure.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Copy of the curriculum from the JUHAN system	Copy of the curriculum taken from the JUHAN system: Radio Communication Micro-Qualification.
3	Copy of the curriculum from the JUHAN system	Copy of the curriculum taken from the JUHAN system: Problem-Based Applied Machine Learning and Big Data Analysis.
4	Copy of the curriculum from the JUHAN system	Copy of the curriculum taken from the JUHAN system: AI Methods and Tools in Engineering.
5	Copy of the curriculum from the JUHAN system	Copy of the curriculum taken from the JUHAN system: Data Communication and IT Security in Refrigeration Technology.
6	Copy of the curriculum from the JUHAN system	Copy of the curriculum taken from the JUHAN system: Smart robotics and artificial intelligence technologies.
7	Extract from the Occupational Qualifications Registry	Extract from the registry of the Estonian Qualifications Authority: IT Manager, Level 7 Occupational Standard.

8	Extract from the Occupational Qualifications Registry	Extract from the registry of the Estonian Qualifications Authority: Software Developer, Level 6 Occupational Standard.
9	Extract from the Occupational Qualifications Registry	Extract from the registry of the Estonian Qualifications Authority: Senior Software Developer, Level 7 Occupational Standard.
10	Extract from the Occupational Qualifications Registry	Extract from the registry of the Estonian Qualifications Authority: Junior Software Developer, Level 4 Occupational Standard.
11	Extract from the Occupational Qualifications Registry	Extract from the registry of the Estonian Qualifications Authority: ICT Security Specialist, Level 5 Occupational Standard.
12	Implementing statute of the Estonian Occupational Qualifications Register	Implementing statute of the Estonian Occupational Qualifications Register (original name "Kutseregistri põhimäärus"), published in the State Gazette (RT I 2009, 28, 171), in force since 7 June 2009.

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the target.

- **Five curriculums of training shall be registered in Estonia's Adult training information system (JUHAN)**

Estonia provided copies of five curriculums of training extracted from Estonia's Adult training information system in evidence 2 to 6. In line with the framework regulation assessed in milestone 11, these training curricula cover the study fields of engineering, manufacturing, and transport services, developed by Estonian higher education and vocational education institutions in order to support ICT skills supply for businesses.

Estonia provided copies of five curriculums of training extracted from Estonia's Adult training information system in evidence 2 to 6. In line with the framework regulation assessed in milestone 11, these training curricula cover the study fields of engineering, manufacturing, and transport services, developed by Estonian higher education and vocational education institutions in order to support ICT skills supply for businesses. As evidenced in the hyperlinks present on top of page one of each of the five curricula (evidence 2 to 6), these five curricula were registered in the portal of koolitus.edu.ee (JUHAN), which is the national information system for managing of and registering to continuing education courses, including adult training:

1/ Radio Communication Micro-Qualification (training provider: Estonian Aviation Academy), published on the portal on 15 November 2024;

2/ Problem-Based Applied Machine Learning and Big Data Analysis (training provider: Tallinn University of Technology), published 26 November 2024;

3/ AI Methods and Tools in Engineering (training provider: Tallinn University of Technology), published on the portal on 26 November 2024;

4/ Data Communication and IT Security in Refrigeration Technology (training provider: Tallinn Industrial Education Centre), published on the portal on 1 September 2024

5/ Smart robotics and artificial intelligence technologies (training provider: Estonian University of Life Sciences), published on the portal on 7 February 2024.

The Commission services accessed the links provided by the authorities on 10 March 2026 to verify that the links provided in each of the five curriculum direct to the reported registered curriculums in the JUHAN system, and to verify the dates of the registration. This check was completed successfully, confirming that each of the five curriculum provided as evidence by Estonia (evidence 2 to 6) are registered in the JUHAN system and are published on the dates communicated by the authorities.

- **Five new or updated qualification standards for ICT specialists shall be registered in the national register of qualification standards**.

As evidenced by evidence 7 to 11, there are five new or updated occupational standards registered with the Estonian Qualifications Authority Foundation (sihtasutus Kutsekoda) in the Estonian Occupational Qualifications Register. The Estonian Occupational Qualifications Register, established under the Professions Act (State Gazette RT I 2008, 24, 156) and its implementing statute (evidence 12), is the national system for recording professional standards. egal basis for the operation of the occupational qualifications system is specified in the Professions Act (State Gazette RT I 2009, 28, 171). According to paragraph 5 of the statute, the register is managed by the Estonian Qualifications Authority (sihtasutus Kutsekoda), and contains, *inter alia*, data on occupations, occupational standards, occupational certificates and qualifications awarded by qualification awarding bodies. Thus, the official English language terminology used in the Estonian Occupational Qualifications Register refers to ‘occupational standards’, i.e. standards on the basis of which individual qualifications are awarded.

These five occupational standards are:

1/ IT Manager (IT-juht), Level 7 Occupational Standard, registered on 28 March 2024, Occupational standard designation in the professional register 08-28032024-2.1/8k. Corresponding reference in the Estonian Qualifications Framework EstQF Level 7 (Evidence 7);

2/ Software Developer (Tarkvaraarendaja), Level 6 Occupational Standard, registered on 28 March 2024, Occupational standard designation in the professional register 8-28032024-2.2/5k. Corresponding reference in the Estonian Qualifications Framework EstQF Level 6 (Evidence 8);

3/ Senior Software Developer (tarkvaraarenduse insener), Level 7 Occupational Standard, registered on 28 March 2024, Occupational standard designation in the professional register 08-28032024-2.3/3k. Corresponding reference in the Estonian Qualifications Framework EstQF Level 7 (Evidence 9);

4/ Junior Software Developer (Noorem-tarkvaraarendaja), Level 4 Occupational Standard, registered on 02 November 2023, Occupational standard designation in the professional register 08-02112023-2.6/7k. Corresponding reference in the Estonian Qualifications Framework EstQF Level 4 (Evidence 10);

5/ ICT Security Specialist (Infoturbespetsialist), Level 5 Occupational Standard, registered on 02 November 2023, Occupational standard designation in the professional register 8-02112023-2.7/2k. Corresponding reference in the Estonian Qualifications Framework EstQF Level 5 (Evidence 11).

All five occupational standards relate to ICT specialists.

The Commission services conducted an on-the-spot check on 10 March 2026 to verify the alignment of the documents submitted (evidence 7 to 11) with the data contained in Estonia’s Occupational

Qualifications Register (Kutseregister), as well as the dates of registration. During the on-the-spot check, it was established that the listed five occupational standards were newly registered, or updated, in the system at the dates indicated (evidence 7 to 11). This check was completed successfully, confirming that the five occupational standards for ICT specialists submitted in evidence 7 to 11 are registered in the national Occupational Qualifications Register.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: EE-C[B]-I[2-6-.2-6-]-M[39a], Completion of the investment by the Ministry of Economic Affairs and Communication

Related Measure: EE-C[B]-I[2-6-.2-6-], Green Fund

Qualitative Indicator: Transfer

Time: Q3 2025

1. Context:

The objective of the investment is to provide capital for the development of new green technologies in strategic areas through the Green Fund. The measure is implemented as a financial instrument. The Green Fund consists of a public investment in a Facility, the SmartCap Green Fund, in order to incentivise private investment and improve access to finance in Republic of Estonia.

Milestone 39a is related to a transfer of EUR 100 million by the Ministry of Economic Affairs and Communications to AS SmartCap for the Facility.

Milestone 39a is the third milestone of the investment, and it follows the completion of milestone 37 and milestone 38 related to the contractual agreement between the Ministry and SmartCap and to the investment policy document adopted by SmartCap. It will be followed by target 40a, related to the signature of legal financing agreements signed with equity/venture capital funds.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Proof of payment for transfer I by the Ministry	Proof of payment from 31.01.2022 by Ministry of Economic Affairs and Communications to Estonian Business and Innovation Agency (EIS) in the amount of EUR 25 mio.
3	Proof of payment for transfer II by the Ministry	Proof of payment from 10.10.2022 by Ministry of Economic Affairs and Communications to Estonian Business and Innovation Agency (EIS) in the amount of EUR 75 mio.
4	Proof of payments	Proof of payments from the Estonian Business and Innovation Agency (EIS) to SmartCap in the amount of EUR 100 mio.
5	SmartCap bank account statement	Bank account statement proving that SmartCap Green Fund has received EUR 100 million on 17 December 2025.
6	SmartCap Green Fund Subscription agreement (hereinafter referred to as "implementing agreement")	Agreement whereby the Ministry of Economic Affairs and Communications subscribes units of SmartCap Green Fund. The implementing agreement was signed between the Estonian Ministry of Economic Affairs and Communication and AS SmartCap on 17 December 2021

7	SmartCap Green Fund Rules and Investment Policy (hereinafter referred to as “Rules and Investment Policy”)	The rules and Investment Policy principles of the Green Fund is approved by the resolution of the supervisory board of AS SmartCap on 09 December 2021. The Rules and Investment Policy form an integral part of the implementing agreement and is referred to in recital G. of the implementing agreement (evidence 6) as follows: *[...] The basis of the Fund’s activities and the relations of unit-holders ("Investors") with SmartCap as the Fund’s management company are set out in the rules of the non-public common fund SmartCap Green Fund („Fund Rules“) approved by the 9 December 2021 decision of the supervisory board of SmartCap. The Fund Rules are attached to this Agreement and form an integral part of this Agreemen*t.
8	SmartCap Green Fund Investment Policy Statement	Amended document for planning, implementing and administering the Green Fund in years 2022-2026, adopted by AS SmartCap and approved by the Ministry of Economic Affairs and Communications on 9 June 2026. The Investment Policy statement is a contractual agreement, referred to in recital I. of the implementing agreement (evidence 6) as follows: *The Ministry as the investor and SmartCap as the management company intend to agree on an investment strategy statement document for the Fund at the beginning of 2022 to further define, specify and describe the strategies that SmartCap will employ to meet the objectives of the Fund (e.g., asset allocation, investment focuses, etc.).*
9	SmartCap Green Fund Investment Programme for Green Technology Companies	SmartCap Greentech Direct Investment Programme adopted on 31 October 2022 is addressed to green technology companies who wish to apply for an investment from the Green Fund. The programme sets out more precise terms and conditions of the programme, application process and investment decision making process. The programme implements the direct equity product line of the Green Fund and contributes to the Fund objective as described in Art. 2.2. of the Rules and Investment Policy (evidence 7) according to which the objective of the Fund is to grow the assets of the Fund by making investments in companies that create technological breakthroughs to solve environmental problems and achieve a climate-neutral circular economy.
10	SmartCap Investment Procedure (hereinafter referred to as ‘investment procedure”)	SmartCap general investment procedure regulating the relevant roles and process of screening, electing, executing and monitoring of investments. The Investment procedure forms an integral part of the contractual agreement and is referred to in the Article 2.2.2. of the Investment Policy Statement (evidence 8).

11	SmartCap Procedure for management of conflicts of interest	SmartCap internal procedure for managing conflicts of interest. The procedure for management of conflicts of interest procedure forms an integral part of the contractual agreement and is referred to in Article 2.2.3. of the Investment Policy Statement (evidence 8).
12	Work Organisation Rules and Personnel Policy	SmartCap personnel policy and work organisation rules.
13	Side Letter signed between SmartCap and 2C Ventures Fund I usaldusfond dated 16 June 2026	Bilateral Side Letter agreed with the underlying fund manager that encompasses the specifics of SmartCap Green Fund's mandate.
14	Side Letter signed between SmartCap and Stockholmsnorrskenet Impact Accelerator Fund II AB dated 22 June 2026	Bilateral Side Letter agreed with the underlying fund manager that encompasses the specifics of SmartCap Green Fund's mandate.
15	Side letter signed between SmartCap and Taaleri SolarWind III SCSp dated 18 June 2026	Addendum to the bilateral Side Letter agreed with the underlying fund manager that encompasses the specifics of SmartCap Green Fund's mandate.

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the milestone.

Estonia shall transfer EUR 100 million to AS SmartCap for the Facility.

Evidence 2-4 provided by Estonia duly justify that EUR 100 million has been transferred to AS SmartCap for the Facility. The SmartCap bank account statement dated 17 December 2025 (evidence 5) confirms that EUR 100 million have been received by SmartCap. The implementing agreement signed between the Estonian Ministry of Economic Affairs and Communication and AS SmartCap on 17 December 2021 (evidence 6) confirms that EUR 100 million will be allocated to the Green Fund.

The transfer shall be conditional upon the inclusion of the requirements of the measure description in the relevant contractual agreements. Furthermore, in line with the description of the measure, **in order to implement the investment into the Facility, the Estonian Ministry of Economic Affairs and Communication and AS SmartCap shall sign an Implementing Agreement that shall include the following content: [...]**

The implementing agreement has been signed between the Estonian Ministry of Economic Affairs and Communication and AS SmartCap on 17 December 2021 (evidence 6) for the subscription of SmartCap Green Fund shares.

Furthermore the following documents form an integral part of the implementing agreement:

- **SmartCap Green Fund Rules and Investment Policy (evidence 7)** is attached to and forms an integral part of the implementing agreement and was approved by the resolution of the supervisory board of AS SmartCap on 09 December 2021. The Rules and Investment Policy is referred to in recital G. of the implementing agreement (evidence 6) as follows: [...] *The basis of the Fund's activities and the relations of unit-holders ("Investors") with SmartCap as the Fund's management company are set out in the rules of the non-public common fund SmartCap Green Fund („Fund Rules") approved by the 9 December 2021 decision of the supervisory board of SmartCap. The Fund Rules are attached to this Agreement and form an integral part of this Agreement.*
- **The SmartCap Green Fund Investment Policy Statement (evidence 8),** last amended and approved by AS SmartCap and the Ministry of Economic Affairs and Communications on 9 June 2026, forms an integral part of the implementing agreement and is referred to in recital I. of the implementing agreement (evidence 6) as follows: *The Ministry as the investor and SmartCap as the management company intend to agree on an investment strategy statement document for the Fund at the beginning of 2022 to further define, specify and describe the strategies that SmartCap will employ to meet the objectives of the Fund (e.g., asset allocation, investment focuses, etc.).*
- **The SmartCap Green Fund Investment Programme for Green Technology Companies (evidence 9)** was adopted in October 2022 and describes a more precise step-by-step guide to electing and processing eligible investments. The programme implements the direct equity product line of the Green Fund and contributes to the Fund objective as described in Art. 2.2. of the Rules and Investment Policy (evidence 7) according to which the objective of the Fund is to grow the assets of the Fund by making investments in companies that create technological breakthroughs to solve environmental problems and achieve a climate-neutral circular economy.
- **Three Side letters to the Funding Agreements** with financial intermediaries **(evidence 13, 14, 15)**.

1) Description of the decision-making process of the Facility: The final investment decision of the Facility shall be taken by an investment committee or other relevant equivalent governing body and approved by a majority of votes from members who are independent from the government

- The Investment policy statement (evidence 8) defines the governance and decision-making process of the Facility. Art. 2.2.3. sets out that the investment committee takes the final investment decisions of the Fund by a majority of votes from members who are independent from the government and any other public interests. Art 3.4 of the SmartCap Procedure for management of conflicts of interest (evidence 11) states that "*All Employees who participate in the work of SmartCap's investment committee and make decisions on investment applications submitted to SmartCap, as well as other decisions related to the investment object at a later stage of the investment, must confirm their impartiality and independence when performing any activity. Impartiality and independence may be confirmed either by signing the relevant decision, checklist or by other means (e.g. through a confirmation in the information system).*"
- Art.2 of the Investment Procedure (evidence 10) sets out the role and responsibilities of the investment committee. Art. 2.2. requires that the investment committee consists of at least three members appointed by the Board of SmartCap.

2) Key requirements of the associated investment policy shall be specified

a. The description of the financial product(s) and eligible final beneficiaries;

- The implementing agreement (evidence 6) recital H. provides, through reference to the attached fund terms and conditions, a general description of the product:

"*... The objective of the Fund is to grow the assets of the Fund by making investments in companies that create technological breakthroughs to solve environmental problems and achieve a climate-neutral circular economy, and thereby contribute to the development of the local capital market and business environment. The fund creates the supply of capital to develop new green technologies in strategic areas (energy, agriculture, food industry, transport and logistics, material and chemical industry, and the environment) and thereby finances innovative research-intensive green technology companies the activities of which potentially contribute to climate-neutral economy, improving resilience to climate change, solving environmental problems or the development and introduction of new products, services or technologies which reduce or sequester greenhouse gas emissions. The investments of the Fund contribute to the achievement of the environmental objectives arising from the strategy "Estonia 2035" and aim to promote the objectives provided in Article 9 of Regulation (EU) 2020/852 of the European Parliament and of the Council, but also to solving wider societal problems.*"

- The associated investment policy is described in the Green Fund Rules and Investment Policy (evidence 7). Art 3.1 – 3.5 provide the description of the financial products:

    - *3.1 In order to achieve the objectives of the Fund, 100% of the assets of the Fund are invested in innovative and/or research-intensive green technology companies in the manner provided for in clause 3.3 (hereinafter the Direct Equity Investments) and/or in the investment funds that are in compliance with the requirements provided for in clause 3.4 and 3.5 in the manner provided for in clause 3.6 (hereinafter the Investment Fund(s)), who comply with the investment policy and aims set out in the Rules (the respective investments hereinafter collectively the Investments).*

    - *3.2. The volume of the Fund's Investment commitments must be at least 55 million euros by the fourth quarter of 2024 and 90 million euros by the second quarter of 2026.*

    - *3.3. The assets of the Fund may be invested as Direct Equity Investments in early to expansion stage (including late growth and maturity stage and infrastructure) innovative and/or research-intensive green technology companies that are in compliance with this investment policy (hereinafter the Target Undertakings), by acquiring equity instruments, in particular new ordinary or preferred shares of a private or public limited company or other equivalent rights that represent a holding issued by the Target Undertaking.*

    - *3.4. The Fund's assets may be invested in Investment Funds that make equity investments that focus on: 3.4.1. initial or seed phase investments to ensure market activation and the generation of transaction flows based on new technologies through business accelerators and 3 intensive programs for the development of innovative and/or research-intensive* *companies; 3.4.2. early-stage investments to finance the market introduction of new technologies; and/or 3.4.3. early growth or expansion stage (including late growth and maturity stage and infrastructure) investments to finance the rapid growth and expansion of companies on the market, including international expansion and export of products, services or technology.*

  - *3.5. The Fund´s assets may be invested only in Investment Funds that apply the principles of responsible investment. The assets of the Fund may be invested in an Investment Fund if it is an alternative fund within the meaning of the IFA and, in accordance with the documents serving as a basis for its activities, its assets are invested in Target Undertakings that are in compliance with the terms and conditions specified in clause 3.3 in the manner specified in clause 3.3 at least to the extent of the investment volume made in the respective investment fund by the Fund.*

- The associated investment programme "The Green Fund Investment Programme for Green Technology Companies” (evidence 9) sets out the eligibility criteria for final beneficiaries:
  - An Applicant shall be considered a Green Tech Company, if it meets both of the following criteria:

    (i) the Applicant develops innovative and/or research-intensive technologies; and
    (ii) such technology contributes to at least one of the following environmental objectives:
    (a) climate change mitigation;
    (b) climate change adaptation;
    (c) the sustainable use and protection of water and marine resources;
    (d) the transition to a circular economy;
    (e) pollution prevention and control; and
    (f) the protection and restoration of biodiversity and ecosystem
- The Investment procedure (evidence 10) Art 3.12-3.15. regulates the conducting of the eligibility checks regarding investment targets during the sourcing phase, whereby it is validated that the proposed investment matches the obligatory eligibility criteria.

b. The requirement that all investments supported are economically viable;

- Art. 3.4.4. of the Investment Policy Statement (evidence 8) states that the fund’s assets must be invested on market terms in a pari passu transaction together with private investor, which ensures that at the moment of the investment decision is made, the supported investment is deemed economically viable.

- The Investment Programme for Green technology companies (evidence 9) sets out that every counterparty applying for direct investment from the fund needs to fill out declaration of honour, where the applicant confirms the absence of ongoing bankruptcy or similar proceedings, thereby ensuring the economic viability of the investment. The template for the declaration of honour is attached to evidence 9 in Appendix 2.

c. The requirement to comply with the 'Do no significant harm' Technical Guidance (2021/C58/01). The legal agreement signed between Estonia and SmartCap and the subsequent investment policy of the Green Fund shall:

i. **require the application of the Commission's technical guidance on sustainability proofing for the InvestEU Fund; and**
ii. **require companies that derived more than 50% of their revenues during the preceding financial year from the following activities and/or assets to adopt and publish green transition plans: (i) activities and assets related to fossil fuels, including downstream use1 ; (ii) activities and assets under the EU Emission Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks2 ; (iii) activities and assets related to waste landfills, incinerators3 and mechanical biological treatment plants4 ; and (iv) activities and assets where the long-term disposal of waste may cause harm to the environment; and**
iii. **require the verification of legal compliance with the relevant EU and national environmental legislation of the beneficiary by SmartCap for all transactions, including those exempted from sustainability proofing**

- Art 4.1.1. – 4.1.4. of the Green Fund Rules and Investment policy (evidence 7) include the requirement to comply with the 'Do no significant harm' Technical Guidance (2021/C58/01) and other EU climate and environmental standards. Art. 4.1.2. requires the verification of legal compliance with the relevant EU and national environmental legislation of the beneficiary by SmartCap. Art. 4.1.3. requires the application of the Commission's technical guidance on sustainability proofing. Art. 4.1.4. requires companies that derived more than 50% of their revenues during the preceding financial year from certain activities and/or assets to adopt and publish green transition plans.

3) Monitoring, audit, and control requirements, including:

1. **The description of the SmartCap monitoring system to report on the investment mobilized.**

- According to Art 14.1 of the SmartCap Green Fund Rules and Investment Policy (evidence 7), SmartCap reports to the Ministry of Economic Affairs and Communications (the Investor):

  The Management Company makes at least the following data and documents available to the Investor at the request of the latter:

  14.1.1. the Rules;

  14.1.2. the report of the Fund about the activities of the Fund as of the end of the financial year and as of the half-year no later than within 4 months after the end of the respective reporting period;

  14.1.3. data referred to in Article 22 (2) (d) of Regulation (EU) No 2021/241 of the European Parliament and of the Council; When making Investments in Investment Funds, the Management Company must impose an obligation on the Investment Fund in the agreement on which the Investment is based to submit the information specified in this clause to the

Management Company in order to enable submission by the Management Company to the Investor;

14.1.4. the most recent annual report of the Fund;

14.1.5. data on common indicators referred to in Article 29 (4) of Regulation (EU) No 2021/241 of the European Parliament and of the Council

- According to Art 14.5 of the SmartCap Green Fund Rules and Investment Policy (evidence 7), transparency is ensured with:

  The accounting of the Fund is organised by the Management Company or a third party to whom the organisation of accounting of the Fund has been transferred in accordance with clause 11.5. […] An annual report of the Fund is made available in accordance with the procedure set out in clause 14 no later than within 6 months after the end of the financial year of the Fund.

2. **The description of the SmartCap procedures that will ensure the prevention, detection and correction of fraud, corruption, and conflicts of interests.**

- SmartCap has established internal rules that ensure the prevention, detection, and correction of fraud, corruption, and conflicts of interest in the course of its investment operations (evidence 10, 11 and 12).
- The SmartCap Investment procedure (evidence 10) point 4.1 sets out the mechanism for prevention and detection of fraud, corruption and conflicts of interest. *If a person engaged in the investment process at SmartCAP determines possible or actual occurrence of fraud, corruption or conflict of interest, the person must inform the Board and the employee of SmartCap responsible for risk management of such situation and follow the provided instructions to eliminate the situation.*
- The Procedure for management of conflicts of interest (evidence 11) demonstrates that SmartCap has a procedure in place for prevention, detection and correction of conflicts of interest. Chapter 3 of the procedure describes the identification of the conflict of interest. Chapter 4 describes the prevention and management of conflicts of interest. Article 2.3 states that: *In order to manage conflicts of interest, SmartCap assesses the conflicts of interest of its Employees regularly, but at least once a year by the end of February. For this purpose, the Employees fill in the declaration of economic interests included in Annex 1.*
- Detection of fraud, corruption, and conflicts of interest is also covered through the internal reporting and whistleblowing arrangements in points 1.6-1.7 of the Work Organisation Rules and Personnel Policy (evidence 12) with point 1.7 guaranteeing protection to whistleblowers.
- The Council Implementing Decision required Estonia to have the SmartCap procedures that will ensure the prevention, detection and correction of fraud, corruption, and conflicts of interests in the SmartCap Green Fund Subscription agreement (evidence 6), also known as the Implementing Agreement. Estonia, instead of including the said procedures in the implementing agreement, included these procedures in the SmartCap Investment Procedure (evidence 10), in the Procedure for Management of Conflicts of Interest (evidence 11) and the Work Organisation Rules and Personnel Policy (evidence 12). Whilst this constitutes a minimal substantive deviation from the

requirement of the Council Implementing Decision, procedures that will ensure the prevention, detection and correction of fraud, corruption, and conflicts of interests are in place. As a result, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the investment that the target represents. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

3. **The obligation to verify the eligibility of every operation in accordance with the requirements laid out in the Implementing Agreement before committing to finance an operation.**

- SmartCap has adopted the following internal processes for verifying the eligibility of every operation:
  - SmartCap Greentech Direct Investment Programme (evidence 9) sets out the eligibility criteria in Annex 3 of the document, including:
    - *The Applicant is not engaged in any activity included in the ESG Exclusion List of SmartCap, and its existing or new investors are not legal entities established in Russia or Belarus or the citizens of Russia or Belarus (including the UBOs of such investors).*
    - *The Applicant is a Green Tech Company*
  - SmartCap general investment procedure (evidence 10) Art 3.12-3.14 states that during the sourcing phase, which takes place before decision and execution phase, "*the Call Lead is responsible for reviewing or arranging the reviewing of the Investment Cases to determine whether they meet the eligibility (or other type of pre-screening) requirements established for the specific Call, if applicable."* Art 3.38-3.40 states that the Investment Lead and SmartCap's internal lawyer will check whether the activities are in line with the Call Document, through an operational risk and investment report, which needs to be confirmed by the Board.

4. **The obligation of carrying out risk-based ex-post audits in accordance with an audit plan of the AS SmartCap. These audits shall verify i) that the control systems are effective, including the detection of fraud, corruption, and conflict of interests; ii) compliance with the DNSH principle, the State Aid rules, the climate target requirements. The audits shall also verify the legality of the transactions and that the conditions of the applicable Implementing Agreement and Funding Agreements are being respected.**

- Art 4.2. of the SmartCap Green Fund investment policy statement (evidence 8) sets out the monitoring, audit and control requirements. The requirements foresee that the fund manager implements a risk-based ex-post audit that verifies i) that the control systems are effective, including the detection of fraud, corruption, and conflict of interests; and ii) compliance with the DNSH principle, the State Aid rules, the climate target requirements. Moreover, the audit and control requirements foresee that the audits shall verify the legality of the transactions and that the conditions of the applicable Implementing Agreement and Funding Agreements are being respected.

- The Green Fund Rules and Investment policy (evidence 7) Art 14.3 and 14.8 describe the auditing process of AS SmartCap:

  14.8. An audit firm is appointed to the Fund. The audit firm is appointed by the management board of the Management Company. Annual accounts of the Fund are audited in compliance with the requirements provided for in respect of audit in legal acts.

4) Requirements for selecting financial intermediaries: AS SmartCap shall select financial intermediaries in an open, transparent, and non-discriminatory manner. Controls for the absence of conflict of interests on financial intermediaries shall take place and be conducted ex-ante for all financial actors involved.

- Art. 2.2.4 of the Investment policy statement (evidence 8) sets out that the financial intermediaries are selected in an open, transparent and non-discriminatory manner and that the fund manager verifies ex-ante the absence of conflicts of interest of the financial intermediaries.
- Art 3.2 of SmartCap Procedure for management of conflicts of interest (evidence 11) sets out the ex-ante controls for the absence of conflict of interest for all financial actors involved:

  3.2. The obligation to monitor the conflict-of-interest situations stipulated in clause 3.1 must first and foremost be carried out:

  3.2.1. when preparations are being made to make an investment by the Fund, make an investment decision or to conclude a transaction, and during subsequent investment management;

  3.2.2. when the value of the Fund and its assets is determined or a valuator is appointed for determining the value (incl. when the respective decision is made);

  3.2.3. when transactions are prepared and concluded on behalf of SmartCap.

5) Requirement to sign Funding Agreements: AS SmartCap shall sign Funding Agreements with the financial intermediaries in line with key requirements that shall be provided as an annex of the Implementing Agreement. The key requirements of the Funding Agreement shall include all the requirements under which the Facility operates, including:

a. **The obligation of the financial intermediary to take its decisions in compliance mutatis mutandis with the decision making and investment policy requirements specified above, including related to respect of the DNSH principle.**

b. **The description of the monitoring and audit and control framework that the financial intermediary shall put in place, which mutatis mutandis shall be subject to all the monitoring, audit and control requirements specified above.**

- Section 2.3. of the Investment policy statement (evidence 8) describes the principles for concluding funding agreements with financial intermediaries.

- Art. 2.3.1. states that the funding agreements with financial intermediaries shall be based on the terms and conditions agreed between the investor and the fund manager in the agreement and its annexes.
- Art. 2.3.2. states that the financial intermediary needs to ensure that the investment decisions of the financial intermediary are taken by a collegiate body, independently of the investor and other public interests, in accordance with the investment principles set out in the investment policy statement and Fund Rules, including the principle of making investments on market terms and respecting the DNSH principle.
- Art. 2.3.3. states that the financial intermediary is required to implement appropriate monitoring, audit and control mechanisms covering the entire investment cycle. Prior to each investment that fulfils the terms of the contract with the fund manager, the financial intermediary is required to verify that the transaction complies with all applicable requirements and to ensure that sufficient records are collected and stored to enable checks and audits.
- Art. 2.3.5. includes the description of the monitoring, audit and control framework that the financial intermediary should put in place.

- The key requirements as described above have been translated in the Funding Agreements with the financial intermediaries. Estonia has provided the Annexes to the Funding Agreements (so called Side Letters) concluded with the three financial intermediaries (evidence 13, 14 and 15).
  - They include the requirements under which the Facility operates. The obligation of the financial intermediary to take its decisions in compliance mutatis mutandis with the decision making and investment policy requirements specified above, including related to respect of the DNSH principle are reflected in the side letters.
  - The description of the monitoring and audit and control framework that the financial intermediary shall put in place, which mutatis mutandis shall be subject to all the monitoring, audit and control requirements specified above, are described in Art. 10.4 of evidence 13, Art. 8.6 of evidence 14 and Art. 7.8 of evidence 15. More specifically, the side letters include the requirement on carrying out risk based ex post audits in accordance with the risk management policies and audit plan and the need to verify i) that the Manager's control systems are effective, including the detection of fraud, corruption, and conflict of interests; ii) compliance with the obligations established under the Side Letter, including compliance with the DNSH principle, the State Aid rules and the climate target requirements.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: EE-C[B]-I[2-7-.2-7-]-T[43], T43 Grant agreements signed for projects in renewables-based green hydrogen technologies

Related Measure: EE-C[B]-I[2-7-.2-7-], Creating opportunities for the uptake of renewables-based green hydrogen technologies

Quantitative Indicator: EUR

Baseline: 0

Target: 11 550 000

Time: Q3 2025

1. Context:

The objective of the investment is to support the first phase of the launch and piloting of hydrogen integrated value chains from energy production and supply solutions to final consumption in different application areas. The measure consists of support for projects in renewables based green hydrogen technologies.

Target 43 is related to grant agreements signed for projects in renewables based green hydrogen technologies under this measure, representing at least EUR 11 million.

Target 43 is the second and final milestone or target of the investment, and it follows the completion of milestone 41, related to entry into force of the ministerial decree setting out the terms and conditions for granting support.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	List of investments	A list of investments in renewables-based green hydrogen technologies showing for each item the allocated grant amount, the beneficiaries and the location and a short description of the project.
3	Grant agreement for OÜ Derivaat NH3 signed on 11 December 2023	Decision of the Management Board of the Environmental Investment Centre (KIK), adopted on the basis of Regulation No. 109 of the Minister of Economic Affairs and Infrastructure of 30 December 2022, approving the OÜ Derivaat NH3 project.
4	Grant agreement for Eesti Energia AS signed 24 July 2024	Decision of the Management Board of the Environmental Investment Centre (KIK), adopted on the basis of Regulation No. 109 of the Minister of Economic Affairs and Infrastructure of 30 December 2022, approving the Eesti Energia AS project.

5	Grant agreement for Elme Messer HYDG OÜ signed 24 July 2024	Decision of the Management Board of the Environmental Investment Centre (KIK), adopted on the basis of Regulation No. 109 of the Minister of Economic Affairs and Infrastructure of 30 December 2022, approving the Elme Messer HYDG OÜ project.

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the target.

Grant agreements signed for projects in renewables-based green hydrogen technologies under this measure, representing at least EUR 11 million.

Evidence 2 provides a list of three investments in renewables-based green hydrogen technologies supported under the measure, showing for each item the allocated grant amount, the beneficiaries and a short description of the project.

Project 1 (Evidence 3) OÜ Derivaat NH3: Decision for grant agreement for the project "Green hydrogen value chain for green ammonia production in Paldiski", signed by the Management Board of the Environmental Investment Centre (KIK) on 11 December 2023. Article 1 of the grant agreement states that the grant is based on the Regulation No 109 of the Minister of Economic Affairs and Infrastructure of 30 December 2022, i.e. the measure "Creating opportunities for the uptake of renewables-based green hydrogen technologies" of the Estonian Recovery and Resilience Plan. The objective of the project is to transition to a chemical industry in Estonia that consumes green hydrogen and green ammonia, which causes less environmental impact, creating the prerequisites for developing a complete hydrogen value chain primarily in the chemical industry sector, while indirectly supporting also the transport sector. The agreed grant amount for the project is **EUR 16,965,000.**

Project 2 (Evidence 4) Eesti Energia AS with several partners: Decision for grant agreement for the project "Green hydrogen complete solution pilot project," signed by the Management Board of the Environmental Investment Centre (KIK) on 24 July 2024. Article 1 of the grant agreement states that the grant is based on the Regulation No 109 of the Minister of Economic Affairs and Infrastructure of 30 December 2022, i.e. the measure "Creating opportunities for the uptake of renewables-based green hydrogen technologies" of the Estonian Recovery and Resilience Plan. The objective of the project is to develop and pilot a complete green hydrogen value chain in Estonia, consisting of green hydrogen production, transportation, and its adoption in the transport sector. As a result of the project, renewable hydrogen will be used in the transport sector, and no non-renewable fuels will be used for its production. **The agreed grant amount for the project is EUR 24,740,015.**

Project 3 (Evidence 5) Elme Messer HYDG OÜ: Decision for grant agreement for the project "Establishment of a green hydrogen plant in the city of Narva", signed by the Management Board of the Environmental Investment Centre (KIK) on 24 July 2024. Article 1 of the grant agreement states that the grant is based on the Regulation No 109 of the Minister of Economic Affairs and Infrastructure of 30 December 2022, i.e. the measure "Creating opportunities for the uptake of renewables-based green hydrogen technologies" of the Estonian Recovery and Resilience Plan. As a result of the project, a green hydrogen production unit will be established and the hydrogen produced will be used as a feedstock in the chemical industry. Renewable electricity will be used throughout the entire value chain, and implementing this chain will help reduce greenhouse gas emissions associated with hydrogen production, transportation and consumption. **The agreed grant amount for the project is EUR 1.98 million**.

Together, the signed grant agreements represent EUR 43.68 million, in line with the target.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: EE-C[B]-I[2-8-.2-8-]-T[43c], Confirmations from authorities accepting the final reports

Related Measure: EE-C[B]-I[2-8-.2-8-], Supply security investment support

Quantitative Indicator: Number of confirmations from authorities accepting the final reports

Baseline: 0

Target: 70

Time: Q2 2026

1. Context:

The objective of the investment is to support the transition of companies from fossil energy sources to alternative energy supply sources. The investment consists of support to investment projects for the transition of companies from fossil energy sources to alternative energy supply.

Target 43c is the last target of the investment, and it follows the completion of milestone 43a, related to launching a call for proposals to support investment projects for the transition of companies from fossil energy sources to alternative energy supply sources.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Extract of the Structural Funds Monitoring and Information System (SFOS) IT system, controlled by the Ministry of Finance, listing the projects selected following the call for proposals from milestone 43a and their status	Extract of the SFOS IT system listing 163 completed projects corresponding to real time view of the system.
3	List of completed projects selected for the assessment of the target	A list of 70 completed projects presented in a table providing details regarding project number, dates, project title, beneficiaries, etc.

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the target.

At least 70 confirmations from the authorities accepting the final project implementation reports following the call for proposals from milestone 43a.

Estonia published a call for proposals to support investment projects facilitating the transition of companies from fossil energy sources to alternative energy supply sources, as part of milestone 43a, which was positively assessed by the Commission under the 3rd payment request. Following the call, the "Estonian Business and Innovation Agency - Enterprise Estonia" funded at least 70 projects (Evidence 2).

The Commission services conducted an on-the-spot check on 18 March 2026 to verify the confirmations from the authorities accepting the final project implementation reports following the call for proposals from milestone 43a requirement. Estonia was requested to conduct a walkthrough of the *Struktuuritoetuse registri pidamise põhimäärus–Riigi Teataja* (i.e. the Structural Funds Monitoring and Information System – SFOS, which is the system in which the application and grant process is conducted, including the storage of confirmations by authorities accepting the final project implementation reports. A representative of the Estonian authorities showed the Commission the complete list of selected projects. The list included the 70 projects submitted by the Estonian authorities for the fulfilment of the target under Evidence 3.

- The Commission verified that the projects refer to the ones selected following the call for proposals to support investment projects for the transition of companies from fossil energy sources to alternative energy supply sources. The representative of the Estonian authorities filtered the relevant projects based on the name of the call for application, i.e. "Security of supply support for undertakings (national) (20.2.2.44)", confirming that all projects are related to the call for proposals from milestone 43a.
- Additionally, the Commission verified that the online listing in the system of the relevant projects included for each project the reference number, name, the beneficiary and the project status. The platform clearly displayed the projects status as "completed" ("lõpetatud", in Estonian language) for each project. When the status of the project in the SFOS is "completed", it means that the final project report has been submitted by the beneficiary, and there is an administrative confirmation by the authorities accepting the final report for the project. When the final project report is accepted, the final payment is forwarded for disbursement. Once the grant has been paid out, the project is marked as completed in the system. Thus, projects are marked as completed in the SFOS only after these steps are taken.
- For randomly selected projects, the Commission asked the authorities to click on the project to show detailed information on the project status, which included the name of the person (i.e. a representative of Enterprise Estonia) who had accepted the final implementation project and the link to the final implementation report submitted related to the call for proposals from milestone 43a. Each of the final reports opened by the authorities included complete information regarding the steps of the project implementation.

These checks were completed successfully, confirming that there are at least 70 confirmations from the authorities accepting the final project implementation reports following the call for proposals from milestone 43a.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[C]-R[3-1-.3-1-]-T[46], Publication of datasets

Related Measure: EE-C[C]-R[3-1-.3-1-], Creation and development of a centre of excellence for data governance and open data

Quantitative Indicator: Number of published datasets

Baseline: 706

Target: 2600

Time: Q4 2025

1. Context:

The objective of the measure is to foster a better management of the data collected and held by the Estonian public authorities. The measure consists of the creation of a data management team within Statistics Estonia, and publication of datasets.

Target 46 requires that the number of datasets published shall be increased from 706 on 13 August 2021 to 2 600.

Target 46 is the second target or milestone of the reform, and it follows the completion of milestone 44, related to setting up a data management team in the Statistical Office, the Ministry of Economic Affairs and Communications and the State Information System Authority.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Estonia_Datasets - active hyperlinks	The list and description of datasets include an automated export of metadata from the Estonian national data portal (andmed.eesti.ee).

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the target.

The number of datasets published shall be increased from 706 on 13 August 2021 to 2,600.

Estonia provided, under evidence 2, a list and description of datasets published in the Estonian National Data Portal as of 13 August 2021 and of 1 January 2026, generated through an automated export of metadata from the Estonian National Data Portal (andmed.eesti.ee). This list provides a structured and verifiable record of the datasets published at both reference dates, enabling a direct comparison between the baseline and the situation at the close of the implementation period. The list furthermore shows that

706 datasets were published on 13 August 2021 and that 5,683 datasets were published on 1 January 2026. The Estonian authorities have therefore significantly overachieved the target.

The Commission services conducted an on-the-spot check on 10 March 2026 to verify that the number of published datasets presented in evidence 2 corresponds to the number of published databases in the National Data Portal at the reference dates. This check was completed successfully, confirming that the number of published datasets available as of 13 August 2021 was 706 and that as of 1 January 2026 the number of published datasets was 5683.

Following the selection of a random sample of 60 units, Estonia submitted a list and description of the sampled datasets, drawn from a metadata export of the Estonian national data portal. The sample was constructed from a total population of 5,683 datasets by first excluding records published on or before 13 August 2021, yielding a filtered pool of 5,299 records from which 60 datasets were randomly selected. For each of the 60 sampled datasets, Commission services successfully accessed the corresponding URL on 24 March 2026, confirming that the dataset was live and publicly available at the time of verification.

Based on the datasets published in the Estonian National Data Portal as of 13 August 2021 and 1 January 2026 (evidence no. 2), the number of datasets increased from 706 to 5,683, thus exceeding the target of 2,600 by 3,083 datasets.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: EE-C[C]-R[3-3-.3-3-]-T[50], IT developments online

Related Measure: EE-C[C]-R[3-3-.3-3-], Development of event services and digital gateway for entrepreneurs

Quantitative Indicator: Number of IT developments online

Baseline: 1

Target: 10

Time: Q4 2025

1. Context:

The objectives of the measure are to support the efficiency and the quality of the delivery of public services and reduce the administrative burden for entrepreneurs. The measure consists of IT developments related to the business event services and/or gateway for entrepreneurs.

Target 50 requires IT developments related to business event services and/or the gateway for entrepreneurs.

Target 50 is the second and last target of the reform, and it follows the completion of target 49, related to one project having successfully deployed new developments online.

2. Evidence provided:

	Name of the evidence	Short description
1	Cover note	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.
2	General links to Entrepreneur's view	**Entrepreneur's mailbox IT development.** This document describes the development of Estonia's state mailbox for entrepreneurs, detailing its role in facilitating communication between the state and businesses, and it includes screenshots and links to access the tool. Link: https://www.eesti.ee/ettevotja/et/avaleht
3	Central Authorisations Management Information System (CAMIS) (EST: Pääsuke) of Estonia	**Access management service Pääsuke IT development.** This document describes a detailed description of CAMIS, accompanied by screenshots and links to illustrate various functionalities. Link: https://www.eesti.ee/eraisik/et/artikkel/volituste-rollid Press release: https://www.ria.ee/uudised/riigiportaal-eestiee-taienes-keskse-volituste-haldamise-teenusega
4	Grants for entrepreneurs	**Information service about grants for entrepreneurs IT development.**

		This document describes the project's functionality and online presence, detailing how it aids users in accessing funding opportunities through various interactive tabs. It includes screenshots and links showcasing its accessibility. Link: https://www.eesti.ee/ettevotja/et/syndmusteenused/finantseerimisvoimalused#uldinfo Press release (in Estonian): https://www.ria.ee/en/news/state-portal-eestiee-added-two-new-services-entrepreneurs
5	Temporary obligations	**Service for temporary obligations for entrepreneurs IT development** This document describes, with screenshots, the service's completion by outlining its functionalities, such as timeline categorisation and filtering. It includes screenshots and links showcasing its accessibility. Link: https://www.eesti.ee/ettevotja/et/syndmusteenused/tahtajalisedkohustused#uldinfo Press release: https://www.ria.ee/en/news/state-portal-eestiee-added-two-new-services-entrepreneurs
6	Business-related supporting information	**Public services that support and facilitate business IT development.** This document describes, with screenshots, solutions for entrepreneurs, featuring accessible resources. Link: https://www.eesti.ee/ettevotja/et/syndmusteenused/tahtajalisedkohustused#lisateave
7	Activity licenses and notices	**Services related to activity licences and notices of economic activities from one place IT development.** This document describes, with screenshots, the facilitation of business event services and gateways, offering a link to user-accessible tools and a portal for entrepreneurs to manage company licences and notifications. Link: https://www.eesti.ee/ettevotja/et/syndmusteenused/tegevusload#pohiinfo
8	Employee related operations	**Information service about employee-related services IT development.** This document describes, with screenshots, a consolidation of employee-related services into a single eesti.ee portal for streamlined access, showcasing organised functionalities and links for easy navigation. Link: https://www.eesti.ee/ettevotja/et/syndmusteenused/tootajatega-seotud-toimingud#toosuhe

9	Establishing a company	**Business establishment information service IT development.** This document describes through screenshots a structured landing page with a step-by-step guide that simplifies company formation and enhances information accessibility, and links for accessing tools. Link: https://www.eesti.ee/syndmusteenused/et/ettevotte-asutamine-ja-haldamine
10	Export operations	**Information service on export operations IT development.** This document describes through screenshots the organisation of export operations into categories such as market entry and financing, featuring interactive menus, step-by-step guidance, consolidating information on eesti.ee for a unified overview. Link: https://www.eesti.ee/ettevotja/et/syndmusteenused/eksport#uldinfo-ja-sihtturud

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the target.

Number of IT developments related to the business event services and/or gateway that are available online.

- Evidence 2 to 10 provide an overview of each of the nine IT developments related to business event services and/or the digital gateway for entrepreneurs. The digital gateway Eesti.ee, is the Estonian government's official online portal page for entrepreneurs, where business-related information, services, and company data are centralized in one place. Each piece of evidence describes an IT development, includes screenshots of the IT tool and the links to access the tool. The developments provide entrepreneurs with multilingual support, ensuring comprehensive coverage of the planned service scope.
- The baseline of 1 IT development is the Entrepreneur's data card and desktop IT development, which was positively assessed under target 49 in payment request 2.
- The Commission services conducted an on-the-spot check on 19 January 2026 to verify that the IT developments are available online and available to entrepreneurs through their online account on the eesti.ee government portal and relate to the business event services and/or gateway.
- The Commission services accessed the link provided by the authorities on 22 January 2026 to verify the working of the provided URL links of the 9 IT developments.
- All nine IT developments, supported by the eesti.ee portal, are available to cross-border users on a non-discriminatory basis in line with Art. 13 of the Single Digital Gateway Regulation, since the eesti.ee portal's authentication layer supports cross-border eID recognition under the eIDAS Regulation.

- The checks were completed successfully confirming that the IT development tools are available online and confirming that all 9 IT developments are related to the business event services and/or digital gateway. More precisely, the Commission services were able to verify that:
  - *Entrepreneur's mailbox* enhances the state mailbox for entrepreneurs by expanding communication, integrating notifications, synchronising contacts, improving security, and involving key institutions (as described in evidence 3). The mailbox service is available exclusively to authenticated entrepreneurs via the eesti.ee state portal. This IT development is directly relevant to the digital gateway as it provides entrepreneurs with a secure, centralised channel for receiving and managing official communications.
  - *CAMIS (known as Pääsuke)* centralises authorisation management for Estonian legal entities via the eesti.ee portal, removing the need for multiple self-service access (as described in evidence 4). This IT development is related to and strengthens the digital gateway by simplifying access control, enabling entrepreneurs to seamlessly utilise business event services without redundant logins or permissions.
  - *Information service about grants for entrepreneurs* offers entrepreneurs a digital platform for accessing updated public funding opportunities, such as loans and grants, with search filters and saved measures for efficient use (as described in evidence 5). This IT development is related to and supports business event services by providing real-time access to a broad range of funding options, enabling entrepreneurs to identify and secure the financial support needed for their events in a timely manner and reducing potential delays in planning and execution.
  - *Service for temporary obligations for entrepreneurs* helps entrepreneurs track public sector deadlines through a user-friendly interface, providing detailed information for authenticated users in multiple languages (as described in evidence 6). This IT development is related to and supports business event services by providing a structured means to monitor and meet time-sensitive regulatory obligations, thereby facilitating event planning, licensing processes, and operational continuity.
  - *Public services that support and facilitate business* unifies non-financial public services like activity licences on eesti.ee, using micro frontend technology to enhance the entrepreneurs' portal (as described in evidence 7). This IT development is related to and supports business event services by consolidating permit and licence management within a single digital environment, simplifying the administrative steps required to organise compliant and legally sound events.
  - *Services related to activity licences and notices of economic activities from one place* provides entrepreneurs with a portal to manage company licences and notifications, ensuring transparent, high-quality business services (as described in evidence 8). This IT development is related to and supports business event services by offering a centralised access point for licence and notification management, facilitating compliance with the legal and regulatory requirements applicable to events.
  - *Information service about employee-related services* consolidates employee-related services like employment and health into a single eesti.ee portal for streamlined access and personalisation for entrepreneurs (as described in evidence 9). This IT development is related to business event services as it enables entrepreneurs to access the employment and health-related services needed to recruit, engage, and manage staff for their events from a single digital environment, reducing the administrative burden associated with workforce management.
  - *Business establishment information service* simplifies company formation, guiding users step-by-step through start-up processes (as described in evidence 10). This IT

development is related to business event services as it enables entrepreneurs to establish the legal entities required to organise and operate events, providing structured guidance that reduces the time and complexity involved in meeting formation requirements. *Information service on export operations* consolidates export-related information for entrepreneurs, providing a unified overview of obligations and services in organised categories on eesti.ee (as described in evidence 11). This IT development is related to business event services as it enables entrepreneurs organising or participating in cross-border events to navigate export-related obligations and services from a single digital environment, reducing the complexity of meeting international requirements and supporting the operational continuity of events with an international dimension.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: EE-C[C]-I[3-5-.3-5-]-T[58], Security testing by the Information System Authority

Related Measure: EE-C[C]-I[3-5-.3-5-], Reconfiguration of basic digital services and safe transition to cloud infrastructure

Quantitative Indicator: Number of tests

Baseline: 0

Target: 16

Time: Q4 2024

1. Context:

The objective of the measure is to increase the resilience, the security and the reliability of the IT systems and services of the Estonian public authorities. The measure consists of the creation of a new public body in charge of the central management of the IT basic services and infrastructures of public institutions, the procurement of private cloud infrastructure resources, the migration of existing information systems to the private cloud, the testing of information systems used by public authorities by the Estonian Information System Authority (RIA), the extension of the private cloud to the data embassy.

Target 58 relates to the security testing by the Information System Authority information systems used by public authorities.

Target 58 is the fifth and last milestone or target of the investment. It follows the completion of milestone 54, target 55 and milestone 56, related to the development of centrally delivered IT base services, deployment of national private cloud infrastructure by public authorities and to the extension of the cloud infrastructure to the data embassy, respectively.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Report of the security test No1	Report of the first security test carried out at the Ministry of Education and Research (HTM) during the period of 13.02.2024-28.02.2024 by the Information System Authority (RIA).
3	Report of the security test No2	Report of the first security test carried out at the Information System Authority (RIA) during the period of 11.01.2024-24.01.2024 by the Information System Authority (RIA)
4	Report of the security test No3	Report of the second security test carried out at the Information System Authority (RIA) during the period of

		24.01.2024-31.01.2024 by the Information System Authority (RIA)
5	Report of the security test No4	Report of the security test carried out at the Tax and Customs Board (MTA) during the period of 24.10.2023-01.11.2023 by the Information System Authority (RIA).
6	Report of the security test No5	Report of the security test carried out at the Centre of Registers and Information Systems (RIK) during the period of 20.12.2023-16.01.2024 by the Information System Authority (RIA).
7	Report of the security test No6	Report of the third security test carried out at the Information System Authority (RIA) during the period of 05.02.2024-13.03.2024 by the Information System Authority (RIA).
8	Report of the security test No7	Report of the first security test carried out at the Tallinn Administrative and Circuit Courts during the period of 15.02.2024-03.04.2024 by the Information System Authority (RIA).
9	Report of the security test No8	Report of the fourth security test carried out at the Information System Authority (RIA) during the period of 09.05.2024-15.05.2024 by the Information System Authority (RIA).
10	Report of the security test No9	Report of the second security test carried out at the Ministry of Education and Research (HTM) during the period of 04.04.2024-19.04.2024 by the Information System Authority (RIA).
11	Report of the security test No10	Report of the security test carried out at the National Electoral Committee (VVK) during the period of 30.04.2024-02.05.2024 by the Information System Authority (RIA).
12	Report of the security test No11	Report of the third security test carried out at the Ministry of Education and Research (HTM) during the period of 30.05.2024-20.06.2024 by the Information System Authority (RIA).
13	Report of the security test No12	Report of the second security test carried out at the Tallinn Administrative and Circuit Court during the period of 15.02.2024-03.04.2024 by the Information System Authority (RIA).
14	Report of the security test No13,	Report of the security test carried out at the Information Technology Centre of the Ministry of Finance (RmIT) during the period of 30.04.2024-28.06.2024 by the Information System Authority (RIA).
15	Report of the security test No14	Report of the fourth security test carried out at the Ministry of Education and Research (HTM) during the period of 10.05.2024-28.06.2024 by the Information System Authority (RIA).
16	Report of the security test No15	Report of the third security test carried out at the Information System Authority (RIA) during the period of

		07.08.2024-19.08.2024 by the Information System Authority (RIA).
17	Report of the security test No16	Report of the fifth security test carried out at the Ministry of Education and Research (HTM) during the period of 17.07.2024-30.10.2024 by the Information System Authority (RIA).
18	Report of the security test No17	Report of the security test carried out at the Environmental Investment Centre (KIK) during the period of 11.11.2024-20.11.2024 by the Information System Authority (RIA).
19	Report of the security test No18	Report of the first security test carried out at the Agricultural Registers and Information Board (PRIA) during the period of 16.12.2024-31.12.2024 by the Information System Authority (RIA).
20	Report of the security test No19	Report of the security test carried out at the Information Technology Centre of the Ministry of Interior (SMIT) during the period of 25.11.2024-31.12.2024 by the Information System Authority (RIA).
21	Report of the security test No20	Report of the sixth security test carried out at the Ministry of Education and Research (HTM) during the period of 10.05.2024-28.06.2024 by the Information System Authority (RIA).
22	Report of the security test No21	Report of the second security test carried out at the Environmental Investment Centre (KIK) during the period of 25.11.2024-19.12.2024 by the Information System Authority (RIA).
23	letter from the State Information System Authority (RIA) to the Ministry of Justice	letter from the State Information System Authority (RIA) to the Ministry of Justice and Digital Affairs, presenting 21 reports on the central security testing of information systems of state institutions
24	printout of the digital signature	printout of the digital signature of the Director-General of the State Information System Authority (RIA) on 28 March 2025, on the 21 security tests

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the target.

Number of security tests carried out by the Information System Authority. The test results shall be summarised in security testing reports.

- Estonia's Information System Authority (RIA) carried out a total of 21 security tests, as demonstrated by 21 security reports prepared by a security testing team (the so-called Red Team) at the Estonian Information System Authority (RIA) (evidence 2 to 22), exceeding the target of 16 security tests. The reports provided show that the following security tests were conducted:

State institutions whose information system was security tested	Number of tests carried out	Security test numbers	Period of testing
Ministry of Education and Research (HTM)	6	1	13.02.2024 – 28.02.2024
		9	04.04.2024 – 19.04.2024
		11	30.05.2024 – 20.06.2024
		14	10.05.2024 – 28.06.2024
		16	17.07.2024 – 30.10.2024
		20	10.05.2024 – 28.06.2024
Information System Authority (RIA)	6	2	11.01.2024 – 24.01.2024
		3	24.01.2024 – 31.01.2024
		6	05.02.2024 – 13.03.2024
		8	09.05.2024 – 15.05.2024
		12	08.05.2024 – 12.07.2024
		15	07.08.2024 – 19.08.2024
Estonian Tax and Customs Board (MTA)	1	4	24.10.2023 – 01.11.2023
Centre of Registers and Information Systems (RIK)	1	5	20.12.2023 – 16.01.2024
Tallinn Administrative and Circuit Court	1	7	15.02.2024 – 03.04.2024
National Electoral Committee (VVK)	1	10	30.04.2024 – 02.05.2024
Environmental Investment Centre (KIK)	2	17	11.11.2024 – 20.11.2024
		21	25.11.2024 – 19.12.2024
Agricultural Registers and Information Board (PRIA)	1	18	16.12.2024 – 31.12.2024
Information Technology Centre of the Ministry of Finance (RmIT)	1	13	30.04.2024 – 28.06.2024
Information Technology Centre of the Ministry of Interior (SMIT)	1	19	25.11.2024 – 31.12.2024

- Each security test report (evidence 2-22) shows on the top of the first page that the test concerned a security test, namely a penetration test. The first row in the Penetration Testing Information section of each security test report specifies the period of testing, confirming that all tests happened between 2023 and 2024. The fourth row in the same section of each security test report specifies the targeted organisation.
- All 21 test results have been signed by the Director General of the State Information System Authority (RIA), Mr Joonas Heiter, on 28 March 2025 (evidence 24) in one encrypted container (asice) and transferred to the Ministry of Justice and Digital Affairs with a cover letter (evidence 23). Signature of the Director General together with the letter to the ministry attesting this confirms that the security tests were carried out by the State Information System Authority (RIA).

Furthermore, in line with the description of the measure, **the measure consists of the testing of information systems used by public authorities by the Estonian Information System Authority (RIA),** Each security test report (Evidence 2–22) specifies the Estonian public authorities for which the information systems were tested, in particular:

- Ministry of Education and Research (HTM) (evidence 2, evidence 10, evidence 12, evidence 15, evidence 17 and evidence 21)
- Information System Authority (RIA) (evidence 3, evidence 4, evidence 7, evidence 9, evidence 13 and evidence 16)
- Estonian Tax and Customs Board (MTA) (evidence 5)
- Centre of Registers and Information Systems (RIK) (evidence 6)
- Tallinn Administrative and Circuit Court (evidence 8)
- National Electoral Committee (VVK) (evidence 11)
- Environmental Investment Centre (KIK) (evidence 17 and evidence 22)
- Agricultural Registers and Information Board (PRIA) (evidence 19)
- Information Technology Centre of the Ministry of Finance (RmIT) (evidence 14)
- Information Technology Centre of the Ministry of Interior (SMIT) (evidence 20)

Therefore, the reports provided (evidence 2 to 22) demonstrate the information systems tested by the Estonian Information System Authority (RIA) are systems used by public authorities.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: EE-C[C]-R[3-6-.3-6-]-M[59], Entry into force of legal act(s)

Related Measure: EE-C[C]-R[3-6-.3-6-], The strategic analysis of money laundering and terrorist financing in Estonia

Qualitative Indicator: Entry into force of legal act(s)

Time: Q4 2024

1. Context:

This reform aims to increase the capacity of the Financial Intelligence Unit to identify money laundering schemes and channels at an early stage. The measure consists of establishing a Centre for Strategic Analysis within the Financial Intelligence Unit.

Milestone 59 concerns the strategic analysis to access and process data relevant to the detection and prevention of money laundering and terrorist financing in Estonia.

Milestone 59 is the only milestone or target of this reform.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Amendment to the Money Laundering and Terrorist Financing Prevention Act (MLTFPA) adopted on 17 June 2020, publication reference RT I, 10.07.2020, 1	Amendment to the MLTFPA imposing additional reporting obligations https://www.riigiteataja.ee/akt/110072020001
3	Regulation 39 of the Minister of Finance adopted on 6 November 2020, publication reference RT I, 10.11.2020, 16	Statutes of the Financial Intelligence Unit https://www.riigiteataja.ee/akt/110112020016

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the milestone.

Entry into force of the legal act(s). Legal act(s) shall have entered into force to allow the Centre for Strategic Analysis to access and process data relevant to the detection and prevention of money

laundering and terrorist financing: (1) the statute of the Financial Intelligence Unit shall enter into force establishing the Centre for Strategic Analysis. [...]

The statute of the Financial Intelligence Unit (‘Rahapesu Andmebüroo põhimäärus’ in Estonian) was adopted by Regulation 39 of the Minister of Finance (evidence 3) on 6 November 2020 and published in the State Gazette (‘Riigiteataja’ in Estonian) on 10 November 2020. According to its article 22, Regulation 39 entered into force on 1 January 2021.

- Paragraph 10 of the statute of the Financial Intelligence Unit (FIU) established the Centre for Strategic Analysis (SAO) as a separate structural unit of the Financial Intelligence Unit.
- Paragraph 13 of the statute defines the tasks of the Centre for Strategic Analysis as “conduct research and analysis on the risks, threats, trends, patterns and methods of operation of money laundering and terrorist financing.”

[...] (2) an amendment of the Money Laundering and Terrorist Financing Prevention Act shall enter into force.

The ‘Act on Amendments to the Money Laundering and Terrorist Financing Prevention Act and Other Acts’ (‘Rahapesu ja terrorismi rahastamise tõkestamise seaduse ja teiste seaduste muutmise seadus’ in Estonian) (hereinafter referred to as ‘MLTFPA’) (evidence 2). amending the Money Laundering and Terrorist Financing Prevention Act was amended on 17 June 2020 and published in the State Gazette (‘Riigiteataja’ in Estonian) on 10 July 2020. According to its header, the amendment entered into force on 20 July 2020 (the date of entry into force or “Jõustumise kp" in Estonian is in the header). The MLTFPA was amended to grant the Minister of Finance (the minister responsible for the Money Laundering and Terrorist Financing prevention area) the authority to impose anti-money laundering reporting obligations on companies.

With the amendment, a new paragraph 54^1 (titled “Reports submitted to Financial Intelligence Unit”) was introduced to the MLTFPA. In particular, section one of paragraph 54^1 states that *“Credit and financial institutions, as well as persons subject to supervision exercised by the Financial Intelligence Unit under subsection 1 of paragraph 64 of this Act, must submit reports to the Financial Intelligence Unit containing information necessary for the performance of the statutory functions.”* This ensures the collection of data relevant to the detection and prevention of money laundering and terrorist financing.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: EE-C[D]-R[4-4-.4-4-]-M[72], Entry into force of legal acts

Related Measure: EE-C[D]-R[4-4-.4-4-], Boosting the green transition in the energy economy

Qualitative Indicator: Legal act entered into force

Time: Q4 2024

1. Context:

The objective of the measure is to contribute to decarbonising energy in Estonia. The measure consists of updating the National Development Plan of the Energy Sector and adopting legislation to accelerate the installation of renewable electricity production capacity.

Milestone 72 relates to the entry into force of legal acts to remove the barriers to installation of renewable energy generation and storage facilities.

Milestone 72 is the third milestone of the reform, and it follows the completion of milestone 70 related to the adoption of the Government decision on investments needed to alleviate the defence related height restrictions on wind parks and milestone 71 related to the adoption of the decision of the Government on the initiation of the preparation process of the National Development Plan of the Energy Sector. It will be followed by milestone 73, related to the adoption of the National Development Plan of the Energy Sector by the Government.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	The Act Amending the Electricity Market Act and Other Acts which was published on 7 March 2023 and entered into force on 17 March 2023 (Promulgated by the President of the Republic, 01.03.2023 Decision No. 281), publication reference RT I, 07.03.2023, 21	The link to the State Gazette: Act on Amendments to the Electricity Market Act and Other Acts – Riigi Teataja
3	Amendment to the Regulation No 10 of the Government of the Republic from 14 February 2019 "Electricity Network Code for the Operation of the Electricity System" which entered into force on 22 June 2024 (Regulation No. 10), publication reference RT I, 19.06.2024, 4	The link to the State Gazette: Amendment of Regulation No. 10 of the Government of the Republic of 14 February 2019 "Network Code for the Operation of the Electricity System" – Riigi Teataja

4	– Council of European Energy Regulators, Annual national report	2024 Annual Activity Report in Estonia: on the Results of Monitoring the Internal Electricity and Natural Gas Markets in 2023.
5	The Act amending the Electricity Market Act which entered into force on 14 February 2026 (Promulgated by The President of the Republic, 29.01.2026 Decision No. 660), publication reference RT I, 04.02.2026, 1	The link to the State Gazette: Act on Amendments to the Electricity Market Act – Riigi Teataja
6	2024 Report: "Active consumers in the future energy system: development trends until 2040"	2024 Report: "Active consumers in the future energy system: development trends until 2040" published by the Estonian Foresight Centre. The link to the report: 2024_aktiivsed-tarbijad-tuleviku-energiasusteemis_raport-1.pdf

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the milestone.

Legal acts shall enter into force to remove the barriers to installation of renewable energy generation and storage facilities (...)

According to the 2024 Estonia National Report from the Council of European Energy Regulators (see section 1.1.1, Evidence No 4), the volume of electricity producers wishing to connect to the grid has increased significantly over 2022 and significantly exceeds the capacity of the grid. The report describes the so-called "phantom projects" in the electricity grid as being a barrier to the installation of new energy generation capacity: when a connection point is added to the transmission network without a corresponding production unit, it blocks valuable network capacity. This creates a significant barrier to building new power plants and grid connections, as connection fees increase due to the scarcity of available grid resources (Section 1.1.1, Evidence 4). The report states that, in order to alleviate that barrier, network operators should be given the right to charge a reasonable fee for a reserved but unused electricity network resource. This approach has been introduced through the amendments to the Electricity Market Act.

The Act Amending the Electricity Market Act and Other Acts (hereinafter referred to as 'Decision No 281') (Evidence 2) was published in the State Gazette No. RT I, 07.03.2023,21 on 07 March 2023 and a Decision No 281 entered into force on 17 March 2023.

Paragraph 87^1 of Decision No. 281 has been added and states that a market participant entering the electricity grid must pay a fee to the Transmission Network Operator if they do not use the connection capacity. This contributed to free up unused capacity for the installation of new renewable generation and storage facilities.

The period specified in subsection 4 of paragraph 87 is as follows: one-year after the commencement of production in the case for solar panels installation, three years for offshore wind farms installations and two years for other technologies, as of completion of the connection point or the network operator's deadline for performing the connection contract.

Subsection 10 of paragraph 87 states that "*The network operator shall use the funds paid (...) to cover the investment costs related to the increase of the capacity of its network*." Therefore, the amendments enable a faster connection to the grid and enhance the developments of renewables and energy storage capacities.

Moreover, the Act amending the Electricity Market Act (hereinafter referred to as 'Decision No 660') (Evidence 5) was published in the State Gazette No. RT I, 04.02.2026, 1on 04.02.2026. Decision No 660 entered into force on 14 February 2026, as specified in the header of the legal act.

Subsection 8 of paragraph 42[7] was added to establish a single calculation basis for all fees charged to energy storage units, based on net consumption. This replaces the previous mechanisms under which energy storage units were charged twice, both for charging and discharging energy.

The 2024 Report on Active consumers in the energy system of the future (Evidence 6) identified that allowing grid fee exemptions to energy storage units would enable consumers to manage their energy reserves more actively and flexibly. In particular, buying electricity from the grid at low-price moments and storing it in the battery would no longer incur extra costs and thus incentivize the installation of energy storage units.

Therefore, the amendments give better opportunity to electricity storage units' owners to compete with electricity producers by removing this double taxation and thereby reducing the operating costs of energy storage units. Thus, introducing a fee for unused grid capacity for electricity production and removing double fees for storage remove barriers to installing renewable energy generation and storage facilities, as unused capacity is returned to the TSO and costs of storage units are lowered. This incentivises and allows new electricity producers and storage developers to connect to the grid faster, directly improving the grid queue management process.

(...) for example, streamlining permitting procedures.

The Act amending the Regulation No 10 of the Government of the Republic from 14 February 2019 "Electricity Network Code for the Operation of the Electricity System" (hereinafter referred to as 'Regulation No 10') (Evidence 3) was published in the State Gazette of Estonia No. RT I, 19.06.2024, 4 on 19 June 2024. Regulation No 10 entered into force on 22 June 2024, as specified in the header of the legal act.

The amendments to the Electricity Network Code aim to streamline permitting procedures. Subsection 1 of Article 19 has been amended to clarify the information and documents that a market participant must submit to the transmission system operator (TSO) when applying for a new network connection or changing the consumption and production conditions of an existing one.

This includes repealing Subsection (1)2 of Article 19 which requested "*a decision made by the decision-maker specified in the Environmental Impact Assessment and Environmental Management System Act which certifies that the environmental impact has been assessed or according to which there is no need to* *carry out an environmental impact assessment"* as part of the connection application procedure, therefore streamlining the process.

The amendments to the Electricity Network Code (Evidence 3) also add the information and document that a market participant shall submit to the TSO regarding the connection of offshore wind farms (subsection 1^2 of Article 19), which were not specified before in the Electricity Network Code.

The amendment to subsection 1^1 of Article 22 of the Electricity Network Code states that the distribution network operator must offer a connection contract to a market participant within 30 days of receiving an application to connect electricity produced from renewable energy sources to the network. Setting a deadline for receiving a contract offer speeds up the permitting procedures process.

Furthermore, in line with the description of the measure, the milestone consists of **adopting legislation to accelerate the installation of renewable electricity production capacity.** Introducing a fee for unused grid capacity for electricity production enables new electricity producers and storage developers to connect to the grid more quickly (see above, Evidence 2). Setting a single calculation basis for fees charged to energy storage give better opportunities to the owners of electricity storage units to compete with electricity producers (see above, Evidence 5). Setting a deadline for the distribution network operator to issue a connection contract offer to market participants also accelerates the installation of renewable electricity production capacity (see above, Evidence 3).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: EE-C[D]-I[4-8-.4-8-]-M[80a], Contractors for the radar and passive radar systems selected and contracts signed

Related Measure: EE-C[D]-I[4-8-.4-8-], Boosting offshore wind farms development

Qualitative Indicator: Contracts signed

Time: Q4 2024

1. Context:

The objective of this measure is to make it possible for offshore wind turbines, regardless of their height, to operate in the Gulf of Riga and Estonian islands Hiiumaa, Saaremaa and Vormsi.

Milestone 80a consists in the signature of contracts for the detailed design of air surveillance radar, passive radar system, and construction works for radar buildings.

Milestone 80a is the first step of the implementation of the investment. It will be followed by milestone 80c, related to the removal of the height restriction on offshore wind turbines in the Gulf of Riga and Estonian islands Hiiumaa, Saaremaa, Vormsi.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Signed Contract between Air Traffic Services Agency and Bauest OU for the Renovation of the radar building and territory's technical systems, including design	Signed contract No 279889 for Renovation of the radar building and territory's technical systems, including design Contract signed on 22 August 2024.
3	Technical Specifications	Technical specifications of the contract on Renovation of the radar building and territory's technical systems, including design.
4	Signed contract between the Estonian Centre for Defence Investments and Mapri Ehitus on Building A1 - design and construction	Signed contract No 3-6/24/1178 for Building A01 - design and construction. Signed 27 December 2024.
5	Signed Contract between the Estonian Centre for	Signed contract No 2-2/24/1138 on Passive Coherent Location System.

	Defence Investments and Pro Patria Electronics Ltd on the Passive Coherent Location system	Signed 12 December 2024.
6	Signed Contract between the Estonian Centre for Defence Investments and Thales LAS France S.A.S for Procurement MRR2023 System	Signed Contract for Radar system Procurement. Signed on 20 June 2024.
7	Statement of Work	Statement of Work – Appendix to the contract MRR2023 System.

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the milestone.

Contracts signed for the detailed design of air surveillance radar, (...)

The contract No TLASFR-TLASFR-23-00040098-000 for active air surveillance radar (Evidence No 6) was signed on 20 June 2023 between Thales (the Seller) and the Estonian Centre for Defence Investments (EMOD, the Buyer). Annex 6 to the contract "Statement of Work" (Evidence No 7) provides the technical description of the two long range air surveillance radar systems to be acquired. Section 4 provides a description of the goods and services to be provided under the contract. Section 2.3 of the Statement of Work requires a System Specification Review as well as a System Design Review and a Critical Design Review to present the design of the radar system. The contract therefore requires detailed design of the air surveillance radar systems.

(...) passive radar systems (...)

A passive radar system contract was signed on 12 December 2024 (Evidence No 5) between the Estonian Centre for Defence Investments (EMOD, the Buyer) and Pro Patria Electronics Ltd. (the Seller) following the request for proposal No 2-7/23/3903. The object of the contract is "*the passive coherent location system equipment with accessories, spare parts, training, consulting maintenance and repairing services and other equipment and services which are related to Passive Coherent Location system project*" (Section 1.1, Evidence No 5). In the price proposal for Passive coherent location system (page 17, Evidence No 5) it is stated that "*the proposal contains stationary PCL System which is able to 3D localize aerial targets exploiting FM and DVB-T/T2 sources of illumination*." The Passive Coherent Location System is defined in the Project Management Activities of ProPatria Electronics (page 29, Evidence No 5).

(...), and construction works for radar buildings

A contract for construction works was signed between Air Traffic Services Agency (the contracting entity) and OÜ BauEst (the contractor) on 22 August 2024 as a result of the public procurement "Renovation of the radar building and the technical systems of the territory with design (Estonian Air Navigation Services)" (reference No 279889) (Evidence No 2). Section 2.1 of the contract (Annex 3.1 page 1) states that "*The contractor shall carry out the design and construction work for the construction of a communication line* *between the radar building and its technical systems [... and the premises of the contracting authority's air traffic control centre [...]"*.

The technical specifications of the contract describe that: "*the Radar building consists of the diesel generator space, the UPS space, the radar equipment space, the corridor, the stairway tower and the equipment room at the top of the tower*" (page 1, Evidence No 3). The construction of a new communication link from the air traffic control building to the radar building, together with all the necessary works and equipment and the technical expertise for the construction of the radar building are also part of the scope of the works.

In addition, the contract for services No. 3-6/24/1178 between the Estonian Centre for Defence Investment (the contracting authority) and the limited liability company Osaühing Mapri Ehitus (the contractor) was signed on 27 December 2024 (Evidence No 4) following the procurement "Building A1 - design and construction" (reference 273127). The A1 Building is the air surveillance radar building (referred as A01 in the contract). Paragraph 1.1 of the contract states that the contractor undertakes "*to carry out the design and execution of the A1 building* [...] *in accordance with this contract, on the basis of the basic information supplied by the contracting authority in the context of the procurement procedure 'Building A1 – Design and Construction' (reference No 273127) and in accordance with the prescribed construction and technical requirements"* (page 1, Evidence No 4).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: EE-C[E]-I[5-4-.5-4-]-M[91], EE-C[E]-I[5-4-.5-4-]-M[91], New tramway line

Related Measure: EE-C[E]-I[5-4-.5-4-], Construction of the Tallinn Old Port tram line

Qualitative Indicator: New tramway line in operation

Time: Q4 2025

1. Context:

The objective of the measure is to increase the share of sustainable mobility in the Tallinn region. The investment consists in constructing a new tramline.

Milestone 91 relates to a new section of 2500m of tramway line in operation, as confirmed by the permit to operate.

Milestone 91 is the third and last milestone of the investment and follows the implementation of milestone 89 related to the completion of the tramway construction project design and milestone 90 related to the award of the works contract.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Permit to operate Authorisation No. 2412371/04965	Permit to operate issued by the Tallinn City Planning Board (*Tallinna Linnaplaneerimise Amet*) for the contractor on 28 October 2024.
3	Submission notice No. 2511525/03831 requesting length correction	Submission notice by the Tallinn City Planning Department requesting that the length of the tramway in the Building Register (EHR) Authorisation No 2412371/04965 dated 14 February 2025 be corrected. The entry is visible online: online: https://urldefense.com/v3/__https:/livekluster.ehr.ee/ui/ehr/v1/document?docNr=2511525*03831__;Lw!!DOxrgLBm!EjethZmJhY4PWVZpePsv7wpHRGlOglayzwewBzuFpXzmKLgp-YD2YJNE2ycZMm8edO6s98BTC3Ey9dqZ4gAMoKe88gXJfZe7rao0$ https://urldefense.com/v3/__https:/livekluster.ehr.ee/ui/ehr/v1/document?docNr=2511525*03831__;Lw!!DOxrgLBm!EjethZmJhY4PWVZpePsv7wpHRGlOglayzwewBzuFpXzmKLgp-YD2YJNE2ycZMm8edO6s98BTC3Ey9dqZ4gAMoKe88gXJfZe7rao0$

4	Correction entry in the registry No. 2511522/19439	Correction of the Authorisation No 2412371/04965 dated 15 March 2025. The entry is visible online: https://urldefense.com/v3/__https:/livekluster.ehr.ee/ui/ehr/v1/document?docNr=2511525*03831__;Lw!!DOxrgLBm!EjethZmJhY4PWVZpePsv7wpHRGlOglayzwewBzuFpXzmKLgp-YD2YJNE2ycZMm8edO6s98BTC3Ey9dqZ4gAMoKe88gXJfZe7rao0$

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the milestone.

New 2 500m section of tramway line in operation as confirmed by the permit to operate. Furthermore, in line with the description of the measure, **the investment consists of constructing a new tramline.**

The permit to operate the tramway line (Kasutusluba) Authorisation No. 2412371/04965 (Evidence No. 2) was issued by the Tallinn City Planning Board (Tallinna Linnaplaneerimise Amet) and registered in the Building Registry on 28 October 2024. It certifies that the tramway line section Kivisilla-Hobujaama is new and in operation.

Estonia has explained that the permit to operate contained a clerical error. On page 4 of permit to operate (Evidence No. 2) the length of the tramline is incorrectly stated as 2000 m², whereas the actual length of the tramline is 2510 m. Consequently, the main construction contractor submitted a correction request to the Building Registry via a notice dated 14 February 2025 (Evidence no. 3). This request is digitally signed and specifically notes as “Reason for notification: I am correcting errors in the data of an existing building”.

The notice includes the following comment: “the length of the route was erroneously indicated in the application to the Building Registry (EHR). The corrected length of the route is 2510 m. The m² is erroneously indicated as the unit of measurement of the length of the route on the permit for use No 2412371_04965. Please correct this and indicate the correct unit of measurement – m – on the use permit…”.

Subsequently, the Tallinn City Planning board issued a registry correction notice No. 2511522/19439 on 16 March 2025, correcting the length of the tramway line in the permit to operate to 2510 meters (Evidence No. 4). This is in line with the description of the milestone requiring a length of 2500 meters of tramway line.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: EE-C[E]-I[5-5-.5-5-]-T[93], Construction works on bike- and walkways infrastructure delivered

Related Measure: EE-C[E]-I[5-5-.5-5-] Municipalities' investments in bike- and walkways

Baseline: 0

Goal: 18

Quantitative Indicator: Construction works

Time: Q4 2025

1. Context:

The objective of the measure is to reduce car dependency and increase sustainable mobility in areas outside the three major urban centres (Tallinn, Tartu, Pärnu). The investment consists of construction works for bike- and walkways.

Target 93 concerns the delivery of at least 18 construction works of bike and walkways infrastructure.

Target 93 is the second and last milestone or target of the investment, and it follows the completion of milestone 92 related to the publication of a call for proposals for investments by municipalities in bike- and walkways.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Certificate of completion of works of Walkway and Bikeway in Elva	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Elva issued by the Municipality of Elva, signed by the Municipality of Elva and the Contractor.
3	Signature printout of Certificate of Works in Viru-Nigula	Document confirming the authenticity of signatures of the Certificates of Works in Viru-Nigula.
4	Certificate of completion of Walkway and Bikeway in Viru-Nigula	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Viru-Nigula issued by the Municipality of Viru-Nigula and the Contractor.
5	Signature printout of Certificate of Works in Laeva-Valmaotsa	Document confirming the authenticity of signatures of the Certificates of Works in Laeva-Valmaotsa.
6	Certificate of completion of works of Walkway and Bikeway in Laeva-Valmaotsa	Certificate of Completion of Works regarding a Walkway and Bikeway in the Rural Municipality of Tartu issued by the Rural Municipality of Tartu, signed by the Rural Municipality of Tartu and the Contractor.

7	Signature printout of Certificate of Works in Tsooru	Document confirming the authenticity of signatures of the Certificates of Works in Tsooru.
8	Certificate of completion of works of Bikeway in Tsooru	Certificate of Completion of Works regarding a Bikeway in the Municipality of Antsla issued by the Municipality of Antsla, signed by the Municipality of Antsla and the Contractor.
9	Signature printout of Certificate of Works in Märjamaa	Document confirming the authenticity of signatures of the Certificates of Works in Märjamaa.
10	Certificate of completion of works of Walkway and Bikeway in Märjamaa	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Märjamaa issued by the Municipality of Märjamaa, signed by the Municipality of Märjamaa and the Contractor.
11	Signature printout of Certificate of Works in Sillamäe	Document confirming the authenticity of signatures of the Certificates of Works in Sillamäe.
12	Certificate of completion of works of Walkway and Bikeway in Sillamäe	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Sillamäe issued by the Municipality of Sillamäe, signed by the Municipality of Sillamäe and the Contractor.
13	Signature printout of Certificate of Works in Loksa	Document confirming the authenticity of signatures of the Certificates of Works in Loksa.
14	Certificate of completion of works of Walkway in Loksa	Certificate of Completion of Works regarding a Walkway in the Municipality of Loksa issued by the Municipality of Loksa, signed by the Municipality of Loksa and the Contractor.
15	Certificate of completion of works of Walkway and Bikeway in Kohila	Certificate of Completion of Works with signatures regarding a Walkway and Bikeway in the Municipality of Kohila issued by the Municipality of Kohila, signed by the Municipality of Kohila and the Contractor.
16	Signature printout of Certificate of Works in Kose	Document confirming the authenticity of signatures of the Certificates of Works in Kose.
17	Certificate of completion of works of Walkway and Bikeway in Kose	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Kose issued by the Municipality of Kose, signed by the Municipality of Kose and the Contractor.
18	Signature printout of Certificate of Works in Põltsamaa	Document confirming the authenticity of signatures of the Certificates of Works in Põltsamaa.
19	Certificate of completion of works of Walkway and Bikeway in Põltsamaa	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Põltsamaa issued by the Municipality of Põltsamaa, signed by the Municipality of Põltsamaa and the Contractor.

20	Signature printout of Certificate of Works in Rakvere	Document confirming the authenticity of signatures of the Certificates of Works in Rakvere.
21	Certificate of completion of works of Walkway and Bikeway in Rakvere	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Rakvere issued by the Municipality of Rakvere, signed by the Municipality of Rakvere and the Contractor.
22	Signature printout of Certificate of Works in Anija	Document confirming the authenticity of signatures of the Certificates of Works in Anija.
23	Certificate of completion of works of Walkway and Bikeway in Anija	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Anija issued by the Municipality of Anija, signed by the Municipality of Anija and the Contractor.
24	Signature printout of Certificate of Works in Kastre	Document confirming the authenticity of signatures of the Certificates of Works in Kastre.
25	Certificate of completion of works of Walkway and Bikeway in Kastre	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Kastre issued by the Municipality of Kastre, signed by the Municipality of Kastre and the Contractor.
26	Signature printout of Certificate of Works in Tori	Document confirming the authenticity of signatures of the Certificates of Works in Tori.
27	Certificate of completion of works of Walkway and Bikeway in Tori	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Tori issued by the Municipality of Tori, signed by the Municipality of Tori and the Contractor.
28	Signature printout of Certificate of Works in Paide	Document confirming the authenticity of signatures of the Certificates of Works in Paide.
29	Certificate of completion of works of Walkway and Bikeway in Paide	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Paide issued by the Municipality of Paide, signed by the Municipality of Paide and the Contractor.
30	Signature printout of Certificate of Works in Haapsalu	Document confirming the authenticity of signatures of the Certificates of Works in Haapsalu.
31	Certificate of completion of works of Walkway and Bikeway in Haapsalu	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Haapsalu issued by the Municipality of Haapsalu, signed by the Municipality of Haapsalu and the Contractor.
32	Signature printout of Certificate of Works in Kääpa	Document confirming the authenticity of signatures of the Certificates of Works in Kääpa.
33	Certificate of completion of works of Walkway and Bikeway in Kääpa	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Mustvee issued by the

		Municipality of Mustvee, signed by the Municipality of Mustvee and the Contractor.
34	Signature printout of Certificate of Works in Alutaguse	Document confirming the authenticity of signatures of the Certificates of Works in Alutaguse.
35	Certificate of completion of works of Walkway and Bikeway in Alutaguse	Certificate of Completion of Works regarding a Walkway and Bikeway in the Municipality of Alutaguse issued by the Municipality of Alutaguse, signed by the Municipality of Alutaguse and the Contractor.
36	Building Code (*Ehitusseadustik)*, adopted on 11 February 2015, publication reference RT I, 05.03.2015, 1	Estonian act regulating building construction, https://www.riigiteataja.ee/akt/105032015001).

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the target.

At least 18 construction works of bike and walkways shall be delivered.

A total of 18 construction works have been delivered, as confirmed by 18 signed certificates of completion provided by Estonia for 18 construction works for bike and walkways projects. The certificates of completion are issued by the municipality where the works are located after they have been completed. The certificates are signed by the municipality and the contractor who carried out the works. The certificates include the location of the works, the type of work and the date of completion. The table below (evidence 2 to 35) summarize these elements for the 18 certificates.

Annex / Works identifier	Evidence number	Works completed	Type	Building code	Location
1	2	17 August 2023	Walkway and Bikeway (*Kergliiklustee*) (on page 1 of evidence 2)	Construction (on page 1 of evidence 2)	Mahlamäe (Elva Municipality)
2	3 and 4	3 September 2024	Walkway and Bikeway *(Kergliiklustee*) (on page 1 of evidence 4)	Reconstruction (on page 2 of evidence 4)	Viru-Nigula
3	5 and 6	15 November 2023	Walkway and Bikeway (*Kergliiklustee)* (on page 1 of evidence 6)	Construction (on page 1 of evidence 6)	Laeva-Valmaotsa (Tartu Rural Municipality)
4	7 and 8	17 August 2023	Bikeway (*Kergliiklustee*) (on page 1 of evidence 8)	Construction (on page 2 of evidence 8)	Tsooru (Antsla Municipality)

5	9 and 10	01 September 2023	Reconstruction of street with construction of a Walkway and Bikeway (*Kergliiklustee*) (on page 1 of evidence 10)	Reconstruction (on page 1 of evidence 10)	Märjamaa
6	11 and 12	15 December 2023	Walkway and Bikeway (*Kergliiklustee*) (on page 1 of evidence 12)	Construction (on page 1 of evidence 12)	Sillamäe
7	13 and 14	16 October 2024	Walkway (*Jalgtee*) (on page 1 of evidence 14)	Construction (on page 1 of evidence 14)	Loksa
8	15	21 December 2023	Walkway and Bikeway (*Jalg- ja jalgrattateede)* (on page 2 of evidence 15)	Construction (on page 1 of evidence 15)	Kohila
9	16 and 17	19 August 2023	Walkway and Bikeway (*Jalg- ja jalgrattatee)* (on page 1 of evidence 17)	Construction (on page 1 of evidence 17)	Kose
10	18 and 19	21 November 2022	Walkway and Bikeway *(Kergliiklustee)* (on page 1 of evidence 19)	Construction (on page 1 of evidence 19)	Põltsamaa
11	20 and 21	30 October 2023	Walkway and Bikeway *(Kergliiklustee)* (on page 1 of evidence 21)	Construction (on page 1 of evidence 21)	Rakvere
12	22 and 23	30 November 2023	Walkway and Bikeway *(Jalgratta- ja jalgtee)* (on page 1 of evidence 23)	Construction (on page 1 of evidence 23)	Anija
13	24 and 25	2 October 2023	Walkway and Bikeway *(Kergliiklustee)* (on page 1 of evidence 25)	Construction (on page 1 of evidence 25)	Kastre
14	26 and 27	9 October 2023	Walkway and Bikeway *(Jalg- ja jalgrattatee)* (on page 1 of evidence 27)	Construction (on page 1 of evidence 27)	Tori
15	28 and 29	26 October 2023	Walkway and Bikeway *(Jalg- ja jalgrattatee)* (on page 1 of evidence 29)	Construction (on page 1 of evidence 29)	Paide
16	30 and 31	31 August 2023	Light traffic road *(Kergliiklustee)* (on page 1 of evidence 31)	Construction (on page 1 of evidence 31)	Haapsalu
17	32 and 33	29 June 2023	Light traffic road *(Kergliiklustee)* (on page 1 of evidence 33)	Construction (on page 1 of evidence 33)	Kääpa (Mustvee Municipality)
18	34 and 35	31 July 2023	Bikeway *(Jalg- ja jalgrattatee)* (on page 1 of evidence 35)	Construction (on page 1 of evidence 38)	Alutaguse

Article 4 of the Estonian Building Code https://urldefense.com/v3/__https:/www.riigiteataja.ee/akt/105032015001__;!!DOxrgLBm!AGZkJ0yv0

MnCwEQaFXiqUT0dfvS0gt-4RCwbRe9lMTB-E95lZMatWoi4kuaXJKVGJIDaCu8OFARmLqz6aENcl1X-GSB4RpR2OwtXKA$ defines construction (evidence 36). In particular:

- Article 4(1) states that *Construction is the erection, construction, installation, demolition and other activities related to a construction work, as a result of which the physical properties of the building are created or its physical properties change. Construction is also the relocation of soil or pavement to an extent that has a significant permanent impact on the surrounding environment and a functional connection with the building*.
- Article 4(3) states that *Reconstruction of a building is construction in the course of which the characteristics of an existing building change significantly. [...]*

All 18 certificates of completion provided by the Estonian authorities confirm that the works were carried out in compliance with all applicable regulations, specifically in line with the Estonian Building Code (evidence 2 to 35). All 18 certificates confirm that the works carried out are for the delivery of bike- and walkways. 16 certificates cover construction works for bike- and walkways (article 4(1) of the Estonian Building Code), one certificate covers reconstruction works for bike- and walkways (article 4(3) of the Estonian Building Code), and one certificate covers construction and reconstruction for bike- and walkways works (article 4(1) and (3) of the Estonian Building Code).

Each of the 18 certificates of completion noted in the table above confirms that the works have been carried out between 21 November 2022 and 16 October 2024.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: EE-C[F]-R[6-1-.6-1-]-M[94], Entry into force of the Government Order on the Hospital network development roadmap

Related Measure: EE-C[F]-R[6-1-.6-1-], A comprehensive change in the organisation of health care in Estonia

Qualitative Indicator: Entry into force of the Government Order

Time: Q4 2024

1. Context:

The objective of the reform is to support the resilience of the Estonian health system, including for coping with crises, thus ensuring that people have access to high-quality, integrated healthcare throughout Estonia. The measure consists of reforms to consolidate the hospital network; to outline the provision of health services in the various health sectors; to incentivise doctors, nurses and pharmacists to work in remote areas; and to increase admission to medical professions with shortages.

Milestone 94 provides for the entry into force of the Government Order which lays down the list of regional, central, local and rehabilitation hospitals in order to ensure equal access to health care services, objectives and steps to be taken for consolidating the hospital network; and the necessary investments for the construction and renovation of the hospitals included in the list of hospitals.

Milestone 94 is the fifth milestone or target of the reform, and it follows the completion of milestone 95 related to the strategic framework for workforce shortages, milestone 96 related to the reimbursement system for doctors and pharmacists, target 97 related to admission to nursing training and milestone 96a related to the reimbursement system for nurses. It will be followed by milestone 98, related to the entry into force of the Ministerial Regulation amending the agreement between the Ministry of Social Affairs and the University of Tartu lay down the requirements for the gradual increase of admission in medical professions with shortages.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Government Order No. 262 on the Hospital Network Development Roadmap 2040 which was published in the Official Journal on 21 December 2024 (publication note RT III, 21 December 2024) and entered into force on 22 December 2024 https://www.riigiteataja.ee/akt/321122024014	The legal act has four annexes which define the Estonian hospital network, the tasks of the listed hospitals, the principles of cooperation and consolidation, the list of hospitals in the hospital network, and it also maps the needs for infrastructure investments in hospitals and contains an action plan for the implementation of the development objectives

3	The explanatory memorandum issues by the Minister of Health published in the Online Information System on 16 December 2024: https://eelnoud.valitsus.ee/main/mount/docList/7b910d36-44c4-4160-bbb8-ad921a9a765a?activity=1#cWuFmhDg	The explanatory memorandum provides detailed information/justification regarding the content of the legislation

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the milestone.

Entry into force of the Government Order

The Government Order No. 262 on the Hospital Network Development Roadmap 2040 (hereinafter referred to as "Order") was published in the Official Journal of Estonia on 21 December 2024 (publication note RT III, 21 December 2024). According to Article 3 of the Order, the Order entered into force on 22 December 2024, notably on the day following its publication in the Official Journal. The adoption and entry into force dates also appear in the Official Journal. Article 1 of the Order specifies that the implementation of the roadmap is outlined in the four annexes attached to the Order

...**which shall lay down:**

- the list of regional, central, local and rehabilitation hospitals in order to ensure equal access to health care services;

Clause 10.1 of Annex 1 of the Order (evidence 2) provides that, in order to ensure equal access to healthcare services, Annex 2 contains a list of hospitals in the hospital network, according to their type and scope of responsibility. Annex 2 of the Order on "The list of the hospitals included in the hospital network based on scope of responsibility" sets out the updated list of hospitals, which includes 17 regional, central, local, general and rehabilitation hospitals.

- objectives and steps to be taken for consolidating the hospital network;

- Annex 1 of the Order (evidence 2) contains the objectives of the consolidation. The introductory section of Annex 1 states that one of the objectives of the development of the hospital network is its consolidation with a view to reduce and merge some hospitals to create a more efficient network; centralize complex care in major regional hospitals; maintain essential services geographically accessible, especially emergency care, and integrate hospitals with primary care, social care and other health services. Furthermore,
    - Clauses 2-8 specify the objectives as regards the tasks related to the consolidation which include – among others – that consolidating the hospital network should take into account the demographic changes of the region and the health needs of the population (Clause 2) and to ensure the availability of specialized medical care, including 24-hour emergency care, in all counties in the hospitals included in the hospital network (Clause 3).

    - Clauses 11-15 refer to the objectives of the consolidation regarding the networking and the physical consolidation of hospitals which include – among others – the development of networking between hospitals with regional and county responsibility in order to support meaningful cooperation between hospitals to ensure consistent availability of healthcare and related services (Clause 11), the consolidation of hospitals in Tallinn in order to create a competence centre in Northern Estonia, which improves the quality and provision of the health services (Clause 12), as well as providing health and social services in an integrated way (Clause 15)
    - Clauses 17-18 lay down the objectives of the consolidation regarding the health workforce and e-health, which include better management of the needs and workload of the health workforce (Clause 17).
- Annex 4 of the Order (evidence 2) contains eight steps for the implementation of the Hospital Network Development Roadmap, containing the timeline and specific actions to be taken. The steps support the consolidation of the hospital network and include -among others - that the Ministry of Social Affairs draws up in 2025 a financing plan for the merger of the Tallinn hospitals with a view to establish a new Tallinn medical campus (point 1), the Ministry of Social Affairs develops proposals for organising and financing the integration model of social services and health care in 2025 (point 3) and that the Ministry of Social Affairs implements the framework for reducing the shortage of healthcare workers and updates the existing one in 2026.

- the necessary investments for the construction and renovation of the hospitals included in the list of hospitals.

Annex 3 of the Order (evidence 2) contains a table which presents the amounts needed for construction of new hospitals, renovation of hospitals, or both construction and renovations of the different hospitals. The table specifies the investment needs of the hospitals in the hospital network, based on the type of hospital as specified in Annex 2, notably regional, central, general, local or rehabilitation hospitals.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: EE-C[F]-I[6-2-a.6-2-a-]-M[100a], TERVIKUM constructed

Related Measure: EE-C[F]-I[6-2-a.6-2-a-], Construction of TERVIKUM

Qualitative Indicator: TERVIKUM constructed

Time: Q4 2025

1. Context:

This investment aims at contributing to improving the access to health care as well as the provision of health and social care in an integrated way. The investment consists of building a new health centre in the city of Viljandi.

Milestone 100a concerns the construction of the TERVIKUM, a general hospital and health care centre.

Milestone 100a is the last step in the implementation of the investment. It follows milestone 99a related to the signature of the contract for the construction of the TERVIKUM.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	The permission to use the TERVIKUM issued by the city government of Viljandi	The permission No 2512371/07477 to use the TERVIKUM issued on 16 June 2025 is publicly available in the Register of construction works (Ehitisregister): https://livekluster.ehr.ee/ui/ehr/v1/document?docNr=2512371/07477
3	Certificate of completion of the construction works	Certificate of completion of the construction works of the contract #AET-6/2023-3 signed by the parties , notably by the representatives of Riigi Kinnisvara AS (the representative of the Viljandi Haigla) and the contractor for the construction Ehitusfirma Rand ja Tuulberg AS and the Engineering Bureau Telora OÜ (on site on 10 July 2025) A link is also provided to the Procurement Register where it is indicated that the contract was completed as of 10 July 2025: https://riigihanked.riik.ee/rhr-web/#/procurement/5006380/contracts https://riigihanked.riik.ee/rhr-web/#/procurement/5006380/contracts/8288238
4	Contract regarding the construction of TERVIKUM	Contract for the construction of TERVIKUM No AET-6/2023-3 (hereinafter referred to as “Contract”). The contract signed on 10 January 2023 by Riigi Kinnisvara AS (the representative of the Viljandi Haigla) and the contractor for

		the construction Ehitusfirma Rand ja Tuulberg AS and Ehitustrust Ehitusfirma Rand ja Tuulberg AS and Ehitustrust
5	The Press Release issued by Viljandi Hospital regarding the ceremonial opening of the TERVIKUM	The press release issued on 18 June 2025 is available on the webpage of the TERVIKUM: https://newviljandihospital.ee/uudised/viljandimaa-kaasaegsem-haigla-ja-tervisekeskus-tervikum-on-valminud
6	Notice on the webpage of the TERVIKUM regarding the launch of the services	The information on the available services is published on the webpage of the TERVIKUM states that the provision of the services started on 9 August 2025: https://newviljandihospital.ee/#second
7	Building code published in the Official Journal on 11 February 2015 (publication notice RT I, 05.03.2015, 1	The Building Code – among others – lays down the requirement to issue a permit to use a constructed building

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the milestone.

The TERVIKUM, consisting of a general hospital and health care centre, shall be constructed. Furthermore, in line with the description of the measure, **the investment consists of building a new health centre in the city of Viljandi.**

As stated in Point 4 of the general conditions of the contract No AET-6/2023-3 signed on 10 January 2023 by Riigi Kinnisvara AS (the representative of the Viljandi Haigla) and the contractor for the construction Ehitusfirma Rand ja Tuulberg AS and Ehitustrust Ehitusfirma Rand ja Tuulberg AS and Ehitustrust regarding the construction of the TERVIKUM (evidence 4 and hereinafter referred to as “Contract”), the purpose of the contract is the construction of the general hospital and the health care centre TERVIKUM in Viljandi city.

The completion of the construction of a general hospital and health care centre in the city of Viljandi is demonstrated by the permission to use, issued by the city government of Viljandi on 16 June 2025 and published in the Register of construction (evidence 2). The permission to use the constructed building has been issued in accordance with Article 50 (1) of the Building Code (evidence 7) which provides that a permit for use is issued if the construction of the completed building complied with the building permit and the building can be used in accordance with the requirements and purpose of use. Furthermore, the Estonian authorities also provided the certificate of completion of the contract which was signed by the representatives of Riigi Kinnisvara AS (the representative of the Viljandi Haigla) and the contractor for the construction Ehitusfirma Rand ja Tuulberg AS and the Engineering Bureau Telora OÜ on 10 July 2025 and published in the Procurement Register (evidence 3).

According to the website of the TERVIKUM, the different services, such as hospital, emergency and general practice, started in August 2025 (evidence 6). The Commission services accessed the links provided by the authorities on 16 December 2025 to verify that the Register of construction refers to the completion of the contract as well as that the TERVIKUM started the different services. This check was completed successfully, confirming that the construction of the TERVIKUM was completed.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: EE-C[F]-I[6-6-.6-6-]-T[115], Number of young people enrolled in labour market related measures

Related Measure: EE-C[F]-I[6-6-.6-6-], Providing labour market measures to reduce youth unemployment

Quantitative Indicator: Number of participants

Baseline: 0

Target: 3178

Time: Q4 2025

1. Context:

The objective of the investment is to help young people get into employment. The measure consists of a legislation on the renewed "My first job" (M1T) scheme; support for the enrolment in labour market related measures, and a reinforced Youth Guarantee Action Plan.

Target 115 concerns the enrolment of at least 3 178 young people aged 15-29 in labour market related measures, of which at least 2 000 in the "My First Job" scheme.

Target 115 is the third and last target or milestone of the investment, and it follows the completion of milestone 113 related to the entry into force of the legislation which defines the characteristics of the scheme of the My First Job scheme and the conditions for its implementation and milestone 114 related to the adoption of the Youth Guarantee Action Plan.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all the constitutive elements) has been satisfactorily fulfilled.
2	Website of the Estonian Unemployment Insurance Fund regarding the webinars	Detailed information about the timing and content of the eight webinars which aim at improving the general skills of young people so they can enter and stay in employment. Information on the webinars is available here (under completed projects): https://www.tootukassa.ee/en/footer/official-information/projects-supported-structural-funds
3	Website of the Estonian Unemployment Insurance Fund the My First Job scheme	The My First Job scheme aims at supporting young people to gain work experience and improve their skills. The scheme has two components. The first component is a wage subsidy to support an employer who wants to hire a young person to enter the labour market. The second component is that an employer can apply for reimbursement of on-the-job training costs if the young person has taken up a job with a wage subsidy under the 'My First Job' programme.

		The links to the description of the scheme and to its two components are available on the webpage of the Estonian Unemployment Insurance (Eesti Töötukassa) here (under Completed projects): https://www.tootukassa.ee/en/footer/official-information/projects-supported-structural-funds and in more details on wage subsidy here: https://www.tootukassa.ee/en/services/employers/wage-subsidy
4	List of the participants in the My First Job scheme and webinars	The list contains 3294 participants in the two components of the My First Job and in the webinars.
5	Evidence regarding the participation in the My First Job scheme	For each unit of the sample in the My First Job scheme: The evidence proving the enrolment in the wage subsidy component is the wage subsidy contract between the Employment Insurance Fund and the employer of the beneficiary, and the validation sheet that the contract was digitally signed.
6	Evidence regarding the participation in the webinars	The lists of participants in the webinar and digital signature validating the list of participants, both issued by OÜ BDA consulting confirming that the people in the excel enrolled in the webinar and digital documents showing that the list of participants are uploaded and the list validated in the Estonian DigiDoc system (weblink accessible with Estonian identification card https://www.id.ee/en/) .
7	2024 Contract between the Unemployment Insurance Fund and webinar training company OÜ BDA Consulting and its annexes about the webinars	The contract signed digitally between the Unemployment Insurance Fund on 24 July 2024 and webinar training company OÜ BDA Consulting on the details on the content of the webinars and how to organise and carry out the webinars via zoom. Estonia provided a validation sheet of the digital signature.
8	2025 Contract between the Unemployment Insurance Fund and webinar training company OÜ BDA Consulting and its annexes about the webinars	The contract signed between the Unemployment Insurance Fund and webinar training company OÜ BDA Consulting on 28 October 2024 about the content and organising and carrying out the webinars via zoom. Estonia provided a validation sheet of the digital signature.

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the target.

At least 3 178 young people aged 15-29 have been enrolled in labour market related measures, of which at least 2 000 in the "My First Job" scheme.

The Estonian authorities submitted a list of 3294 people who enrolled in labour market related measures, notably in the "My First Job" scheme (hereinafter referred to as "M1J") or in webinars (evidence 4). The Commission services accessed the links provided by the authorities (evidence 2) on 27 April 2026 to verify the description of the M1J scheme on the website of the Estonian Unemployment Insurance Fund. This check was completed successfully confirming that the information on the webpage of the Estonian Unemployment Insurance specifies that the aim of M1J is to support young people to gain work experience and improve their skills. The scheme has two components: the first one is a wage subsidy, which is a support to an employer who wants to hire a young person to enter the labour market. The second component provides that an employer can apply for reimbursement of on-the-job training costs if the young person has taken up a job with a wage subsidy under M1J programme. As regards webinars, the contracts and their annexes signed between the Unemployment Insurance Fund and the webinar training company OÜ BDA Consulting on 24 July 2024 and on 28 October 2024 (evidence 7 and 8) demonstrate that eight seminars had to be organised with the purpose to develop essential and relevant general skills that young people need to enter and remain in employment. These skills help increase their proactivity in shaping their careers, pursuing education, and finding suitable jobs. The topics of the webinars are self-management, creative thinking, care for mental health, project management, green skills, time management, creative and critical thinking, and financial literacy.

The list of participants in the My First Job scheme and webinars (evidence 4) contains the personal identification for each person based on which it is possible to define the age of a person, most importantly the first digit indicates the period of years, the second and third digits the year of birth; the fourth and fifth digits the number of the month of birth, and the sixth and seventh digits the day of birth. The Commission services successfully verified that all people on the list are aged between 15 and 29 years based on the identification codes included in the wage subsidy contracts for M1J and appearing in the list indicating the participation in webinars.

Following the selection of a random sample of 60 units, Estonia submitted evidence as follows:

1) for the persons who participated in M1J (30 units), Estonia provided the wage subsidy contract between the Unemployment Insurance Fund and the employer, who employs the young person (evidence 5). The contract has a number and it contains the name and identification code of the hired young person. Furthermore, it specifies the type of job the young person was expected to carry out. The authorities also provided a printout of the digital signature of the contract for each unit. The age of the participants were verified based on the personal identification code and the date of the signature of the contract.
2) for the persons participating in webinars (30 units), the Estonian authorities provided the lists of participants extracted by the operator and digitally signed (evidence 6), indicating the persons' personal identification codes, the title and date of the webinars. The webinars took place using Zoom. Following each webinar, the training operator extracted the participation list from zoom and uploaded it in the Estonian DigiDoc (an Estonian government application allowing the digital signature of documents) and e-signed the list. Once signed, these documents cannot be changed. The Commission services conducted an on-the-spot check on 29 June 2026 to access the Estonian DigiDoc application where the signed list of webinar participants are stored, to verify that the

persons randomly selected for sampling appear in the list of participants in webinars and that the list was digitally signed by the operator in DigiDoc. This check was completed successfully, confirming that young people aged 15-29 enrolled in labour market related measures. The Commission services also accessed the link provided by the authorities on 27 April 2026 to verify that the timing and content of the webinars. This check was completed successfully, confirming that the webinars correspond to the information provided in evidence 2 and evidence 6.

The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met and that 3 294, young people aged 15-29 enrolled in labour market related measures, of which 2006 in the “My First Job” scheme.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: EE-C[F]-R[6-8-.6-8-]-M[120], Entry into force of the legislative amendments of the support system for children with higher care needs

Related Measure: EE-C[F]-R[6-8-.6-8-], Long-term care

Qualitative Indicator: Entry into force of the legislative amendments

Time: Q1 2025

1. Context:

The objective of the reform is to support the provision of long-term care.

The reform consists of legislative amendments to define the concept of long-term care, to provide for the modernisation and integration of services for children with higher care needs, and an Action plan for integrated social and health care.

Milestone 120 consists of the entry into force of a legal act which provides for the modernisation and integration of services for children with higher care needs.

Milestone 120 is the last step in the implementation of the measure. It follows the completion of milestone 117 related to laying down – among others - the concept of long-term care and milestone 118 related to the adoption of an Action Plan on providing social and health care in an integrated way.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	The Child Protection Act in force from 10 January 2025 published in the Official Journal on 31 December 2024 (RT I, 31.12.2024, 23). The publication is available in the Official Journal in Estonian: https://www.riigiteataja.ee/akt/131122024023 Act in English: https://www.riigiteataja.ee/en/eli/506022025003/consolide	The Child Protection Act provides for the obligations and tasks of state and local governments ensuring the rights and well-being of children.
3	The Child Protection Act for the period 1.01.2025-9.01.2025 published in the Official Journal on 31 December 2024 (RT I, 31.12.2024, 22) The publication is available in the Official Journal in Estonian:	Version of the Child Protection Act before its amendment.

	https://www.riigiteataja.ee/akt/131122024022 Act in English: https://www.riigiteataja.ee/en/eli/ee/503022025002/consolide	
4	The Act amending the Child Protection Act and the other acts, adopted on 11 December 2024 entered into force in 1 January 2025 and published in the Official Journal on 31 December 2024 (RT I, 31.12.2024, 3) The publication is available in the Official Journal in Estonian: https://www.riigiteataja.ee/akt/131122024003	The Act amends the Child Protection Act and other Acts in order to –among others – support children with higher care needs.
5	The Child Protection Act for the period 1.04.2023-31.12.2024 published in the Official Journal on 1 June 2023 (RT I, 06.01.2023, 15) The publication is available in the Official Journal in Estonian: https://www.riigiteataja.ee/akt/106012023015 Act in English: https://www.riigiteataja.ee/en/eli/510042023004/consolide	Version of the Child Protection Act which was in force between 1 April 2023 and 31 December 2024.
6	The Social Benefits for Disabled Persons Act for the period 01.01.2025-31.05.2025 and published in the Official Journal on 31 December 2024 (RT I, 31.12.2024, 25) The publication is available in the Official Journal in Estonian: https://www.riigiteataja.ee/akt/131122024025#para2b6lg2 Act in English: https://www.riigiteataja.ee/en/eli/515012025005/consolide	Social Benefits for Disabled Persons Act containing the amendments introduced by the Amending Act.
7	The Social Benefits for Disabled Persons Act for the period 01.07.2023-31.12.2024 and published in the Official Journal on 30 June 2023 (RT I, 30.06.2023, 59) The publication is available in the Official Journal in Estonian:	Social Benefits for Disabled Persons Act before its amendment.

	https://www.riigiteataja.ee/akt/130062023059 Act in English: https://www.riigiteataja.ee/en/eli/ee/504072023010/consolide	
9	The Regulation of the Minister of Social Protection "The Conditions causing a child's permanent need for support" and published in the Official Journal on 21 December 2024 (RT I, 21.12.2024, 21) entered into force on 1 January 2025 The publication is available in the Official Journal in Estonian: https://www.riigiteataja.ee/akt/121122024021	The Regulation implements the amendments to the Child Protection Act.
10	"The plan for the provision of integrated need-based support for children in social, health and educational fields and consolidation of assessments", approved by the Minister of Social Protection, the Minister of Education and Research and the Minister of Health on 29 April 2024 The plan is available on the website of the Ministry of Social Affairs: https://sm.ee/uudised/ministrid-kinnitasid-tegevuskava-mille-rakendamine-tagab-oigeaegse-ja-tervikliku-abi	The action plan outlines the steps to be taken to ensure timely and comprehensive assistance to children with special needs and their families.
11	Explanatory memorandum to the Amending Act: https://www.riigikogu.ee/tegevus/eelnoud/eelnou/03aee7a7-9111-4ac8-ad6a-142b4816eaca/lastekaitseseaduse-ja-teiste-seaduste-muutmise-seadus/	The explanatory memorandum to the Amending Act provides the reasoning for amending the Child Protection Act and other acts.

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the milestone.

Entry into force of the legal act …

The act amending the Child Protection Act and Other Acts (hereinafter referred to as "Amending Act") was published in the Official Journal on 30 December 2024 (publication notice RT I, 31.12.2024, 3). According to its Article 6(1), the Amending Act entered into force on 1 January 2025(evidence 4).

… which shall provide for the modernisation and integration of services for children with higher care needs. In particular, services in the health, education, social protection and employment areas shall be integrated in order to provide support for families under care burden,

In order to provide for the modernisation of services for children with higher care needs, Article 1(13) of the Amending Act added in Article 27^2 (1) of the Child Protection Act (RT I, 06.01.2023, 15) (evidence 5) the possibility of automated exchange of data between the health information system and the register of social services and benefits regarding children who need permanent support due to their health condition. As a result of the amendment, local authorities receive automatic notification of children with higher care needs from the health information system so that they can intervene, including by involving persons working with the child and other relevant specialists and institutions, to ensure that services are provided according to the needs of the children and their families. Furthermore, in order to clarify who are the children with higher care needs, Article 4 of the Amending Act added Article 2^6 to the Social Benefits for Disabled Persons Act (evidence 6) on the procedure for determining the severity of disability for a child with a permanent need for support due to a health condition. In accordance with Article 2^6, the Social Insurance Board automatically initiates the procedure for determining the severity of the disability without any additional applications submitted by the person. Furthermore, as provided by Article 2^6 (2), the Minister of Social Protection adopted a Regulation on "The Conditions causing a child's permanent need for support" which entered into force on 1 January 2025 in accordance with its Article 2 and published in the Official Journal (RT I, 21.12.2024, 21) (evidence 9). Article 1 of that Regulation lists the conditions under which permanent support for a child is required due to their health conditions.

The provision of integrated services is ensured by Article 1(16) of the amending Act which has added Chapter 8^1 on the processing of personal data to ensure the rights and well-being of the child. Article 34^2 (1) of Chapter 8^1 provides that the local authority has the right to process the personal data of a child, a parent, a person raising a child and a family member of the child, as well as the personal data of a person belonging to the child's social network, which are necessary for assessing the child's need for assistance and providing suitable assistance involving all the concerned authorities or bodies. Furthermore, Article 34^2 (3) lists the areas where the data of the child should be processed and thus appropriate services provided. These include health (34^2 (3)(4)), education (34^2 (3) (6)), social protection (34^2 (3) (3)) and employment (34^2 (3) (9)).

…and the current support system shall be simplified and the assessment of care needs consolidated

Article 1(16) of the amending Act has added Chapter 8^1 on the processing of personal data. Ensuring data exchange between different information systems, helps reduce the delay in providing support and the number of different assessments. Therefore, Article 34^2 (1) of Chapter 8^1 provides that the local authority has the right to process the personal data of a child, a parent, a person raising a child and a family member of the child, as well as the personal data of a person belonging to the child's social network, which are necessary for assessing the child's need for assistance and providing suitable assistance involving all the concerned authorities or bodies. Moreover, Article 28 of the Child Protection Act (evidence 2) provides that a child protection official of a local government should process all the comprehensive data about the child, his/her parents and family members, and persons belonging to a his/her social network thus becoming a secure contact to parents and families under care burden. Together, these articles therefore simplify the assessment of care needs and consolidate the assessment of care needs through the changes to the processing of personal data of children with higher care needs.

Furthermore, in line with the measure description, **the reform consists of legislative amendments to define the concept of long-term care, … and an Action plan for integrated social and health care.** The Commission's preliminary assessment of 22 September 2023 positively assessed the implementation of milestone 117 which required to define the concept of long-term care, and the preliminary assessment of 12 March 2024 positively assessed the implementation of milestone 118 which required the adoption of the Action Plan of integrated care model.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: EE-C[H]-R[8-1-.8-1-]-M[127], Governmental decision establishing priority development areas for wind energy

Related Measure: EE-C[H]-R[8-1-.8-1-], Facilitating the deployment of renewable energy sources

Qualitative Indicator: Governmental decision adopted

Time: Q3 2024

1. Context:

The objective of the reform is to facilitate the deployment of renewable energy sources, notably wind energy. The reform shall consist of the entry into force of the legislative amendments to streamline planning, permitting and environmental impact assessment processes for wind energy projects. The government shall establish priority development for wind areas based on a technical report. Local authorities shall receive support to improve administrative procedures, including permitting, for wind energy development.

Milestone 127 relates to a governmental decision establishing priority development areas for wind energy.

Milestone 127 is the third milestone of the measure, and it follows milestone 125 related to the publication of a call for proposals to support local authorities and milestone 126 related to amending the following laws to the extent necessary: the Building Code, the Water Act, the Planning Act, the Environmental Impact Assessment and Environmental Management System Act, the Environmental Charges Act and the Forest Act. Milestone 127 is accompanied in this payment request by target 128 on support to local authorities to improve administrative procedures, including permitting, for wind energy development.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	Governmental decision establishing wind energy Priority development areas	Governmental decision establishing wind energy priority development areas dated 24 October 2024 Published on the register of the Government Office: Document: Deciding on Wind Energy Priority Development Areas
3	Explanatory Memorandum of a Governmental decision	Explanatory memorandum of the Governmental Decision establishing wind energy development areas dated 3 September 2024.
4	Press release of the Ministry of Climate	Press release of the Ministry of Climate on the technical report identifying areas suitable for the construction of wind farms on state-owned land dated 13 September 2024
5	Press release of the Ministry of Climate	Press release of the Ministry of Climate about the Governmental decision about the use of public lands for the construction of wind farms dated 24 October 2024.

6	Technical report from the Environmental Agency	Technical report from the Environmental Agency on the mapping of priority areas for the development of wind energy published on 30 August 2024.

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the milestone.

The government shall adopt a decision establishing priority areas for wind energy development. [...]

The government decision establishing wind energy priority development areas was adopted by the government during a Cabinet meeting held on 24 October 2024 and published on the register of the Government Office. The decisional text entitled “Deciding on priority development areas for wind energy” which has been voted unanimously, is provided in Evidence no. 2 and states that the following areas have been identified as priority areas for the development of wind energy:

- Areas in the municipalities of Türi, Pärnu, Small-Maarja-Vinn, Türi-Kose-Paide, Türi-Northern Sakala, Haljala-Kadrina, Järva-Põltsamaa, Viljandi, West Harju, Türi-Järva, Türi-Rapla with an estimated capacity of up to 128 wind turbines with a production potential of 921.6 MW and an area of 6 470 ha.
- Small areas suitable for wind energy development in the municipalities of Valga-Tõrva, Kose-Rae-Rasiku, Vinni-Alutaguse, North Sakala, Tõrva, Lüganuse-Viru-Nigula, Mulgi-Tõrva and West Neigula, with an estimated capacity of up to 24 wind turbines with a production potential of 172.8 MW and a surface area of 2 470 ha.

The areas identified as priority areas for the development of wind energy are also listed on page 3 of the explanatory memorandum of the Protocol Decision of the Government of the Republic “Decision on priority wind energy development areas” (Evidence no. 3).

[...] The government shall adopt the decision on the basis of a technical report.

The governmental decision establishes a total of 19 areas as priority development areas for wind energy, with a total estimated production potential of 1 094.4 MW for wind turbines to be installed on state-owned land (Evidence 2) based on a technical report.

The technical report, along with its conclusions, was submitted by the Environment Agency and published on 30 August 2024 (Evidence No 6 and No 4). The mapping of wind energy priority areas is described in the technical report (Evidence No 6) and is based on a preliminary analysis carried out by the Environment Agency from January 2023 to May 2024, in which 2 431 km² of sites have been pre-selected. The report prioritized areas based on environmental and economic considerations, as well as the status of existing local government spatial planning efforts.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: EE-C[H]-R[8-1-.8-1-]-T[128], Support to local authorities

Related Measure: EE-C[H]-R[8-1-.8-1-], Facilitating the development of renewable energy sources

Quantitative Indicator: Number of local authorities supported

Baseline: 0

Target: 20

Time: Q1 2025

1. Context:

The objective of the reform is to facilitate the development of renewable energy sources, notably wind energy. The reform consists of legislative amendments to streamline planning, permitting and environmental impact assessment processes for wind energy projects, the establishment of wind priority development areas and support to local authorities to improve administrative procedures, including permitting, for wind energy development.

Target 128 relates to local authorities supported to improve administrative procedures.

Target 128 is the fourth and last milestone or target of the measure. It follows milestone 125 related to the call for proposals for the support to local authorities, milestone 126 related to legislative amendments, and milestone 127 related to a government decision establishing priority areas for wind development.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.
2	List of local authorities supported	List of local authorities supported (issued by Shared State Service Centre) including dates and details of support to each local municipality.
3	Haljala municipality project No. 20.8.01.24-0040	A. Contract of services with Osaühing Alfa-Omega Communications (signed on 4 December 2024, contract No. 12-2/24/88) B. Tender specification document for “a communication service to more meaningfully involve target groups in the processing of local government special plans.” C. Digital signature printout of the contract of services.
4	Hiiumaa municipality project No. 20.8.01.23-0028	A. Contract of services with AB Artes Terrae OÜ (signed on 11 January 2024 No.14-1/84 lisa nr 2) B. Digital signature printout of the contract of services.
5	Järva municipality project No. 20.8.01.23-0020	A. Local government directive assigning additional tasks to two employees (signed digitally on 06 December 2023, No. 13-1/2023/94).

		B. Digital signature printout of the local government directive.
6	Kadrina municipality project No. 20.8.01.23-0031	A. Authorisation agreement (signed on 18. December 2024). B. Digital signature printout of the authorisation agreement.
7	Kehtna municipality project No. 20.8.01.23-0019	A. Authorisation agreement (signed on 2 August 2024 No.12-3/2024/9). B. Digital signature printout.
8	Lääne-Nigula municipality project No. 20.8.01.23-0025	A. Service contract with Cobalt OÜ (signed on 3. January 2024). B. Tender specification document (signed on 3 January 2024). C. Digital signature printout.
9	Lääneranna municipality project No. 20.8.01.23-0008	A. Employment contract (signed on 15 May 2023 No. 023/14-3/181-1). B. Digital signature printout of the employment contract C. Employment contract Annex 2 (signed on 8 January 2024). D. Digital signature printout. E. Job description of the special planning project manager.
10	Lüganuse municipality project No. 20.8.01.24-0038	A. Employment contract (signed on 31 May 2024 No. 4/2023) with signature.
11	Märjamaa municipality project No. 20.8.01.23-0014	A. Directive to employ one planning specialist (signed on 15. April 2024 No. 21.1-1.1/48/2024). B. Digital signature printout. C. Job description of the planning specialist.
12	Pärnu municipality project No. 20.8.01.23-0022	A. Employment contract (signed on 21 June 2024 No. 4.2-3.1/148/2024). B. Digital signature printout. C. Job description of the renewable energy specialist.
13	Põltsamaa municipality project No. 20.8.01.24-0056	A. Service contract (signed on 17 January 2025) B. Tender specification document. C. Digital signature printout.
14	Rakvere municipality project No. 20.8.01.24-0046	A. Employment contract (signed on 22 January No. 15-4/195). B. Job description of the special planning project manager. C. Digital signature printout.
15	Saarde municipality project No. 20.8.01.24-0042	A. Directive of the mayor appointing an employee (signed on 30 September 2024 No. 14-1/35). B. Digital signature printout of the mayor’s directive. C. Amendment to the directive of the mayor (signed on 16. December 2024 nr 14-1/52). D. Digital signature printout of the amendment to the directive of the mayor.

		E. Job description of the renewable energy specialist .
16	Saaremaa municipality project No. 20.8.01.23-0015	A. Employment contract (Signed on 12 April 2024 No. 2 7.5/ 13-1). B. Digital signature printout. C. Job description of the general planning specialist.
17	Tori municipality project No. 20.8.01.23-0006	A. Employment contract (signed on 04 October 2023 No. 12-3/56). B. Digital signature printout. C. Employment contract, annex 1 (signed on 20. May 2024 No. 12-3/43). D. Digital signature printout. E. Job description of the renewable energy project manager.
18	Tõrva municipality project No. 20.8.01.24-0050	A. Directive for additional tasks for construction specialist (signed on 22 November 2024 No. 13-1/2024/140). B. Digital signature printout.
19	Väike-Maarja municipality project No. 20.8.01.24-0055	A. Procurement contract for legal service related to the wind energy planning communication (signed on 15 January 2025). B. Digital signature printout.
20	Valga municipality project No. 20.8.01.23-0011	A. Procurement contract for legal service related to the special planning (signed on 30 April 2024 No. 8.1-10/60). B. Digital signature printout.
21	Viljandi municipality project No. 20.8.01.24-0039	A. Authorisation agreement concluded with Skepast&Puhkim OÜ (signed on 13 November 2024 No. 15-1/24/445). B. Digital signature printout.
22	Vinni municipality project No. 20.8.01.24-0047	A. Directive to employ a wind energy specialist (signed on 05 November 2024 No. 33). B. Digital signature printout. C. Job description of the wind energy specialist.
23	Information on the first call for proposals on RTK website	Publication of the first round of the call for proposals on 11 September 2023 and press release on opening the first call of proposals on the webpage of the RTK (The State Shared Service Centre). https://rtk.ee/meede-kohalike-omavalitsuste-voimestamine-roheliste-investeeringute-tegemisel-11.09.2023-17.11.2023 https://www.rtk.ee/uudised/riik-toetab-kohalikke-omavalitsusi-roheliste-investeeringute-tegemisel
24	Information on the second call for proposals on RTK website	Publication of the second round of the call for proposals on 22 January 2024 and press release on opening the second round of the call of proposals on the webpage of the RTK (The State Shared Service Centre). https://www.rtk.ee/meede-kohalike-omavalitsuste-voimestamine-roheliste-investeeringute-tegemisel

		https://rtk.ee/uudised/riik-eraldab-kokku-viis-miljonit-eurot-kohalike-omavalitsuste-roheinvesteeringute
25	Regulation No 43 of the Minister of Regional Affairs from 12 July 2023 "Empowering local governments to make green investments *(”Kohalike omavalitsuste võimestamine roheliste investeeringute tegemisel“),* publication reference RT I, 22.10.2025	Regulation No 43 of the Minister of Regional Affairs from 12 July 2023 setting out the terms and conditions of the support measure for local authorities to hire experts or procure services aimed at improving administrative procedures, including permitting, for wind energy development. The publication is available in the Official Journal: https://www.riigiteataja.ee/akt/113072023088?leiaKehtiv
26	SFOS extract with the list of projects	Extract from the Structural Funds Monitoring and Information System (SFOS) IT system with payments for each local authority supported.
27	SFOS extract with the payments	Extract from the SFOS with the list of projects based on the two rounds of the call for proposals.
28	Regulation of the Minister of Finance No 105 from 11 December 2003 on “Public Sector Financial Accounting and Reporting Guide”, Publication reference RT I, 03.01.2025, 7	The Regulation of the Minister of Finance No 105 of 11 December 2003 governing public sector accounting “*Public Sector Financial Accounting and Reporting Guide*”.

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the target.

Following the call for proposals set out in milestone 125 or through the use of centrally procured services, 20 local authorities shall have received support to improve administrative procedures, including permitting, for wind energy development.

Estonia has provided a list of 20 local authorities (Evidence 2) which have received support from the two rounds of the call for proposals set out in milestone 125, launched respectively on 11 September 2023 for the first round and 22 January 2024 for the second round. All support was through the call for proposals as Estonia explained that there was no need for the option to use centrally procured services, as the interest from municipalities in the call for proposals was higher than expected (25 municipalities applied). This is demonstrated through an extract from the Structural Funds Monitoring and Information System (SFOS), the IT system managing RRF funding which lists the projects related to these two rounds of the call for proposals (Evidence 26).

Estonia also provided extracts from SFOS confirming that support has been paid out to each of the 20 local authorities (Evidence 27). The extracts show the status of the project and payment. When a request for payment has been sent by SFOS, it is automatically sent for payment to the State Treasury and the “paid” note appears in SFOS after it has been paid out. The legal basis of SFOS stipulates that the system records all data linked to the payments, status timelines, recoveries and other financial information for each project, under strict access conditions. The Regulation of the Minister of Finance No 105 of 11 December 2003 governing public sector accounting “*Public Sector Financial Accounting and Reporting Guide*” refers to SFOS in $28 (evidence 28). Therefore, the “paid” reference in SFOS can be considered as received by the local governments as public bodies.

The Commission services conducted an on-the-spot check on 25 March 2026 to verify the status of the payments to the 20 local authorities and that all 20 projects reported under evidence 2 and for which extracts from SFOS were provided in evidence 27 did have a status as “paid”. The Commission services also verified that the 20 projects are linked in the IT system to the call for proposals from milestone 125. These checks were conducted successfully, confirming that 20 local authorities have received support following the two rounds of call for proposals set out in milestone 125.

Evidence 3 to Evidence 22 provide contracts of services, authorisation agreements, directives of local government, and/or employment contracts (with digital signature printouts) showing the actions taken by the 20 municipalities for the improvement of administrative procedures, including permitting, for wind energy development – as in the following list. Each project has unique 11-digit identifier code, and the project numbers indicated in the contracts/agreements (Evidence 3-22) correspond to those listed in the SFOS extracts (Evidence 26-27).

1. Haljala rural municipality, project No 20.8.01.24-0040: contract of services (evidence 3A) was concluded (digital signature printout in evidence 3C) for communication support for wind farm special spatial planning. This is specified under point 1.1 in the contract, which states that the contract is signed as a result of the tender for “a communication service to more meaningfully involve target groups in the processing of local government special plans” (evidence 3A, page1). Point 2.1 of the tender specifications further clarifies the task “*To advise on communication issues regarding the organization of the local government special spatial plan and the strategic environmental impact assessment procedure with the aim of ensuring more thorough and meaningful involvement of target groups and well-coordinated, purposeful, timely and relevant communication of the procedure”* (evidence 3B, page 2).
2. Hiiumaa rural municipality, project No 20.8.01.23-0028: contract of services (evidence 4A) concluded (digital signature printout in evidence 4B) tendering a study specifying the conditions for the introduction of wind energy to the Hiiumaa Rural Municipality Urban Development Plan. Point 1.1 in the contract (evidence 4A, pages 1) specifies the objectives of the study as “analyses based on map applications to identify suitable areas for wind energy development” and elaboration of conditions for the construction of a wind farm in the development areas found in the study etc.
3. Järva rural municipality, project No 20.8.01.23-0020: directive of the local government (evidence 5A, signed digitally (evidence 5B)) hiring additional human resources. Point 1 of the directive (evidence 5A, page 1) assigns additional duties to two employees, directing them to work on the project "Special Spatial Plan for Wind Farms in Järva Rural Municipality", which consists of “accelerating the deployment of renewable energy" and the supporting the measure "empowering local governments for green investments".

4. Kadrina rural municipality, project No 20.8.01.23-0031: authorisation agreement (evidence 6A) concluded (digital signature printout in evidence 6B) for purchasing services. Point 1.1. of the agreement (evidence 6.A) stipulates the tasks, including facilitation of the preparation of the local government's special spatial plan and strategic environmental impact assessment and involvement of public, speeding procedural actions and elaborating best spatial solutions in planning. Point 9.3 of the agreement specifies that it is financed from a measure which includes only wind energy related activities as stipulated in Art 2 of the Regulation No 43 of the Minister of Regional Affairs from 12 July 2023 (publication reference RT I, 13.07.2023, 88).

5. Kehtna rural municipality, project No 20.8.01.23-0019: authorisation agreement (evidence 7A) concluded (digital signature printout in evidence 6B) to organize the special spatial planning and environmental impact assessment process, including *“organizing the documentation and information exchange of wind energy planning, strategic environmental impact assessment, including process management, more effective and substantive participation and involvement, acceleration of the procedures etc”*, as specified under point 1.2 of the agreement (Evidence 7A, page 1).

6. Lääne-Nigula rural municipality, project No 20.8.01.23-0025, service contract for legal services (evidence 8A, digital signature printout in evidence 8C) for speeding up and streamlining the second phase environmental impact assessment for special spatial plan for wind farm, as specified under Point 1 of the service contract (evidence 8A, page 1). Terms of reference (evidence 8B, page 1) further specifies the scope of the service: “*Advising on the preparation of the necessary legal documentation, including the drafting of draft legislation, participating in the resolution of objections (preparing responses), including litigation, representing the interests of the Lääne-Nigula Rural Municipality Government as the drafter of the plan, and participating in relevant meetings.*”

7. Lääneranna rural municipality, project No 20.8.01.23-0008, employment contract (evidence 9A, digital signature printout in evidence 9B) concluded (digital signature printout in evidence 9B) for hiring a project manager. Annex 2 of the employment contract stipulates the link to the measure (evidence 9C, digital signature printout 9D). Point 1.1 of the contract stipulates that “*the main objective of the employee's work is to organize affairs related to special spatial plans (wind energy)*”. Annex 1 of the employment contract contains the job description of the special planning project manager contract (evidence 9A, page 3). Point 4 of the job description (evidence 9E, page 1) further specifies the tasks, including “*organization of the preparation of the wind energy planning, strategic environmental impact assessment, including substantive process management, more effective participation, acceleration of the procedure, etc and resolution of legal issues related to the preparation and processing of the wind energy planning.../”*

8. Lüganuse rural municipality, project No 20.8.01.24-0038, employment contract (evidence 10A) concluded to carry out the objectives of the measure “Empowering local goverments for green investments”. Point 2.2 of the employment contract specifies the tasks of the employee, including *“organisation of the wind energy planning and strategic environmental impact assessment in Lüganuse municipality*” (evidence 10A, page 1).

9. Märjamaa rural municipality, project No 20.8.01.23-0014, directive of the mayor (Evidence 11A, digital signature in evidence 11B) hiring additional su*pport for the project "Accelerating wind energy planning in Märjamaa rural municipality".* Point 2 of the annex to the Directive (job description, evidence 11C) specifies the tasks as *“Organizing special spatial planning activities in Märjamaa rural municipality for the project "Accelerating wind energy planning in Märjamaa rural*

municipality"/... / and organizing information work related to the special spatial plan and advising citizens within the scope of its competence" (evidence 11C, page 1).

10. Pärnu City Government, project No 20.8.01.23-0022, employment contract (evidence 12A, digital signature printout evidence 12B) for hiring renewable energy specialist to fulfil the objectives of the measure 20.8.1, which includes only wind energy related activities as stipulated in Art 2 of the Regulation No 43 of the Minister of Regional Affairs from 12 July 2023 (publication reference RT I, 13.07.2023, 88). Point 3 of the Annex to the employment contract contains the job description (evidence 12C, page 1). Job description specifies that the expert *"Prepares and organizes development documents related to renewable energy; participates in the preparation of the renewable energy section of the Pärnu City Master Plan; develops legislation related to the development of renewable energy (including strategic environmental impact assessments and environmental impact assessments), .../"* (evidence 12C, page 1).

11. Põltsamaa rural municipality, project No 20.8.01.24-0056, service contract (evidence 13A) concluded (digital signature printout evidence 13C) for outsourcing as per point 1.1 "*legal assistance services to resolve legal issues related to the local government's special spatial planning process according to the terms of reference"* (evidence 13A, page 1). *Terms of reference (*evidence 13B, page 1) refers to the special spatial planning for wind energy parks in point 1.1.

12. Rakvere rural municipality, project No 20.8.01.24-0046, employment contract (evidence 14A, digital signature printout evidence 14B) hiring project manager for wind parks special spatial plan (point 2.1 of the contract). Point 3 of the Annex to the contract contains the job description (evidence 14C, page 1), specifying the tasks of the employee as *"Preparation and organization of the local government special spatial plan and strategic environmental impact assessment, including substantive process management, participation in content issues, effective involvement, information work, accelerating procedural actions.../*" and solving related legal issues and other tasks.

13. Saarde rural municipality, project No 20.8.01.24-0042, directive of the mayor (evidence 15A, digital signature printout in evidence 15B) for hiring renewable energy expert (point 1 of the Directive). Amendment to the mayor's directive (evidence 15C and digital signature printout in evidence 15D) makes reference to the measure which includes only wind energy related activities stipulated in Art 2 of the Regulation No 43 of the Minister of Regional Affairs from 12 July 2023 (publication reference RT I, 13.07.2023, 88). Point 2 of the Annex to the directive contains the job description (evidence 15E), specifying the tasks of the employee as "*Accelerating the preparation and processing of local government special spatial plans, detailed plans, design conditions, building and use permits in the field of wind energy, ensuring the management and organization of processes and activities related to special spatial plans in accordance with the Planning Act, the Building Code, the Environmental Fees Act and other legislation regulating the field."*

14. Saaremaa rural municipality, project No 20.8.01.23-0015, employment contract hiring planning specialist (point 1.4, evidence 16A, digital signature printout evidence 16B). The tasks are specified in point 3 in the job description (evidence 16C), including developing spatial concepts and conditions; preparing and updating legal acts and information materials, preparation of the master plan, development plans and local government special spatial plans; including the planning of wind energy areas.

15. Tori rural municipality, project No 20.8.01.23-0006, employment contract hiring project manager for renewable energy (point 1.1, evidence 17A), digital signature printout evidence 17B. The main

task is further specified under point 2 in job description (evidence 17E) "*is to organize the planning process (both detailed and special spatial plans) related to the development of renewable energy*.". Annex I to the employment contract specifies the link to the measure (evidence 17C, digital signature printout evidence 17D), the objectives of which includes only wind energy related activities as stipulated in Art 2 of the Regulation No 43 of the Minister of Regional Affairs from 12 July 2023 (Evidence 25).

16. Tõrva rural municipality, project No 20.8.01.24-0050, directive of the mayor adding tasks to building specialist related to special spatial planning for wind energy, involvement of public, and communication (point 1, evidence 18A, digital signature printout evidence 18B).

17. Väike-Maarja rural municipality, project No 20.8.01.24-0055, contract for purchasing services. Point 1.2 in the contract specifies the object of the service: *"Procurement of communication services to better inform local residents and interested parties when preparing detailed plans for wind areas in Väike-Maarja rural municipality" (*evidence 19A, digital signature printout evidence 19B*).*

18. Valga rural municipality, project No 20.8.01.23-0011, procurement contract following the tender *"Purchasing legal assistance services to resolve legal issues related to the local government's special spatial planning process*" as specified in point 1.1 of the contract (evidence 20A, digital signature printout evidence 20B). Point 2.7 of the contract refers to the project name of "Special spatial planning for Wind Energy parks in Valga rural municipality."

19. Viljandi rural municipality, project No 20.8.01.24-0039, authorisation agreement concluded, as specified in point 1.2: "*The subject of the contract is the implementation and organization of the procedure related to the Viljandi Rural Municipality Wind Energy Special Spatial Plan and related activities in accordance with the technical specifications of the procurement.../" (*evidence 21A, digital signature printout evidence 21B*).*

20. Vinni rural municipality, project No 20.8.01.24-0047, directive of the mayor hiring planning specialist for wind farms (point 1 of the directive, evidence 22A, digital signature printout evidence 22B). The job description further specifies the objective of the post in first paragraph: *Processing of documents related to the development of planned wind farms (renewable energy parks) in Vinni rural municipality and providing additional input to planning solutions, including resolving and planning issues related to utility networks and facilities (evidence 22C).*

Therefore, the support received by the local municipalities selected under the call for proposals enabled them to improve administrative procedures, including permitting, for wind energy development.

4. Commission Preliminary Assessment: satisfactorily fulfilled

Number and name of the Milestone: EE-C[H]-I[8-3-.8-3-]-M[133], Action plan for the production and use of biogas and biomethane

Related Measure: EE-C[H]-I[8-3-.8-3-], Increasing production and uptake of sustainable biogas and biomethane

Qualitative Indicator: Approved plan

Time: Q2 2025

1. Context:

The objective of this measure is to boost the uptake of sustainable biogas and sustainable biomethane and to accelerate the integration of renewable energy sources. The investment consists of an action plan for increasing the production and use of sustainable biogas and sustainable biomethane, and support for the uptake of sustainable biomethane.

Milestone 133 consists of approval of the action plan for the production and use of sustainable biogas and sustainable biomethane.

Milestone 133 is the second milestone of the investment, and it follows the completion of milestone 131, related to Call for applications for grants to support the uptake of biomethane. It will be followed by target 134, the final target of the measure, related to the installation of new biomethane production capacity.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Roadmap	Roadmap (which includes the action plan) for the production and use of sustainable biogas.
3	Digital signature printout	Printout of the digital signatures of the Minister of Climate (3 September 2025) and the Minister of Regional Affairs and Agriculture (15 September 2025).

3. Analysis:

The justification and substantiating evidence provided by the Estonian authorities cover all constitutive elements of the milestone.

The Minister of Climate and the Minister of Regional Affairs and Agriculture shall approve the action plan for the production and use of sustainable biogas and sustainable biomethane.

The "roadmap for the production and use of sustainable biogas" ('Kestliku biogaasi tootmise ja kasutuselvotu suurendamise teekaart', evidence 2) contains an action plan ('tegevuskava'; pages 17 to 22) that describes the activities in the periods 2025–2040 and 2040+ that are necessary to ensure the sustainable development and production of biogas including biomethane in Estonia.

The roadmap, including the action plan on pages 17 to 22, was approved by the Minister of Energy and the Environment (in charge of the Ministry of Climate) and the Minister of Regional Affairs and Agriculture respectively on 3 September and 15 September 2025. This is demonstrated by the names and titles of the Minister of Energy and Environment and of the Minister of Regional Affairs and Agriculture on page 2, followed by 'signed digitally' ('allkirjastatud digitaalselt' in Estonian). The printout of the digital signatures (evidence 3) therefore demonstrates that the action plan was approved by the Minister of Energy and Environment on 3 September 2025 and by the Minister of Regional Affairs and Agriculture on 15 September 2025.

The action plan (part of evidence 2, pages 17 to 22) includes investments, regulatory changes, market development measures and research and development activities that contribute to the economic viability of the sector and the achievement of climate goals.

More specifically, a non-exclusive list of actions addressing the production includes:

a) 'Establishment of additional incentive criteria for applicants planning to use manure storage facilities to be built or expanded as part of the biogas production process under the terms of the "Investment support for achieving environmental and climate policy objectives of agricultural enterprises for the period 2023–2027"' (evidence 2, page 19),
b) 'Implementation of a support measure for the purchase of biogas equipment for wastewater treatment plants (4 plants)' (evidence 2, page 21),
c) '"Investment support for achieving environmental and climate policy objectives of agricultural enterprises" (50% of the investment cost, average size of the support approx. 3.5 million euros) for the construction and expansion of 10 manure storage facilities used in biogas production processes' (evidence 2, page 21),
d) 'Investment subsidies for bio-waste biogas plants (1 central and 8 regional).' (evidence 2, page 21),
e) as part of task 4 (Ensuring a level playing field for biogas and biomethane compared to other environmentally friendly energy sources and fuels), a 25 MEUR action titled 'Investment subsidies for the construction of new agricultural biogas plants' (evidence 2, page 21),

A non-exclusive list of action addressing the use includes:

f) 'Support for the purchase of buses, for county routes, that run biogas' (evidence 2, page 19),
g) as part of task 4 (ibid), a measure titled 'Creating a competitive advantage for biomethane in public transport procurement' (evidence 2, page 19),
h) 'Entry Point Investment Program' (evidence 2, page 19) to establish infrastructure (entry points) that allow producers to direct their biomethane gas into the distribution network.

The element of the milestone related to biomethane is covered in the action plan, as biomethane constitutes a subcategory of biogas, or more precisely, a processed product derived from biogas (evidence 2, pages 4 and 23), and the road map also discusses this processed product (biomethane) explicitly where the distinction from biogas is useful for the analysis (evidence 2, pages 4, 6, 14, 15).

Regarding sustainability, it is made clear that 'the roadmap's action plan describes the necessary actions' (evidence 2, page 18) and that the sustainability framework set out in the roadmap therefore also governs the actions included in the action plan. More specifically:

(a) the EU legal framework excludes the inclusion of unsustainable biogas. The Roadmap's chapter "Legal framework for biogas production and use" explains that the biogas sector is regulated by

EU legislation, including the Renewable Energy Directive and the European Climate Regulation (evidence 2, page 7). The Renewable Energy Directive (RED II/RED III) sets mandatory sustainability and greenhouse gas emission reduction criteria for biofuels and biogas. This means that biogas or biomethane can only be taken into account for national energy and climate policy objectives if it meets the sustainability requirements set out in the Directive. In practice, this means that biogas that does not meet these criteria is not included in renewable energy or greenhouse gas reduction policies. As the roadmap only covers biogas production to be developed within the framework of the EU sustainability criteria, biogas in the roadmap is to be interpreted as sustainable biogas.

(b) the roadmap also addresses traceability and sustainability of the biomethane supply chain. The roadmap discusses the 'Guarantee of Origin' (GO) and 'Proof of Sustainability' (Pos) mechanisms (evidence 2, page 7) and the 'Union Database for Biofuels' (UDB) system being developed at the EU level (evidence 2, page 8). These mechanisms are part of the European Union framework, which aims to ensure the verification of the sustainability of biofuels and transparency of the supply chain. In practice, this means that the use of biomethane in meeting energy and climate policy objectives requires verification of compliance with sustainability criteria and corresponding documentation. Therefore, biomethane in the roadmap is to be interpreted as sustainable biomethane.

The action plan therefore covers both the production and the use of sustainable biogas and sustainable biomethane.

4. Commission Preliminary Assessment: Satisfactorily fulfilled