10 November 2026

Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the fifth payment request submitted by Estonia on 29 September 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 29 September 2026, Estonia submitted a request for payment for the sixth 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 27 milestones and targets of the sixth 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, 10 March 2026 and 6 August 2026.[1]

For five targets covering a large number of recipients, in addition to the summary documents and official listings provided by Estonia, the 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 27 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 to develop citizens' life event services online and a skills reform for the digital transformation of businesses. The milestones and targets also confirm progress toward completing investment projects related to the Green Fund and to increasing the production capacity and uptake of sustainable biogas and biomethane.

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, 11892/26 INIT, ST 11892/26 ADD 1

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Number and name of the Target: EE-C[A]-I[1-1-.1-1-]-T[3], Award of grants

Related Measure: EE-C[A]-I[1-1-.1-1-]: Digital transformation in enterprises

Quantitative Indicator: Number of grant award decisions

Baseline: 110

Target: 230

Time: Q4 2025

1. Context:

The objective of the measure is to foster the digital transformation of businesses with a particular focus on SMEs and micro-enterprises. The measure consists in providing financial support to companies for projects related to digital transformation.

Target 3 is about the number of grant award decisions following the call for proposals under milestone 1.

Target 3 is the third and last target of the investment, and it follows the completion of milestone 1 and target 2, related to the publication of the notice related to the call for proposals to support the digital transformation of businesses and the number of enterprises to which grants were awarded by the Ministry of Economic Affairs and Communications under this measure.

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	A list of projects that received a positive grant award decision following the call for proposals under milestone 1, provided by the State Shared Service Centre	A list of projects that received a positive grant decision under measure 1.1.
3	Regulation of the Minister of Entrepreneurship and Information Technology on the terms and conditions of support for the digital transformation of enterprises (*Ettevõtete digipöörde toetuse tingimused ja kord*) published in the State	The Regulation stipulates the grant award conditions and procedure to follow for projects supported under measure 1.1. The regulation was assessed under milestone 1. https://www.riigiteataja.ee/et/akt/119082022005?leiaKehtiv

	Gazette No. 65 of 17 August 2022	
4	https://eis.ee/teenused/digipoorde-toetus/ Webpage of the Enterprise Estonia	Webpage of the Enterprise Estonia (Estonian Business and Innovation Agency) showing the call for projects under measure 1.1. https://eis.ee/teenused/digipoorde-toetus/
5	Grant award decisions related to the call for projects assessed under milestone 1.	For a sample of 60 randomly selected units, copies of 60 digitally signed grant award decisions issued under the call for projects assessed under the milestone 1 of measure 1.1.

3. Analysis:

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

Number (205) of grant award decisions following the call for proposals under milestone 1.

The Estonian authorities provided a list of 291 projects (evidence 2) which received a positive grant award decision under the call for proposals assessed in milestone 1. The list provides reference to the measure, project number, name and business registry number of companies whose projects received the positive grant award decisions, dates of the project implementation and other information extracted from the measure-related database of the State Shared Service Centre (SFOS system).

The Estonian authorities provided the link to the calls for projects webpage (evidence 4) by the intermediary institution (Enterprise Estonia, as assessed under Milestone 1). The Commission services were able to access the link on 31 August 2026 to verify that there were two calls for projects under milestone 1, one targeted at the manufacturing industries and one for other sectors. The list provided in evidence 2 shows that 230 projects were financed under the call for manufacturing industries, and 61 projects under the call for other sectors.

Following the selection of a random sample of 60 units from the list of projects that received a positive grant award decision (evidence 2), the Estonian authorities submitted copies of 60 grant award decisions (evidence 5), each digitally signed. The company name and registry number, as well as the project number and the title for each of the grant decision corresponds to the information provided for the relevant unit in the Excel list under evidence 2. Moreover:

- As evidenced in the first paragraph on page one of each of the 60 grant decisions (evidence 5), there are 60 grants that were awarded to support digital transformation under the two calls for projects, in accordance with the Regulation of the Minister of Entrepreneurship and Information Technology on the terms and conditions of support for the digital transformation of enterprises (*Ettevõtete digipöörde toetuse tingimused ja kord*) published in State Gazette No. 65 of 17 August 2022 (hereinafter referred to as the "Ministerial regulation", listed as evidence 3), in line with milestone 1. In particular, in the section regarding the findings by the Estonian Business and Innovation agency, which is part of page one of each grant award decision, it is stated that the award decision is taken by

the implementing agency while taking into consideration paragraph 11 (1) of the Ministerial regulation, which identifies sectors that are not eligible for support. The webpage of the Estonian Business and Innovation agency dedicated to measure 1.1. “Investment in digital transformation of enterprises” (evidence 4) specifically states that there were two calls for projects: one dedicated to manufacturing industries and one for all other sectors excluding those listed in paragraph 11 (1) of the Ministerial regulation. This is in line with information about grant award decisions presented in evidence 2.

- As evidenced on pages one and four of each of the grant decisions (evidence 5), the awards were granted by the Estonian Business and Innovation Agency, in line with milestone 1. For each decision (evidence 5), page one specifies that the grant was awarded in accordance with the Ministerial regulation that stipulated the scope and procedure of awarding grants under investment 1.1, in accordance with the call for proposals and with milestone 1.

Furthermore, **the measure consists in providing financial support to companies for projects related to digital transformation.**

- Paragraph 2 of each grant award decision (evidence 5) outlines the scope of the funded projects. The decisions recall the objectives of the supported projects as being consistently aligned with the scope of the measure: namely, that the grants were awarded for projects that have scope of supporting digitalisation of companies. The project objectives (e.g., to support automation, deployment of digital technologies and robots) are consistent with the scope of the measure and with the CID requirement of support being granted for the digital transformation of enterprises.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[A]-I[1-3-.1-3-]-T[9], Confirmations from authorities accepting the final reports

Related Measure: EE-C[A]-I[1-3-.1-3-]: Development of digital waybills services

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

Baseline: 0

Target: 205

Time: Q1 2026

1. Context:

The objective of the measure is to support the digitalisation of the exchange of information on road freight transport. The measure consists in supporting service providers in the establishment of eFTI platforms, and projects related to digital waybills.

Target 9 consists in at least 205 confirmations by the authorities accepting the final project implementation report for projects related to digital waybills.

Target 9 is the second and last target of the investment, and it follows the completion of target 7, related to number of projects developing an eFTI platform which have received a positive grant decision.

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	List of completed projects	A list of 205 completed projects compiled by the State Shared Service Centre from the SFOS (Structural Funds monitoring and information system) including the reference of the project, its name, short description, and name of the beneficiary.
3	List of the completed projects under investment 1.3	Snapshot of the real time view of the SFOS system indicating that each one of the 205 projects related to digital waybills (measure 1.3) with the status “Completed”.
4	Regulation No. 34 of 11 September 2024 of the Minister of Economic Affairs and Industry on “Support for Connecting to the Data Exchange Service of the e-Consignment Note” “E-veoselehe andmevahetusteenusega	The Regulation stipulates the grant award conditions and procedure to follow for projects supported under measure 1.3. https://www.riigiteataja.ee/et/akt/116042025004?leiaKehtiv

	liidestamise toetus", RT I, 12 September 2024, 1, as amended by Regulation No. 9 of 11 April 2025, RT I, published on 16 April 2025, in force as of 19 April 2025	

3. Analysis:

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

At least 205 confirmations by the authorities accepting the final project implementation reports for projects related to digital waybills.

The Estonian authorities provided the Ministerial Regulation No. 34 of 11 September 2024 of the Minister of Economic Affairs and Industry on "Support for Connecting to the Data Exchange Service of the e-Consignment Note" (E-veoselehe andmevahetusteenusega liidestamise toetus), in force as of 19 April 2025 (evidence 4). According to paragraphs 2(1) and (2), and 6(1) and (2) of the Regulation, the support programme is aimed at projects related to digital waybills, by supporting undertakings in connecting their systems and processes to the e-waybill platform.

According to paragraph 8 (4) of the Regulation, the project is considered completed upon approval of the final report by the intermediary body and payment of the grant to the final recipient. Furthermore, paragraphs 19 to 20 of the Regulation stipulate that the submission and approval of the final report constitutes a step towards completion of the measure, as the final report provides information on the activities implemented, progress and achievement of the result indicator, and the support is paid within ten working days following its approval. Specifically, paragraph 20 (1) defines the conditions for paying out the grant award based on the acceptance of the final report by the authorities. Once the project grant award is paid out, the project is 'completed'.

A list of 205 completed projects ("*lõpetatud*" in Estonian) was presented to confirm the achievement of the target (evidence 2). The list is extracted from the Structural Funds Operational System (SFOS), which is the system used for the processing of projects and making payments under the Estonian RRP. The list indicates, for each project: the project number, name of the project, name of the beneficiary, project description, and the status of the project as 'completed'. For each of the 205 projects, the title of the projects (column G in evidence 2) and the short description (column J in evidence 2) are clearly related to the scoping of supported projects as defined in the paragraphs 2(1) and (2), and 6(1) and (2) of the Regulation, i.e. they are related to digital waybills, either by enabling the use of digital waybills or by ensuring connectivity to the waybills platform.

Following the selection of a random sample of 60 units from evidence 2, the Estonian authorities submitted the digital document (evidence 3) that represents the real-time view of the SFOS system and

contains each of the sampled units with the status ‘completed’. In line with the paragraph 8(4) of the Regulation (evidence 4), each project listed in the document had the final project report accepted by the authorities. The Commission services conducted an on-the-spot check on 31 August 2026 to verify that the evidence submitted in evidence 2 and evidence 3 corresponded to the information in the SFOS system for the 60 units and that the project reference number, its name, scope and status as ‘completed’ confirming the availability of the confirmation by the authorities accepting the final project reports, and that the beneficiary names corresponded to the information submitted in evidence 2. For each project, the authenticity of the above data was confirmed, including the title of the project confirming that the project is related to digital waybills and the status in the SFOS database confirming the availability of confirmations by the authorities accepting the final project report. For three projects, the availability of the full audit trail of the project was verified, including the presence in the system of the final report as well as the detailed information on the confirmations by the authorities accepting the final project report.

The evidence provided for a sample of 60 units confirmed that the requirement of the target of having at least 205 confirmations by the authorities accepting the final project implementation report has been satisfactorily fulfilled.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[A]-R[1-4-.1-4-]-T[13], Training confirmations issued

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

Quantitative Indicator: Number of training confirmations issued

Baseline: 0

Target: 1818

Time: Q2 2026

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.

Target 13 consists in the number of confirmations of participation issued for training activities supported under this measure.

Target 13 is the fourth and last target of the reform, and it follows the completion of milestone 11 related to the entry into force of legislation for the allocation of support, target 12 related to the number of participants enrolled and target 14 related to revisions in the occupational qualifications register.

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	Anonymised list of confirmed participations in training activities supported under this measure, provided by the State Shared Service Centre	The file includes a list with personal identification codes, certificate numbers, titles of the training programme, name of the training provider and the location of record about certificates issued
3	Adult Education Act (Estonian name "*Täiskasvanute koolituse seadus*"), published in the State Gazette no. RT I, 30.01.2025, 2 on 30 January 2025	The law stipulates requirements for continuing education institutions regarding continuing education, the basis for financing continuing education, etc. https://www.riigiteataja.ee/akt/130012025002?leiaKehtiv
4	Continuing education standard (Estonian name "*Täiendkoolituse standard"*), published in	The law contains provisions related to records issued for completion of and participation in continuing education. https://www.riigiteataja.ee/akt/122042025002?leiaKehtiv

	the State Gazette under number RT I, 22.04.2025, 2 on 22 April 2025	
5	Conditions and procedure for organizing continuing education in vocational education institutions (Estonian name "*Kutseõppeasutuses täiendusõppe korraldamise tingimused ja kord*"), published in the State Gazette under number RT I, 20.09.2013, 10 on 20 September 2013	Among other things, it defines how training is completed in continuing education courses conducted at vocational training institutions and what documents must be kept regarding the courses organized. https://www.riigiteataja.ee/akt/120092013010
6	Ministerial order No. 1.1-2/25/185 on the Approval of the order for national in-service training provided on the website of the Ministry of Education and Research, issued on 22 July 2025	Order of the Ministry of Education and Research for training activities to be provided, *inter alia*, under the NRP measure 1.4 "Skills reform for the digital transformation of businesses", for September 2025 to June 2026 https://dok.hm.ee/et/document.html?id=718752a1-dc06-4ca9-865d-67ffdea70c21
7	Annex 8 of the Ministerial order of 22 July 2025 No. 1.1-2/25/185 on the Approval of the order for national in-service training	Annex specifies the list of the national continuing education courses for adults financed from the Recovery and Resilience Facility reform "*Skills reform for the digital transformation of businesses*" (list of DIGI training activities commissioned).
8	Ministerial order No. 1.1-2/26/23 on the Approval of the order for national continuing education for the first half of 2026, provided on the website of the Ministry of Education and Research, issued on 6 February 2026	Order of the Ministry of Education and Research for continuing education training activities to be provided, *inter alia,* under the NRP measure 1.4 "Skills reform for the digital transformation of businesses", for January 2026 to June 2026 https://dok.hm.ee/et/document.html?id=9a4cdb4a-886d-4635-937e-baa56178c733
9	Annex 3 of the Ministerial Order of 6 February 2026 No. 1.1-2/26/23 on the Approval of the order for national continuing education for the first half of 2026	Annex specifies the list of the national continuing education courses for adults financed from the Recovery and Resilience Facility reform "*Skills reform for the digital transformation of businesses*" for this period (list of DIGI training activities commissioned).
10	Ministerial Order No. 1.1-2/26/114, Appendix 1 - Support conditions for the	Updated support conditions setting the measure-level legal, eligibility and implementation basis for the RRF reform 1.4 "Skills

	RRF reform 1.4 “Skills reform for the digital transformation of businesses”, issued by the Ministry of Education and Research on 3 June 2026	reform for the digital transformation of businesses”, including the basis for Harno-implemented training activities.
11	Appendix 2 to the Ministerial Order No. 1.1-2/26/114, - Action plan 2024–2026 for the RRF reform 1.4 “Skills reform for the digital transformation of businesses”, issued by the Ministry of Education and Research on 3 June 2026	Updated 2024–2026 action plan specifying the approved activities, responsibilities, implementation periods, output targets, payment conditions and budget allocations for the RRF digital skills measure 1.4, including Harno-implemented training activities.

3. Analysis:

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

Number (1818) of confirmations of participation issued for training activities supported under this measure. Furthermore, in line with the description of the measure, it **consists of the support for ICT skills.**

The Estonian authorities submitted a database providing ID numbers of participants in the digital skills trainings provided under measure 1.4 of the RRP (evidence 2) and the numbered certificates of participation/graduation issued for the training activities supported under measure 1.4. Altogether, there were 2945 reported participants with the status ‘graduated’ (“lõpetatud” in Estonian) for the digital skills training activities, as evidenced from the numbers of graduation/participation certificates indicated for each participant. This represents an overachievement of the target by 1127 units.

The list of graduates of training activities submitted by Estonia (evidence 2) contains references to the location of the records pertaining to the issuance of certificates, which can be either the Estonian Education Information system (national register for education data - EHIS), or Juhan system (the national information system for continuing education (täienduskoolituste infosüsteem Juhan), or the institutional information systems of the educational institutions that contain records on the issuance of certificates.

Under the Estonian law, continuing education institutions (trainings providers) are obliged to keep records of issued certificates, which can be either an extract from the institution’s information system indicating certificate recipients and the corresponding final document numbers, or an executive order signed by the school principal on the completion of training and the issuance of certificates (vocational educational institutions):

- As specified in article 12(2) of subsection 2 of the Adult Education Act in force from 1 April 2025, published in the State Gazette RT I, 23 March 2015, 5 (evidence 3), the continuing education

institution issues a micro-credential certificate to the person having completed micro-credential studies.

- As specified in article 3(8) of the Continuing education standard adopted on 19 June 2016 and published in the State Gazette (evidence 4), the certificates and notices issued by a continuing education institution shall be numbered and the continuing education institution shall keep records of them. The certificates and notices may be issued electronically.
- According to article 5(7) of the law "Conditions and Procedures for the Provision of Continuing Education in a Vocational Education Institution", in force since 23 September 2013 and published in the State Gazette RT I, 20 September 2013, 10 (evidence 5), certificates and attestations are issued pursuant to an order of the principal and are entered into the school's register of documents certifying participation in learning and learning outcomes.

The Estonian authorities provided copies of the ministerial orders (evidence 6, 8 and 10) specifying the training activities procured under the measure 1.4 (evidence 7, 9 and 11). These training activities are related to ICT skills as follows:

1/ Ministerial order 22.07.2025 No.1.1.-2/25/185 (evidence 6), which specifies in point 5 that the list of training activities approved for the state-funded continuing education order for the second half of 2025 is financed under the Recovery and Resilience Facility measure "Skills Reform for the Digital Transformation of Enterprises". The list of training activities is detailed in the annex to the ministerial order (evidence 7).

2/ Ministerial order 6.02.2026 no 1.1-2/26/23 (evidence 8), which specifies in point 2 that the list of training activities approved for the state-funded continuing education order for the first half of 2026 is financed under the Recovery and Resilience Facility measure "Skills Reform for the Digital Transformation of Enterprises". The list of training activities is detailed in the annex to the ministerial order (evidence 9).

3/ Ministerial order (evidence 10), which details in point 3.2 the scope of training activities supported under the Recovery and Resilience Facility measure "Skills Reform for the Digital Transformation of Enterprises". The list of training activities is detailed in the annex to the ministerial order (evidence 11).

Following the selection of a random sample of 60 units from the list of confirmed participants (evidence 2), the Commission services conducted an on-the-spot check on 10 August 2026 to verify that the confirmations of participation in training activities submitted under evidence 2 for the 60 randomly selected units correspond to the real time content of the official record-keeping systems for vocational and continuing education related to participation in training activities supported under measure 1.4 and that for each unit, a certificate of participation for a training activity supported under measure 1.4 was recorded in the national registries, therefore confirming participation in a training activity under the measure. The Commission services were able to confirm for each of the 60 randomly selected certificates of completion the existence of the record of participation in the national registries containing the full reference to the training activity provided, which, for each unit, was one of the trainings supported by measure 1.4 and listed in evidence 7,9 and 11; date(s) and duration of the corresponding activity, date of issuance of the graduation/participation certificate, and the ID and certificate numbers of participants

that matched information provided in evidence 2. As explained above, the Estonian legislation does not require continuing education institutions (trainings providers) to keep the copies of certificates but the records of issued certificates, which can be either an extract from the institution's information system indicating certificate recipients and the corresponding final document numbers, or an executive order signed by the school principal on the completion of training and the issuance of certificates (vocational educational institutions). The Commission services were able to verify that the national registries contained the audit trail documentation related to the training activities, including the records of the issuance of/issued certificates of graduation/participation, identified by the relevant certificate numbers, and that these are related to the training activities supported by the measure, 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 1818 certificates of graduation or participation in the training activities supported by the measure has been satisfactorily fulfilled.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[A]-R[1-5-.1-5-]-T[18], Strategies published and missions organised

Measure name: EE-C[A]-R[1-5-.1-5-]: Supporting the competitiveness of enterprises in foreign markets

Quantitative Indicator: Number of strategies published and missions organised

Baseline: 0

Target: 27

Time: Q2 2026

1. Context:

The objective of the measure 1.5 is to increase the export capacity and competitiveness of Estonian companies, including those of the ICT sector. The export strategies and missions implemented under the measure contribute to this objective by supporting Estonian companies in entering and expanding in foreign markets. The measure consists of the development of export strategies aimed at specific countries or regions; the opening of business centres located in selected export markets and the organisation of missions with global impact groups.

Target 18 concerns the publication of at least 13 national and/or regional export strategies and the organisation of at least 14 missions.

Target 18 is the fifth milestone or target of the reform, and it follows the completion of milestone 16, milestone 17, milestone 19 and milestone 21 related to the preparation of the development of strategies, procurement of studies, preparatory analysis to define the content and the locations of business centres and setting-up of impact groups and selection of destinations for global digital missions. It is complemented in this payment request by target 20, related to the number of business centres opened in export markets to support companies.

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	Link to webpages of the Ministry of Foreign Affairs	Link to official web page of the Ministry of Foreign Affairs where the national and regional export strategies are published. Available in English under this link: https://vm.ee/en/export-strategies
3	Mission reports	14 Mission reports prepared by the Ministry of Foreign Affairs detailing the dates, target market/location, target sectors and main activities undertaken.

3. Analysis:

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

At least 13 national and/or regional export strategies shall be published [...]. Furthermore, in line with the measure description, **[...] the measure consists of the development of export strategies aimed at specific countries or regions.**

The Estonian authorities provided a link to the official webpage of the Ministry of Foreign Affairs where all the export strategies are published (evidence 2).

The Commission services accessed the link provided on 30 May 2026 to verify that at least 13 national and/or regional export strategies were published and accessible. The referenced webpages included 23 national export strategies aimed at specific countries as follows: United States, Poland, India, Ukraine, Germany, France, the Philippines, Malaysia, Vietnam, Thailand, Indonesia, Singapore, Saudi Arabia, the United Arab Emirates, Qatar, Israel, the United Kingdom, Japan, Korea, South Africa, Kenya, Namibia and Botswana; and one regional export strategy covering Africa. This check was completed successfully, confirming that 23 national export strategies and one regional export strategy are published on the official webpage of the Ministry of Foreign Affairs.

The above-mentioned 24 strategies were developed by the Ministry of Foreign Affairs to support Estonian companies seeking to enter or expand in foreign markets. They provide market-specific information on economic conditions, business opportunities, sectoral priorities and market entry requirements, as well as practical guidance and recommendations to support companies' internationalisation effort.

The evidence provided confirms that 24 national and/or regional export strategies have been published, thereby overachieving the target.

[...] and at least 14 missions organised. Furthermore, in line with the measure description, **[...] with global impact groups.**

The Estonian authorities presented 14 mission reports (evidence 3), prepared by the Ministry of Foreign Affairs and identifiable through the Ministry's logo displayed in the header or footer of each report, confirming that at least 14 missions were organised.

Mission reports were presented for the following missions: Industrial technologies – Germany (April 2024), Green technologies - South Korea (April 2025), Health technologies - United Kingdom (October 2025), Defense technologies - United Kingdom (November 2024), Industrial technologies – United Kingdom (November 2024), Germany (November 2024), Industrial technologies - Germany (April 2025), Space technologies – Germany (April 2025), Maritime technologies – Germany (June 2025), Maritime technologies – United States (November 2025), Green technologies – United States (May 2025), GovTech – Africa (May 2025), Defense technologies – Ukraine (May 2025),

Each report states on page 1 that the mission was organised to support market entry for Estonian companies and contribute to export development and country promotional activities, with the objective

of increasing the export capacity and competitiveness of Estonian companies, including the ICT sector. Each mission report specifies the dates and location of the mission, its thematic focus, the participating organisations and companies, the activities carried out, and the main outcomes and impact achieved. Each report further indicates that participants in the missions included representatives of Estonian companies, the Ministry of Foreign Affairs and other relevant public and private stakeholders. These participants formed the global impact groups participating in the missions, bringing together Estonian companies and relevant public and private stakeholders in the respective target markets.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled**.**

Number and name of the Target: EE-C[A]-R[1-5-.1-5-]-T[20], Number of business centres opened

Related Measure: EE-C[A]-R[1-5-.1-5-]: Supporting the competitiveness of enterprises in foreign markets

Quantitative Indicator: Number of business centres

Baseline: 0

Target: 7

Time: Q2 2026

1. Context:

The objective of measure 1.5 is to increase the export capacity and competitiveness of Estonian companies, including those of the ICT sector. The measure consists of the development of export strategies aimed at specific countries or regions; the opening of business centres located in selected export markets; and the organisation of missions with global impact groups.

Target 20 concerns the opening of seven business centres in export markets to support companies.

Target 20 is the sixth milestone or target of the reform and follows the completion of milestone 19 related to the preparation of an analysis to define the content and the locations of the business centres, milestone 16 related to the preparation of development of strategies, milestone 17 related to the procurement of studies, and milestone 21 related to the setting up of impact groups and selection of destinations for global digital missions. It is accompanied in this payment request by target 18 related to the publication of national and/or regional export strategies and the organisation of missions.

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	Link to the website of the Estonian Ministry of Foreign Affairs on the Estonian Business centres	Official webpage of the Estonian Ministry of Foreign Affairs providing information on the Estonian Business Hubs (business centres), including their locations, activities and opening dates. https://vm.ee/ebh
3	Press release on the opening of the Estonian Business Hub in London	Official press release published on the website of the Estonian Ministry of Foreign Affairs on 19 June 2025, confirming the opening of the London Business Hub and describing its purpose and the support provided to Estonian companies.
4	Press release on the opening of the Estonian Embassy and Business Hub in Singapore	Official press release published on the website of the Government of Estonia on 5 June 2023, confirming the inauguration of the Embassy and Business Hub in Singapore.

5	Press release on the opening of the Estonian Business Hub in Paris	Official press release published on the website of the Estonian Ministry of Foreign Affairs on 11 March 2025, confirming the opening of the Paris Business Hub and describing its purpose.
6	Press release on the opening of the Estonian Business Hub in Riga	Official press release published on the website of the Estonian Ministry of Foreign Affairs on 26 May 2025, confirming the opening of the Riga Business Hub and describing its purpose.
7	Press release on the opening of the Estonian Business Hub in Washington, D.C.	Official press release published on the website of the Estonian Ministry of Foreign Affairs on 17 October 2024, confirming the opening of the Washington Business Hub and describing its purpose.
8	Press release on the opening of the Estonian Business Hub in Berlin	Official press release published on the website of the Estonian Ministry of Foreign Affairs on 14 November 2025, confirming the opening of the Berlin Business Hub and describing its purpose.
9	Article on the Estonian Business Hub in Seoul	Official article published on the website of the Estonian Ministry of Foreign Affairs on 4 April 2023, describing the operation of the Seoul Business Hub and the support provided to Estonian companies.
10	Ministry of Foreign Affairs communication on the Estonian Business Hubs	Official communication published on the website of the Estonian Ministry of Foreign Affairs on 15 October 2025, describing the facilities, services and support provided to Estonian companies through the Business Hubs.

3. Analysis:

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

Number of business centres opened in export markets to support companies.

The achievement of the target is demonstrated by the official website of the Estonian Ministry of Foreign Affairs (evidence 2), which provides information on the business centres established at Estonian representations in foreign markets, together with the official press releases and articles concerning the individual business centres (evidence 3-9). The Commission services accessed the link provided by the authorities on 11 June 2026 to verify that business centres were opened in export markets. This check was completed successfully, confirming that business centres were opened in seven export markets: Seoul (evidence 9), Singapore (evidence 4), Washington (evidence 7), Paris (evidence 5), Riga (evidence 6), London (evidence 3) and Berlin (evidence 8).

The opening dates of the seven business centres are documented on the official website of the Estonian Ministry of Foreign Affairs (evidence 2): Seoul on 16 January 2023, Singapore on 3 June 2023, Washington on 15 October 2024, Paris on 10 March 2025, Riga on 26 May 2025, London on 18 June 2025 and Berlin on 13 November 2025. The website provides information on each business centre, including its opening date, contact details and a dedicated LinkedIn page, as well as photos and video material showing the premises of the business centres. The opening and operation of the individual business centres are also

substantiated by official press releases and articles concerning the respective centres (evidence 3 to 9). These document, among others, the opening events and participation of representatives of Estonian companies and public authorities, and provide information on the premises, services and activities of the business centres.

The information provided for the individual business centres also demonstrates how they support Estonian companies in the respective export markets. In particular, the Seoul business centre provides premises for client meetings and presentations; the Singapore business centre supports the establishment of business contacts in Singapore and the wider ASEAN region; the London business centre provides premises for meetings, presentations and events and supports the visibility and credibility of Estonian companies in the UK market; and the Washington business centre provides premises for meetings, product presentations and networking and supports contacts with both the business and public sectors.

Similarly, the Paris business centre supports Estonian companies entering the French market, including by facilitating contacts with investors and local partners; the Riga business centre supports entry into and growth in the Latvian market and provides premises for meetings and events; and the Berlin business centre supports Estonian companies entering the German market, including by facilitating contacts with German companies, investors and other partners. More generally, the business centres provide companies with a representative environment for business meetings, product presentations and events, enable the presentation of Estonian products, services and technologies, and support the development of business contacts in foreign markets. The practical use of the business centres to support companies is further substantiated by concrete examples, including business meetings, product launches, seminars, B2B meetings, networking activities and contract-signing events in the respective export markets (evidence 10).Therefore, on the basis of the evidence provided, seven business centres have been opened in export markets to support companies.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled**.**

Number and name of the Target: EE-C[B]-I[2-2-.2-2-]-T[27], Training confirmations issued

Related Measure: EE-C[B]-I[2-2-.2-2-]: Green skills to support the green transition of enterprises

Quantitative Indicator: Number of confirmations issued

Baseline: 0

Target: 2830

Time: Q2 2026

1. Context:

The objective of the investment is to ensure the availability of skills required for the green transition of enterprises. The investment consists of the introduction of green skills upskilling and retraining programmes.

Target 27 consist in the number of confirmations of participation issued for training activities supported under this measure.

Target 27 is the second and last target of the investment, and it follows the completion of milestone 25, related to the entry into force of secondary legislation setting out the terms of support for the development of green skills.

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	Anonymised list of confirmed participations in training activities supported under this measure	The file, provided by the State Shared Service Centre, includes a list with personal identification codes, certificate numbers, titles of the training programme, name of the training provider and the location of record about certificates issued.
3	Adult Education Act; adopted on 18 February 2015; this version entered into force on1 April 2025	The law (Estonian name “Täiskasvanute koolituse seadus”) stipulates requirements for continuing education institutions regarding continuing education, the basis for financing continuing education, etc. Published in the State Gazette (RT I, 30.01.2025, 2) https://www.riigiteataja.ee/et/akt/130012025002?leiaKehtiv
4	Continuing education standard; adopted on 19 June 2015; this version entered into force on 25 April 2025	The law (Estonian name “Kutseõppeasutuses täiendusõppe korraldamise tingimused ja kord“) contains provisions related to records issued for completion of and participation in continuing education. Published in the State Gazette (RT I, 22.04.2025, 2) https://www.riigiteataja.ee/et/akt/122042025002?leiaKehtiv

5	Conditions and procedure for organizing continuing education in vocational education institutions (regulation); adopted on 23 September 2013	The law (Estonian name “Kutseõppeasutuses täiendusõppe korraldamise tingimused ja kord”), among other things, defines how training is completed in continuing education courses conducted at vocational training institutions and what documents must be kept regarding the courses organized. Published in the State Gazette (RT I, 20.09.2013, 10) https://www.riigiteataja.ee/et/akt/120092013010
6	Ministerial order 9 May 2024 No. 1.1-2/24/119 Approval of the National Continuing Education Order for 2024	Order of the Ministry of Education and Researchcontinuing education courses to be provided, *inter alia*, under the NRP measure 2.2 “Green skills to support the green transition of enterprises”, for April 2024 to December 2024. Signed on 9 May 2024. https://dok.hm.ee/et/document.html?id=edf12e46-2659-4fae-8933-4e684b1478b1
7	Annex 3 of Ministerial order 9 May 024 No. 1.1-2/24/119 Approval of the National Continuing Education Order for 2024	Annex specifies the list of the national continuing education courses for adults financed from the Recovery and Resilience Facility investment "Green skills to support the green transition of enterprises" for this period (list of Rohe training activities commissioned).
8	Ministerial order 23 January 2025 No. 1.1-2/25/10 Approval of the order for state in-service training for the period from 1 January 2025 to 30 June 2026	Order of the Ministry of Education and Research continuing education courses to be provided, *inter alia*, under the NRP measure 2.2 “Green skills to support the green transition of enterprises”, for January 2025 to June 2026. Signed on 23 January 2025. https://dok.hm.ee/et/document.html?id=eb4fc96b-fcb4-4535-95fb-bba2a03e1184
9	Annex 3 of Ministerial order 23 January 2025 No. 1.1-2/25/10 Approval of the order for state in-service training for the period from 1 January 2025 to 30 June 2026	Annex specifies the list of the national continuing education courses for adults financed from the Recovery and Resilience Facility reform "Green skills to support the green transition of enterprises" for this period (list of Rohe training activities commissioned).
10	Ministerial order 22 July 2025 No. 1.1-2/25/185 Approval of the order for national in-service training to provide micro-qualification training, digital and green skills training and prison training	Order of the Ministry of Education and Research continuing education courses to be provided, *inter alia*, under the NRP measure 2.2 “Green skills to support the green transition of enterprises”, for September 2025 to June 2026. Signed on 22 July 2025. https://dok.hm.ee/et/document.html?id=718752a1-dc06-4ca9-865d-67ffdea70c21
11	Annex 4 of Ministerial order 22 July 2025 No. 1.1-2/25/185 Approval of the	Annex specifies the list of the national continuing education courses for adults financed from the Recovery and Resilience Facility investment "Green skills to support the green transition

	order for national in-service training to provide micro-qualification training, digital and green skills training and prison training	of enterprises" for this period (list of Rohe training activities commissioned).
12	Ministerial order 6 February 2026 No. 1.1-2/26/23 Approval of the order for national continuing education for the first half of 2026	Order of the Ministry of Education and Research continuing education courses to be provided, inter alia, under the NRP measure 2.2 “Green skills to support the green transition of enterprises”, for the first half of 2026. Signed on 6 February 2026. https://dok.hm.ee/et/document.html?id=9a4cdb4a-886d-4635-937e-baa56178c733
13	Annex 1 of Ministerial order 6 February 2026 No. 1.1-2/26/23 Approval of the order for national continuing education for the first half of 2026	Annex specifies the list of the national continuing education courses for adults financed from the Recovery and Resilience Facility investment "Green skills to support the green transition of enterprises" for this period (list of Rohe training activities commissioned).

3. Analysis:

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

Number (2830) of confirmations of participation issued for training activities supported under this measure. Furthermore, in line with the description of the investment, the measure **consists of the introduction of green skills upskilling and retraining programmes.**

The Estonian authorities submitted a database providing ID numbers of participants in the green skills trainings provided under measure 2.2 of the RRP (evidence 2) and the numbered certificates of participation/graduation issued for the training activities supported under measure 2.2. Altogether, there were 3009 reported participants with the status ‘successfully completed’ (“Väljunud edukalt” in Estonian) for the green skills training activities, as evidenced from the numbers of graduation/participation certificates indicated for each participant. This represents an overachievement of the target by 179 units.

The list of graduates of training activities submitted by Estonia (evidence 2) contains references to the location of the records pertaining to the issuance of certificates, which can be either the Estonian Education Information system (national register for education data - EHIS), or Juhan system (the national information system for continuing education (täienduskoolituste infosüsteem Juhan), or the institutional information systems of the educational institutions that contain records on the issuance of certificates.

Under the Estonian law, continuing education institutions (trainings providers) are obliged to keep records of issued certificates, which can be either an extract from the institution’s information system indicating

certificate recipients and the corresponding final document numbers, or an executive order signed by the school principal on the completion of training and the issuance of certificates (vocational educational institutions):

- As specified in article 12(2) of subsection 2 of the Adult Education Act in force from 1 April 2025, published in the State Gazette RT I, 23 March 2015, 5 (evidence 3), the continuing education institution issues a micro-credential certificate to the person having completed micro-credential studies.
- As specified in article 3(8) of the Continuing education standard adopted on 19 June 2015 and published in the State Gazette (evidence 4), the certificates and notices issued by a continuing education institution shall be numbered and the continuing education institution shall keep records of them. The certificates and notices may be issued electronically.
- According to article 5(7) of the law "Conditions and Procedures for the Provision of Continuing Education in a Vocational Education Institution", in force since 23 September 2013 and published in the State Gazette RT I, 20 September 2013, 10 (evidence 5), certificates and attestations are issued pursuant to an order of the principal and are entered into the school's register of documents certifying participation in learning and learning outcomes.

Estonian authorities provided copies of the ministerial orders (evidence 6, 8, 10 and 12) specifying the training activities procured under the measure 2.2 (evidence 7, 9, 11 and 13). These training activities were as follows:

i) Ministerial order 9.05.2024 No. 1.1-2/24/119 (evidence 6), which specifies in point 2 that the list of training activities approved for the state-funded continuing education order for the year 2024 is financed under the Recovery and Resilience Facility measure "Green skills to support the green transition of enterprises". The list of training activities is detailed in the annex to the ministerial order (evidence 7).

ii) Ministerial order 23.01.2025 No. 1.1-2/25/10 (evidence 8), which specifies in point 2 that the list of training activities approved for the state-funded continuing education order for the period January 2025 to June 2026 is financed under the Recovery and Resilience Facility measure "Green skills to support the green transition of enterprises". The list of training activities is detailed in the annex to the ministerial order (evidence 9).

iii) Ministerial order 22.07.2025 No. 1.1-2/25/185 (evidence 10), which specifies in point 3 that the list of training activities approved for the state-funded continuing education order for the period *September 2025 to June 2026* is financed under the Recovery and Resilience Facility measure "Green skills to support the green transition of enterprises". The list of training activities is detailed in the annex to the ministerial order (evidence 11).

iv) Ministerial order 6.02.2026 No. 1.1-2/26/23 (evidence 12), which specifies in point 1 that the list of training activities approved for the state-funded continuing education order for the first half of 2026 is financed under the Recovery and Resilience Facility measure "Green skills to support the green transition of enterprises". The list of training activities is detailed in the annex to the ministerial order (evidence 13).

Following the selection of a random sample of 60 units from the list of confirmed participants (evidence 2), the Commission services conducted an on-the-spot check on 5 August 2026 to verify that the confirmation of participation in training activities submitted under evidence 2 for the 60 randomly selected units correspond to the real time content of the official record-keeping systems for vocational and continuing education related to participation in training activities supported under measure 2.2 and that for each unit, a certificate of participation for a training activity supported under measure 2.2 was recorded in the national registries, therefore confirming participation in a training activity under the measure. The Commission services were able to confirm for each of the 60 randomly selected certificates of participation the existence of the record of participation in the registries of the Ministry of Education and Research containing the full reference to the training activity provided, which, for each unit, was one of the trainings supported by measure 2.2 and listed in evidence 7, 9, 11 and 13; date(s) and duration of the corresponding activity, date of issuance of the graduation/participation certificate, and the ID and certificate numbers of participants that matched information provided in evidence 2. As explained above, the Estonian legislation does not require continuing education institutions (trainings providers) to keep the copies of certificates but the records of issued certificates, which can be either an extract from the institution's information system indicating certificate recipients and the corresponding final document numbers, or an executive order signed by the school principal on the completion of training and the issuance of certificates (vocational educational institutions). The Commission services were able to verify that the national registries contained the audit trail documentation related to the training activities, including the records of the issuance of/issued certificates of graduation/participation or executive orders, identified by the relevant certificate numbers, and that these are related to the training activities supported by the measure, 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 2830 confirmation issued for graduation or participation in the training activities supported by the measure has been satisfactorily fulfilled.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[B]-I[2-3-.2-3-]-T[31], Confirmations by authorities accepting the final project reports

Related Measure: EE-C[B]-I[2-3-.2-3-]: Green technology development programmes

Quantitative Indicator: Number of confirmations by authorities accepting the final project reports

Baseline: 0

Target: 15

Time: Q2 2026

1. Context:

The objective of the investment is to contribute to the green transition of companies. The investment consists of support to start-ups and development clusters with a focus on integrated green technology solutions.

Target 31 consists in the confirmations by the authorities accepting the final report for at least 5 clusters and at least 10 start-ups from the Green Technology Development programme.

Target 31 is the third and last target of the investment, and it follows the completion of milestone 28, related to establishment of a working group to plan and set up the development programme, and milestone 29, related to the set up of the Green Technologies Development Programme.

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	Regulation of the Minister of Climate "Terms and Conditions for Granting Support for the Development of Green Technologies"	Regulation of the Minister of Climate (original name "*Kliimaministri määrus: Rohetehnoloogiate arendamise toetuse andmise tingimused ja kord*", published in the State Gazette (RT I, 12.03.2024, 2) in force since 15 March 2024. Available here: https://www.riigiteataja.ee/akt/112032024002
3	Final report for Development Accelerator "Material Science, Resource Valuation, Reducing the Use of Chemicals"	Final report prepared by Beamline OÜ for the Accelerator for the development of products and services for start-ups in the fields of materials science, resource valorization, and reducing chemical usage, dated 20 June 2025.
4	Certificate of acceptance of final report for "Sustainable Environmental Solutions	Certificate of acceptance of the final report for "Sustainable Environmental Solutions for Local Living Environments" Accelerator signed on 18 December 2025 by the Foundation

	for Local Living Environments" Accelerator	Environmental Investment Centre (hereinafter EIC) and Beamline OÜ.
5	Final report for Sustainable Environmental Solutions for Local Living Environments" Accelerator	Final report prepared by Sihtasutus Tartu Teaduspark of the "Sustainable Environmental Solutions for Local Living Environments" Accelerator, dated 15 August 2025.
6	Certificate of acceptance of final report for "Sustainable Environmental Solutions for Local Living Environments" Accelerator	Certificate of acceptance of the final report for "Sustainable Environmental Solutions for Local Living Environments" Accelerator signed on 22 August 2025 by EIC and Sihtasutus Tartu Teaduspark.
7	Final report for "Mobility and Logistics" Accelerator	Final report prepared by Sihtasutus Tartu Teaduspark for the "Mobility and Logistics Accelerator", dated 9 December 2025.
8	Certificate of acceptance of final report for "Mobility and Logistics" Accelerator	Certificate of acceptance of the final report for "Mobility and Logistics" Accelerator signed on 15 December 2025 by EIC and Sihtasutus Tartu Teaduspark.
9	Final report for "Energy, Construction, and Climate Resilience" Accelerator	Final report prepared by prepared by Beamline OÜ for the "Energy, Construction, and Climate Resilience" Accelerator, dated 31 March 2026.
10	Certificate of acceptance of final report for "Energy, Construction, and Climate Resilience" Accelerator	Certificate of acceptance of the final report for "Energy, Construction, and Climate Resilience" Accelerator signed on 28 May 2026 by EIC and Beamline OÜ.
11	Final report for "Forestry, Soil, Biodiversity, and Land Use" Accelerator	Final report prepared by Sihtasutus Tartu Teaduspark for the "Forestry, Soil, Biodiversity, and Land Use" Accelerator, dated 5 February 2025.
12	Certificate of acceptance of final report for "Forestry, Soil, Biodiversity, and Land Use" Accelerator	Certificate of acceptance of the final report for "Forestry, Soil, Biodiversity, and Land Use" Accelerator signed on 9 March 2026 by EIC and Sihtasutus Tartu Teaduspark.
13	List of supported start-ups	List of startups supported through the Green Technology Development Programme.
14	Final implementation reports for the projects	For the ten projects listed under evidence 13, Estonia provided the final implementation reports submitted by the beneficiaries in the SFOS IT system and approved by the authorities.
15	Control sheet for TETNET OÜ	Checklist of the application requirements for TETNET OÜ, prepared and signed by the EIC on 30 September 2024.
16	Control sheet for Innoair OÜ	Checklist of the application requirements for Innoair OÜ, prepared and signed by the EIC on 3 October 2024.
17	Control sheet for Wemel Wood OÜ	Checklist of the application requirements for Wemel Wood OÜ, prepared and signed by the EIC on 1 October 2024.
18	Control sheet for Jälle Technologies OÜ	Checklist of the application requirements for Jälle Technologies OÜ, prepared and signed by the EIC on 30 September 2024.
19	Control sheet for CleanHand OÜ	Checklist of the application requirements for CleanHand OÜ, prepared and signed by the EIC on 2 October 2024.

20	Control sheet for PowerUp Fuel Cells OÜ	Checklist of the application requirements for PowerUp Fuel Cells OÜ, prepared and signed by the EIC on 30 September 2024.
21	Control sheet for Optigon OÜ	Checklist of the application requirements for Optigon OÜ, prepared and signed by the EIC on 25 September 2024.
22	Control sheet for Timbeter OÜ	Checklist of the application requirements for Timbeter OÜ, prepared and signed by the EIC on 30 September 2024.
23	Control sheet for Power Algae OÜ	Checklist of the application requirements for Power Algae OÜ, prepared and signed by the EIC on 30 September 2024.
24	Control sheet for Better Than Driving OÜ	Checklist of the application requirements for Better Than Driving OÜ, prepared and signed by the EIC on on 30 September 2024.
25	Application for funding of the project by Jälle Technologies OÜ	Application for the funding of the project under the Green Technology Development programme, sent by Jälle Technologies OÜ on 27 May 2024.
26	Application for funding of the project by Better Than Driving OÜ	Application for the funding of the project under the Green Technology Development programme, sent by Better Than Driving OÜ on 31 May 2024.
27	Extract of the Structural Funds Monitoring and Information System (SFOS) IT system, controlled by the Ministry of Finance, listing the start-ups from the Green Technology Development programme and their status	Extract of the SFOS IT system listing completed projects corresponding to a real time view of the system.

3. Analysis:

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

Confirmations by the authorities accepting the final report for at least 5 clusters […] from the Green Technology Development programme. Furthermore, in line with the measure description, **the measure consists of support to start-ups and development clusters with a focus on integrated green technology solutions.**

For five clusters (accelerator programmes) supported under the Green Technology Development Programme, Estonia provided the final report prepared by the cluster organisers for each cluster (evidence 3, 5, 7, 9 and 11) and the respective authority's acceptance of the final report (evidence 4, 6, 8, 10 and 12). According to paragraph 4 of the regulation of the Minister of Climate "Terms and Conditions for Granting Support for the Development of Green Technologies" (RT I, 12.03.2024, 2), herein after "regulation of the Minister of Climate" (evidence 2), the intermediate authority is the Foundation Environmental Investment Centre (hereinafter EIC). In line with the requirement of the target, the clusters are part of the Green Technology Development programme as confirmed by the final reports (evidence 3,

5, 7, 9 and 11). The five development clusters are the same as the ones for which contracting was assessed in milestone 29.

The five clusters are:

- Accelerator for the development of products and services for start-ups in the fields of materials science, resource valorization, and reducing chemical usage. The programme focused on accelerating the journey from tested prototypes to scalable market-ready solutions, supporting startups working on new materials, resource efficiency, and reduced chemical use, while offering access to mentoring, industry and investor networks, regulatory guidance, pilot opportunities, and an active alumni community. Acceptance of the final report was signed by Beamline OÜ and the Foundation Environmental Investment Centre on 18 December 2025 (evidence 3).

- "Sustainable Environmental Solutions for Local Living Environments" Accelerator. The programme for green technology startups supports the development and scaling of innovative environmental solutions in cooperation with local governments. The programme focused on products and services that address environmental challenges at the local level. Acceptance of the final report was signed by Tartu Science Park Foundation and the EIC on 22 August 2025 (evidence 5).

- "Mobility and Logistics" Accelerator. The programme supports early-stage companies developing innovative green technologies in the mobility and logistics sectors. Acceptance of the final report was signed by Tartu Science Park Foundation and the EIC on 10 December 2025 (evidence 7).

- "Energy, Construction, and Climate Resilience" Accelerator. The programme for early-stage startups developing innovative solutions in the energy and climate technology sectors supports companies building science-based and impact-driven solutions related to energy systems, construction, and climate change mitigation and adaptation Acceptance of the final report was signed by Beamline OÜ and the EIC on 28 May 2026 (evidence 9).

- "Forestry, Soil, Biodiversity, and Land Use" Accelerator. The programme is designed to support early-stage green technology startups in developing and scaling innovative solutions related to forestry, soil, biodiversity, and land use. The programme provides comprehensive development support to help teams bring their ideas to market more efficiently, combining training, mentoring, and expert guidance through a structured pre-programme and a main acceleration phase. Acceptance of the final report was signed by Tartu Science Park Foundation and the EIC on 9 March 2026 (evidence 11).

Confirmations by the authorities accepting the final report for […] at least 10 start-ups from the Green Technology Development programme.

Estonia provided a list of ten start-ups supported by the Green Technology Development programme (evidence 13). For the ten projects listed under evidence 13, Estonia provided a copy of the final implementation reports submitted by the beneficiaries (evidence 14). Each of the ten reports confirms that the project is supported under the Green Technology Development programme.

Clause 11 paragraph 3 of the regulation of the Minister of Climate "Terms and Conditions for Granting Support for the Development of Green Technologies" (RT I, 12.03.2024, 2), herein after "regulation of the Minister of Climate" (evidence 2), gives the definition of a start-up enterprise. The clause lists the following requirements for a start-up:

i) SME registered in Estonia, other than a self-employed person
ii) whose development of a new, innovative, green-tech climate and environment-related solution contributes to climate change mitigation or adaptation and makes a significant contribution to environmental objectives
iii) the solution is potentially scalable on the market

For each of the selected start-ups, the Estonian authorities provided an "Initial control of application" (*"Taotluse esmane kontroll*" in Estonian, evidence 15-24, hereinafter "control sheet"), a checklist which lists the requirements necessary to have an application assessed to participate in the program. This document is prepared and signed by the EIC. The control sheets include points for the requirements for a start-up as listed in the regulation (evidence 2). Requirement i) is verified under point 2.1 of the control sheets, requirement ii) is verified under point 3.2 in the control sheets and requirement iii) is verified in under point 3.3 in the control sheets. For each of the ten selected start-ups, the requirements i), ii) and iii) listed in clause 11, paragraph 3 of the regulation of the Minister of Climate (evidence 2) are verified in the respective control sheet. For the company Jälle Technologies OÜ (evidence 18) and the company Better Than Driving OÜ (evidence 24), the verification of requirement ii) is verified in the control sheet through the applicantions for funding made by the companies (evidence 25 and 26).

The Commission services conducted an on-the-spot check on 25 August 2026 to verify the confirmations from the authorities accepting the final project implementation reports for at least 10 start-ups from the Green Technology Development programme. Estonia was requested to conduct a walkthrough of the *Struktuuritoetuse registri operatiivsüsteem* (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 confirmations by authorities accepting the final project implementation reports. A representative of the Estonian authorities showed the Commission services the complete list of supported start-ups registered in SFOS under the code for the Green Technology Development Programme (evidence 27). The list includes the 10 start-ups submitted by the Estonian authorities for the fulfilment of the target under evidence 14.

- The Commission verified that the projects refer to the ones supported by the Green Technology Development programme. The representative of the Estonian authorities filtered the relevant projects based on the name of the programme (i.e. "*Rohetehnoloogiate arendusprogrammid (siseriiklik) (20.2.1.33)*", confirming that all ten projects are related to the Green Technology Development programme.

- Additionally, the Commission services verified that the online listing in the system of the relevant start-ups included for each project the reference number and name of the project, the beneficiary and the project status. The platform clearly displayed the projects status as "completed" ("lõpetatud", in Estonian language) for each of the ten start ups. 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 each project, 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 EIC) who had accepted the final implementation report and the link to the final implementation report submitted related to the start-up from the Green Technology Development programme. 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 ten confirmations from the authorities accepting the final project implementation reports for ten start-ups under the Green Technology Development programme.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[B]-I[2-4-.2-4-]-T[33], Confirmations by authorities accepting the final project reports

Related Measure: EE-C[B]-I[2-4-.2-4-]: Modernisation of the business models in manufacturing companies

Quantitative Indicator: Number of confirmations by authorities accepting the final project reports

Baseline: 0

Target: 70

Time: Q2 2026

1. Context:

The objective of the investment is to support the change of business models in manufacturing to facilitate the compliance of Estonian products with environmental and climate objectives. The measure consists of support to projects modernising the business models of manufacturing companies related to climate and environmental objectives.

Target 33 consists in at least 70 confirmations by the authorities accepting the final project implementation reports.

Target 33 is the second and last target of the investment, and it follows the completion of milestone 32, related to the entry into force of the ministerial decree setting out the terms and conditions of grant eligibility.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.
2	Extract of the Structural Funds Monitoring and Information System (SFOS) IT system, controlled by the Ministry of Finance, listing the projects	Extract of the SFOS IT system listing completed projects corresponding to a 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.
4	Ministerial regulation "Conditions and procedure for applying for support for changing the business model of a production	Ministerial regulation by the Minister of Entrepreneurship and Information Technology (in Estonian "*Taastekava tootmisettevõtja ärimudeli muutmise toetuse tingimused ja taotlemise kord*"), published in the State Gazette (RT I, 16.11.2022, 5), entry into force 19 November 2022.

	company in the recovery plan"	
5	Final implementation reports for the projects	For the 70 projects listed under evidence 3, Estonia provided the final implementation reports submitted by the beneficiaries in the SFOS IT system and approved by the authorities.

3. Analysis:

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

At least 70 confirmations by the authorities accepting the final project implementation reports for projects supported under this measure. Furthermore, in line with the measure description, **the measure consists of support to projects modernising the business models of manufacturing companies related to climate and environmental objectives.**

The ministerial regulation "Conditions and procedure for applying for support for changing the business model of a production company in the recovery plan" (in Estonian "*Taastekava tootmisettevõtja ärimudeli muutmise toetuse tingimused ja taotlemise kord"*) by the Minister of Entrepreneurship and Information Technology (evidence 4) entered into force on 19 November 2022. The regulation sets out the terms and condition of grant eligibility to support modernising the business models of manufacturing companies related to climate and environmental objectives, which was positively assessed by the Commission under the first payment request as part of milestone 32 under measure 2.4 "Modernisation of the business models in manufacturing companies". According to Article 7 of the ministerial regulation (evidence 4), the measure covers two lines of action: "Implementation of development activities and application of business model change" and "Conducting a green audit". Following the entry into force of the regulation and the call for proposals, the "Estonian Business and Innovation Agency - Enterprise Estonia" funded 114 projects (evidence 2).

For the 70 projects listed under evidence 3, Estonia provided a copy of the final implementation reports submitted by the beneficiaries (evidence 5). Each of the 70 reports confirms that the project was to support modernising the business models of manufacturing companies related to climate and environmental objectives (in Estonian, "*Tootmisettevõtete ärimudeli muutused (siseriiklik) (20.2.1.44)*") and was related to the call for application supported by this measure, i.e. "Green support: implementation of development activities and application of business model change" and "Green support: conducting a green audit" (in Estonian, "*Rohetoetus: arendustegevuse elluviimine ja ärimudeli muutmise rakendamine*" and "*Rohetoetus: roheauditi läbiviimine*"), confirming that all projects are supported under this measure.

Enterprise Estonia verified each project individually to ensure that it supported the modernisation of manufacturing companies' business models in line with climate and environmental objectives. This verification was carried out by examining the content of each project, including the information provided in the application form, against a predefined checklist and in accordance with an established procedure to assess whether the proposed projects contributed to the objectives of the measure.

The Commission services conducted an on-the-spot check on 26 August 2026 to verify the confirmations from the authorities accepting the final project implementation reports supported under measure 2.4 for the 70 projects listed under evidence 3. Estonia was requested to conduct a walkthrough of the *Struktuuritoetuse registri operatiivsüsteem* (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.

- For the 70 projects listed under evidence 3, the Commission services 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, corresponding to the information presented in evidence 3. 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. This also confirms that the projects have received support, as per the measure description.

For randomly selected projects within the list of 70, 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 Estonian Business and Innovation Agency – Enterprise Estonia) who had accepted the final implementation project and the link to the final implementation report submitted related to support for changes of business models in manufacturing to facilitate the compliance of Estonian products with environmental and climate objectives.

These checks were completed successfully, confirming that there are at least 70 confirmations from the authorities accepting the final project implementation reports for projects supported under measure 2.4.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[B]-I[2-5-.2-5-]-T[36], Confirmations from authorities accepting the final reports

Related Measure: EE-C[B]-I[2-5-.2-5-]: Resource-efficient green technologies

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

Baseline: 0

Target: 36

Time: Q2 2026

1. Context:

The objective of the investment is to support the resource efficiency of companies, including energy efficiency, with a particular focus on the valorisation of underutilised bio-resources. The measure consists of support to projects for resource-efficient green technologies and for the valorisation of bio-resources.

Target 36 consists of at least 36 confirmations from the authorities accepting the final project implementation reports following the call for proposals from milestone 34.

Target 36 is the third and last target of the investment, and it follows the completion of milestone 34, related to the publication of calls for the proposal for grants, and target 35, related to the award of grants to projects selected under the call for proposal.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.
2	Extract of the Structural Funds Monitoring and Information System (SFOS) IT system, controlled by the Ministry of Finance	Extract of the Structural Funds Monitoring and Information System (SFOS) IT system listing completed projects selected following the call for proposals to support projects for resource-efficient green technologies (from milestone 34) and their status, corresponding to a real time view of the system.
3	Extract of the Structural Funds Monitoring and Information System (SFOS) IT system, controlled by the Ministry of Finance	Extract of the SFOS IT system listing completed projects selected following the call for proposals to support projects for the valorisation of bio-resources (from milestone 34) and their status, corresponding a to real time view of the system.
4	List of completed projects selected for the assessment of the target	A list of 27 completed projects selected following the call for proposals to support projects for resource-efficient green technologies presented in a table providing details regarding project number, project title, beneficiaries, etc.

5	List of completed projects selected for the assessment of the target	A list of 12 completed projects selected following the call for proposals to support projects for the valorisation of bio-resources presented in a table providing details regarding project number, 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 36 confirmations from the authorities accepting the final project implementation reports following the call for proposals from milestone 34. Furthermore, in line with the measure description, **the measure consists of support to projects for resource-efficient green technologies and for the valorisation of bio-resources.**

The "Foundation Environmental Investment Centre (KIK)" published a call for proposals to support projects for resource-efficient green technologies and the "Agricultural Registers and Information Board (ARIB)" published a call to support the valorisation of bio-resources as part of milestone 34, which was positively assessed by the Commission under the first payment request submitted by Estonia. Following the call, the "Foundation Environmental Investment Centre (KIK)" and the "Agricultural Registers and Information Board (ARIB)" funded at least 36 projects for which final implementation reports were accepted by the authorities as confirmed by the list of completed projects in the Estonian SFOS IT system for each call (evidence 2 and 3).

The Commission services conducted an on-the-spot check on 31 August 2026 to verify the confirmations from the authorities accepting the final project implementation reports following the call for proposals from milestone 34 requirement. Estonia was requested to conduct a walkthrough of the *Struktuuritoetuse registri operatiivsüsteem* (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 services the list of completed projects supported by the two lines of intervention in the SFOS system (evidence 2 and 3). The list of completed projects included the 39 projects submitted by the Estonian authorities for the fulfilment of the target under evidence 4 and 5 and corresponds to the extracts from the SFOS system provided by the authorities under evidence 2 and 3.

- The Commission verified that the projects refer to the ones selected following the call for proposals to projects for resource-efficient green technologies and for the valorisation of bio-resources. For projects for resource-efficient green technologies, the representative of the Estonian authorities filtered the relevant projects based on the name of the call for proposals, i.e. calls "Investment in resource efficiency of companies (RRF)", in Estonian "*Ettevõtete ressursitõhusus investeerinud (RRF)*"; and "Investment in resource efficiency of companies II (RRF)", in Estonian "*Ettevõtete ressursitõhusus investeerinud II (RRF)*", confirming that all projects are related to the call for proposals from milestone 34. For projects for the valorisation of bio-resources, the representative of the Estonian authorities filtered the relevant projects based on

the name of the call for proposals, i.e. call “Valorization of bioresources (national) (20.2.2.22)”, in Estonian “*Bioressursside väärindamine (siseriiklik) (20.2.2.22)*”, confirming that all projects are related to the call for proposals from milestone 34.

- 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. This also confirms that the projects have received support, as per the measure description.
- For each of the 39 projects of the list (evidence 4 and 5), 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 “Foundation Environmental Investment Centre (KIK)” for projects resource-efficient green technologies, and a representative of “Agricultural Registers and Information Board (ARIB)” for the valorisation of bio-resources) who had accepted the final implementation project, the date and the link to the final implementation report submitted related to the call for proposals from milestone 34. Each of the final reports opened by the authorities included complete information regarding the steps of the project implementation, as well as the name of the project, the final beneficiary and the call of proposal.

These checks were completed successfully, confirming that there are at least 36 confirmations from the authorities accepting the final project implementation reports following the call for proposals from milestone 34.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[B]-I[2-6-.2-6-]-T[40a], Legal financing agreements signed with equity/venture capital funds

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

Quantitative Indicator: Percentage (%)

Baseline: 0

Target: 100

Time: Q2 2026

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 investment 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. Target 40a is related to AS SmartCap having signed legal financing agreements with equity investments /venture capital funds for an amount necessary to use 100% of the RRF investment into the Facility (taking into account operational expenditures).

Target 40a is the fourth and last target of the investment, and it follows the completion of milestones 37, 38 and 39a, related to the contractual agreement between the Ministry of Economic Affairs and Communications and AS SmartCap, the investment policy document adopted by AS SmartCap, and the transfer of EUR 100 million by the Ministry of Economic Affairs and Communications to AS SmartCap for the Facility.

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	Legal financing agreement between SmartCap Green Fund and the final beneficiary, signed on 21 July 2023	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 750,000.
3	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 9 May 2025	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 999,998.

4	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 7 April 2026	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 750,000.
5	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 10 July 2023	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 750,000.
6	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 16 June 2023	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 1,250,000.
7	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 4 June 2024	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 542,250.
8	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 20 November 2025	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 1,000,000.
9	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 19 June 2026	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 1,000,000.
10	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 20 December 2024	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 4,999,999.
11	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 11 February 2026	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 500,000.
12	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 18 July 2024	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 1,999,990.
13	Legal financing agreement between SmartCap Green	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 400,000.

	Fund and the final beneficiary signed on 14 March 2025	
14	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 8 December 2025	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 400,000.
15	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 20 December 2024	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 1,000,000.
16	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 17 December 2024	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 500,000.
17	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 13 July 2023	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 500,000.
18	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 18 July 2025	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 35,000.
19	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 14 October 2025	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 1,499,975.
20	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 9 December 2025	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 5,000,000.
21	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 19 June 2025	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 917,979.
22	Legal financing agreement between SmartCap Green Fund and the final	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 4,000,000.

	beneficiary signed on 19 December 2024	
23	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 8 December 2025	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 1,999,533.
24	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 9 September 2025	Direct Investment Agreement signed by SmartCap Green Fund in the amount of EUR 4,696,840.
25	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 29 June 2026	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 656,134.
26	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 26 October 2023	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 1,292,167.
27	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 1 August 2024	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 1,179,948.
28	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 1 August 2023	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 957,500.
29	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 1 May 2025	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 1,000,019.
30	Legal financing agreement between SmartCap Green Fund and the final beneficiary signed on 17 July 2024	Direct Investment Agreement signed by SmartCap Green Fund and the final beneficiary in the amount of EUR 1,500,000.
31	Legal financing agreement between SmartCap Green Fund and 2C Ventures Fund I signed on 3 November 2023	Fund investment agreement (subscription agreement) in relation to 2C Venture Fund I in the total commitment amount of EUR 20,000,000.

32	Amendment to the Legal financing agreement between SmartCap Green Fund and 2C Ventures Fund I Subscription Agreement	Fund Investment agreement (subscription agreement) in relation to 2C Venture Fund I, whereby the original investment amount was increased by EUR 1,000,000.
33	Legal financing agreement between SmartCap Green Fund and Norrsken Impact Accelerator (SIAF II) Signatory Documentation (AS SmartCap) signed on 01 July 2025	Fund Investment agreement (subscription agreement) in relation to Norrsken Impact Accelerator Fund II in the total commitment amount of EUR 6,000,000.
34	Legal financing agreement between SmartCap Green Fund and Taaleri SolarWind III SCSp signed on 30 June 2025	Fund Investment agreement (subscription agreement) in relation to Taaleri SolarWind III fund in the total commitment amount of EUR 25,000,000.
35	17 copies of bank transfers for management fees transferred from SmartCap Green Fund to SmartCap AS in the timeframe from 15 August 2022 to 29 July 2026	Bank statements proving the use of management fees until August 2026.

3. Analysis:

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

AS SmartCap shall have entered into legal financing agreements with equity investments /venture capital funds for an amount necessary to use 100% of the RRF investment into the Facility (taking into account operational expenditures). Moreover, in line with the measure description, **on the basis of the RRF investment, the Facility aims at initially providing at least EUR 90 million of financing.**

Estonia has submitted evidence 2-30 proving that AS SmartCap has entered into 29 legal financing agreements with direct equity investments between 16 June 2023 and 29 June 2026, accounting in aggregate for EUR 42 077 332. Evidence 31-34 submitted by the Estonian authorities prove that four legal financing agreements with venture capital funds have been signed between 3 November 2023 and 1 July 2025, accounting in aggregate for EUR 52 000 000.

In total, the legal financing agreements signed with direct equity and venture capital funds represent an aggregate invested amount of EUR 94 077 332.

Furthermore, Estonia has provided the SmartCap Green Fund investment policy document (IPS), which has been assessed under milestone 39a and defines the management costs for the Green Fund. According to Article 3.2.1. of the investment policy document, the Fund Manager SmartCap reserves EUR 10 million of the investment into the Facility for fees and direct costs related to managing the Green Fund. The reserved management costs of EUR 10 million and signed legal financing agreements in the amount of EUR 94 077 332 add up to the total of 100% of the investment into the Facility. Finally, Estonia has provided evidence that EUR 3.2 million of the reserved management costs has been used until August 2026 (Evidence 35).

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled**.**

Number and name of the Target: EE-C[C]-R[3-2-.3-2-]-T[48], Online personal life event services

Related Measure: EE-C[C]-R[3-2-.3-2-]: Development of event services for individuals

Quantitative Indicator: Number of services online

Baseline: 2

Target: 10

Time: Q4 2025

1. Context:

The objective of the measure is to support the efficiency of the delivery of public services and reduce the administrative burden for citizens. The measure involves providing life event services for citizens online.

Target 48 relates to the number of citizen life event services online, providing at least the basic parts of a given service.

Target 48 is the second and last target of the reform, and it follows the completion of target 47, related to the launch of two citizens life event services and/or proactive services online.

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	Screenshots and link to State portal homepage	Screenshots of the eesti.ee State Portal homepage showing the life-event services. This website provides an overview of all Estonian life events that are available online. https://www.eesti.ee/eraisik/en/avaleht
3	Service Description of **Death of a loved one**	Explanatory document drafted by the Ministry of Justice and Digital Affairs explaining the goal of the service, developments and justification for the life event service "Death of a loved one". Launch of the service: 7 December 2023.
4	Screenshots and link to the service: **Death of a loved one**	Screenshots of steps and overview of the service in state portal eesti.ee: https://www.eesti.ee/syndmusteenused/en/death-of-a-loved-one
5	Service Description of **Settling in Estonia**	Explanatory document drafted by the Ministry of Justice and Digital Affairs explaining the goal of the service, developments and justification for "Settling in Estonia" . Launch of the service: 12 December 2023.

6	Screenshots and link to the service: **Settling in Estonia**	Screenshots of steps and overview of the service in state portal eesti.ee. https://www.eesti.ee/syndmusteenused/en/settling-in-estonia
7	Service Description of **National Defence obligation**	Explanatory document drafted by the Ministry of Justice and Digital Affairs explaining the goal of the service, developments and justification for the life event service "National defence obligation". Launch of the service: 29 November 2023.
8	Screenshots and link to the service: **National defence obligation**	Screenshots of steps and overview of the service in state portal eesti.ee. https://www.eesti.ee/syndmusteenused/en/national-defence-obligation
9	Service Description of **Divorce**	Explanatory document drafted by the Ministry of Justice and Digital Affairs explaining the goal of the service, developments and justification for the life event service "Divorce". Launch of the service: 1 December 2024.
10	Screenshots and link to the service: **Divorce**	Screenshots of the steps of submitting the online application on population register and screenshots of steps and overview of the service in state portal eesti.ee. Population Register website where the getting divorced application can be submitted: https://www.rahvastikuregister.ee/family/divorce-registration https://www.eesti.ee/syndmusteenused/en/divorce
11	Service Description of **My Pension**	Explanatory document drafted by the Ministry of Justice and Digital Affairs explaining the goal of the service, developments and justification for the life event service "My Pension". Launch of the service: 27 November 2024.
12	Screenshots and link to the service: **My Pension**	Screenshots of steps and overview of the service in state portal eesti.ee. https://www.eesti.ee/syndmusteenused/en/my-pension
13	Service Description of **Child with health problem**	Explanatory document drafted by the Ministry of Justice and Digital Affairs explaining the goal of the service, developments and justification for the life event service "Child with health problem". Launch of the service: 11 December 2024.
14	Screenshots and link to the service: **Child with health problem**	Screenshots of steps and overview of the service in state portal eesti.ee https://www.eesti.ee/syndmusteenused/en/supporting-a-child-who-requires-permanent-support-due-to-their-medical-condition
15	Service Description of **Becoming a volunteer**	Explanatory document drafted by the Ministry of Justice and Digital Affairs explaining the goal of the service, developments and justification for the life event service "Becoming a volunteer". Launch of the service: 30 September 2025.
16	Screenshots and link to the service: **Becoming a volunteer**	Screenshots of steps and overview of the service in state portal eesti.ee. https://www.eesti.ee/syndmusteenused/en/becoming-an-internal-security-volunteer

17	Service Description of **Name change**	Explanatory document drafted by the Ministry of Justice and Digital Affairs explaining the goal of the service, developments and justification for the life event service “Name change”. Launch of the service: 11 December 2025.
18	Screenshots and link to the service: **Name change**	Screenshots of the steps of submitting the online application on population register and screenshots of steps and overview of the service in state portal eesti.ee. Population Register website where the name change application can be submitted: https://www.rahvastikuregister.ee/name/name-change https://www.eesti.ee/syndmusteenused/en/name-change
19	Summary of life event service vision and action plan 2030	The report, commissioned by the Ministry of Justice and Digital Affairs and prepared by consultancy Trinidad Wiseman and dated 23 January 2025, draws on the analysis and planning carried out in late 2024 and early 2025 to set out Estonia's vision and strategy for 'life-event services' through 2030, including reporting eight services live.
19	Summary of life event service vision and action plan 2030	The report, commissioned by the Ministry of Justice and Digital Affairs and prepared by consultancy Trinidad Wiseman and dated 23 January 2025, draws on the analysis and planning carried out in late 2024 and early 2025 to set out Estonia's vision and strategy for 'life-event services' through 2030, including reporting eight services live.

3. Analysis:

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

Number of citizen life event services online, providing at least the basic parts of a given service.

The State portal homepage is the Estonian government's official online portal for life events (evidence 2). The homepage centralizes Estonia's life-event services, bringing together the related information and online services citizens need into a single, easily accessible overview. All life-event services are provided by the State and are organized around key moments in a person's life designed to support citizens at exactly those moments.

Estonia provided evidence on eight online citizen life event services, which have been added to the baseline of two ('getting married' (enabling digital marriage registration) and 'having a baby' (streamlining newborn registration, parental leave, and family benefits into one process)), reaching the target of 10.

Evidence 3–18 provides an overview of each of the eight online citizen life event services. Each overview describes the digital online solution, includes screenshots, and provides links to access the life-event service. The eight services cover the following citizen life events:

Service name	Main aim online life-event service	Brief impact on Estonia

1	Death of a loved one (Evidence 3-4)	It organises bereavement-related administrative steps and legal notifications for citizens, simplifying notifications to authorities, inheritance-related procedures, and access to bereavement support.	Expands digital support during difficult life transitions, reducing administrative stress for families.
2	Settling in Estonia (Evidence 5-6)	It helps newcomers settle in Estonia by guiding them through the main administrative steps of establishing residence, including residence registration, access to local services, and key integration arrangements.	Enhances accessibility for migrants and foreign residents, supporting smoother relocation and inclusion.
3	National defence obligation (Evidence 7-8)	It handles defence-related administrative duties related to compulsory military service online, such as matters linked to conscription and reserve obligations.	Improves efficiency in fulfilling national service requirements and clarifies obligations for citizens.
4	Divorce (Evidence 9-10)	It allows couples to initiate and manage divorce proceedings through a unified digital process.	Broadens online coverage of major life events, making legal transitions more user-friendly.
5	My Pension (Evidence 11-12)	It enables citizens to view pension entitlements, apply for benefits, and manage retirement planning.	Strengthens digital access to social security services, supporting long-term financial planning for residents.
6	Child with a health problem (Evidence 13-14)	It connects families to health services, special-needs support, and reimbursements in one place.	Improves coordination between health and social services, easing access for vulnerable families.
7	Becoming a volunteer (Evidence 15-16)	It facilitates registration, training, and matching for volunteer opportunities across sectors.	Encourages civic engagement by lowering barriers to volunteering through digital tools.
8	Name change (Evidence 17-18)	It allows citizens to update legal names across registers through a single online application.	Simplifies a cross-agency administrative process, reducing duplication and processing time.

The Commission conducted an on-the-spot check on 28 April 2026 to verify that Estonia's eight newly developed citizen life event services complied with the requirement of providing at least the basic parts of each service online. During the virtual check, the Estonian authorities demonstrated eight life events online using mock e-IDs, namely: Death of a loved one, Settling in Estonia, National defence obligation, Divorce, My pension, Child with a health problem, Becoming a volunteer, and Name change. This check was completed successfully, confirming that these services were accessible to citizens and fully completable end-to-end without the need for in-person interaction with public administration.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[C]-I[3-4-.3-4-]-T[52], Bürokratt virtual assistant on public authorities' websites

Related Measure: EE-C[C]-I[3-4-.3-4-]: #Bürokratt programme (national virtual assistant)

Quantitative Indicator: Number of websites

Baseline: 0

Target: 18

Time: Q4 2025

1. Context:

The objective of the measure is to support the user-friendliness and accessibility of public services in Estonia. The measure consists of developing a virtual assistant for the access to online public services which builds on pilot projects carried out in 2020 and 2021.

Target 52 consists of 18 public authority websites in which the virtual assistant provides.

Target 52 is the second and last target of the investment, and it follows the completion of target 51, related to one digital public service made available through the platform of virtual assistant.

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 including links to 19 websites where the virtual assistant provides services.
2	Link to the Estonia's electronic ID solution (id.ee) website https://www.id.ee/	https://www.id.ee/
3	Link to the state portal (eesti.ee)	https://www.eesti.ee/eraisik/et/avaleht
4	Link to the *Lawyer helps* (a state-supported legal counselling) website	https://www.juristaitab.ee/
5	Link to the Police and Border Guard Board (PPA) website	https://www.politsei.ee/
6	Link to the Health Insurance Fund's (Tervisekassa) website	https://tervisekassa.ee/

7	Link to the Estonian Tax and Customs Board's (EMTA) website	https://www.emta.ee
8	Link to the at the Agricultural and Food Board's (PTA) website	https://pta.agri.ee/
9	Link to the Estonian Environment Agency's (keskkonnaagentuur) website	https://www.keskkonnaagentuur.ee/
10	Link to the National Library of Estonia's (RARA) website	https://www.rara.ee/
11	Link to the Environmental board's website	https://www.keskkonnaamet.ee/
12	Link to the Data Protection Inspectorate's (AKI) website	https://www.aki.ee/
13	Link to the Information System Authority's (RIA) website	https://www.ria.ee/
14	Link to Rae Municipality's website	https://www.rae.ee/
15	Link to the *Be IT-Conscious* website	https://www.itvaatlik.ee/
16	Link to the Digital State Academy's (a central e-learning platform) website	https://digiriigiakadeemia.ee/
17	Link to the *Education Estonia* website	https://www.educationestonia.org/
18	Link to the Ministry of Justice and Digital Affairs (JUSTDIGI) website	https://www.justdigi.ee/
19	Link to the *State Cloud*'s (a state-managed cloud environment) website	https://www.riigipilv.ee/
20	Link to the *Bureaucrat portal* (kratid) website	https://www.kratid.ee/

3. Analysis:

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

Number (18) of public authority websites in which the virtual assistant provides services

The Estonian authorities had provided links to 19 websites (evidence 2 to 20) of public authorities where the virtual assistant provides services:

Web-site num-ber	Evidence	Name of the public authority operating the website	Website description	Services the virtual assistant provides at the website
i	2	Information System Authority (RIA)	Estonia's electronic ID's website	Virtual assistant answers questions about using ID-card, Mobile-ID, and Smart-ID, including instructions on how to set them up, troubleshoot them, and use them. The virtual assistant also provides information on how to use DigiDoc4 software and guides the user on how to resolve ID-card or certificate-related errors.
ii	3	Information System Authority (RIA)	Estonia's state portal's website	Virtual assistant answers questions related the state portal on various topics, including access to e-services offered by the state and local governments (checking the validity of prescriptions, sick leaves, business-related notifications and services), notifications and reminders (notifications about document expiration, voter cards, military service, fines and other topics), data tracker service (overview of which state agencies have used your data), areas of activity with special requirements (information on applying for activity permits and licenses in areas of activity with special requirements).
iii	4	Ministry of Justice and Digital Affairs	*Lawyer helps,* a state-supported legal counselling website	Virtual assistant provides initial legal counselling and answers questions about Estonian laws.
iv	5	Police and Border Guard Board (PPA)	Police and Border Guard Board (PPA) website	Virtual assistant answers questions about the services provided by the PPA, including how to fill a police report, how to apply for documents and how to pay fines.
v	6	Health Insurance Fund	Health Insurance Fund website	Virtual assistant answers questions about healthcare services for insured people in Estonia, including which medical services are covered by the Fund.
vi	7	Estonian Tax and Customs Board (EMTA)	Estonian Tax and Customs Board (EMTA) website	Virtual assistant answers questions related to taxation and submission of tax returns.

vii	8	Agriculture and Food Board (PTA)	Agricultural and Food Board's (PTA) website	Virtual assistant answers questions related to food safety, organic farming, seed certification, animal health and welfare, and other related topics.
viii	9	Estonian Environment Agency	Estonian Environment Agency's website	Virtual assistant answers questions about weather data, environmental monitoring, Estonian Nature Information System (EELIS) data, and other related topics.
ix	10	National Library of Estonia (RARA)	National Library of Estonia's (RARA) website	Virtual assistant answers questions about the library and its services and helps users search for literature, facts, texts, and photographs, specify references to information sources, and find printed works.
x	11	Environmental board	Environmental board's website	Virtual assistant answers questions about the use of the environment, nature conservation and radiation safety.
xi	12	Data Protection Inspectorate (AKI)	Data Protection Inspectorate's (AKI) website	Virtual assistant answers questions about protection of personal data and ensuring compliance with data protection laws in Estonia.
xii	13	Information System Authority (RIA)	Information System Authority's (RIA) website	Virtual assistant answers questions about the services related to the development, management, and security of Estonia's state IT systems.
xiii	14	Rae Municipality	the Rae Municipality's website	Virtual assistant answers questions related to the rural municipality's services, events and governance.
xiv	15	Information System Authority (RIA)	*Be IT-Conscious* website	Virtual assistant answers questions about cybersecurity and fraud schemes.
xv	16	The Digital State Academy	Digital State Academy's website answers	Virtual assistant answers questions about the learning platform for the public sector itself and about the free courses being offered.
xvi	17	Estonian Education and Youth Board (HARNO)	*Education Estonia* website	Virtual assistant answers questions related (solely in English) about the degree and other study opportunities in Estonia.
xvii	18	Ministry of Justice and Digital Affairs	Ministry of Justice and Digital Affairs (JUSTDIGI) website	Virtual assistant answers questions about courts (including E-File & Online Courts), notaries, bailiffs, certified translators and about registries (including the Land Registry, Business Registry, and the official State Gazette (Riigi Teataja)).
xviii	19	Information and Communication	*State Cloud*'s website	Virtual assistant answers questions about the central IT infrastructure solutions and

		Technology Centre (RIT)		services to the public sector that State Cloud provides.
xix	20	Ministry of Justice and Digital Affairs	Bürokratt virtual assistants' website	Virtual assistant answers questions about Estonia's national data and AI strategy, public sector AI solutions, and governance of data and AI in Estonia.

The Commission services accessed all 19 links provided by the authorities on 30 July 2026 to verify that each website accurately reflected the information provided by the Estonian authorities. To do so, the Commission services engaged the Bürokratt virtual assistant on each of the 19 websites in a conversation on a topic related to the relevant public authority and its website. The check was completed successfully, confirming that the Bürokratt virtual assistant provides services on all 19 public authority websites.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: EE-C[C]-I[3-7-.3-7-]-M[60], ICT system for strategic analysis

Related Measure: EE-C[C]-I[3-7-.3-7-]: Information system for strategic analysis of money laundering and terrorist financing

Qualitative Indicator: The ICT system for strategic analysis of money laundering shall be available for use by the Financial Intelligence Unit.

Time: Q2 2026

1. Context:

The objective of the measure is to enable the exploitation of data available from different authorities and the identification of possible money laundering schemes and channels. The measure consists of developing an IT system for strategic analysis of money laundering, which shall be available for use by the Financial Intelligence Unit.

Milestone 60 relates to the availability ICT system for strategic analysis.

Milestone 60 is the only milestone of this investment.

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	Money Laundering and Terrorist Financing Prevention Act, published in the State Gazette RT I, 11.07.2026, 93	The Act sets out, amongst others, the tasks of the Financial Intelligence Unit. https://www.riigiteataja.ee/et/akt/111072026093
3	Regulation 39 of the Minister of Finance adopted on 6 November 2020, published in the State Gazette RT I, 10.11.2020, 16	Statutes of the Financial Intelligence Unit creates Centre for Strategic Analysis (SAO) and defines its tasks https://www.riigiteataja.ee/akt/110112020016
4	Minutes of the Board Members of the FIU meeting of 13 June 2022	Minutes of the Board Members of the FIU meeting of 13 June 2022
5	Service contract for the provision of ICT services by the Information Technology Centre of the Ministry of Finance (RmIT) to the Financial Intelligence Unit (FIU),	Service contract for the provision of ICT services by the RmIT to the FIU. This contract was used to commission the RmIT to develop parts of the ICT system for strategic analysis of money laundering and terrorist financing.

	signed on 6 July 2022 by the Deputy Director of the RmIT acting as a Director and on 7 July 2022 by the Head of the FIU.	
6	Annex 1 to the service contract for the provision of ICT services by the Information Technology Centre of the Ministry of Finance (RmIT) to the Financial Intelligence Unit (FIU)	Annex 1 to the service contract for the provision of ICT services by the RmIT to the FIU contains definitions of the terms used by the parties.
7	Summary of completed works signed on 7 August 2026 by the Director of the Information Technology Centre of the Ministry of Finance (RmIT) and on 10 August by the Head of the Financial Intelligence Unit (FIU).	Summary of completed works confirming the completion of the development tasks related to the data warehouse, which constitutes the main component of the information system, signed digitally by the Director of the Information Technology Centre of the Ministry of Finance (RmIT) acting as a Director and by the Head of the Financial Intelligence Unit (FIU).
8	A report sent from Financial Intelligence Unit (FIU) to the Ministry of Finance on 25 March 2026	A report sent from Financial Intelligence Unit (FIU) to the Ministry of Finance on 25 March 2026, titled "the objectives of the Financial Intelligence Unit (FIU) in 2026 and results of the FIU in 2025"

3. Analysis:

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

The ICT system for strategic analysis of money laundering shall be available for use by the Financial Intelligence Unit. Moreover, in line with the measure description, **the IT system shall be developed**.

Pursuant to section 54(1) of the Money Laundering and Terrorist Financing Prevention Act (evidence 2), the FIU's principal tasks are the prevention of money laundering and terrorist financing, as well as related strategic analysis, which is mentioned in point 2 of the Section 54(1). The Strategic Analysis Function was established on 6 November 2020 with the adoption of the statute of the FIU ('Rahapesu Andmebüroo põhimäärus') by Regulation 39 of the Minister of Finance (evidence 3), with paragraph 10 establishing the Centre for Strategic Analysis (SAO) as a separate structural unit of the FIU and paragraph 13 defining the tasks of the SAO as the "conduct research and analysis on the risks, threats, trends, patterns and methods of operation of money laundering and terrorist financing."

As the key components of the ICT system, the management dashboards were developed in-house at the Financial Intelligence Unit (FIU) and the data warehouse was developed by the Information Technology

Centre of the Ministry of Finance (RmIT), at the request of the FIU. The minutes of the 13 June 2022 FIU Board Members meeting (evidence 4) provide an overview of the basic principles, components and relationship of the Strategic Analysis Function system (SAF) to the existing RABIS (the official database and electronic information system of FIU). The FIU Board Members stated that "all data should be loaded into a data warehouse and the data warehouse should query third party databases" (evidence 4, point 2.1. (ii) on page 2). The purpose of the SAF is to support FIU analysts in their conduct of the strategic analysis of money laundering.

The development undertaken by the RmIT took place under the general service contract for the provision of ICT services by the RmIT to the Financial Intelligence Unit (FIU), signed on 6 July 2022 by the Deputy Director of the RmIT acting as a Director and on 7 July 2022 by the Head of the FIU (hereinafter referred to as "service contract", evidence 5). The service contract specifies that the services shall include the development of IT services (point 4), which is a combination of people, processes, hardware and software (Annex 1, evidence 6). A summary of completed works (evidence 7) was signed on 7 August 2026 by the Director of the RmIT and on 10 August 2026 by the Head of the Financial Intelligence Unit (FIU)), confirming that a data warehouse with a solution for loading external data has been developed under the contract.

The development of the management dashboards is confirmed in a report on the objectives of the FIU, sent by the FIU to the Ministry of Finance on 25 March 2026. The result for SAF in 2025 is reported as "dashboards have been developed and are in active use" (evidence 8, page 2).

The Commission services conducted a physical on-the-spot check on 17 August 2026 to verify that the SAF ICT system is operational and available for use by the Financial Intelligence Unit. During the checks, conducted with the login credentials of an RmIT staff member, the Estonian authorities showed the user log of the system which confirmed that multiple users, who are staff of the FIU, are using the system. These checks confirmed that the system is available for use by the FIU. During the on-the-spot checks, the Estonian authorities also showed that a FIU analyst can conduct a strategic analysis of money laundering using the ICT system. The authorities conducted a demonstration of the system and showed the Commission services the administrators' view of data marts (focused subsets of a larger data repository) in the data warehouse and dashboard functionalities which allow to conduct strategic analysis of money laundering. The Estonian authorities demonstrated dashboard functionalities by visualising on screen the data from the data warehouse developed under the measure and by carrying out a mock strategic analysis, confirming that a FIU analyst can conduct a strategic analysis of money laundering using the ICT system.

On this basis, the Commission has reasonable assurance that this milestone has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[C]-I[3-8-.3-8-]-T[62], Number of very high-capacity broadband network projects confirmed

Related Measure: EE-C[C]-I[3-8-.3-8-]: Construction of very high-capacity broadband networks

Quantitative Indicator: Number of projects

Baseline: 0

Target: 100

Time: Q4 2025

1. Context:

The objective of the investment is to support the access to very high-capacity broadband networks (VHCN), which offer a connection of at least 100 Mbps. The measure consists of the construction of very high-capacity broadband networks.

Target 62 relates to the confirmation by the Consumer Protection and Technical Regulatory Authority (TTJA) that 100 very high-capacity broadband network projects (of at least 100 Mbps) have been completed, in accordance with the ministerial Regulation that defines VHCN.

Target 62 is the only target of the investment related to very high-capacity broadband networks.

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	Ministerial regulation No. 35 adopted on 3 May 2022 that defines very high-capacity broadband networks. The regulation is published on Riigi Teataja (Estonian's official publication for legislation and other state documents)	Regulation no. 35 "Conditions and procedure for the support measure for the establishment of a very high-capacity electronic communications access network" is published by the Minister of Entrepreneurship and Information Technology, (https://www.riigiteataja.ee/akt/106052022011 (adopted 3 May 2022); https://www.riigiteataja.ee/akt/108012026001 (consolidated version, 6 January 2026)). The Regulation is established on the basis of subsection 8 (4) of the Foreign Relations Act and subsection 8 (1) of Regulation No. 108 of the Government of the Republic of 29 November 2021 "Organisation of the Implementation of the Recovery and Resilience Plan and General Conditions for the Provision of Support".
3	TTJA confirmation letter	The letter by the Consumer Protection and Technical Regulatory Authority (TTJA) states that TTJA confirms that the projects reviewed by experts comply with the requirements of the

		Regulation. The letter is from TTJA addressed to the RTK (Shared Service Centre (RTK) of the Ministry of Finance).
4	Signature printout of the confirmation letter	Printout of the digital signature of the confirmation letter. Signed on 25 May 2026.
5	TTJA confirmation file of conducted inspections	List of the inspections conducted on the projects by TTJA. The file shows the projects inspected, when each project was submitted for review and approval, and when the TTJA control results were forwarded to RTK. The inspections assessed whether the projects comply with Regulation No. 35.
6	Signature printout TTJA confirmation file of conducted inspections	Printout of the digital signature dated 4 June 2026. This printout signature signs the TTJA confirmation file of the conducted inspections. Furthermore, it links the confirmation file to the TTJA letter confirming that the projects reviewed by experts comply with the requirements of the Regulation, by attaching the letter's signed printout (Evidence 4).

3. Analysis:

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

Number of projects confirmed by the Consumer Protection and Technical Regulatory Authority (TTJA) to be respecting the requirements of the ministerial Regulation on the conditions and procedure for the support measure for the construction of a VHCN.

The ministerial Regulation shall define the VHCN using the end users' download speed of at least 100 Mbps. Furthermore, in line with the description of the measure, **the investment consists of the construction of very high-capacity broadband networks.**

The broadband support measure was implemented by the State Support Services Centre of the Ministry of Finance (RTK) over the period 2022–2026, on the basis of Regulation No. 35 of the Minister of Entrepreneurship and Information Technology of 3 May 2022, 'Conditions and procedure for the support measure for the establishment of a very high-capacity electronic communications access network' (Evidence 2).

Under Regulation No. 35, the Consumer Protection and Technical Regulatory Authority (TTJA) was tasked with the approval of applicants and applications, in the verification of documentation for completed broadband infrastructure construction, and with carrying on-site inspections. The confirmation letter from the TTJA to RTK (Evidence 3), signed on 25 May 2026 (Evidence 4), confirms that the projects inspected by TTJA experts comply with the requirements of the Regulation. The confirmation letter also confirmed that the very high-capacity broadband networks were constructed**.** This confirmation is based on the verification of documentation for completed broadband infrastructure in accordance with Section 24 of the Regulation, and on-site inspections in accordance with Section 25 of the Regulation, both of which confirm that the network's technical parameters comply with the conditions laid down in Section 9 of the Regulation No. 35 and, by extension, the VHCN definition in Section 4.

According to Section 4 of Regulation No. 35, a network qualifies as delivering a very high-speed broadband service where it can provide end-users with a download speed of at least 1 Gigabit per second, well above the 100 Mbps threshold set out in the target. For each project reviewed, TTJA experts confirmed that the network established through the support measure meets this requirement.

The authorities also provided a list of the 112 projects inspected by TTJA (Evidence 5). Among other details, the list states the project number, project name, the date the project was submitted for review and approval, and the date on which the results of the TTJA's inspection were forwarded to RTK. Evidence 6, a digital signature dated 4 June 2026, authenticates the list and it establishes the link between the list and the TTJA confirmation letter, by including the ASiCE (2) of Evidence 4. Together, these confirm the inspection and completion of the projects.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

2 ASiCE stands for Associated Signature Containers Extended. It is a standardized digital signature format used to bundle files and their digital signatures securely.

Number and name of the Target: EE-C[D]-I[4-2-.4-2-]-T[66], Multi-apartment buildings with improved energy performance

Related Measure: EE-C[D]-I[4-2-.4-2-]: Support for the renovation of multi-apartment buildings

Quantitative Indicator: Number of multi-apartment buildings

Baseline: 0

Target: 80

Time: Q2 2026

1. Context:

The objective of the measure is to boost renovations of multi-apartment buildings in order to increase energy efficiency. The measure consists of support for energy efficiency renovations of multi-apartment buildings.

Target 66 requires that the renovations of at least 80 multi-apartment buildings shall result in an average level of primary energy savings of at least 30%. The results shall be certified by ex-ante and ex post (calculated) Energy Performance Certificates of the building.

Target 66 is the second and last target of the investment, and it follows the completion of milestone 65, related to the publication of calls for applications for residential apartment buildings renovation grants.

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	List of completed renovation projects for multi-apartment buildings	List of 80 multi-apartment buildings, with unique identifier (project code) for each apartment building, address, data on energy consumption in the ex-ante and ex post (calculated) Energy Performance Certificates (EPCs), calculated primary energy consumption and achieved primary energy savings.
3	Energy Performance Certificates (EPC) for each building issued by certified experts through the Building Registry	For each project, ex-ante and ex-post (calculated) Energy Performance Certificates.
4	Final reports submitted by the beneficiaries	Final reports submitted by the beneficiaries in the Estonian SFOS IT system confirming the completion of the renovation works.
5	Methodology for calculation of primary energy savings based on data on EPCs	Calculation methodology for CO_2 emissions and primary energy use in multi-dwelling buildings (similar to the agreed FNLC schemes in Structural Funds).

6	The Regulation No 81 of 20.12.2021 of the Minister of Economy and Infrastructure "Support for reconstruction of multi-apartment buildings" (published in the State Gazette RT I, 23.12.2021, 31), entry into force 26.12.2021)	The Regulation No 81 of the Minister of Economy and Infrastructure "Support for reconstruction of multi-apartment buildings" setting out scope of support, conditions for application, implementation and payment of support for small residential buildings.
7	Extracts from the SFOS IT system showing that payment has taken place	Extracts from the SFOS IT system showing that payment has been made for each project.

3. Analysis:

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

The renovations of at least 80 multi-apartment buildings shall result in an average level of primary energy savings of at least 30%. The results shall be certified by ex-ante and ex post (calculated) Energy Performance Certificates of the building.

The Estonian authorities submitted a list of 80 renovated multi-apartment buildings (Evidence 2), which includes for each building: the project code in the Structural Funds Operational System (SFOS), address of the building, data on energy consumption (heat and electricity) in the ex-ante and ex-post (calculated) Energy Performance Certificates (EPCs), calculated primary energy consumption andprimary energy savings.

The Regulation No 81 of the Minister of Economy and Infrastructure "Support for reconstruction of multi-apartment buildings" (RT I, 23.12.2021, 31) (evidence 6) sets the conditions for payment of support. §28(2) stipulates that the support will be paid out on the basis of real costs, based on supporting documentation such as copies of invoices; payment order, account statement, work handover-acceptance certificate etc. §28(2) stipulates that the EIS – Estonian Business and Innovation Agency - has to verify that the expenditure corresponds to the incurred expenditure. Therefore, payment is only made once the project has been implemented and checks have been conducted.

For each of the 80 multi-apartment renovation projects, Estonia submitted:

- The final project report prepared and signed by the beneficiary and submitted in the Estonian SFOS IT system which confirm that the project concerned energy efficiency renovation (evidence 4). All project reports were signed before 31 August 2026.

- An extract from the SFOS IT system confirming that payment took place as verified through the "paid" status in the system ("Makstud" in Estonian), confirming that the renovations were completed (evidence 7) before 31 August.

- The ex-ante Energy Performance Certificate (EPC) indicating the energy performance of the building before the renovations and the ex-post (calculated) EPC demonstrating the energy performance of the building and energy class post renovations (evidence 3). The EPC indicates the address for the building and the category of the building. For each of the units, the "Intended use of the building" ("Hoone kasutamise otstarve") included the category *11222 "Building with 3 or more apartments",* therefore confirming that the renovated buildings are multi-apartment buildings. The primary energy savings achieved by the reported projects have been calculated on the basis of the ex-ante and ex-post (calculated) EPC according to an agreed methodology used for the Financing not linked to costs (FNLC) schemes in the Cohesion Policy (evidence 5). The Commission services verified that the numbers for heat and electricity taken into account in the calculations of primary energy savings in evidence 2 correspond to the data on the ex-ante and ex-post (calculated) EPCs provided for each project.

- Based on these calculations per each individual project, the total annual primary energy savings across all reported projects amounts to 12 858 MWh, which constitutes an average saving of 35%, above the minimum requirement of 30%.

Furthermore, in line with the measure description, the measure **consists of support for energy efficiency renovations of multi-apartment buildings.**

The Commission services conducted an on-the-spot check on 6 October 2026 to verify that the final reports and extracts confirming payment from the Structural Funds Monitoring and Information System (SFOS) are an accurate representation of the information stored in the system. SFOS is the system through which the application and grant process is conducted. Final reports signed by the beneficiary confirming the works have been done are stored in the system. In addition, the "paid" status can be checked in the SFOS system, confirming that the project was implemented and checks carried out by the EIS – Estonian Business and Innovation Agency, in line with Regulation No 81 of the Minister of Economy and Infrastructure "Support for reconstruction of multi-apartment buildings" (RT I, 23.12.2021, 31) (evidence 6).

This check was conducted successfully confirming that final reports are stored in the system and that the extracts from the SFOS system showing the "paid" status were extracted from the SFOS system for all units, therefore confirming that the projects for energy efficiency renovations were completed and support paid. With the on-the-spot check, there is assurance that all the activities were completed before the 31 of August.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[D]-I[4-3-.4-3-]-T[69a], Small residential buildings with improved energy performance

Related Measure: EE-C[D]-I[4-3-.4-3-]: Support for the renovation of small residential buildings

Quantitative Indicator: Number of small residential buildings

Baseline: 0

Target: 900

Time: Q1 2026

1. Context:

The objective of the measure is to boost renovations of small residential buildings in order to increase energy efficiency. The measure consists of support for energy efficiency renovations of small residential buildings.

Target 69a requires that at least 900 small residential buildings shall be renovated and achieve an increase in energy efficiency or, in the case of complete renovations, at least the energy efficiency class C. The results shall be certified by ex-ante and ex-post (calculated) Energy Performance Certificates of the building or by ex-ante and ex-post KredEx Energy Performance calculations.

Target 69a is the second and last target of the investment, and it follows the completion of milestone 68, related to publication of calls for applications for residential apartment buildings renovation grants.

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	List of complete renovations	List of small residential buildings with complete renovations, along with unique identifiers (project number and building registry code), Energy Performance Certificate (EPC) label before renovations, EPC label calculated after renovations and scope of reconstruction.
3	List of partial renovations	List of small residential buildings with partial renovations, along with unique identifiers (project number and building register code), EPC label before renovations, electricity and/or total energy consumption before renovation, energy savings MWh/a and in percentage, scope of reconstruction.
4	Calculations of energy efficiency for partial renovations	Energy saving calculations for small residential buildings.
5	Certified expert credentials	Occupational Qualification Certificate No 190290 issued for the certified expert.

6	Methodology for calculation of energy efficiency	Methodology used as for the calculations by the certified expert.
7	Regulation No 5 of the Minister of Climate "Support for the reconstruction of small residential houses 2024-2025" of 3 April 2024 published in the State Gazette (RT I, 05.04.2024 8) in force since 08.04.2024. https://www.riigiteataja.ee/akt/105042024008?leiaKehtiv	Regulation of the Minister of Climate (published in the State Gazette RT I, 05.04.2024 8) setting out scope of support, conditions for application, implementation and payment of support for small residential buildings. The act is available at https://www.riigiteataja.ee/akt/105042024008?leiaKehtiv
8	Energy Performance Certificates	For a random sample of 60 units, ex-ante EPCs (for all units) and ex-post (calculated) EPCs (for units related to complete renovations).
9	Final reports of the projects	For a random sample of 60 units, final implementation reports submitted and signed by the beneficiaries in the SFOS IT system.
10	Building Code of 11 February 2024 published in State Gazette (RT I, 05.03.2015, 1) in force since 01.07.2015	Building Code RT I, 05.03.2015,1 stipulates the legal and technical rules for the buildings and built environment. The act is available at https://www.riigiteataja.ee/et/akt/111072026033?leiaKehtiv

3. Analysis:

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

At least 900 small residential buildings shall be renovated and achieve an increase in energy efficiency or, in the case of complete renovations, at least the energy efficiency class C. The results shall be certified by ex-ante and ex-post (calculated) Energy Performance Certificates of the building or by ex-ante and ex-post KredEx Energy Performance calculations.

The Estonian authorities submitted lists of 998 renovated small residential buildings. 311 of these are complete renovations (Evidence 2), and 687 are partial renovations projects (Evidence 3). The lists include, for each building, the project code from the Structural Funds Monitoring and Information System (SFOS) database, the Building Registry code for the building which identifies the building which was renovated, ex-ante Energy Performance Certificate (EPC) labels, scope of renovation. For partial renovations, the list also includes information on the energy consumption before the renovation, information on the energy savings in MWh/a and in percentage after renovation; and for complete renovations, the energy efficiency class after renovation. Each of the fully renovated buildings have achieved an energy efficiency class C after the renovation.

Estonia also provided the description of the methodology used to calculate the energy savings for ex post (calculated) EPCs for partial renovations (evidence 6) and the calculations from the expert applying this methodology for each partially renovated building (evidence 4) on 31 August 2026. The Occupational Qualification Certificate No 190290 issued through the Estonian Qualifications Authority provided for the expert (evidence 5) confirms that the expert has been awarded with the qualification of Chartered Energy Efficiency Specialist, EstQF Level 8. The Commission services verified the authenticity of the certificate on the public Registry of the Estonian Qualifications Authority, an authorised body for keeping the Register for all valid occupational qualifications.

Following the selection of a random sample of 60 units, Estonia submitted final project reports submitted and signed in the SFOS IT system to demonstrate that renovations took place and were completed (evidence 9), ex-ante EPCs indicating the energy performance of the building before the renovations for all units (evidence 8), and ex-post EPCs (for complete renovations) demonstrating the energy performance of the building and energy class post renovations (evidence 8) or energy performance calculations certified by an expert demonstrating the energy performance of the building post renovations for partial renovations (evidence 4). The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met.

The Energy Performance Certificates (EPC) indicates the building registry code for the building. For each of the 60 units, the "Intended use of the building" (“Hoone kasutamise otstarve”) was for Building Registry code “11101 - Individual building” (*üksikelamu*), or code “11212 - Building with two apartments” (*Kahe korteriga elamu*) or code “11221 – Terraced house” (*Ridaelamu*), therefore confirming that the renovated buildings are small residential buildings.

For all units of the sample, the final project report extracted from the SFOS IT system confirms that the works consisted of renovations and that the project was completed before 31 August 2026 as confirmed by the date of the final report signature in the system.

For all units of the sample related to complete renovations, the energy performance labels in the ex-ante EPC and in the ex-post EPC for the building correspond to the energy performance information reported by Estonia in evidence 2. For all fully renovated units of the sample, the ex-post EPC confirms that the building has achieved at least an energy class C.

For all units of the sample related to partial renovations, the ex-ante EPC data on “Electricity consumption - baseline, MWh/a” for projects including photovoltaic panels only and “Total energy consumption-baseline" for other partial renovations stated in evidence 3 corresponds to the energy consumption baseline used by the certified expert to calculate the ex-post EPC (evidence 4). The installation of photovoltaic panels is considered a partial renovation under § 4(3) of the Building Code (RT I, 05.03.2015,1) (Evidence 10). For all units of the sample related to partial renovations, the energy performance calculations (evidence 4) confirm that there was an increase in the energy efficiency of the building. The Council Implementing Decision required the results to be certified either by ex-ante and ex-post (calculated) Energy Performance Certificates of the building or by ex-ante and ex-post KredEx Energy Performance calculations. For complete renovations, Estonia provided ex ante and ex post EPCs. For partial renovations, Estonia provided ex-ante EPCs and ex-post Kredex expert calculations. Whilst this

constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, this deviation is acceptable as the ex-ante EPCs constitute a valid basis for indicating the energy performance of the building and the information from the ex ante EPC was then used by the Kredex expert as a baseline for the ex post calculations. As of this, 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.

Furthermore, in line with the description of the measure, **the measure consists of support for energy efficiency renovations of small residential buildings.**

§20(4) and (5) of the Regulation of the Minister of Climate No 25 (RT I, 05.04.2024, 8) on „*Conditions for Support for renovation of small residential buildings*" (evidence 7) stipulates that all beneficiaries had to submit supporting documents proving that costs have been incurred or activities have been carried out, e.g invoices, delivery and acceptance acts, or other documents. §20(8) sets that the Implementing body (EIS - Estonian Business and Innovation Agency) verifies the supporting documents justifying the expenditure incurred and the compliance of the payment request with the requirements and, in case of such compliance, initiates the payment.

The Commission services conducted an on-the-spot check on 17 September 2026 to verify that supporting documents (final reports) confirming that the works have been carried out are stored in the system, are an accurate representation of the information stored in the system, and that therefore the renovation took place. This check was conducted successfully, and either the final acceptance acts for each project, or proof of payment were verified by the Commission services for all projects of the sample. Moreover, the Commission services verified during on-the-spot check, for a few random projects that the "payment" has been initiated in SFOS system, as verified through "paid" status in the system ("*Makstud*" in Estonian). With the on-the-spot check, there is assurance that all the activities were completed before the 31 of August.

Following the sampling, Estonia requested the withdrawal of 1 project on 22 September as a precautionary measure due to a suspected fraud case. A statistical analysis was carried out taking into account the results of the sampling, the revised list and the overachievement of 98 units (998 projects in the revised list of projects against the target of 900). Based on this, there is statistical assurance that the target has been met, and all its constitutive elements have been satisfactorily fulfilled.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: satisfactorily fulfilled.

Number and name of the Milestone: EE-C[D]-R[4-4-.4-4-]-M[73], Adoption of the National Development Plan of the Energy Sector by the Government

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

Qualitative Indicator: Document adopted by the Government

Time: Q4 2025

1. Context:

The aim of this 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 73 relates to the adoption of the National Development Plan of the Energy Sector by the Government.

Milestone 73 is the fourth and last 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 park; milestone 71 related to the adoption of the Government decision on the initiation of the preparation process of the National Development Plan of the Energy Sector; and milestone 72, related to the entry into force of the relevant legislation to remove the barriers to the installation of renewable energy generation and storage facilities.

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	National Development Plan of the Energy Sector 2035 (ENMAK) adopted by the Government on 8 January 2026	National Development Plan of the Energy Sector adopted by the Government on 8 January 2026 published on the Legislation Information System (Eelnõude infosüsteem) Draft Energy Sector Development Plan until 2035 – EIF Available in English under this link: https://kliimaministeerium.ee/sites/default/files/documents/2026-02/ESDP%202035.pdf https://kliimaministeerium.ee/sites/default/files/documents/2026-02/ESDP 2035.pdf
3	Annex 1 of the National Development Plan of the Energy Sector 2035	Annex 1: “Description of planned activities and support topics” of the National Development Plan of the Energy Sector 2035.

3. Analysis:

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

The National Development Plan of the Energy Sector shall be approved by the Government [...]

The National Development Plan of the Energy Sector (Document No 25-0803/12) was adopted by the Government on 8 January 2026 (Reference 1-4/25/3271-37), and published on the Legislation Information System (Eelnõude infosüsteem) which is Estonia's official digital centralized platform for managing the legislative processes and documents (see evidence No 2).

[...] The plan shall include the actions related to the phase-out of direct burning of oil shale for electricity production by 2035 [...]

Chapter 3.1 "Role of oil shale energy" of the National Development Plan of the Energy Sector, states that Electricity generation by direct combustion of oil shale will be phased out by 2035 *(*see page 16 of Evidence No 2).

The actions related to the phase-out of direct burning of oil shale for electricity production are described in table 3 of Chapter 3 of the National Development Plan of the Energy Sector (see page 13 of Evidence No 2) and in section 1.1 of Annex 1 of the National Development Plan of the Energy Sector (see Evidence No 3). The actions are related to:

- Ensuring the generation capacity necessary to meet the security of supply standard and ensuring the stability of the electricity system, implementing and auctioning the island interoperability service or capacity mechanism (including the strategic reserve). If necessary, analysing the deployment of nuclear energy and preparing for its deployment by establishing regulations and nuclear regulator.
- Establishing a market framework for demand side management by 2027 with the implementation of a central billing model, tariff systems and frequency market developments.
- Developing electricity storage (e.g. lithium batteries, pumped hydro-accumulation plants, heat storage units) through the removal of market barriers, regulatory changes and the analysis of a guarantee mechanism.
- Increasing the grid capacity through regulatory changes and the preparation of 10-year network development plans by distribution networks and the transmission network, the use of flexibility as an alternative to network investments in network development plans, the development of more user-friendly connection applications, increasing the quality of network services, coping with hybrid threats, marine network development, new external connections.
- Harmonising the regulation of the retail electricity markets in the Baltic States and Finland through the creation of a harmonised regulatory framework.
- Increasing the share of fuel-free energy sources, by accelerating the procedural processes and site plannings of wind and solar parks, finalising the construction of renewable electricity generating plants and implementing measures for mitigating the environmental impact of solar power plants.
- Hedging of investments risks with the promotion of the development of renewable electricity and long-term financing solutions, assessing the development risks related to nuclear power.

[...] with an exception for out-of-market oil shale for potential strategic reserve needs in case of deviation from the reliability standard [...]

Chapter 3.1 of the National Development Plan of the Energy Sector (Evidence No 2) states that plants using direct combustion of oil shale can be kept in a strategic reserve outside the market and can be used after 2035 only in the event of deviation from the security of supply standard. (see page 16 of Evidence No 2).

The Estonian TSO Elering will give the amount of the strategic reserve needed to ensure the security of supply in Estonia and its opinion regarding the dispatchable capacities in the annual security report (see footnote in page 12 of evidence No 2) which will be the basis to establish a potential deviation from the security of supply standard. The reliability standard can be found in Elering's adequacy report and updated yearly.

[…] The plan shall include actions related to the phase-out of the use of shale oil in domestic heat production by 2040 […]

Chapter 3.1 of the National Development Plan of the Energy Sector states that the use of shale oil in national heat energy production will be phased out by 2040 (Evidence No 2).

The actions planned to replace shale oil are described in Chapter 5 of the National Development Plan of the Energy Sector (page 19, Evidence No 2) and are the following:

- Developing the necessary infrastructure to ensure the continuity of district heating, including for reducing the temperature of the district heating networks and integrating ambient and waste heat and heat storage;
- Using ambient and waste heat;
- Improving energy efficiency and supporting the modernisation of district heating networks;
- Replacing fossil fuels (including in local heating);
- Establishing thermal energy storage facilities; and
- Developing district cooling to replace local cooling and introducing cooling materials with a lower carbon footprint.

[…] It shall also include targets for electricity generation capacity to be replaced with renewable energy and other clean energy technologies.

The targets for electricity generation capacity to be replaced with renewable energy and other clean energy technologies are described in chapter 2.3 "Metrics and targets" of the National Development Plan of the Energy Sector (page 11, Evidence No 2) and are the following:

- more than 80% ratio of clean energy generation to final electricity consumption by 2035
- more than 80% ratio of clean energy generation to final heat consumption by 2035
- In addition, chapter 3.1 of the National Development Plan of the Energy Sector (page 16, Evidence No 2) describes the target of new dispatchable capacities that will replace the direct combustion

of oil shale in electricity generation, with up to 236 MW of new dispatchable capacity from power plants which will be built in 2028/2029 and 50 MW based on batteries.

In line with the measure description, it is stated in the introduction of the plan that "*The Government of the Republic initiated the preparation of ESDP 2035 on 18.11.2021 in order to update the trends, objectives and activities of the energy sector in the effective energy development plan*" (see page 4 of Evidence No 2). Therefore, the measure consists of updating the National Development Plan of the Energy Sector.

On this basis, the Commission has reasonable assurance that this milestone has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[D]-I[4-5-.4-5-]-T[75], Additional grid capacity

Related Measure: EE-C[D]-I[4-5-.4-5-]: Programme to increase the capacity of the electricity transmission network

Quantitative Indicator: Additional grid capacity (MW)

Baseline: 0

Target: 310

Time: Q2 2026

1. Context:

The objective of this measure is to enable the connection of additional renewable energy production to the transmission network. The measure consists of an increase in the capacity of the electricity transmission network.

Target 75 relates to increasing in the capacity of the Estonian electricity transmission network by at least 310 MW.

Target 75 is the second and last target of the investment, and it follows the completion of milestone 74, related to the conclusion of a co-financing agreement for electricity network investments between the Ministry of Economic Affairs and Communications and Elering AS which sets out the expected results and deadlines.

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	Certificate of completion of the co-financing agreement (Act No No 4-6/43/176 issued on 27 August 2026 signedby the Ministry of Climate and Elering AS)	The certificate of completion is the Act on the implementation of the co-financing agreement No. 1.1-7/22-120 signed by the Ministry of Climate and board of Elering AS. It demonstrates that point 1.5 of the co-financing agreement has been implemented.
3	Signature printout of the certificate of completion	Copy of the signature printout of the certificate of completion.
4	Final report of the co-financing agreement signed by the representative of Elering AS on 27 August 2026	The final report outlines the details/actions pursued for the implementation of the co-financing agreement and how grid capacities in the Estonian electricity transmission network have increased by at least 310 MW.

5	Signature printout of the final report	Copy of the signature printout of the final report.
6	Methodology for the final report approved by AS Elering on 17 April 2026	Copy of the methodology used by Elering ES to validate that the grid capacities in the Estonian electricity transmission network have increased by at least 310 MW.
7	Signature printout of the methodology for the final report	Copy of signature printout of the methodology for the final report.
8	Co-financing agreement for electricity network investments between the Ministry of Economic Affairs and Communications and Elering AS, signed on 28 February 2022, Document management system of MoEC No. 1.1-7/22-120	The co-financing agreement. The agreement identifies the projects and deadlines to increase grid capacities in the Estonian electricity transmission network.

3. Analysis

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

Increase in the capacity of the Estonian electricity transmission network by at least 310 MW.

The increase in capacity of the Estonian electricity transmission network is achieved via the implementation of the co-financing agreement No. 1.1-7/22-120 (hereinafter referred to as "the co-financing agreement") signed between the Ministry of Economic Affairs and Communications and Elering AS, on 28 February 2022 (evidence 8). The co-financing agreement was positively assessed under milestone 74 in the Commission's preliminary assessment adopted on 22 September 2023. Point 1.5 of the agreement provided the investments to be carried out to achieve an increase of at least 310 MW of the interconnection capacity of renewable electricity generating installations in the electricity transmission network.

The representative of the board of Elering AS signed the final report (hereinafter referred to as "report") on the implementation of the co-financing agreement on 27 August 2026 (evidence 4 and 5). Point 2.1 of the report lists the specific works carried out to increase the capacity of the electricity network and create better conditions for the integration of new renewable energy generation capacities. Point 3 specifies that the works started in 2022 and concluded in June 2026. The calculation of the capacity is based on the methodology approved by AS Elering on 17 April 2026 (evidence 6 and 7). According to the methodology, the increase in capacity is proven by adding up the connection contracts and their capacities that were affected by the completion of transmission network investments related to the fulfilment of the co-financing agreement (page 2). Furthermore, point 5 of the methodology concludes that the RRF investments as specified in point 1.5 of the financing agreement are a pre-requisite for the realisation of

the connection contracts, on the basis of which the connection of at least 310 MW of renewable electricity generation capacity will be achieved.

As a result, more than 310 MW of increase in the capacity in the Estonian electricity transmission can be proven and according to the measured capacity of related connection contracts capacity increase reached 437,4 MW (point 4 of the methodology). Table 1 of the report contains the name, date of signature and contracted connection capacity increase. The report contains three investment maps (Figures 1-3) showing the realisation of the connection agreements. Point 4 (Key results) and Point 5 (Summary of projects) provide that the measured capacity reached 437,4 MW, well above the target of 310 MW. Point 5 also confirms that all the works specified in point 1.5 of the financing agreement have been accepted by the Ministry of Climate (beneficiary).

The certificate of completion for the co-financing agreement (evidence 2 and 3) is an Act signed by the Ministry of the Climate and Elering AS on 27 August 2026. In this act, the Ministry confirms the acceptance of the final report.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[D]-I[4-6-.4-6-]-T[77], Additional connection capacity for renewable electricity production

Related Measure: EE-C[D]-I[4-6-.4-6-]: Programme to boost energy production

Quantitative Indicator: Connection capacity created (MW)

Baseline: 0

Target: 28

Time: Q2 2026

1. Context:

The objective of the measure is to incentivise the production of electricity close to consumption. The measure consists of supporting additional connection capacity for renewable electricity production.

Target 77 relates to the construction of additional connection capacity for renewable electricity production for at least 28 MW as specified in the confirmation letter from the network company.

Target 77 is the second and last target of the investment, and it follows the completion of milestone 76, related to the publication of an open call by the Environmental Investment Centre to support the grid connection costs of companies producing electricity from renewable sources in industrial sites.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all its constitutive elements) was satisfactorily fulfilled.
2	Confirmation letter by Elering AS and the printout of the digital signature	The letter signed digitally by the project manager of Elering AS on 6 March 2026 confirming that the contract No. 1.1-4/2022/159 was executed by Elering AS on 15 September 2025.
3	Contract No. 1.1-4/2022/159 and the printout of the digital signatures	Connection agreement between the network operator Elering AS and the client, Enery Estonia OÜ signed on 11 May 2022 and 11 July 2022 respectively.
4	Amended Contract No. 1.1-4/2022/159 and the printout of the digital signatures	The amended contract 1.1-4/2022/159 was digitally signed by the representatives of Elering AS and Enery Estonia OÜ on 12 May 2023, 15 May 2023 and 16 May 2023. The amendment concerns termination of the grid connection agreements No. 1.1-4/2022/112 and the amendment of connection agreement No. 1.1-4/2022/159 so that the production units and capacities under both arrangements are combined into a single connection point at Kabli 110/10 kV substation.
5	Agreement on the Transfer of Connection Agreement	The agreement transfers the rights and obligation stemming from contract No. 1.1-4/2022/159 from Enery Estonia OÜ's rights

	No. 1.1-4/2022/159 and the printout of the digital signature	to Kabli Energiapark OÜ. The agreement was digitally signed by the parties on 19 and 20 May 2025.
6	Contract No. 2021822.1 signed by Enery Estonia OÜ and Kabli Energiapark OÖ on 25 and 27 November 2025 and the printout of the digital signature	The rights of Enery Estonia OÜ related to the grant application are transferred to Kabli Energiapark OÜ.
7	Checklist for OÜ Kabli Energiapark OÜ and the printout of the digital signature	Checklist for the conditions for granting support for the activities of the measure 'Intensification of the deployment of renewable electricity generating installations in industrial areas'.
8	Amendment of Grant Approval Decision No. 4-8/1560 and the printout of the digital signature	The application for the change of the beneficiary, Kabli Energiapark OÜ, was approved by Environment Investment Center (EIC) on 22 December 2025.
9	Final report by Kabli Energiapark OÜ on the implementation of connection to the Kabli solar power plant and digital print out of the submission and approval in the Estonian SFOS system	Kabli Energiapark OÜ project final report was submitted to the Environment Investment Center (EIC) on 26 January 2026 and EIC approved it on 30 March 2026. The report presents the implementation of the connection to the Kabli solar power plant and the achievement of the additional connection capacity for renewable electricity production.

3. Analysis:

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

Additional connection capacity for renewable electricity production constructed for at least 28 MW as specified in the confirmation letter from the network company.

The additional connection capacity for renewable electricity production was implemented through contract No 1.1-4/2022/159 (evidence 3) (hereinafter referred to as "contract") and its amendment (evidence 6) (hereinafter referred to as "amended contract"). The contract was digitally signed between the network operator Elering AS and the client, Enery Estonia OÜ on 11 May 2022 and 11 July 2022, respectively. The amended contract was digitally signed by the representatives of Elering AS on 16 May 2023 and by the representatives of Enery Estonia OÜ on 12 May 2023 and on 15 May 2023. In May 2025, the rights and obligations stemming from the contract were transferred from Enery Estonia OÜ to Kabli Energiapark OÜ through a transfer agreement and new contract signed digitally between Enery Estonia OÜ, Elering AS and Kabli Energiapark OÜ (evidence 5-8). The contract envisaged the construction of a new 110 kV connection point to the Kabli solar power plant and the related grid infrastructure needed to

connect the planned renewable energy installations to the transmission network with a capacity of 20.96 MW.

Point “g” of the amended contracts specifies that point 3 of Annex 1 of the contract is amended foreseeing the connection of a Type D power-generating module to the client’s (Enery Estonia and later Kabli Energiapark) connection point, consisting of solar power plants Kabli and “Nimmi Energiapark”, with a maximum capacity of 43.44 MW. Point “n” of the amended contract provides that point 6 of Annex 1 of the contract is modified to ensure that when performing the connection contract, the transmission network operator ensures electricity at the point of consumption and at the connection point with a maximum production capacity allowed at the place of consumption of 43.44 MW.

Elering AS confirmed in its letter, digitally signed on 6 March 2026 (evidence 2), that contract No 1.1-4/2022/159 between Elering and Kabli Energiapark OÜ was executed by the network operator Elering AS 15 September 2025.

In addition, the Estonian authorities also submitted the final report on the implementation of the amended contract by Kabli Enegiapark OÜ of 26 January 2026 (evidence 9). The report (p. 4) specifies that the additional connection capacity of 43.4 MW was achieved, well above the target of 28 MW. The report was approved by the implementing body, notably the Environment Investment Center on 30 March 2026 as shown in Estonia’s SFOS system (SFOS is an IT system with an e-service platform used to manage and monitor grants, particularly EU funding, including RRF-related funding, and the approval of the report is indicated in the e-platform).

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: EE-C[D]-I[4-7-.4-7-]-M[80], Additional heat and electricity storage capacity

Related Measure: EE-C[D]-I[4-7-.4-7-]: Pilot Energy Storage Programme

Qualitative Indicator: Additional energy storage capacity

Time: Q2 2026

1. Context:

The objective of the measure is to carry out a pilot programme on renewable energy storage in Estonia. The investment consists of investing in heat and electricity storage capacity. The milestone concerns the installation of at least 23 600 m^3 heat storage capacity and at least 10 MW of electricity storage capacity.

Milestone 80 is the second and last milestone of the investment, and it follows the completion of milestone 78, related to the publication of a call for proposals for a pilot energy storage programme.

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 authorisation No 2612371/00212	Permit authorisation No 2612371/00212 issued by Jõgeva municipality on 13 January 2026 for the installation of a heat storage device.
3	Certificate of completed works	Certificate of completed works signed by AS Utilitas Eesti and Ciest Metal OU on 30 March 2026 related to Jogeva heat storage project.
4	Contract No 10.ADM-8/1048	Contract No 10.ADM-8/1048 between AS Utilitas Eesti and CIEST METAL OÜ dated December 2024.
5	Contract No 34100-1/2864	Contract No 34100-1/2864 between AS Utilitas Tallinn and Rodoverken AB dated May 2024.
6	Certificate of completed works related to Project No 22827 “Accumulation tank”	Certificate of completed works signed by Rodoverken AB and AS Utilitas Tallina Soojus on 19 December 2025 related to Project No 22827 “Accumulation tank”.
7	Permit authorisation No 2512371/10073	Permit authorisation No 2512371/10073 issued by the Rural Municipality Government of Saaremaa on 31 October 2025 for the installation of a heat storage device.
8	Certificate of completed works No 20.4.03.24-0086	Certificate of completed works dated 30 November 2025 related to project No 20.4.03.24-0086 on the energy storage facility at Kuressaare.

9	Technical requirements related to project No 20.4.03.24-0086	Technical description of the construction works related to project No 20.4.03.24-0086 on the energy storage facility at Kuressaare.
10	Contract No 51 between Ciest Metal OU and Kuressaare Soojus AS	Contract No 51 signed on 6 January 2025 by Ciest Metal OU and on 30 December 2024 by Kuressaare Soojus AS.
11	Technical requirements related to public procurement No 286989	Technical specifications to the public procurement No 286989 by PSW Energy OU dated 10 January 2025.
12	Certificate of completed works related to the procurement No 286989	Certificate of completed works related to the procurement No 286989 signed on 28 August 2025 by PSW Energy OÜ and on 20 August 2025 by Photomate s.r.o.
13	Contract related to procurement No 286989 between PSW Energy OU and Photomate s.r.o.	Contract signed by PSW Energy OU on 7 February 2025 and Photomate s.r.o on 10 February 2025.
14	Contract related to procurement No. 285964 between Congsolar OU and Enefit AS	Contract between Congsolar OU and Enefit AS dated 3 January 2025 on the battery energy storage system in accordance with procurement procedure No. 285964.
15	Technical proposal related to procurement No 285964	Technical proposal for Jersey project dated 3 September 2024 – Annex to the contract between Congsolar OU and Enerfit AS on the battery energy storage system dated 3 January 2025.
16	Certificate of completed works related to procurement No 285964	Certificate of completed works signed by Congsolar OU and Enefit AS on 19 September 2025.
17	Technical requirements No 250926	Technical specifications for the purchase, installationand related construction and electrical installation works of the recording device.
18	Certificate of completed works No 250926	Certificate of completed works related to contract No 250926 for the sale of an electricity storage system, signed on 31 March 2026.
19	Certificate of completed works related to contract No 274827	Certificate of completed works signed by Enefit, InserVolt OU and MS Engineering on 25 March 2026.
20	Technical requirements in contract No 274827	Technical requirements of a grid-connected battery energy storage system by Enefit Green AS dated 22 March 2024.
21	Contract No 274827 between Enefit Green AS and Enefit AS	Contract No 274827 signed by Enefit AS on 29 January 2025 and on 22 January 2025 by Enefit Green AS on the battery energy storage system.

3. Analysis:

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

Installation of at least 23 600 m³ heat storage capacity […]

Three projects have been implemented for the installation of heat storage capacity:

- **Heat storage facility installed at the Jogeva central boiler house**: the permit authorisation No 2612371/00212 (Evidence No 2) has been issued by Jõgeva Rural Municipality Government (Registration code 77000401) on 13 January 2026 for the construction of a heat storage facility with a capacity of 3 000 m^3 in the county of Jogeva. The certificate of completed works (Evidence No 3) has been issued on 30 March 2026 and signed by Ciest Metal Ltd (referred to as the constructor) and AS Utilitas Estonia (referred to as the customer). It confirms that the construction works have been carried out in accordance with permit No 2612371/00212 and contract No. 10.ADM-8/1048 (Evidence No 4). It states that the equipment "Jogeva heat storage facility" of 3 000 m^3 is ready for use.
- **Heat storage facility installed in Tallinn's integrated district heating network**: the contract No 34100-1/2864 (see Evidence No 5) has been signed in May 2024 by AS Utilitas Tallinn (referred to as the customer) and Rodoverken AB (referred to as the contractor). The object of the contract is "*the design and construction of a heat accumulator with the necessary construction and installation work*" (Evidence No 5, page 1). According to Annex 3 of the contract, the accumulator is guaranteed to have an active working volume of 20 055 m^3 as a performance and reliability benchmark (Evidence No 5, page 75). The certificate of completed works issued on 19 December 2025 (Evidence No 6) states that the contractor Rodoverken AB has carried out the work stipulated in contract No 34100-1/2864 for the customer "Utilitas Tallinna Soojus".
- **Heat storage facility installed in Kuressaare**: the permit authorisation No 2512371/10073 has been issued on 31 October 2025 by the Rural Municipality Government of Saaremaa (see Evidence No 7) for the construction of a heat storage tank in Kuressaare for a capacity of 600 m3. The contract No 51 has been signed on 6 January 2025 by Ciest Metal OU and on 30 December 2024 by Kuressaare Soojus AS. The object of the contract is the design and construction works of a heat storage tank in Kuressaare (see Evidence No 10). The technical requirement of the construction works (Annex 1 to the contract) state that a new storage tank with a capacity of 600 m^3 shall be designed and constructed (Evidence No 9). The certificate of completed works related to the project (Evidence No 8) has been signed on 30 November 2025 by the contracting authority "Kuressaare Soojus AS" and the contractor "Ciest Metal OU".

In total, with the three above-mentioned projects, the installed heat storage capacity amounts to 23 655 m3.

[…] and at least 10 MW of electricity storage capacity.

Four projects have been implemented for the installation of electricity storage capacity:

- **Battery energy storage system for PSW Energy production units**: the object of the contract based on procurement No 286989 signed by PSW Energy OU on 7 February 2025 and Photomate s.r.o on 10 February 2025 (Evidence No 13) is the purchase of two complete battery energy storage systems. The technical specifications and instructions for bidders which are an annex to the contract (Evidence No 11) state that PSW Energy OU shall procure two complete battery storage

systems by public procedure, with a storage capacity of 500-510 kW each, which equals to at least 1 MW of combined power capacity.

The certificate of completed works signed on 20 August 2025 by Photomate (the contractor) and on 26 August 2025 by PSW Energy OU (the customer) confirms that the installation of the battery energy storage system has been completed in accordance with the contract linked to the procurement No 286989 and technical specifications (Evidence No 12). Therefore, at least 1 MW of electricity storage capacity has been installed.

- **Battery energy storage system for Congsolar OU**: the contract between Congsolar OU (referred to as the customer) and Enefit AS (referred to as the contractor) has been signed on 3 January 2025 in accordance with the procurement procedure No 285964 "*Purchase of 6 MW/12 MW battery energy storage system*" (Evidence No 14). The technical proposal related to the contract (see Evidence No 15) states that the nameplate power of the project is 6.58 MW (Evidence No 15) The certificate of completed works signed on 19 September 2025 by Enefit AS and Congsolar OU (Evidence 16) relates to the procurement procedure No. 285964 and confirms that the project was completed. Therefore, 6.58 MW of electricity storage capacity has been installed.
- **Electricity storage system for Prategli Invest OU**: the certificate of completed works signed by Prategli Invest OU and Energiapartner OU on 31 March 2025 related to procurement No 277866 "*At least 1MWh solar energy storage device purchase, installation, and related construction and electrical installation works*" and contract No 250926 "Sale agreement of an electricity storage system" (Evidence No 18) confirms that "*the device is installed, configured and connected at its location Kalda 7c*". Clause 4 of the technical specifications in the annex to the contract mentioned above (Evidence No 17) states that the power of the storage system must be "not less than 1000 kW and not more than 1 100 kW". Therefore, at least 1 MW of electricity storage capacity has been installed.
- **Energy storage pilot project at the Purtse wind and solar hybrid park:** The "technical requirements of a grid-connected battery energy storage system" signed by Enefit AS and dated 22 March 2024 state that the "*client is planning to install a grid-connected battery energy storage system (BESS) (…) with the following combination of power and energy rated capacities 4 MW/ 8 MWh operation at rated power*" (Section 1, Evidence No 20). The technical requirements are an annex to Contract No 274827 (Evidence No 21). The object of the contract is to procure a battery energy storage system. The "Detailed technical specifications" part (Section 7.1.2, Evidence No 16) state that the installed power capacity should be at least 4 MW. The certificate of completed works (Evidence No 19) has been issued on 25 March 2026 and signed by Enefit OU (referred to as the customer) and InserVolt OU and MS Engineering Group OU (referred to as the contractors). It states that the energy storage system design, construction and installation work has been performed in accordance with the agreement between the parties. Therefore, at least 4 MW of electricity storage capacity has been installed.

In total, with the four above-mentioned projects, the installed electricity storage capacity amounts to at least 12.58 MW.

On this basis, the Commission has reasonable assurance that this milestone has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: EE-C[D]-I[4-8-.4-8-]-M[80c], Removal of the height restriction on offshore wind turbines in the Gulf of Riga and Estonian islands Hiiumaa, Saaremaa, Vormsi

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

Qualitative Indicator: Notice

Time: Q2 2026

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. The measure consists of the signature of contracts on designing air surveillance radars and passive radar systems, construction works for radar buildings and the removal of height restriction on offshore wind turbines.

This milestone requires a Notice issued by the Ministry of Defence, stating that the height restrictions on offshore wind turbines have been lifted in the Gulf of Riga and Estonian islands of Hiiumaa, Saaremaa and Vormsi.

Milestone 80c is the second and last milestone of the investment. It follows the completion of milestone 80a, related to the signing of contracts for the detailed design of air surveillance radar, passive radar systems and construction works for radar buildings.

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 Notice No 12-3/26/102 on removing the height restrictions on wind turbines in the Gulf of Riga and the Estonian islands (Hiiumaa, Saaremaa, Vormsi)	The Notice, issued on 18 August 2026 by the Ministry of Defence, announces that height restrictions on offshore wind turbines in the Gulf of Riga and Estonian islands of Hiiumaa, Saaremaa and Vormsi have been lifted. It is addressed to the Ministry of Climate, the Ministry of Economic Affairs and Communications, the Consumer Protection and Technical Regulatory Authority (TTJA), and local governments. It is also available at the MoD Document Management System here: https://adr.rik.ee/kaitseministeerium/dokument/18944006
3	Printout of the digital signature	Printout of the digital signature of the Head of Innovation at the Ministry of Defence on 18 August 2026, the official who signed the Notice.

3. Analysis:

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

Notice issued by the Ministry of Defence, stating that the height restrictions on offshore wind turbines have been lifted in the Gulf of Riga and Estonian islands of Hiiumaa, Saaremaa and Vormsi.

The "Notice No 12-3/26/102 on removing the height restrictions on wind turbines in the Gulf of Riga and the Estonian islands (Hiiumaa, Saaremaa, Vormsi)" (in Estonian *'Teatis Liivi lahe ja Eesti saarte (Hiiumaa, Saaremaa, Vormsi) tuulegeneraatorite kõrguspiirangute kaotamise kohta*') was issued on 18 August 2026 by the Ministry of Defence (evidence 2) and addressed to the Ministry of Climate, the Ministry of Economic Affairs and Communications, the Consumer Protection and Technical Regulatory Authority (TTJA), and the local governments of Estonian islands of Saaremaa, Hiiumaa, and Vormsi. The notice is digitally signed by the head of Innovation Department in the Ministry of Defence (Evidence 3) and is published in the public Document Management System of the Ministry of Finance, to which the link was provided. The Commission services accessed the link provided by the authorities on 23 September 2026 to verify that the Notice is available at the link provided. This check was completed successfully.

In the Notice, the Ministry of Defence informs its addressees that Estonia's height restrictions for the erection of wind turbines in the Gulf of Riga and on the islands of Hiiumaa, Saaremaa and Vormsi were completely abolished as of 1 August 2026.

With this Notice, height restrictions on wind turbines in the locations specified by the milestone no longer apply.

On this basis, the Commission has reasonable assurance that this milestone has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: EE-C[E]-I[5-2-a.5-2-a-]-M[85a], Multifunctional work vessel built

Related Measure: EE-C[E]-I[5-2-a.5-2-a-]: Multifunctional work vessel

Qualitative Indicator: Vessel built

Time: Q2 2026

1. Context:

The objective of the investment is to ensure the safety and condition of the waterways necessary for the operation of maritime transport, enable anti-pollution operations to be carried out and increase research capacity for environmental studies.

The investment consists in building a low-emission vessel.

Milestone 85a is the second and last target of the investment. It follows the completion of milestone 84a regarding the signature of a contract to build a multifunctional work vessel.

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 acceptance by the National Fleet (Riigilaevastik)	Copy of certificate of acceptance signed on 30 July 2026 by the National Fleet, the contracting authority, and AS Baltic Workboat, the contractor.
3	Digital signature printout for the certificate of acceptance	Copy of the digital signature printout of the certificate of acceptance.
4	Act of acceptance for stage III	Copy of the act of acceptance of stage III, signed on 30 July 2026 by the National Fleet, the contracting authority, and AS Baltic Workboat, the contractor.
5	Annex to the act of acceptance for stage III with the list of underperformances	Tables with the list of underperformances identified and that will be rectified by the contractor within 60 days.
6	Digital signature printout for the act of acceptance for stage III	Copy of the digital signature printout of the act of acceptance for stage III signed on 30 July 2026 by the National Fleet, the contracting authority, and AS Baltic Workboat, the contractor.
7	Statement of completion by the National Fleet	This is official confirmation by the Estonian State Fleet signed on 26 August 2026 that the vessel has been built and meets the investment and financing requirements. It specifies that the vessel is a low-emission vessel using electricity and compressed biomethane.

8	Digital signature printout for the statement of completion	Copy of the digital signature printout of the statement of completion signed on 26 August 2026 by the National Fleet, the contracting authority.
9	Contract for the building of the vessel	Public contract (number 6-3/24/11) for the building of the multifunctional work vessel, signed by the contractor (Baltic Workboats AS) and the National Fleet (Riigilaevastik) signed on 19 January 2024.

3. Analysis:

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

The multifunctional work vessel shall be built. Furthermore, in line with the measure description, **the investment consists in building a low-emission vessel.**

A multifunctional work vessel has been built as confirmed by (1) the certificate of acceptance for the investment in a multifunctional work vessel (evidence 2), signed by the National Fleet and the contractor AS Baltic Workboats on 30 July 2026 (evidence 3); (2) the act of acceptance for stage III (evidence 4), signed by the National Fleet and the contractor AS Baltic Workboats on 30 July 2026 (evidence 6) and (3) the statement of completion (evidence 7) signed by the National Fleet on 26 August 2026 (evidence 8).

The certificate of acceptance (evidence 2) does state that there are underperformances to be rectified within 60 days of the signing of the certificate of acceptance. The underperformances are listed in annex to the act of acceptance for stage III (evidence 5). The act of acceptance for stage III (evidence 4) confirms that construction works were completed, and states that the contracting authority considers the deficiencies to be of minor importance. They concern workmanship quality, equipment and systems needing improvement or their settings adjusted, documentation and training – none of which could adversely impact the vessel's low-emission capabilities.

Taken together, the certificate of acceptance (evidence 2), the act of acceptance for stage III (evidence 4), and the statement of completion (evidence 7) confirm that the vehicle meets the low-emission characteristics required by the milestone. Annex 1 of the public contract for the building of the multifunctional work vessel (evidence 9) requires in points 10.3 and 1.4 that the vessel is low emission and in point 1.1 and 4 that the vessel is a multifunctional vessel to conduct environmental studies and anti-pollution operations. Point 2.1.2 of the certificate of acceptance (evidence 2) confirms that the vessel complies, except for the deficiencies of minor importance unrelated to its emission performance, with all the terms of the contract. In addition, the statement of completion (evidence 7) expressly states that the "vessel is a low-emission vessel…".

On this basis, the Commission has reasonable assurance that this milestone has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: EE-C[E]-I[5-3-a.5-3-a-]-M[87a], Viaducts constructed and disbursement made for construction work of terminal

Related Measure: EE-C[E]-I[5-3-a.5-3-a-]: Construction of the Rail Baltic viaducts and terminal

Qualitative Indicator: Acceptance certificates issued for the construction of the viaducts and disbursement made

Time: Q2 2026

1. Context:

The objective of the measure is to increase the share of sustainable mobility in Estonia and to contribute to the Rail Baltic project, which connects the three Baltic States. The investment consists of the construction of four viaducts and one tunnel, as well as contributing to the construction of the Rail Baltic Ülemiste terminal.The RRF shall support part of the costs of this investment. This investment may also receive support from other Union programmes or instruments for costs that are not supported by the RRF.

Milestone 87a requires certificates of acceptance to be issued for the construction of the Kangru viaduct, Raudalu viaduct, Raku viaduct, Männiku light traffic viaduct and Männiku light traffic tunnel.

Milestone 87a is the second and last milestone of the investment; it follows the completion of milestone 86a concerning related to the signature of work contracts for the following Rail Baltic viaducts: Kangru viaduct, Raudalu viaduct, Raku viaduct, Männiku light traffic viaduct and Männiku light traffic tunnel.

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	Financing agreement between representatives of the Transport Administration, OÜ Rail Baltic Estonia and the Ministry of Climate	Copy of the financing agreement signed on 20 March 2024 by representatives of the Transport Administration, OÜ Rail Baltic Estonia and the Ministry of Climate which specifies the work to be done in order to receive payment (hereinafter referred to as 'Financing Agreement No 4-6/43/122').
3	Signature printout	Copy of the signature printout of the financing agreement No 4-6/43/122.
4	Certificate of acceptance	Copy of the certificate of acceptance of the Rail Baltica viaducts specified in the milestone description signed by OÜ Rail Baltic Estonia, the Ministry of Climate and the Republic of Estonia's Transport Administration signed on 7 May 2026. The first sentence of the certificate refers to the financing agreement in evidence 2 as the basis for the certificate of acceptance.
5	Signature printout	Copy of signatures printout of the certificate of acceptance of the Rail Baltica viaducts.

6	Financing agreement to support the construction of Ülemiste terminal	Copy of the financing agreement to support the construction of the Rail Baltica Ülemiste railway terminal signed on 16 December 2025 by the Ministry of Climate and Rail Baltica Estonia (hereinafter referred to as 'Financing agreement No 4-1/25/225').
7	Signature printout	Copy of signature printout of the financing agreement No 4-1/25/225.
8	Amended financing agreement to support the construction of Ülemiste terminal	Copy of the amended financing agreement to support the construction of the Rail Baltica Ülemiste railway terminal signed on 29 April 2026 by the Ministry of Climate and Rail Baltica Estonia (hereinafter referred to as 'revised agreement').
9	Signature printout	Copy of signature printout of the revised agreement.
10	Bank payment order	Copy of bank payment order nr 1 of 19/12/2025 according to evidence 6.
11	Bank payment order	Copy of bank payment order nr 2 of 27/05/2026 according to evidence 6.
12	Bank payment order	Copy of bank payment order nr 3 of 07/08/2026 according to evidence 6.
13	Description of Estonia's control and accounting mechanisms	Certificate provided by the State Shared Service Centre under the Ministry of Finance setting out how Estonia ensures the clear traceability of costs and the fundings source used to cover them, thereby preventing double funding and guaranteeing that RRF funds are used exclusively for their intended purposes.

3. Analysis:

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

Certificates of acceptance shall be issued for the construction of the Kangru viaduct, Raudalu viaduct, Raku viaduct, Männiku light traffic viaduct and Männiku light traffic tunnel. Furthermore, in line with the description of the measure, **the investment consists of the construction of four viaducts and one tunnel, as well as contributing to the construction of the Rail Baltic Ülemiste terminal.**

Articles 1.6.1 to 1.6.5 of the Financing Agreement No 4- 6/43/122 (evidence 2) signed on 20 March 2024 (evidence 3) between the Transport Administration, OÜ Rail Baltic Estonia and the Ministry of Climate, describe the construction works to be carried out including, the construction of the Kangru viaduct, the Raudalu viaduct, the Raku viaduct, the Männiku light traffic viaduct and the Männiku light traffic tunnel. The certificate of acceptance (evidence 4) signed on 7 May 2026 (evidence 5) by OÜ Rail Baltic Estonia, the Ministry of Climate and the Republic of Estonia's Transport Administration confirms that Financing Agreement No 4- 6/43/122 was implemented, including the constructions of the three viaducts, one light traffic viaduct and one light traffic tunnel covered by the Financing Agreement.

At least EUR 8.84 million shall be paid towards the construction of the Ülemiste terminal.

Financing agreement No 4-1/25/225 signed on 16 December 2025 by the Ministry of Climate and Rail Baltica Estonia (evidence 6) and amendedon 29 April 2026 (evidence 8) states that its objective is to support the construction of the Rail Baltica Ülemiste railway terminal. Article 2.1 on page 1 of the revised agreement stipulates the grant amount to be awarded from the Recovery and Resilience Facility which amounts to 8.848.295 EUR. Estonia provided bank payment orders confirming that an amount of 3.191.959 EUR was paid by the Ministry of Climate to Rail Baltic Estonia on 19/12/2025 (evidence 10), 3.001.848 EUR was paid by Ministry of Climate to Rail Baltic Estonia on 27/05/2026 (evidence 11) and 2.654.488,50 EUR was paid by the Ministry of Climate to Rail Baltic Estonia on 07/08/2026 (evidence 12), corresponding to the Recovery and Resilience Facility contribution to the construction of the Ülemiste terminal.

Any amounts provided by other Union programmes or instruments shall not be counted towards this amount.

The description of Estonia's control and accounting mechanisms (evidence 13) certifies how Estonia ensures the clear traceability of costs and the fundings source used to cover them, thereby preventing double funding and guaranteeing that RRF funds are used exclusively for their intended purposes.

On this basis, the Commission has reasonable assurance that this milestone has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: EE-C[E]-I[5-3-b.5-3-b-]-M[88b], Renovation of railway section

Related Measure: EE-C[E]-I[5-3-b.5-3-b-]: Renovation of a section of the railway from Rapla to Lelle

Qualitative Indicator: Certificate of acceptance

Time: Q1 2026

1. Context:

The objective of the measure is to increase the lifespan of Estonia's sustainable mobility network. The investment consists of renovating the railway superstructure of a 23 km long section of existing railway from Rapla to Lelle.

Milestone 88b consists of the renovation of a section of the railway from Rapla to Lelle as proved by a certificate of acceptance for the renovation of 23 km of railway in the section Rapla to Lelle.

Milestone 88b is the only milestone or target of the investment.

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 certificate of acceptance that works on 23kms of railway track between Rapla and Lelle has been completed	Certificate of acceptance signed on 4 June 2026 between the Ministry of Climate and the beneficiary AS Edelaraudtee certifying that the works have been completed in line with the financing agreement (evidence 2).
3	Signature printout of certificate of acceptance	Signature printout of the certificate of acceptance signed on 4 June 2026 on behalf of the Ministry of Climate by the Minister for Infrastructure and by a board member of AS Edelaraudtee
4	Construction permit for the Rapla Lelle renovation on the Building Registry portal	The link: https://livekluster.ehr.ee/ui/her/v1/document?docNr=2211271/24703 gives access to the construction permit in the Building Registry portal showing that renovation of the existing elements of railway infrastructure between Rapla and Lelle was permitted in August 2022.

3. Analysis:

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

Certificate of acceptance for the renovation of 23 km of railway in the section Rapla to Lelle. Furthermore, in line with the description of the measure, the investment consists of **renovating the railway superstructure of a 23 km long section of existing railway from Rapla to Lelle.**

The certificate of acceptance signed on 4 June 2026 by the Minister for Infrastructure on behalf of the Ministry of Climate and AS Edelaraudtee (evidence 2) certifies that works on at least 23km of railway in the section Rapla to Lelle has been completed and therefore accepted.

The authorities also provided a link to the construction permit for these works, which consisted of the renovation of the existing Rapla Lelle railway (evidence 4). The Commission services accessed the link on 17 September 2026 to verify the permit on the Building Registry Portal. This check was conducted successfully, confirming that the construction permit was for the renovation of the Rapla Lelle railway section; in addition, that permission to carry out the works was given on 17 August 2022. On this basis, the Commission has reasonable assurance that fulfilling this milestone began after February 2022 and was satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: EE-C[F]-R[6-1-.6-1-]-M[98] Entry into force of the Ministerial Regulation on the admission in medical professions with highest shortages

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 Ministerial Regulation

Time: Q2 2026

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 prioritise the admission in medical professions with highest shortages.

Milestone 98 requires the entry into force of the Ministerial Regulation which shall lay down the requirements for giving priority to admission in medical professions with highest shortages. The agreement between the Ministry of Social Affairs and the University of Tartu shall implement the prioritisation.

Milestone 98 is the sixth and last milestone or target of the reform , and it follows the completion of milestone 94 related to 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, 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.

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 Regulation No 21 of the Minister of Social Affairs on the "Amendments to the regulations of the Minister of Social Affairs and Health on health education" adopted on 2 June 2026 and entered into force on	The Regulation – among others - amends Regulation No 70 of the Minister of Social Affairs on the "Framework requirements and conditions for organising residency". Available online here: https://www.riigiteataja.ee/et/akt/109062026010

	12 June 2026 and published in the Official Journal on 9 June 2026 (RT I, 09.06.2026, 10) https://urldefense.com/v3/__https:/www.riigiteataja.ee/et/akt/109062026010__;!!DOxrgLBm!CRbA4J-5KAYysW3VNxg3H6-fe8PUWMg3Wmnn44MfSlvSif4tQu_Fe_eAjYO-Mx7Xtl3SlInDbKH0MD0Ul6dv_I1vlfE676g$	
3	The explanatory letter regarding Regulation No. 21	The explanatory letter by the Ministry of Social Affairs and Health provides clarification on the amendments to the different regulations, including regarding Regulation No 70. Available online here: https://eelnoud.valitsus.ee/main/mount/docList/a28b91a8-dff4-4ef7-aa14-d4387381ee1c
4	The Regulation No 70 of the Minister of Social Affairs on 'Framework requirements and conditions for organising residency "for the period 07.10.2024-30.06.2026, published in the Official Journal on 4 October 2024 (RT I, 04.10.2024, 12) https://www.riigiteataja.ee/akt/104102024012	The version of Regulation No 70 laying down the conditions and organisation of residency before its amendment by regulation No 21. Available in the Official Journal here: https://www.riigiteataja.ee/akt/104102024012
5	The agreement between the Ministry of Social Affairs and the University of Tartu was signed electronically by the represetatives of the Ministry and University on 4 and 5 May 2025 and published in the public document register of the Ministry of Social Affairshttps://adr.rik.ee/som/dokument/18283486	The agreement shows the residency places in 2025. Available online here: https://adr.rik.ee/som/dokument/18283486
6	The agreement between the Ministry of Social Affairs and the University of Tartu was digitally	The 2026 agreement provides increases in residency places for medical profession with highest shortages. Available online here: https://adr.riik.ee/som/document/18701477

	signed by the represetatives of the Ministry and University on 18 May 2026 and its annex 4 (Residency Order) is available in the public document register of the Ministry of Social Affairs	
7	The Act on the University of Tartu entered into force on 21 March 1995 and published in the Official Journal on 19 March 1995 (RT I 1995, 23, 333)	The Act provides for the legal status, objective and limits of autonomy of the University of Tartu as well as the bases of management, financing and activities thereof. Available online here: https://www.riigiteataja.ee/en/eli/503102025004/consolide
8	Residency Regulations of the University of Tartu, adopted by the Senate of the University of Tartu on 28 February 2025 by Regulation No 1 and it entered into force on 1 March 2025	The Residency regulation lays down - among others – the deadlines for publishing of the residency places. The document is available on the webpage of the University of Tartu: https://medical sciences.ut.ee/en/content/residency https://medical sciences.ut.ee/sites/default/files/2025-03/valid_from_01_03_2025_Rules on Residence.pdf
9	The Regulation No 70 of the Minister of Social Affairs on 'Framework requirements and conditions for organising residency in force since 30 June 2026, published in the Official Journal on 9 June 2026 (RT I, 09.06.2026, 35)https://www.riigiteataja.ee/akt/104102024012	The version of Regulation No 70 laying down the conditions and organisation of residency after its amendment by regulation No 21. Available in the Official Journal here: https://www.riigiteataja.ee/akt/104102024012

3. Analysis:

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

Entry into force of the Ministerial Regulation which shall lay down the requirements for giving priority to admission in medical professions with highest shortages.

The Regulation No 21 of the Minister of Social Affairs on the "Amendments to the regulations of the Minister of Social Affairs and Health on health education" (hereinafter referred to as "Regulation No 21") was published in the Official Journal on 9 June 2026 (publication notice RT I, 09.06.2026, 10). Regulation No 21 entered into force on 12 June 2026 as specified in the header of the legal act (evidence 2 , 3, 4).

Article 1 of Regulation No 21 provides for the amendment of Regulation No 70 of the Minister of Social Affairs on the "Framework requirements and conditions for organising residency". Article 5 of Regulation No 21 lays down that the amendment of Article 3 of Regulation No 70 enters into force on 30 June 2026. Article 1 of Regulation No 21 provides for adding a new paragraph 3 in Article 3 of Regulation No 70 which requires that when submitting a request for a residency, priority is given to study places with highest shortages in medical professions taking into account the proposals of the parties concerned. The concerned parties are specified in Article 7^2 of the Act on the University Tartu (hereinafter referred to as "the Act") which lays down the conditions for funded residency places and financing of residency (evidence 7). More specifically, paragraph 1 of Article $7^2$of the Act requires that when determining the number of funded residency places, the Ministry of Social Affairs shall proceed in accordance with the proposals of the committees of health care providers, doctors and dentists' associations, the Estonian Health Insurance Fund and the University.

The agreement between the Ministry of Social Affairs and the University of Tartu shall implement the prioritisation.

Article 7^2 (3) of the Act provides that the Ministry of Social Affairs signs an agreement with the University of Tartu for the provision of funded residency places. The residency places are defined yearly and the agreement between the Ministry and the University amended accordingly. Furthermore, Regulation No 70 is adopted in accordance with Article 7(2) of the Act which requires that the framework requirements and organisation conditions of residency are established by a regulation of the minister in charge of the policy sector. Therefore, it is ensured that the new Article 3(3) of Regulation No 70 on the prioritisation is implemented by the agreement between the Ministry and the University.

Agreement No. 3-4/2813-1 between the Ministry of Social Affairs and the University of Tartu was amended and digitally signed by the representatives of the Ministry and the University on 18 May 2026 (evidence 6). While the agreement was signed before the entry into force of the amended Regulation, the procedure to adopt the Regulation started on 18 May 2026 as shown in the public document register of the Ministry of Social Affairs. This shows that the negotiations of the agreement and the regulation went in parallel so the agreement could already take into account the provision of the regulation on addressing admissions in medical professions with highest shortages. The need to sign the agreement already in May stems from Articles 13 and 14 of the Residency Regulation No 1 (evidence 8) which provides that the period of application for residency places starts on 1 June of the given year and thus the dates of the admission examinations must be set by 20 May. Thus, the agreed number of residency places has to be published in advance. At the same time, the adoption and entry into force of a ministerial regulation takes a longer time as demonstrated by the entry into force of the amended regulation No 70 (evidence 9).

On this basis, the Commission has reasonable assurance that this milestone has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[H]-I[8-2-.8-2-]-T[130], Additional 160 MW capacity available

Related Measure: EE-C[H]-I[8-2-.8-2-]: Programme to increase the access of renewable energy production to the electricity distribution system

Quantitative Indicator: MW of additional capacity available

Baseline: 0

Target: 160

Time: Q1 2026

1. Context:

The objective of the investment is to facilitate the use and development of electricity from renewable energy sources. The investment consists of works in the electricity network to increase its capacity.

Target 130 covers electricity distribution network works, which shall result in an increase in the capacity of the electricity distribution network of 160 MW.

Target 130 is the second and final target of the investment, following milestone 129, which concerned the signing of the co-financing agreement for the electricity distribution network works.

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	Co-financing agreement No. 4-6/43/115-2	Co-financing agreement between Ministry of Climate and Elektrilevi OÜ for the purpose of increasing the capacity of the electricity distribution network by 160 MW.
3	Signature printout for co-financing agreement No. 4-6/43/115-2	Printout of the digital signature of the co-financing agreement. Signed on 24 January 2024.
4	Final implementation report	The final report on the implementation of co-financing agreement no. 4-6/43/115-2 signed off by the board of Elektrilevi OÜ. It confirms that the projects were successfully implemented and achieve an increase in network capacity.
5	Signature printout of the final implementation report	Printout of the digital signature of the final implementation report. Signed on 1 December 2025.
6	Transfer-acceptance Act	The transfer-acceptance Act confirms that the Ministry of Climate accepted the final report under co-financing contract

		No. 4-6/43/115-2 and recognised that Elektrilevi OÜ has achieved the final objective of the grant-financing agreement.
7	Signature printout of the transfer-acceptance act	Printout of the digital signature of the transfer-acceptance act. Signed on 30 June 2026.

3. Analysis:

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

Electricity distribution network works shall result in an increase in the capacity of the electricity distribution network of 160 MW.

The co-financing agreement no. 4-6/43/115-2 (Evidence 2) between the Ministry of Climate and the operator of the electricity transmission network Elektrilevi OÜ, signed digitally on 24 January 2024 (Evidence 3), sets out the obligation for Elektrilevi OÜ to conduct investments to increase the capacity of the electricity distribution network by at least 160 MW under article 1.2. of the agreement.

In accordance with Article 5.2 of the co-financing agreement, the contractor, Elektrilevi OÜ, was required to provide a final implementation report (Evidence 4) confirming that execution was completed by the end of the contract. Elektrilevi OÜ submitted the report to the Ministry of Climate, which accepted it, as confirmed by the transfer-acceptance Act (Evidence 6). The act confirms that the Ministry adopted the report and the fulfilment of the final objective under the co-financing agreement (no. 4-6/43/115-2). The final report presents, per region and investment, a table of additional capacity of the electricity distribution network (MW); the total of 363.30 MW is above the RRP target of 160 MW. Although four of the 14 investments delivered less capacity than initially agreed, this does not affect the target, which is assessed on total additional capacity, not per investment. The final implementation report was digitally signed by the Ministry of Climate on 1 December 2025 (Evidence 5). The transfer-acceptance Act was digitally signed by the Ministry of Climate and Elektrilevi OÜ on 30 June 2026 (Evidence 7).

The final implementation report confirms that 14 investment projects were implemented for the construction of 1545 km of new electricity distribution network, which have resulted in an actual increase in capacity for renewable electricity generation in the distribution network of about 363 MW, significantly above the target of 160 MW.

On this basis, the Commission has reasonable assurance that this target has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: EE-C[H]-I[8-3-.8-3-]-T[134], Installation of new biomethane production capacity

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

Quantitative Indicator: Increase in installed production capacity of sustainable biomethane in cubic metres

Baseline: 0

Target: 4000000

Time: Q2 2026

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 increasing the production capacity of sustainable biomethane.

Target 134 is related to increasing the installed capacity for the production of sustainable biomethane by at least 4 000 000 cubic metres.

Target 134 is the third and last target or milestone of the investment, and it follows the completion of milestones 131 and 133, related to the call for applications for grants to support the uptake of biomethane, and adoption of the action plan for the production and use of biogas and biomethane, respectively.

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	Regulation of the Regional Minister "Investment Support for Increasing the Production and Use of Biomethane" (publication reference RT I, 28 May 2024, 6)	Regulation of the Regional Minister "Investment Support for Increasing the Production and Use of Biomethane" https://www.riigiteataja.ee/akt/117062025013
3	List of completed projects	A list of funded and completed projects extracted from the SFOS IT system.
4	Checklist Bioforce Viiratsi OÜ	Control question whether the application complies with Section 5(7) of the Regulation: "The feedstock used for the production of biomethane complies with the sustainability criteria laid down in Article 29 of the Renewable Energy Directive and is included in

		the list of feedstocks set out in Annex IX to the same Directive." This control question was part of the checklist that was used verify compliance of every project that applied for funding from this measure.
5	Certificate of acceptance of works for the project of Bioforce Viiratsi OÜ signed on 30 June 2026	Certificate of acceptance of works for the project of Bioforce Viiratsi OÜ, signed on 30 June 2026 by Bioforce Viiratsi OÜ Board Member as the representative of the contracting party and by Savekate OÜ Project Manager as the representative of the builder.
6	Printout of the digital signatures of certificate of acceptance of works for the project of Bioforce Viiratsi OÜ	Printout of the 30 June 2026 digital signatures of Bioforce Viiratsi OÜ Board Member and of Savekate OÜ Project Manager.
7	Results of the compliance check of the application for investment support, signed digitally on 1 November 2024	Results of the compliance check (carried out by the Environment Investment Centre (KIK)) of the application for investment support.
8	Printout of the digital signature of the results of the compliance check of the application for investment support	Printout of the digital signature of the Environment Investment Centre (KIK) assessor on the results of the compliance check of the application for investment support.
9	Final report of Bioforce Viiratsi OÜ from 30 June 2026	Project´s final report from 30 June 2026, extracted from the SFOS IT system.
10	Estonian Business registry printout of Bioforce Viiratsi OÜ	Estonian Business registry printout of Bioforce Viiratsi OÜ entry, showing previous names of the company.

3. Analysis:

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

Installed capacity for the production of sustainable biomethane shall increase by at least 4 000 000 cubic metres under the support scheme as demonstrated in the final project implementation reports.

The Bioforce Viiratsi OÜ Project No 20.8.02.24-0006 "Viiratsi biometaanijaama investeeringutoetus" ("Investment grant for the Viiratsi biomethane facility")increased the installed capacity for the production of sustainable biomethane by 11 582 072 Nm^3/y, as demonstrated by the final report of the project from 30 June 2026 (evidence 9, page 2). Together with the final report of the project, the final beneficiary submitted the certificate of acceptance of works (evidence 5), digitally signed on 30 June 2026 by Bioforce Viiratsi OÜ Board Member as the representative of the contracting party and by Savekate OÜ Project Manager as the representative of the builder (evidence 6). In the certificate of acceptance of works, it is

quantitatively indicated that the constructed plant has sufficient capacity to produce biomethane in the amount of 11 582 072 Nm^3/year (evidence 5, page 1), well above the target of 4 000 000 cubic metres.

This Nm^3/year unit refers to normal cubic metres per year. In biomethane production, it measures the annual volume of biomethane under standardised temperature and pressure conditions, allowing volumes to be compared consistently regardless of actual storage conditions. European gas-sector documents normally express comparable biomethane production and capacity in Nm^3.

The fact that the increased capacity is of sustainable biomethane (as opposed to any other type of biomethane) is demonstrated by the positive results of the compliance check of Bioforce Viiratsi OÜ's (the final beneficiary) application for investment support, carried out by the Environment Investment Centre (KIK)) (evidence 7). The Environment Investment Centre (KIK) is the implementing body responsible for assessing the beneficiaries' applications. Bioforce Viiratsi OÜ had a different name at the time the application was made (it was called Murika Rannaküla OÜ), but the e-Business Registery printout (evidence 10) of the entry for Bioforce Viiratsi OÜ includes the list of all prior names of this business entity and demonstrates that Bioforce Viiratsi OÜ is indeed the same entity whose application KIK assessed. KIK's assessment is signed digitally on 1 November 2024 by the assessor (evidence 8). Specifically, control question 7 in the application submitted by the final beneficiary asks whether "The inputs used for the production of biomethane meet the sustainability criteria set out in Article 29 of the Renewable Energy Directive and are listed in the list of feedstocks in Annex IX of the same directive" and the assessment (of the final beneficiary's response) by the KIK's assessor is affirmative, elaborated with a comment "Meets the requirements. Raw materials are solid manure, slurry and feed residues" (translated from Estonian, evidence 7, page 4).

On this basis, the Commission has reasonable assurance that this milestone has been satisfactorily fulfilled by 31 August 2026.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.