

3 February 2025

On Anti-corruption

Ministry of Justice

- 1. What is the state of play on the implementation of the 2021-2025 Anti-Corruption Action Plan? Who, when and how will the implementation be evaluated? What activities and why are likely to be continued in the next Action Plan?**

We have not yet completed the anti-corruption action plan activity report for 2024; this task is scheduled for the first quarter of this year. The Ministry of Justice and Digital Affairs will be coordinating the preparation of this activity report.

Several areas and directions reflected in the current action plan will certainly remain relevant in the future. However, we will provide a more detailed response regarding the plans for the new action plan under the following question.

- 2. What is the state of play of drafting the next Action Plan? When is it likely to be adopted? What are expected to be its main objectives and why? What are the current challenges that the Action Plan is expected to address?**

We have discussed plans for drafting a new action plan internally within the Ministry of Justice and Digital Affairs and have found that it would be reasonable to draft the action plan for a shorter period, i.e., 3 years instead of 5. It should be based on the priorities of the European Union and the Government of the Republic, as well as international agreements. The objective should be formulated as a measurable final outcome, and a deadline should be set for each task. At the same time, we find that the tasks of the anti-corruption action plan should be linked to institutional work plans and should include only those activities and developments for which resources are available. We also find that objectives and their achievement should be more clearly reflected by institutions, meaning that if an activity concerns for example all ministries, an overview of the status of activities should be provided separately for each institution. We have also considered adding 2–3 key anti-corruption objectives to the Open Government Partnership action plan (e.g., related to the transparency and trust of public governance).

We have specifically discussed the necessity of a revision of the Anti-Corruption Act, during which we would analyze the issues related to its implementation, possible solutions, and ultimately likely arrive at a new consolidated text. We have also discussed that, in addition to the state, attention should be given to corruption in the private sector and local governments. This includes a clearer consideration of a more comprehensive corruption prevention concept, including which laws contribute to this—for instance, regulations for preventing conflicts of interest are contained in several different, primarily procedural, laws. In our view, ensuring awareness of corruption prevention should be more explicitly defined as a management task. Therefore, it is important to ensure that institutional leaders recognize their responsibility in developing and implementing corruption prevention measures. It is also essential to consider how to enhance investigative capacity, develop IT solutions, improve transparency, etc. There are many ideas, but we will not elaborate on all of them at this point, as these are still preliminary thoughts within the Ministry of

Justice and Digital Affairs, which have not yet been discussed with other institutions (except Anti-Corruption Select Committee of the Riigikogu) and stakeholders, something that is naturally necessary for finalizing the plans. As we are currently in the middle of the OECD WGB Phase 4 evaluation and the GRECO 6th round evaluation, it is also reasonable to get an overview of the results of these analyses before finalizing our plans. Since resources are limited, we naturally have to make choices about what to do and in what order. At present, we forecast that the final text of the new action plan should be completed by the summer of 2026.

3. What is the current state of play as regards investigating corruption in the private sector? Was there any progress in this regard as planned a year ago? Were specific funds invested after they were allocated last year?

The Ministry of Justice and Digital Affairs can clarify that no specific legislative amendments have been made regarding the investigation of corruption in the private sector. More detailed responses on investigative capabilities should be provided by the Prosecutor's Office and representatives of investigative bodies. For example, the Prosecutor's Office has undergone a structural reform aimed at improving the efficiency of corruption crime investigations, as mentioned in our initial response.

4. You mention in the written input the revision of the Anti-Corruption Act for which amendments were submitted to the Parliament in May 2024. What is the state of play of this initiative and when is it expected to be adopted?

This bill is currently under review by the Constitutional Committee of the Riigikogu. It has been discussed in two committee sessions, in October and December 2024. During the October session, the committee requested the Ministry of Justice and Digital Affairs to submit proposed amendments to the bill, which the ministry complied with. These proposals were discussed in the December session, but discussions are still ongoing. At present, the Ministry of Justice and Digital Affairs is not aware of when the next discussion in the Constitutional Committee will take place.

5. What is the state of play on the implementation of the guidelines on conflicts of interest? Have any new rules or procedures been introduced? What are the results of the last evaluation? What are the long-term plans, considering also the upcoming Anti-Corruption Action Plan? Are there any considerations regarding a possible enforcement mechanism?

When discussing conflicts of interest, we need to distinguish between three concepts:

- 1) Procedural restrictions which are prescribed by the [Anti-corruption Act](#) § 11 for all officials regardless of their duties. The violation of these rules constitutes an offense.
- 2) Recusal rules primarily arising from procedural laws that apply to specific people in specific situations. For example [Administrative Procedure Act](#) § 10, the [Public Procurement Act](#) § 3 and § 4, and the [Code of Misdemeanor Procedure](#) § 25 etc. The consequence may be disciplinary liability, the invalidity of the decision/action, etc.
- 3) Ethical guidelines. For example [Civil Service Act](#) states that public officials (must base their actions on the Code of Ethics for Officials. One of the values outlined in the code of ethics is impartiality which means for example that an official refrains from activities and situations that may raise doubts about their impartiality when performing their duties.

Similar regulations are also found in various sector-specific laws. For example, a code of ethics has been established for judges under the Courts Act and for prison officers under the Imprisonment Act, etc. The consequence may be disciplinary liability.

In addition 2021, the Government of the Republic approved guidelines for avoiding conflicts of interest for ministers and their advisors. These guidelines have not been amended since.

Addition from 03.02.2025 meeting:

Ministry of Justice and Digital Affairs: in terms of possible enforcement mechanisms, no special mechanisms are considered at the moment, as the guidelines are meant to work through constant raising of awareness and practice shows that guidelines are being followed.

Estonian Internal Security Service: The current rules work well in practice and have helped to establish a common practice of preventing corruption. Before the guidelines, the practice of anti-corruption rules varied in different institutions and levels.

6. What is the state of play on the implementation of the guidelines on lobbying? Have any new rules or procedures been introduced? What are the long-term plans, including the upcoming Anti-Corruption Action Plan? Are there any considerations regarding a possible enforcement mechanism? [Are there any statistics on meetings?]

On March 18, 2021, the Government of the Republic approved the Code of Good Practice for Public Officials in Communication with Lobbyists. The Ministry of Justice and Digital Affairs is currently conducting an analysis of this code, aiming to determine the extent to which it ensures transparency in lobbying activities and to identify any necessary future amendments. The results of the analysis will be presented soon, providing an opportunity to discuss whether and what changes might be necessary and feasible within our system.

7. Are there any plans to regulate lobbying of members of Riigikogu?

To the knowledge of the Ministry of Justice and Digital Affairs, the Riigikogu has discussed the introduction of a similar Code of Good Practice to the one established by the Government of the Republic for high-ranking public officials. However, for detailed information on the development of this internal regulation, the Riigikogu itself would be the best source.

The Ministry of Justice and Digital Affairs has also submitted a proposal to amend the Anti-Corruption Act, aiming to require the disclosure of all meetings with tobacco industry lobbyists. Estonia has signed the World Health Organization Framework Convention on Tobacco Control, which, under Article 5.3, obliges parties to protect their public health policies from the commercial and other interests of the tobacco industry through legislation. This obligation means that we must ensure transparency by publicly disclosing all meetings with tobacco industry lobbyists. Therefore, we proposed an amendment to the Anti-Corruption Act to regulate the disclosure of lobbying activities related to the tobacco industry. The Anti-Corruption Act is a suitable legal framework for this, as it allows for the potential expansion of similar disclosure obligations to other sectors in the future. This approach is more practical than regulating lobbying separately in various sector-specific laws, such as the Tobacco Act.

8. What is the state of implementation of the rules on revolving doors, including the recently adopted amendment concerning the cooling-off period?

This topic is currently covered primarily by the Code of Good Practice for Public Officials in Communication with Lobbyists and is part of the aforementioned analysis, which will be completed soon.

9. What is the state of play of the specific guidelines on revolving doors that were expected to be developed by the Public Ethical Council?

We will specify the state of play as soon as soon as possible.

10. What is the state of play of the draft law on extending the investigating powers of the Political Parties Financing Surveillance Committee through a legal basis for requesting documents, information and explanations from third parties? Have there been any changes regarding the scope of this initiative or its aims?

11. What is the state of play of the amendments to the Political Parties Act? When is it expected for adoption?

Answers to Q 10 and 11:

The main scope has not changed - the main scope is still to strengthen the supervision of the funding of political parties.

Regrettably, we have so far failed to adopt amendments to the Political Parties Act. To give you an overview of the work we have done so far on this subject since we last met:

- In July 2024, the [draft was submitted to the ministries for coordination](#) (link to the [press release](#), in Estonian only) and to the following state institutions and interest groups for an opinion: the Committee, the Chancellery of the Riigikogu, political parties, the Electoral Committee of the Republic of Estonia, the Constitutional Committee of the Riigikogu, the Chancellery of the Chancellor of Justice, the Estonian Bar Association, the National Audit Office, the Supreme Court, The Estonian Chamber of Enforcement Officers and Trustees in Bankruptcy, the Association of Estonian Cities and Municipalities, the NGO Transparency International Estonia and the law faculties of universities.
- The feedback was constructive and broadly positive.
- Meanwhile, the government of Estonia changed:
[New centrist government in Estonia after Kallas stepped down;](#)
[The new government is in office and will hold a sitting this Thursday | Eesti Vabariigi Valitsus](#)
- The draft is still being finalised and further political negotiations are ongoing. In the meantime, the draft text and explanatory memorandum will be improved with the participation of the coalition partners - with the aim of ensuring the broadest possible consensus and common understanding.

We expect the draft to be approved by the Government of the Republic in spring 2025. But there is no exact timeframe.

The main content of current draft is (please note that until the political negotiations are ongoing, these main points should not be considered as the final outcome):

- 1) the expansion of the investigative powers of the Political Parties Financing Surveillance Committee (ERJK);
- 2) changes regarding how and when a political party must return a prohibited donation and expand the definition of a political party's affiliated organization;
- 3) state budget support for a criminally sanctioned party will be reduced;
- 4) the financial reporting obligations of political parties are also clarified.

12. You mention in your input the adoption of the legislation on whistleblower protection. Has there been any feedback on its implementation so far or on its impact? What is the state of play regarding the establishment of the electronic whistleblower reporting channel?

The law has been in force for a very short time; therefore, we are not yet able to provide an overview of its implementation practice. Institutions handle the reception of reports independently, and there are currently no plans to establish a central reporting channel. Many organizations already have similar channels in place. They work well and help manage the organization.

13. Is the current scope of the legislation considered sufficient or are there plans to extend the rules also to violations of national legislation?

The law was only recently enacted, and there are currently no plans to amend it. The only change in the foreseeable future relates to the transposing into national law Directive (EU) 2024/1226 of the European Parliament and of the Council of 24 April 2024 on the definition of criminal offences and penalties for the violation of Union restrictive measures. An amendment will be made to the Act on Protection of Persons Who Report Work-Related Breaches of European Union Law, expanding the list of areas to also cover violations related to Union restrictive measures.

14. In the 2024 Rule of Law Report we reported on a number of digital tools that were being developed. Could you please share the state of play and, possibly, results on the following tools:

- **A digital tool to enhance the verification of asset declarations that was expected to be operational in 2025?**

The Ministry of Justice and Digital Affairs is working on the development of a new declarations of interests register to replace the existing one. The exact timeline for its completion is not yet clear, but it is likely that it will not be ready before 2026.

- **e-tool to assess the risks of corruption in the private sector?**

This tool is available and accessible in English: [Simple Risk Assessment Questionnaire for Companies ENG](#)

- **civil society launched an online tool ('Integrity Watch 3.0') that aims at integrating information from the State Procurement Register, e-Business Register data, and income and receipts reports of political parties?**

As part of the Integrity Watch 3.0 project, a web application called Ausa Riigi Valvur (Guardian of a Fair State) (<https://www.ausriik.ee/index.php>) was developed by Korruptsioonivaba Eesti (Transparency International Estonia). An overview of this application is also available on the website if a more detailed review is needed. Essentially, it integrates data from the Public Procurement Register, the e-Business Register, and political party funding reports, helping to enhance transparency in processes and monitor various institutions for potential conflicts of interest, undue influence, or possible corruption.

- **e-learning tool for universities in relation to business corruption, economic crimes, and business ethics?**

The study materials are available in Estonian and can be accessed at: <https://arierialad.korruptsioon.ee/>

Ministry of Interior

- 1. What is the state of play of the activities of the working group established in the Ministry of Interior in order to prepare the legislative and organisational reforms to improve the effectiveness of investigation and prosecution of financial crime? Are there already any conclusions of the report that was expected to be submitted to the Government?**
- 2. What is the state of play of the revision of the Police and Border Guard Act launched in 2024? When are the amendments expected to be adopted?**
- 3. Have you identified specific trends or risk areas with regard to the fight against corruption?**
- 4. You mention in your input some statistics on corruption cases. What is the reference period for this data?**

Addition from 03.02.2025 meeting:

- *We will specify the statistics, including the reference period for corruption cases presented in the initial input.*
- *Please find some links to the report and analysis by the Ministry of the Interior (Mati Omblar):*
 - Omblar, M. 2024. Kuritegevuse varalise mõjutamise tööühma raport. Siseministeerium - <https://siseministeerium.ee/ministeerium-ja-kontaktid/ministeerium-ja-minister/uuringud-ja-analuusid#sisejulgeoleku-tagam>
 - Omblar, M. 2024. Lühianalüüs kriminaalmenetlustes arestitud ja konfiskeeritud vara mahtude erisuse võimalike põhjuste leidmiseks. Siseministeerium - <https://www.siseministeerium.ee/sites/default/files/documents/2025->

[01/L%C3%BChianal%C3%BC%C3%BCs%20varade%20arestimise%20ja%20konfiskeerimise%20vahe%20v%C3%B5imalike%20p%C3%B5hjuste%20leidmiseks_02.10.2024.pdf](#)

- <https://www.siseministeerium.ee/uudised/siseministeerium-saatis-asutustele-tutvumiseks-kuritegevuse-varalise-mojutamise-ettepanekud>

The Police and Border Guard Board (National Criminal Police) and the Estonian Internal Security Service

1. **What is the state of play/statistics of cross-border corruption cases since July 2024? What are the current trends in this regard? Have you investigated a high-level corruption case? What is the state of play regarding foreign bribery cases?**

Addition from 03.02 meeting: We will provide written statistics as soon as possible.

2. **What are the current risk areas in relation to corruption?**
3. **How do you assess your resources (both financial and human) in view of fighting corruption?**
4. **Have there been any specific new trainings relevant for your work since July 2024?**

Anti-corruption Select Committee

Written answers of the Committee were sent to Georgi during the 03.02.2025 meeting.

1. **Can you provide us with an update on the implementation of the Anti-corruption Action Plan? What activities were carried out since July 2024?**
2. **Are there any specific issues that need to be addressed in the upcoming period, possibly also through the new Anti-Corruption Action Plan?**
3. **What is your role with regard to the development of the new Anti-Corruption Action Plan?**
4. **How is the cooperation with other national authorities working in relation to anti-corruption?**

Political Parties Financing Surveillance Committee

1. **Could you please provide us with an update of the Committee's activities since July 2024?**
2. **What is the state of play of the draft law on extending the investigating powers of the Committee through a legal basis for requesting documents, information and explanations from third parties? Have there been any changes regarding the scope of this initiative or its aims?**

3. What is the state of play of the amendments to the Political Parties Act? When is it expected for adoption?

Questions were answered during the 03.02.2025 meeting, I will specify, will there be any written input from the committee as well.

On Justice System and Other institutional issues related to checks and balances

On Justice System

Ministry of Justice and Ministry of Interior

1. Could you inform us about the timeline of the reform concerning the Council for the Administration of Courts?

At the moment we intend to send the draft of the Bill to the Government in the middle of February. Phased entry into force of the law is planned on 01.04.2025, 01.07.2025, 01.09.2025, and 01.01.2026. The majority of the law enters into force on 01.01.2026.

The Court *en banc* should elect the judge members and substitute members of the Court Administration and Development Council. The elections are at the beginning of June 2025. The Court Administration and Development Council should start its work on July 1st, 2025. The Court Administration Service should start its work on September 1st, 2025.

2. What would be the exact composition of the reformed Council? Which powers would the reformed Council have? What are the planned human and financial resources for the reformed Council?

The competencies related to court administration will be largely transferred from the Ministry of Justice and Digital Affairs to the courts. Court administration will move from the executive branch to the judiciary.

A new Court Administration and Development Council (KHAN) will be established to organize court administration and development in the judiciary, through the transformation of the existing council. The current advisory and coordinating body will become the decision-making body at the strategic level of court administration. KHAN will be the highest body for administrating courts.

According to the Bill KHAN will comprise of the Chief Justice of the Supreme Court, 2 judges from the second instance courts, 3 judges from the first instance courts, the Minister of Justice and Digital Affairs or their appointed representative, 2 members of the Riigikogu, an attorney nominated by the Board of the Estonian Bar Association, and the Chancellor of Justice or their appointed representative. The heads of the courts may participate in the council's work with the right to speak.

The rules of procedure for the court office of the first and second instant courts will be established by KHAN instead of the minister. This will require amendments to the Criminal Procedure Code, the Civil Procedure Code, and the Code of Misdemeanour Procedure. Claims for compensation for damage caused by a court will be submitted to KHAN instead of the Ministry of Justice and Digital Affairs, which will require changes to the State Liability Act.

The number of judges in the county, administrative, and appellate courts, the distribution of judges among the courts, the number and remuneration conditions of lay judges in the district courts, and the number of assistant judges will be determined by KHAN, rather than the minister. These are also decisions concerning the court's organization, which depend on the budget.

The responsibility for the budget of the first and second instance courts will transfer from the Ministry of Justice and Digital Affairs to the judiciary, which will defend its budget independently before the Finance Committee of the Riigikogu. As a result of this change, the State Budget Act and the Government of the Republic Act will also be amended.

A Court Administration Service (KHT) will be created to provide support services to the courts and assist KHAN in court development. KHT will consolidate the Ministry of Justice's previous court administration tasks, support services for the courts (such as translation services, archive services) and the tasks performed by the court director (such as financial and asset management). KHT will be led by a court director appointed for a five-year term, who will be supervised by KHAN.

The salary costs for the Director of the KHT and the heads of the support services are covered by the salary costs of the existing service heads and the current court directors in the courts' budgets, as well as by the budget transferred from the Ministry of Justice and Digital Affairs to cover any shortfall (the budget of the tasks related to court administration).

3. Over the last year, have there been any instances where judges had to relocate because of the specialisation imposed by the amendments to the Courts act that entered into force last year?

The specialisation imposed by the amendments to the Courts act entered into force in 2023. There hasn't been any relocation of judges due to the amendments. Some judges changed their residence and due to that have asked to be relocated voluntarily.

4. Over the last year, have there been any instances where judges had to relocate due to the merging of courthouses?

In the beginning of 2025 one judge relocated due to the closing of Võru District court's Põlva building and the other judge asked to be released from office, the Supreme Court en banc granted the application and the judge will be released on 1st March 2025.

5. Have there been any results, positive or negative, regarding the main objectives of the reform – harmonisation of the case law and lowering the workload?

Mainly we have had positive feedback. Harju District Court is preparing to establish more departments. Harju District Court has already divided judicial clerks between Civil Law, Family Law and Economic Law branches. The heads of the departments have actively assumed their roles. The heads of the departments are holding online meetings to ensure that all judges working in other courthouses are included in the discussions. A guardianship supervision department in Pärnu District Court has gained the trust of the judges and also the guardians. Guardianship Supervision department aims to harmonize the supervision and proceedings, are spokespersons of the topic.

The heads of the departments are included directly in the discussions and are able to gather and introduce the feedback from the judges of their department. There is collaboration between the judges of the departments.

6. We understand that there is a plan for budget cuts in the judiciary, and that there is draft law planning to merge all courts at the same level, could you give us more information about this?

The government's goal is to reduce personal and administrative costs, as well as operational and targeted grants in the public sector by 10 percent over the next three years — 5 percent in 2025, 3 percent in 2026, and 2 percent in 2027. According to the budget reduction present court's budget reduction target for 2025 is 2 million euros (2 007 323), for 2026 3.7 million euros and for 2027 the budget reduction will be 4.4 million euros.

The planning of the 2025 budget for the courts was based on the preliminary budget for 2024, which was adjusted for the impacts of legislation and changes resulting from lease agreements with the Riigi Kinnisvara AS (real estate development and management company established for the efficient management of state real estate), as well as reduced by the reduction in the courts' operating expenses for 2025. To consider all of the above the total budget reduction for the courts in 2025 is 2 007 323 euros. The budget for 2025 is 60 193 527 euros. This is 615 385 euros less compared to 2024 when it was 60 808 912 euros. The table is added to explain the budget reduction.

Costs	Type of cost	2024	Changes			2025
			KRAPS ¹ 2025	Changes	Courts' reduction	
Judges' salary	estimated	22 251 648	730 498			22 982 146
Court clerks'/judicial assistants' salary	budget ceiling	13 733 616	420 596			14 154 212
Other court officials' salary	budget ceiling	13 013 243			-668 945	12 344 298
Operating costs	budget ceiling	1 192 794		70 800	-441 055	822 539
Real estate	budget ceiling	6 967 153		-734 636	-897 324	5 335 193
Postage costs	estimated	635 000				635 000
Third-party costs (experts)	estimated	1 000 000		968 000		1 968 000
Advance payments to bailiffs	estimated	5 000				5 000
Value-added tax (VAT)	estimated	1 972 958		-63 319		1 909 639

¹ The Salaries of the Higher State Servants Act

Depreciation	non-monetary	37 500				37 500
Total		60 808 912	1 151 094	240 845	-2 007 324	60 193 527

In the Ministry of Justice and Digital Affairs we are preparing a legislative intent to merge all courts at the same level. It is too early to elaborate what the draft law will include.

7. Have any steps been taken as regards lowering the workload of judges and attracting new judges to the justice system?

- As mentioned in the report, on January 14, 2025, the Riigikogu opened the proceedings of amendments of the Criminal Procedure Code and other laws. The one object of the law is optimizing court proceedings. Similar legislations, to make the use of procedural resources in civil and administrative proceedings more efficient, are in drafting, but in 2024 the drafts of legislation concerning efficiency of civil and administrative proceedings, has not been envisaged by the Government. We intend to send the drafts to the Government in February.
- With amendments made to the Courts Act in 2023, the chief judge of the Circuit Courts of Appel organises at least once a year the prospective judicial candidates training program. The purpose of the program is to provide judicial clerks with the opportunity to develop the knowledge and skills necessary for preparing for the judge's exam and applying for a judicial position. Selected judicial clerks must spend a period of six months to one year performing duties outside the court to which they have been appointed in such a way to gain work experience with several judges, at both first and second instance, but also in the Supreme Court, law firms and at the Office of the Chancellor of Justice. Up to ten judicial clerks from first and second instance courts are selected to the training program. The first program began in September 2023 and five judicial clerks participated in the program. The second program began in September 2024 and seven judicial clerks were selected to be a part of the program.
- Since 2020, we have been drafting legislation, with the aim of easing the restrictions on judges' professional activities and clarifying the conditions for working outside of the judicial office. After the amendments the judge may engage in entrepreneurship, lawmaking, and legal work in an international organization outside of their judicial duties. The judge must inform the court president about any outside employment, who may prohibit or impose restrictions on the judge's secondary activities if the volume or nature of the work impairs the proper performance of the judge's official duties or independence, or if it conflicts with the dignity of the judicial office or the standards of professional ethics.

The second part of the draft is the feedback system for the judges. Higher court judges will begin providing feedback to lower court judges. The purpose of this is to support judges in enhancing their professional knowledge and skills. Judicial feedback is essential to ensure high-quality judicial work, support the professional development of judges, and improve the quality of decisions and proceedings. In 2024 the draft of legislation has not been envisaged by the Government. The draft law is planned to be submitted to the Government in February 2025.

- The courts have employer branding action plan, also they have selected ambassadors who will empower working in the judiciary.

8. What would be the effect of the draft law tabled on 16 September 2024, for the indexation of judges' salaries? Will they be added to the list of salaries that will continue to be indexed the same way as before the law adopted in March 2024?

Yes. The highest salary rate for judges will be indexed again starting April 1, 2025, according to the general procedure set out in the law, meaning the temporary exception for judges will end at that point. The draft has not been envisaged by the Government.

9. As regards the increase of state fees for proceedings in civil and commercial cases, what is the reason behind the increase?

The increase in court fees is necessary to update the state fees related to court proceedings in such a way that the established fee rates partially cover the growth of court operating costs, while also preventing malicious or clearly unpromising lawsuits, and encouraging the parties to seek out-of-court solutions.

10. What were the effects of the recent increase of the same state fees?

The court and registry department fees were last increased on January 1, 2022, based on the analysis of 2020 comparative data. Although the goal of the previous adjustment was to make the fees cost-based, this was unfortunately not achievable for the following reasons:

Firstly, between 2020 and 2023, the consumer price index increased by 36.4%. From the first quarter of 2020 to the first quarter of 2024, the consumer price index rose by 38.7%. The expected change in the consumer price index is between 43% and 45%, the adjustment of the state fees has generally been based on this forecast. Therefore, to ensure that the fees in 2025 are based on the cost structure determined in 2020, all state fees would need to be increased by at least 43%.

Secondly, the changes in state fees implemented in 2022 did not fully achieve cost-based fees for all similarly demanding tasks (e.g., business register entries). The number of entrepreneurs registered in the business register has grown over the years, which has also increased the costs of managing information systems.

Thirdly, in 2022, the fees for entries in the land register, commercial pledge register, and ship registration book were not adjusted. These fees also need to be revised based on the consumer price index and the increased costs of maintaining the registers.

With the amendment to the Courts Act that came into force on May 1, 2023, the salary of an assistant judge was increased. The assistant judges' salary will now be 65% of a judges' salary, compared to the previous 50%. In 2022, the budget for the registry department was 3 135 501 euros, while the 2024 budget already increased to 4 674 398 euros. The cost of maintaining the registers has increased by 1 538 897 euros per year.

Also, previously increasing state fees didn't gain the object – to prevent malicious or clearly unpromising lawsuits and encourage the parties to seek out-of-court solutions.

On Other issues related to checks and balances

Ministry of Justice and Ministry of Interior

1. What changes have been made to the rules of procedure in Parliament to avoid the excessive number of amendments tabled by MPs which led to delays in the legislative process and the use of fast-track procedures?

There have been no changes to the Rules of Procedure and Internal Rules Act of the Riigikogu. In a situation of extensive obstruction (fall 2023/spring 2024), the practice of implementing the law changed. The Riigikogu adhered to the principle that when the submission of amendments becomes primarily a tool of obstruction, threatening the fulfilment of the Riigikogu's constitutional duties, extraordinary measures are permitted to ensure procedural efficiency and the effective functioning of the parliament.

The lead committee has both the right and the duty to ensure the efficiency of bill proceedings. If the number of amendments and the behaviour of their submitters indicate that they are introduced solely to delay proceedings, the lead committee may:

- Merge related amendments and present them to the plenary for voting as a single package.
- Leave some amendments unreviewed if they do not comply with the Rules of Procedure and Internal Rules Act of the Riigikogu, are unconstitutional, or do not contribute to the substantive discussion of the bill.

The session chairperson has the right to limit breaks before amendment votes if such breaks are used solely for obstruction purposes.

At the same time, a balance must be struck between two constitutional principles:

- Protection of opposition rights – Members of the Riigikogu must have the opportunity to submit amendments and participate in the legislative process.
- Effective functioning of the parliament – Legislative work cannot be indefinitely hindered by procedural tactics that do not serve a substantive purpose.

The opposition repeatedly petitioned the Supreme Court for constitutional review, which confirmed that the merging of amendments and the restriction of breaks are permissible if they contribute to the efficiency of parliamentary work and do not unjustifiably restrict the rights of Riigikogu members.

2. Could you inform us about the state of play of the draft reform on the financial autonomy for the Chancellor of Justice and the National Audit Office?

The state budget law was amended to guarantee the Chancellor of Justice and the National Audit Office greater budgetary independence from the executive power. Amendments entered into force in June 2024. As of then, the budget of the Chancellor is discussed directly in the Parliament Financial Committee and no longer needs a prior review of the Government. The same amendment was made regarding the budget of the National Audit Office. See [State Budget Act](#), § 25¹ subsection 3 clause 12 and § 38 subsection 2¹ (in English).

3. Could you inform us about the state of play of the proposal of the Gender Equality and Equal Opportunities Act?

We have provided the state of play in our written input (page 10) and this information was presented in the input as a reply to the concerns that were expressed by the Gender Equality and Equal Treatment Commissioner:

The promotion and coordination of equal treatment and gender equality, including accessibility, belongs to the scope of governance of the Ministry of Economic Affairs and Communications (according to § 63 (1) of the Act on the Government of the Republic). Last year, together with the formation of the new government, the preparation of the draft law on gender equality and equal opportunities was assigned to the responsibility of the minister of Justice and Digital Affairs by [order of the Prime Minister](#) (p 2 of the order).

The proposal of the Gender Equality and Equal Opportunities Act prepared in 2024 by the Ministry of Economic Affairs and Communications undoubtedly deserves recognition for thorough involvement of stakeholders. Unfortunately, this draft received numerous legal criticism and contradictory feedback during the consultations. Given the circumstances and to obtain a different legal perspective on the unification of laws and the transposition of the European Union directive, the minister of Justice and Digital Affairs involved the private sector in the process. The aim of this step is still to ensure broad protection of people in accordance with the Constitution, but without unnecessary administrative burden. The minister of Justice and Digital Affairs can assure that all stakeholders will be involved and can provide their feedback. The minister is ready for comprehensive cooperation with both the relevant state authorities and civil society organizations.

Unfortunately, we have no further information about the state of play, the next steps depend on the cooperation between two ministries, the Ministry of Economic affairs and Communications and the Ministry of Justice and Digital Affairs.

4. What are the main findings of the analysis of consultation periods during the preparatory phase of legislation conducted by the Ministry of Justice and Digital Affairs?

In 2023, the Ministry of Justice and Digital Affairs began monitoring the duration of consultation periods for draft laws prepared by the executive. It is important to note that in Estonia line ministries have broad discretion in conducting consultations —stakeholder engagement can occur at any stage of policy development and in various forms. In many cases, cooperation with stakeholders begins well before draft amendments are formally prepared. As a result, obtaining comparable and measurable data on the extent and quality of stakeholder engagement is challenging.

However, what can be objectively monitored is the duration of the official coordination round that each draft law undergoes once it is made public. At this stage, the draft is sent for interministerial coordination and stakeholder feedback. According to § 7(2) of the [Rules of the Government of the Republic](#), the coordination round should generally last 15 working days.

The Ministry of Justice and Digital Affairs collected data on the consultation periods for all draft laws sent for coordination between January 2023 and December 2024 (N=208). The average consultation period was 14 working days (approximately 20 calendar days). A slight improvement was observed in 2024 compared to 2023, with the average increasing from 12 to 15 working days. However, for 23% of draft laws, the consultation period was less than 10 working days — insufficient time for stakeholders and ministries to provide meaningful feedback. This issue primarily affected draft laws aimed at increasing state revenues or reducing costs, often due to the urgency of the annual state budget process.

The analysis highlights the need for greater adherence to coordination and consultation requirements and has helped draw ministries' attention to the importance of allowing adequate time for stakeholder feedback.

Media pluralism

Ministry of Culture and Ministry of Justice

1. In your opinion, what is the overall situation of the press in 2025 and, more generally, the challenges that the media sector is facing?

Estonia continues to be one of the countries with a very high level of media freedom in the Media Freedom Index (Estonia is ranked sixth in the world). The economic situation of Estonian media companies can be considered satisfactory. However, while the number of paid digital subscriptions by private media companies is increasing, the withdrawal of advertising money from Estonia by large global platforms remains a very big problem. As a result of austerity measures in the state budget, the ERR's budget will be reduced by 5% over the next three years, making it more challenging for the ERR to fulfil all its statutory tasks at the current level.

2. Are there any developments on legal safeguards or incidents regarding editorial independence? How about regarding the rules regulating media concentration or specific legal provisions for companies in the media sector?

Work continues on amending the law on national broadcasting. The aim is to bring the current funding model of the Estonian Public Broadcaster in line with Article 5 of the European Media Freedom Regulation.

3. Could you elaborate on any ongoing work concerning legislative amendments affecting the tasks of the national media regulatory authority, the Consumer Protection and Technical Regulatory authority, including dissemination and distribution of information that poses a security threat and licensing broadcasters? In the 2024 Rule of Law report, it was noted that the Ministry of Culture had gathered views regarding possible changes to the media legislation that could affect the work of the media regulator.

The aim of the proposed amendment is to give the regulatory authority greater powers to restrict the broadcasting of programmes by media service providers from third countries that pose a threat

to national security. The amendment does not affect the current conditions for the registration of media service providers and the licensing of media services. The same principle is reflected in Article 17 of the EMFA.

- 4. Could you elaborate on any ongoing work to strengthen the independence of the public service media, and the areas addressed? In the 2024 Rule of Law report, it was noted that a new legislative proposal was being prepared.**

The process of amending the law on public service media is in its final stages. According to the Government's work plan, the law should enter into force by autumn 2025.

- 5. Could you elaborate on the main takeaways of the analysis on the Public Information Act to improve the right of access to information mentioned in your written input and any further information about the legislative intent that will follow? Could you also elaborate on the content and intended use of the national open data portal?**

Was answered during the meeting.

- 6. Could you elaborate on the next steps with the transposition of the Directive on strategic lawsuits against public participation (SLAPP) and possible cases of defamation or political pressure against journalists, following last year's report?**

We are in the early stages of transposing the Directive (the deadline for transposition is May 2026). As one option, we have considered supplementing the Code of Civil Procedure with a special chapter, but we see that this may be difficult, e.g. considering the transposition of the Directive's definitions. Therefore, as an alternative, we have considered to prepare a special law for the transposition of the Directive.

Initially, we see on a technical level that the Directive's measures should be implemented horizontally, as it would probably be problematic from the perspective of our Constitution if defendants' legal remedies would differ depending on whether a SLAPP would be identified in a domestic or cross-border case. But ultimately, this is a political decision.

We have *early dismissal* in our national law, which is not a decision on merits (we have discussed this during the negotiations in the EU Council). Our national law also provides for compensation of damage; court decisions of all levels are published. We have a couple of bilateral agreements on legal assistance, the agreement with Russia would be denounced by the time of the implementation of the Directive.

We are currently of the opinion that the Government could submit a draft law on the transposition of the Directive to the Parliament in December-January.

- 7. Could you elaborate on the case concerning an Estonian journalist charged with high treason on the grounds of her work for Russian news agencies?**

Some notes from the ministry of Culture (the Prosecutor's Office might be able to provide some additional comments):

Prosecutors have charged Estonian journalist Svetlana Burceva with violating international sanctions and treason. Since 2017, Burceva has been working for various online publications of the Russian media group Rossiya Segodnya. According to the prosecutor, her work was published in online news and other media outlets serving Russian propaganda interests. Even after the Council of Europe imposed sanctions on Russia, Burceva continued to work for Dmitry Kiselyov, the owner and ultimate beneficiary of the Kremlin propaganda outlet Rossiya Segodnya. According to the indictment, Burceva was aware of the prohibition of her activities and continued her sanctioned activities even after the Estonian news portal Sputnik was suspended in 2019 for violating sanctions. Between 2020 and 2023, Burceva continued to produce media content for the Baltnews.ee portal under the pseudonym Alan Torm. The evidence gathered by the prosecution suggests that Burceva knowingly violated international sanctions. As a result of the pre-trial investigation, the Defence Police concluded that Burceva could in no way be considered an independent, objective and neutral journalist.