Independent Reporting Mechanism

Action Plan Review: Estonia 2025–2029

Open Government Partnership

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Section I. Overview

Estonia's seventh action plan aims to develop the skills and create the infrastructure for open government. The most promising commitments seek to improve transparency and participation in the legislative process and strengthen multi-stakeholder collaboration on open government policy. While focusing on incremental improvements to ongoing reforms is a strategic choice, reformers could use the midterm refresh to identify opportunities to deepen reforms.

Estonia's seventh action plan contains six commitments,[1] grouped into two broad themes.[2] It is the country's first four-year action plan and carries forward central themes from previous action plans. The government continues to take incremental steps to strengthen policymakers' skills in collaboration and public engagement while building digital participation and transparency tools. The action plan also introduces an expanded OGP multi-stakeholder forum (MSF) and new requirements for the government's legislative drafting process.

The IRM identified two promising commitments. Commitment 2.1 seeks government-wide adoption of a new digital co-creation environment for drafting legislation and policies, as well as expanded public access to open research and language data. The co-creation environment has been developed across three previous action plans and has now reached the stage of formal adoption by the central government. If successful, this would constitute a substantial change in public transparency and participation by offering a single platform for the public to monitor and participate in the legislative drafting process.

At a Glance

MEMBERSHIP

2011 Joined OGP

COMMITMENTS

5/6 Open government lens

1/6 Substantial potential for results

PROMISING COMMITMENTS

- Increasing the role of the Open Government Committee in promoting open governance.
- Using data and new technologies for decision-making.

Met the minimum requirements during co-creation: Yes

Commitment 1.2 seeks to reform the Open Government Development Committee ('Avatud riigivalitsemise arengukomisjon' or ARVAK), which also serves as Estonia's OGP MSF. The reform aims to involve more diverse stakeholders in ARVAK's work and strengthen its role in coordinating government-wide open government policies. As written, it promises modest advances in transparency and participation. However, the impact could be substantial if the government grants ARVAK a strong mandate and redesigns its work processes to support meaningful open government dialogue and innovation.

Other commitments assessed as having modest potential for results include Commitment 1.1, which aims to continue developing policymakers' skills in cooperation and inclusion, and pilot

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new public participation formats; Commitment 2.2, which aims to increase transparency in public decision-making by facilitating the submission and disclosure of lobbying data and interest declarations and clarifying legislative drafting rules to encourage policymakers to inform the public of new policy initiatives early in the process; and Commitment 2.4, which aims to reduce public sector bureaucracy in collaboration with the private sector.

Estonia can take advantage of its first four-year action plan to focus on implementing ambitious and complex reforms. The OGP Point of Contact stated that the longer timeframe was chosen to allow limited staff to focus on implementation rather than co-creation and reporting.[3] While this is a strategic choice, many commitments currently advance incremental improvements to ongoing reforms. Reformers can use the midpoint refresh to identify opportunities to increase the ambition of reforms in proportion to the four-year timeframe. Compared to the previous action plan (2022–2024) which was fully led by the Government Office, the current action plan involves more institutions, including different departments of the Ministry of Finance and Ministry of Economic Affairs and Communications.

The action plan co-creation process provided ample opportunities for civil society participation. These included MSF discussions, meetings of the OGP civil society roundtable,[4] a three-week online campaign to crowdsource commitment ideas, bilateral meetings between the Network of Estonian Non-Profit Organizations (NENO)[5] and the Government Office, and a full-day civil society engagement workshop in May 2025 to discuss civil society's priorities for the new action plan.[6] According to a civil society representative, the action plan largely reflects civil society's priorities. [7] However, they noted that civil society stakeholders would have preferred a stronger emphasis on implementing proposals from the Open Government Roadmap, a key result of the previous action plan.[8]

The Government Office and civil society also exchanged views on the inclusion of government efficiency reforms. During the final months of the co-creation process, the Government Office added several commitments that had not previously been discussed with civil society.[9] The Government Office did not accept a proposal to convene an MSF meeting to discuss these changes.[10] It did, however, hold a separate, informal meeting with the Estonian Cooperation Assembly and NENO to gather their feedback on the new commitments, and made changes to the draft action plan as a result.[11] Specifically, the Government Office removed a proposed commitment to establish performance bonuses for public officials who delivered savings in public expenditure and the bureaucracy reduction initiative (Commitment 2.4) from the list of 'flagship projects', replacing it with the co-creation environment (Commitment 2.1) as CSOs has suggested.[12] The Government Office noted that it also informed the MSF that none of the activities previously proposed by civil society had been withdrawn, and that the additions consisted only of government-led initiatives. Nonetheless, several activities that NENO does not consider relevant to open government remained in the published action plan.[13]

Compared with Estonia's recent action plans, this seventh action plan contains more milestones, often managed by different departments and public officials. While wider involvement could foster broader commitment to OGP, the larger number of activities may create coordination challenges and increase the risks of fragmentation. During the midpoint refresh, the government could review the list of activities, clarify the open government lens of those that lack a public-facing element, and prioritize implementation of commitments that contribute to open government goals. For example, it could clarify how some activities—under Commitments 1.1, 2.1, and 2.4, as well as Commitment 2.3 on improving the quality of digital public services

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and developing the GovTech ecosystem—will promote government transparency, civic participation, or public accountability.[14]

[1] Since the six activities constitute specific lines of action and comprise 19 distinct sub-activities, this action plan review analyzes the six activities as separate commitments to allow for a more tailored analysis of each reform. The action plan defines altogether 22 milestones. Three are related to reforming the MSF (Commitment 1.2) and two to developing the GovTech ecosystem (Commitment 2.3). After clustering related activities, the milestones constitute 19 standalone activities with distinct objectives and outputs.
[2] Theme 1 ('Commitment 1' in the action plan) aims to foster open government skills in public administration, while Theme 2 ('Commitment 2' in the action plan) focuses on developing a supporting infrastructure for open government.
[3] Marten Lauri (Advisor at the Government Office & OGP Point of Contact), interview by IRM researcher, 10 March 2026.
[4] The OGP civil society roundtable is an informal network of civil society organizations interested in open government issues.
[5] NENO is Estonia's largest civil society advocacy organization and a long-time member of Estonia's OGP MSF.
[6] "Estonia's Open Government Partnership Action Plan 2025–2029," Government Office of Estonia, 15 January 2026, https://www.opengovpartnership.org/documents/estonia-action-plan-2025-2029.
[7] Marcus Ehasoo (Advocacy Lead at NENO), interview by IRM researcher, 31 March 2026.
[8] "IRM Results Report: Estonia 2022–2024," Open Government Partnership, 4 June 2025, https://www.opengovpartnership.org/documents/estonia-results-report-2022-2024; Based on information from the MSF meeting in March 2026, the new action plan addresses seven of the 30 proposals in the roadmap, while ten have been integrated into other government processes; "ARVAK Minutes of Meeting, 11 March 2026," ARVAK, 11 March 2026, https://dhs.riigikantselei.ee/avalikteave.nsf/documents/NT004103BA/%24file/ARVAK26P1.pdf; ARVAK meeting presentation, shared by Marten Lauri (Advisor at the Government Office & OGP Point of Contact), correspondence with IRM researcher, 24 March 2026.
[9] Ehasoo, interview; Külli Taro (Member of Supervisory Board of the Estonian Cooperation Assembly), correspondence with the Government Office, 6 November 2025.
[10] Taro, correspondence.
[11] The meeting took place on 20 November 2025, according to Marcus Ehasoo (Advocacy Lead at Network of Estonian Non-Profit Organizations), correspondence with IRM researcher, 14 April 2026; Marten Lauri, written comments during the report's pre-publication period, 1 October 2026.
[12] Ehasoo, interview.
[13] According to NENO's assessment, Commitments 2.3 on improving the quality of digital public services and developing the GovTech ecosystem, 2.4 on reducing government bureaucracy, and 2.1 on using data and new technologies for decision-making include milestones that do not seem to be relevant for open government.
[14] Commitments and milestones without a clear open government lens are not analyzed in depth in this review but may be revisited during the end-of-term assessment of the action plan results.

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Section II. Promising Commitments

This section analyzes commitments with the most promise to achieve notable results, according to IRM assessment. Promising commitments address a policy area important to stakeholders or the national context. They must be verifiable, have an open government lens, and a modest or substantial potential for results. This review looks at challenges, opportunities, and recommendations to support implementation.

Table 1. Promising Commitments

Commitment 1.2 aims to expand the role of the Open Government Development Committee from a multi-stakeholder forum overseeing OGP action plans to a broad-based cooperation platform to promote and test innovative open government approaches.
Commitment 2.1 seeks to adopt a new digital co-creation environment for legislative drafting. It also aims to improve public access to open data in the areas of research and language data.

Commitment 1.2: Increasing the role of the Open Government Development Committee in promoting open governance

Implementer: Government Office.
For a complete description, see Commitment 1.2 of the action plan.

Context and objectives

This commitment seeks to reform the Open Government Development Committee (ARVAK), which serves as Estonia's OGP multi-stakeholder forum (MSF). ARVAK was established in 2019 by merging the former OGP Coordinating Council with the government committee on improving the state's administrative capacity.[1] After 2024, ARVAK's focused its work on overseeing the national OGP process and supporting the implementation and monitoring of the government's co-creation accelerator program.[2]

For years, civil society stakeholders have criticized the formalistic nature of ARVAK's meetings and expressed a desire for the MSF to facilitate more substantive debate on open government issues and solutions.[3] Commitment 1.2 addresses this issue by reforming ARVAK's mandate, composition, and working processes to increase the transparency of its work and strengthen its role as a multi-stakeholder space for open government innovation across government, beyond OGP action plan cycles. The planned reform could improve both transparency and public participation in the national open government policies.

Potential for results: Modest

The commitment is assessed as having a modest potential for results because it aims to institutionalize ARVAK's new functions and working processes through an order of the Secretary of State, building on the order that established ARVAK. However, the current reform plan does not specify mechanisms or pathways that would support follow up to ARVAK's in government practice.[4]

ARVAK currently oversees the development and implementation of national OGP action plans and supports the Secretary of State in evaluating ministries' funding proposals to the

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government's co-creation accelerator program.[5] Until 2024, ARVAK also served as a thematic monitoring committee for European Union (EU) Structural and Investment Funds, overseeing the implementation of funds dedicated to strengthening public administration management and collaboration capacity, as well as improving the quality of policymaking processes.[6]

Over the years, ARVAK's meeting agendas have been dominated by approving monitoring reports, documents, and decisions related to the use of EU funds, as well as updates on OGP commitment implementation.[7] Although ARVAK has generally met the OGP minimum requirements on participation and co-creation, Estonian civil society stakeholders have been dissatisfied with its focus on formal decision-making and the limited time allocated to deeper discussion of open government reforms and issues,[8] such as ways to improve public engagement practices across the government.[9] Stakeholders have also pointed to the absence of an institution responsible for systematically developing of democracy and open government in Estonia.[10] As a possible solution, CSOs have suggested reshaping the MSF from an oversight body into a genuine discussion forum where government and civil society could co-create solutions to open government issues.[11] They have also proposed giving the MSF a stronger role in monitoring and steering the implementation of wider open government practices, outside OGP action plans.[12]

The Government Office plans three streams of activity: (1) expanding ARVAK's membership to include civil society, research, media, and business stakeholders, as well as expanding the role of non-governmental members, (2) widening ARVAK's mandate to include testing and disseminating open government practices across the public sector, and (3) improving public communication and monitoring of ARVAK's work. Enshrining the reform in a Secretary of State's Order and implementing it during the action plan cycle would help institutionalize the changes. As ARVAK is a standing advisory body to the Government Office, the results are likely to last beyond the action plan cycle.

Evidence of meaningful results could include public records of ARVAK's work, stakeholder statements showing active and consistent contributions to its work, and evidence of ARVAK's influence on government institutions' policymaking practices. Such results could be demonstrated through changes to policy content, institutional procedures, or officials' engagement with open government principles. Increased visibility through regular public communication about ARVAK's activities could provide further evidence.

Based on the March 2026 reform plan proposed by the Government Office,[13] the commitment could lead to modest changes in public participation and transparency in open government policymaking. The reform proposal expands ARVAK's advisory role to the Government Office from covering OGP action plans to addressing open government issues more broadly. It also gives ARVAK the responsibility for facilitating public debate on open government and OGP action plan focus areas. However, the current proposal may fall short of the objective of turning ARVAK into a central driver of open government innovation across the public sector because it does not give ARVAK a mandate to foster and monitor open government practices and innovations across public sector institutions, which would be needed for more substantial impact.

Nevertheless, the Government Office plans to formalize ARVAK's biannual meetings[14] and introduce a more dynamic membership policy based on members' expertise in the OGP action plan's focus areas. Under the proposal, two MSF members would lead the MSF's work in each focus area, one representing government and the other civil society. ARVAK could also engage

external experts as needed. These changes could make ARVAK more open to public input and strengthen the role of non-governmental stakeholders in the forum.

The commitment also plans to increase the transparency of the national OGP process in two ways. First, the Government Office plans to publish more information about the MSF's activities on the national OGP website, which currently includes a description of the MSF's mandate, a list of members, and links to meeting minutes.[15] According to the OGP Point of Contact, the Government Office plans to engage its communication department more actively in public communication around the OGP process.[16] Second, the Government Office is considering to replace biannual updates on the implementation of OGP commitments with a monitoring dashboard updated on a rolling basis.[17] If the Government Office creates such a dashboard for OGP commitments, it could substantially improve the transparency of the OGP process.

Stakeholders welcome this commitment but highlight potential shortcomings. According to a civil society representative, the new format could facilitate more substantive discussions on open government and strengthen CSOs' role in co-leading them.[18] However, they regard the planned changes to the MSF's mandate and structure as relatively minor and question whether they will increase government institutions' interest in ARVAK's work or strengthen their commitment to open government. The representative highlighted the need for the Government Office to encourage ministries to actively participate actively in ARVAK's work to achieve more meaningful results.

Likewise, a representative of the Estonian Cooperation Assembly considered the reform a positive step but cautions that the impact of ARVAK-like advisory bodies is inherently limited if government institutions lack genuine commitment to open government.[19] They also emphasized the importance of giving adequate advance notice of ARVAK meetings and giving CSOs and non-governmental experts sufficient time to prepare if they are expected to take a more active role in leading discussions.[20]

Opportunities, challenges, and recommendations during implementation

The impact of ARVAK's reform will depend on the ambition of the mandate agreed by the Secretary of State, the Government Office, and current MSF members. A key risk is that the reform is implemented on paper but not in practice. Formally updating ARVAK's mandate and appointing new members will not automatically improve the quality or depth of multi-stakeholder dialogue within the MSF. Nor will these measures increase the MSF's influence on public debate and policymaking unless government institutions actively contribute to its work and commit to acting on its advice.

The commitment's ambition to strengthen ARVAK's engagement with the public would also require sufficient staff time for concrete engagement and dissemination activities. Despite already having responsibility for the 'broad dissemination' of Estonia's OGP activities, ARVAK has so far largely lacked the capacity to fulfill this role.[21]

To support meaningful results, the Government Office could:

- **Going beyond the membership and mandate revisions, review and redesign ARVAK's working processes and meeting formats to facilitate substantive and inclusive discussions of topical open government issues**. This could include allocating more discussion time in meeting agendas and dedicating human resources to thorough preparation and moderation. ARVAK could also diversify its working formats by creating smaller thematic working groups or task forces to develop solutions to specific problems. This would address the dissatisfaction expressed by civil society reformers

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regarding ARVAK's focus on formal decision-making and the limited time allocated to deeper discussion of open government reforms and issues in the past.[22] The Government Office could draw on the Netherlands, which strengthened the role of the civil society coalition 'Talking about Information' in the OGP process. The Dutch government also plans to hold eight MSF meetings each year alongside monthly calls with commitment leads to monitor action plan implementation.[23]

- **Work with existing committees and departments to increase government effectiveness.** ARVAK could coordinate with the Government Office's innovation unit and link its work to the Estonian Civil Society Development Concept (EKAK) as it implements its expanded open government policy mandate. ARVAK could draw on the United Kingdom's Policy Lab, which embeds innovation staff in departmental projects rather than operating parallel or duplicate structures.[24]
- **Engage other MSF member institutions in more active public communication around the OGP process**. This could include providing government institutions with support on communication formats and key messages. For CSO members, it could involve targeted public funding to undertake specific communication and engagement responsibilities on behalf of the government, as Latvia did under its 2021–2025 OGP action plan.[25]
- **Create a dynamic monitoring dashboard for OGP commitments.** This could include the implementation status of commitments, links to past and upcoming activities, and explanations of deviations from the original plan. Estonia could draw on Canada's OGP commitment implementation dashboard, which includes overall commitment completion statistics and updates on individual commitments.[26]

Commitment 2.1: Using data and new technologies for decision-making

Implementers: Ministry of Justice and Digital Affairs, Government Office.
For a complete description, see Commitment 2.1 of the action plan.

Context and objectives

This commitment brings together four distinct activities that apply digital technologies to make public decision-making more transparent and participatory. Building on previous action plans, the government aims to mandate the use of a digital environment for co-creating legislative drafts ('Sätla'). This would unify the legislative drafting process and related public participation opportunities on a single digital platform. The Government Office and Ministry of Justice and Digital Affairs have been developing the environment since 2020 to address the longstanding problems of low public participation and fragmented public information about the government's policymaking process.[27]

As part of the government's broader objective to increase the supply and use of open data,[28] the commitment also seeks to categorize Estonian language data and publicly funded research data as 'high-value datasets' under the European Union (EU) Open Data Directive.[29] Since 2018, Estonia has rapidly improved public access to open data[30] and increased the number of open datasets on the national data portal more than fiftyfold,[31] now ranking tenth in the EU according to the 2025 Open Data Maturity report[32] and fourth in the OECD 2025 OURdata Index.[33] The government has contributed to these developments by creating frameworks and guidelines for data management and publication,[34] building the capacity of public agencies,[35] and integrating open data requirements into public sector funding mechanisms.[36] At the same

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time, more than 60 percent of government institutions have not published any open data.[37] The government therefore aims to further improve the creation, findability, and reuse of public sector data to improve access to information and support economic growth.[38]

Commitment 2.1 also includes milestones related to internal data management and sharing. These include developing a language-based data space, secure data-processing environments, a data-driven decision support system, and data-based services. These activities are not analyzed in detail because, as written, they are internally facing reforms, making their relevance to open government values unclear. The government could use the midpoint refresh to clarify the milestones' relevance to open government values.

Potential for results: Substantial

The commitment has substantial potential for results as it creates binding legal changes in two areas: the legislative drafting process and the publication of open language and research data. The new co-creation environment would introduce a single platform for lawmaking, while the publication of open data would be supported through guidelines, trainings, counselling for public sector data holders, and data publication requirements integrated into public sector funding instruments.

Implementation of a co-lawmaking environment ('Sätla')

As part of Estonia's previous action plan, the Government Office and Ministry of Justice and Digital Affairs developed a prototype of the co-creation environment, which continued user testing and piloting after the end of the action plan.[39] The prototype provided a workspace where government institutions and invited non-governmental stakeholders could co-create and jointly edit legislative drafts. It also included a public interface that allowed citizens to view information on draft laws under consideration, subscribe to notifications about selected initiatives, submit comments, and view comments submitted by other stakeholders.[40] Under the current action plan, the government aims to pass legislation mandating phased implementation beginning in October 2026. The government also plans to expand the platform's scope to cover EU legislative initiatives as well as governmental and ministerial regulations.[41]

This commitment addresses the widely acknowledged problem of fragmented information and the lack of user-friendly digital participation channels. Government institutions currently use multiple information systems to prepare legislative drafts.[42] The first draft of a new law is usually created in the responsible ministry's internal system. It is then shared with other ministries and interest groups by email or document management systems, uploaded to the Information System of Draft Acts ('Eelnõude infosüsteem' or EIS) for inter-institutional coordination, transferred to the Information System of Government Sessions ('Vabariigi Valitsuse istungite infosüsteem' or VIIS) for governmental decision-making, and finally entered into Parliament's information system for parliamentary deliberation. While the EIS is open to the public, the other systems are mainly intended for internal public sector use. This makes it difficult for citizens to follow which policies are being prepared, how far they have developed, and who has participated in the process.[43] While some ministries publish annual public engagement plans that list initiatives on which they seek public input and provide indicative timelines,[44] most do not.[45]

Public participation in legislative drafting generally occurs at two key stages.[46] First, government institutions may invite CSOs and interest groups to submit ideas during the preparation phase. Although the government's Good Practice of Engagement guidelines encourage early stakeholder engagement in policy initiatives that have a "significant impact on interest groups

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or the whole society," government institutions often only request feedback on final drafts of policy initiatives, commonly seeking input from civil society umbrella organizations and long-term institutional partners.[47] Second, government institutions may submit final legislative drafts to the EIS for open public consultations.[48] However, full open public consultations remain rare. From 2021 to 2026, the government conducted inter-institutional coordination processes on hundreds of legislative drafts and legislative intent documents, which represent the minimum required level of engagement. Yet it only submitted three legislative initiatives for open public consultation.[49] Instead, the most common form of public engagement at the central government level is to invite comments from selected CSOs and interest groups when drafts are submitted to the EIS.[50] Although citizens can access the EIS, it was not designed as a public participation tool and users find it complicated and difficult to use.[51]

In April 2026, the government submitted a proposal to Parliament to amend the State Gazette Act ('Riigi Teataja Act') and mandate the phased use of the new co-creation environment.[52] The amendment would require the use of Sätla for legislative drafting stages,[53] preceding publication in the State Gazette.[54] The proposal was passed in Parliament in June 2026.[55]

If the amendment is passed, government institutions will be required to use the co-creation tool to draft, process and publish information on government-initiated legislative drafts starting October 2026.[56] Although the obligation would not apply to Members of Parliament (MPs), the current proposal stipulates that key information on all legislative initiatives, including those initiated by Parliament would be published in the co-creation environment for transparency purposes. The system would publish information on any new legislative initiatives as soon as they are initiated, show their timeline and status, and allow users to compare different versions and track changes to legal texts throughout the process.[57]

The co-creation environment therefore promises to reduce the information fragmentation and substantially improve public access to information about the policymaking process. While the tool does not itself create new opportunities for public participation, it would bring information about all participation opportunities together in one place and connect them to each legislative initiative's timeline.[58] It would also simplify participation by providing a single, user-friendly environment where people can submit input from the early stages of policy co-creation through to public consultations on draft legislation.[59] Key indicators of substantial results could include increased public participation during the early stages of policy development and higher levels of citizen satisfaction with the accessibility of information and the digital participation process.

Civil society stakeholders consider the co-creation environment as one of Estonia's flagship open government initiatives and expect it to improve public access to the policymaking process.[60] CSOs that participated in user testing believe it would substantially facilitate civil society participation in policymaking, compared with existing digital tools such as the EIS.[61]

Public access to open research and language data

This activity aims to increase the availability of open data in two categories: Estonian language data and public research data. Currently, the Public Information Act sets relatively flexible requirements for publishing data from publicly funded research: data must be provided under an open license only if it has already been published in a public repository, while easily reusable and machine-readable formats are not mandatory.[62]

As open research data can foster scientific development, verifiability of research results, and transparent use of public funds, the Ministry of Justice and Digital Affairs plans to establish stricter open-access requirements for data generated through publicly funded research.[63] At the

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same time, the government seeks to improve open access to Estonian language data[64] because of its central role in a wide range of digital services that rely on automated language processing.[65] These services may also benefit people with special linguistic needs.[66] Given rapid advances in large language models (LLMs), the government also regards open access to high-quality language data as a vehicle to improve the Estonian language capabilities of LLMs and support the long-term viability of Estonian as a small language.[67]

This activity foresees the adoption of a government regulation categorizing language and research data held or funded by the public sector as high-value datasets. It would oblige data holders to meet the high publication standards established under the 2019 EU Open Data Directive.[68] [69][70] The government aims to increase the total volume of the Estonian open language corpus from 7 billion[71] to 15 billion words,[72] and use the language and research datasets to contribute to an increase in the number of open datasets in the national data portal from 5,600[73] to 10,000[74] in the next few years. The Ministry of Justice and Digital Affairs[75] regards the OGP commitment as complementary to the 2025–2026 Data Action Plan, which includes a wide range of activities to support the supply and reuse of open data.[76] Given these complementarities, this commitment could substantially increase public access to information.

This reform could lead to a sustained increase in easily reusable open datasets in areas of high societal value and greater reuse of government data by non-governmental actors. It could also support new and more inclusive public services, improve accessibility for people with disabilities or speakers of Estonian as a second language, as well as create better opportunities for the public to monitor government decision-making. For example, open data could enable automated analysis of central and local government meeting records or provide access to the underlying data used in government-commissioned policy studies.

A representative of the open data community noted that open research data could help citizens understand which analyses informed certain policy decisions. Wider availability of open language data could also level the playing field for CSOs that depend on the government access to reusable open data.[77] The representative also emphasized the importance of strong coordination among activity leads to ensure that different organizations publish data in interoperable and easily usable formats, for example by using harmonized specifications for API access.[78]

Commitment 2.1 also includes milestones with limited relevance to open government values, or for which limited information is available. The development of a digital tool for analyzing systemic risks on digital platforms was cancelled before it began and is hence excluded from the analysis.[79] Another milestone aims to create a secure, members-only framework through which public and private organizations can exchange language-related data to support economic and technical goals rather than open public access.[80] Similarly, Statistics Estonia is developing a secure data processing environment for authorized users in public sector and research institutions. Although this could improve researchers' access to public sector data, it is not expected to enable public access.[81]

A data-driven decision support system involves prototyping a digital tool that uses LLMs to draw data from different government registers and respond to public officials' policy-related questions in natural language.[82] While the government may consider opening the tool for public use in the future, the current action plan focuses on developing a prototype for internal use.[83] This milestone also envisages developing 'data-based services'. However, it is not yet clear what services would be developed since the government has not defined their type or target groups. They could include public services, such as automated provision of social benefits, private

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services using public data, or data-driven services for internal public sector use. For instance, a system that aggregates data from government databases to help institutions working on child protection identify children at risk could be developed.[84]

Opportunities, challenges, and recommendations during implementation

The government has already initiated legislative amendments to adopt the co-creation tool and a regulation to define additional high-value open datasets. Implementation of this commitment has therefore begun, although both promising streams of activity will demand continued efforts to familiarize stakeholders with the new requirements and processes.

For the co-creation environment to fulfill its potential, it is important the system become institutionalized through daily use, not only internally within the public sector but also by non-governmental actors. A key challenge will be meeting the needs and capabilities of diverse stakeholders, ranging from policymakers accustomed to working with complex legislative texts to citizens who may need information presented in simpler language and formats. Furthermore, although the system has been designed to encourage policymakers to co-create legislative drafts in partnership with civil society, moving toward more open policymaking practices is a cultural change. Digital tools alone cannot achieve without continued attention to civil service training and capacity building.

To achieve the open data-related goals, the new data publication requirements could be accompanied by strong support mechanisms to help data holders with varying capacities to help them publish high-quality, reusable open data in the required formats. It is equally important to understand when and how users are likely to reuse the data. This can help ensure that data is published appropriately and that attention is given to encouraging reuse rather than simply expecting users to find the new datasets. Key implementation challenges include uneven capacity among data holders, the effort required to coordinate and harmonize data publication practices across the public sector, and the need to understand and respond to users' needs.

To support the use of the co-creation environment, the Ministry of Justice and Digital Affairs and the Government Office could:

- **Continue training policymakers and civil society reformers to use the co-creation environment.** This could involve creating online guides in text or video format and organizing training sessions.
- **Establish a feedback mechanism to collect user feedback on the co-creation environment and participation process,** as recommended in the Open Government Roadmap.[85] Feedback could be used to flag issues and improve the public interface and participation process in line with users' needs. It could also help assess compliance with the Good Practice of Engagement.
- **Seek input from citizens and civil society to assess and improve the accessibility of the environment for diverse citizen groups**. This could include user-friendly or customizable design features, explanations of new legislative initiatives in simple language, and visual aids to support public understanding.
- **Integrate the Good Practice of Engagement into the system through practical guidelines, prompts, and checklists** to help policymakers follow its requirements at each stage of policy drafting. For example, when drafts are submitted for public consultation, the co-creation environment could remind policymakers of the requirement to allocate at least four weeks for public feedback.
- **Integrate lobbying data into the co-creation environment.** This activity was planned under the previous OGP action plan but was not implemented due to limited

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technical development resources.[86] In the future, information about lobbying meetings related to a legislative initiative could be linked directly to that initiative's timeline.

To support the use of new open datasets, the Ministry of Justice and Digital Affairs could:

- **Actively promote the reuse of the new datasets among CSOs, advocacy organizations, researchers, or small businesses.** This could include highlighting datasets and interesting use cases on the national data portal, organizing ecosystem events and hackathons, and facilitating meetings between data holders and users to improve usability.
- **Monitor the reuse of the new datasets by researchers, businesses, and public services.** The ministry could use tools such as unique dataset labels, download records, and optional user feedback forms.

Since the IRM's analysis identified several milestones that currently lack an open government focus, the government could introduce a public-facing component into some of these activities. For example, the Government Office could:

- **Open the data-driven decision support tool for public use.** This could follow a phased approach, beginning with a limited public pilot covering non-sensitive, general policy questions. The system could then be expanded to more complex queries based on the pilot's performance.
- **Consider creating independent oversight mechanisms** to monitor the use of AI in public sector decision-making. This would align with OGP's Open Government Challenge on digital governance.[87]
- **Prioritize public services** when developing data-driven services and involve CSOs in their development to ensure an open process that responds to citizens' needs.

Other commitments

Other commitments that the IRM did not identify as promising commitments are discussed below.

Several commitments and milestones address topics that are highly relevant for open government but are likely modest in their impact on open government practices. For example, the skill development programs for mid-level and senior managers (Commitment 1.1) could support gradual changes in public governance practices over the long term. However, the mid-level managers' training program is largely internally focused and lacks an explicit focus on public engagement.[88] The senior managers' development program is more open, inviting private sector and non-governmental stakeholders to join teams of senior civil servants to jointly build skills and develop solutions to real-world policy problems.[89] If turned into a more regular format and is supplemented with open government-related training modules, this could become a promising approach to fostering cross-sector collaboration around specific policy issues.

Likewise, the development of digital tools for public sector information management, lobbying-data reporting, submitting interest declarations (Commitment 2.2), and strategic planning (Commitment 2.4) are relevant but currently more oriented toward facilitating policymakers' work than on improving the public's ability to access or understand the information.[90] Nevertheless, if the government includes a review of the lobbying transparency system in the planned revision of the Anti-Corruption Law,[91] the commitment could lead to substantial improvements in lobbying transparency.

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The most clearly public-facing milestone of Commitment 2.2 is the update of the Rules for Good Legislative Practice and Legislative Drafting.[92] It aims to promote clear language in public documents and broader use of legislative intent as an instrument to inform and engage the public early in legislative drafting processes.[93] While relevant, the planned updates do not create a stronger enforcement mechanism for the rules, which CSO stakeholders cite as the most pressing problem.[94] The Ministry of Justice and Digital Affairs considers it legally complex to incorporate a mechanism to sanction non-compliance into the current system.[95]

In the absence of a stronger enforcement mechanism, the IRM recommends that the Ministry of Justice and Digital Affairs explicitly assess compliance with the legislative drafting rules and national public engagement standards during the inter-institutional approval of regulations. It could also exercise its authority not to approve regulations that fail to comply. The ministry could further also facilitate compliance by providing government officials responsible for implementing the rules and standards with practical compliance guidelines and checklists.

The development of a new public participation format (Commitment 1.1) could be promising if the government took a more active role in integrating new participation methods into policymakers' daily work. The Government Office is a partner in a pilot initiative adapting the national dialogues method,[96] developed in Finland,[97] to engage the public across Estonia. It is also observing the process and results of the Citizens' Panel on Good Life,[98] initiated by non-governmental stakeholders.[99]

Although the methods themselves could be promising, this activity's current focus on documenting the results in the government's online co-creation toolkit may fall short of institutionalizing their use across government.[100] To support changes in practice, the Government Office could conduct trainings and facilitate active experience-sharing among organizations that have implemented innovative participation methods. It could also provide mentoring and funding, for example through the co-creation and communication support program, to help new organizations integrate these methods into their work. Another option would be to revive the network of public engagement coordinators in ministries to disseminate novel practices. The government could also monitor how citizens' proposals resulting from participatory exercises such as citizens' panels are incorporated into public decision-making.

The action plan also contains several commitments and milestones that, as written, have limited relevance to open government values. For example, Commitment 2.3 on improving the quality of digital public services and developing the GovTech ecosystem, and some milestones under Commitment 1.1 (quick consultation model with researchers), 2.1 (data-driven decision support tool), and 2.4 (automated business reporting) could yield positive results for government efficiency, reduced administrative burden, or decision-making quality. However, as described, they do not directly contribute to government transparency, civic participation, or public accountability. During the mid-term refresh, the government could review and redesign commitments with unclear relevance to open government values to include an explicit open government lens. For commitments that do not directly address open government issues, the open government lens could be integrated through designing a highly transparent and collaborative implementation process. The OGP Participation and Co-creation Standards could serve as a source of inspiration and good practices for open implementation.[101]

[1] The governmental committee on improving the state's administrative capacity had been established to oversee the use of the European Union's structural funds and implementation of the OECD's recommendations in the areas of public management capacity and policymaking quality; Open Government Partnership Coordinating Committee, meeting minutes, Government Office, 24 May 2019, https://dhs.riigikantselei.ee/avalikteave.nsf/documents/NT0037B2F6/%24file/AVP19P1.pdf.

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[2] "Riigisekretäri 3. detsembri 2019. a käskkirja nr 43 "Avatud riigivalitsemise arengukomisjoni moodustamine muutmine," Government Office, 2 April 2024, https://dhs.riigikantselei.ee/avalikteave.nsf/documents/NT003DB25A/%24file/RS2414.pdf, p. 14.
[3] "IRM Results Report: Estonia 2020–2022," Open Government Partnership, 30 May 2023, https://www.opengovpartnership.org/documents/estonia-results-report-2020-2022; "IRM Results Report: Estonia 2022–2024," Open Government Partnership, 4 June 2025, https://www.opengovpartnership.org/documents/estonia-results-report-2022-2024
[4] "ARVAK-u rolli suurendamine," Annex to the minutes of the ARVAK meeting on 11 March 2026 provided by Marten Lauri (Advisor at the Government Office & OGP Point of Contact), correspondence with IRM researcher, 24 March 2026.
[5] "Riigisekretäri 3. detsembri 2019. a käskkirja nr 43 "Avatud riigivalitsemise arengukomisjoni moodustamine muutmine," Government Office.
[6] "Riigisekretäri 3. detsembri 2019. a käskkirja nr 43 "Avatud riigivalitsemise arengukomisjoni moodustamine muutmine," Government Office.
[7] See: https://dhs.riigikantselei.ee/avalikteave.nsf/protocolsbyissuer?open&path=Avatud%20riigivalitsemise%20arengukomisjon; The focus on tasks related to EU funding has likely been due to the highly regulated nature of the work of thematic committees, as defined in the 2014–2020 Structural Assistance Act (§ 33. Thematic committee), State Gazette, RT I, 21 June 2014, https://www.riigiteataja.ee/en/akt/504072023006, p. 1.
[8] "IRM Results Report: Estonia 2022–2024," Open Government Partnership, 4 June 2025, https://www.opengovpartnership.org/documents/estonia-results-report-2022-2024.
[9] Kai Klandorf (Executive Director of Network of Estonian Nonprofit Organizations), interview by IRM researcher, 28 October 2022; Marcus Ehasoo (Advocacy Lead of Network of Estonian Nonprofit Organizations), interview by IRM researcher, 18 December 2024.
[10] "Avatud valitsemise partnerluse kaasamisseminar tõi kokku avaliku sektori ja vabaühenduste esindajad," Network of Estonian Nonprofit Organizations, 2 June 2025, https://heakodanik.ee/uudised/avatud-valitsemise-partnerluse-kaasamisseminar-toi-kokku-avaliku-sektori-ja-vabauhenduste-esindajad.
[11] "IRM Results Report: Estonia 2020–2022," Open Government Partnership.
[12] "IRM Results Report: Estonia 2022–2024," Open Government Partnership.
[13] "ARVAK-u rolli suurendamine," Annex to the minutes of ARVAK meeting on 11 March 2026, shared by Lauri, correspondence.
[14] "Riigikantselei dokumendiregistri avalik vaade," [Public View of the State Chancellery's Document Registry], Government Office, https://dhs.riigikantselei.ee/avalikteave.nsf/protocolsbyissuer?open&path=Avatud%20riigivalitsemise%20arengukomisjon.
[15] "Avatud valitsemise partnerlus," Government Office, https://riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/valitsuse-too-toetamine/avatud-valitsemise-partnerlus.
[16] Marten Lauri (Advisor at the Government Office & OGP Point of Contact), interview by IRM researcher, 13 March 2026.
[17] Marten Lauri (Advisor at the Government Office & OGP Point of Contact), interview by IRM researcher, 12 June 2026; The dashboard would be similar to the dashboard of the Council for Efficiency and Economic Growth, see: https://www.riigikantselei.ee/majanduskasvu-noukoda.
[18] Marcus Ehasoo (Advocacy Lead at Network of Estonian Nonprofit Organizations), interview by IRM researcher, 31 March 2026.
[19] Külli Taro (Member of Supervisory Board of Estonian Cooperation Assembly), correspondence with IRM researcher, 14 July 2026.
[20] Külli Taro (Member of Supervisory Board of Estonian Cooperation Assembly), correspondence with the Government Office, 6 November 2025.
[21] See the Open Government Development Committee's meeting minutes on 3 September 2019: https://dhs.riigikantselei.ee/avalikteave.nsf/documents/NT0037B1FE/%24file/ARVAK19P1.pdf
[22] "IRM Results Report: Estonia 2022–2024," Open Government Partnership, 4 June 2025, https://www.opengovpartnership.org/documents/estonia-results-report-2022-2024; Kai Klandorf (Executive Director of Network of Estonian Nonprofit Organizations), interview by IRM researcher, 28 October 2022; Marcus Ehasoo (Advocacy Lead of Network of Estonian Nonprofit Organizations), interview by IRM researcher, 18 December 2024.
[23] "IRM Midterm Review: The Netherlands 2023–2027," Open Government Partnership, 8 July 2026, https://www.opengovpartnership.org/documents/the-netherlands-midterm-review-2023-2027; "IRM Action Plan Review: The Netherlands 2023–2027," Open Government Partnership, 7 October 2024, https://www.opengovpartnership.org/documents/netherlands-action-plan-review-2023-2027.
[24] "About Policy Lab," Policy Lab UK, https://openpolicy.blog.gov.uk/about.
[25] "Nevalstisko organizāciju un Ministru kabineta sadarbības memoranda īstenošanas padomes sekretariāta darbības nodrošināšana," [Ensuring the Operation of the Secretariat of the Council for Implementation of the Memorandum of Cooperation between NGOs and the Cabinet of Ministers], Latvijas Pilsoniskā alianse, 2026, https://nvo.lv/project/nevalstisko-organizaciju-un-ministru-kabineta-sadarbibas-memoranda-istenosanas-padomes-sekretariata-darbibas-nodrosinasana.

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[26] See: https://search.open.canada.ca/nap6.
[27] "Estonia Action Plan Review 2022–2024," Open Government Partnership, 9 March 2023, https://www.opengovpartnership.org/documents/estonia-action-plan-review-2022-2024.
[28] "Andmete ja tehisintellekti valge raamat 2024–2030," Ministry of Education and Research, Ministry of Justice and Digital Affairs, and Ministry of Economic Affairs and Communication, https://www.kratid.ee/_files/ugd/7df26f_9a6d060409214b9da2774e5b5eabf717.pdf.
[29] The Open Data Directive defines six categories of high-value public data, which governments are required to provide as machine-readable open data free of charge; Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information (recast), PE/28/2019/REV/1 http://data.europa.eu/eli/dir/2019/1024/oj.
[30] See 2025 open data maturity in Estonia, Country maturity scores over time: https://data.europa.eu/en/open-data-maturity/2025#country-profiles/country_EE/country_progressions.
[31] "Andmete ja tehisintellekti valge raamat 2024–2030," Ministry of Education and Research, Ministry of Justice and Digital Affairs, and Ministry of Economic Affairs and Communication.
[32] "Open Data in Europe 2025," European Commission, https://data.europa.eu/en/open-data-maturity/2025.
[33] "Digital Government Index and Open, Useful and Re-usable Data Index: 2025 Results and Key Findings," Organization for Economic Co-operation and Development, https://www.oecd.org/content/dam/oecd/en/publications/reports/2026/02/digital-government-index-and-open-useful-and-re-usable-data-index_dbe102ed/6347ec74-en.pdf.
[34] "Juhised," Ministry of Justice and Digital Affairs https://www.kratid.ee/juhised.
[35] "Andmed," Ministry of Justice and Digital Affairs, https://www.kratid.ee/andmed.
[36] Sofia Paes (Data Policy Advisor at the Ministry of Justice and Digital Affairs), interview by IRM researcher, 8 April 2026.
[37] "Andmete ja tehisintellekti valge raamat 2024–2030," Ministry of Education and Research, Ministry of Justice and Digital Affairs, and Ministry of Economic Affairs and Communication.
[38] Explanatory memorandum to the draft government regulation, see: "Muud väärtuslike andmestike kategooriad, nende andmestike nimekirjad ning avaldamise ja taaskasutamise tingimused ja kord," Ministry of Justice and Digital Affairs, https://eelnoud.valitsus.ee/main#3GXGUy4E.
[39] "IRM Results Report: Estonia 2022–2024," Open Government Partnership, 4 June 2025, https://www.opengovpartnership.org/documents/estonia-results-report-2022-2024
[40] Karmen Vilms (Ministry of Justice and Digital Affairs) and Kristina Liik (Project Manager at the Government Office), interview by IRM researcher, 23 January 2025.
[41] Kristina Liik (Advisor at the Government Office), correspondence with IRM researcher, 10 April 2026.
[42] Karmen Vilms, "Riigi koosloome keskkond: uued tuuled õigusloomes," Õiguskeel 2021/3, https://www.justdigi.ee/sites/default/files/documents/2021-07/Karmen%20Vilms.%20Riigi%20koosloome%20keskkond%2C%20uued%20tuuled%20õigusloomes.pdf.
[43] "IRM Design Report: Estonia 2018–2020," Open Government Partnership, 14 October 2019, https://www.opengovpartnership.org/documents/estonia-design-report-2018-2020.
[44] See, for example: https://www.justdigi.ee/sites/default/files/documents/2026-03/JDM%20kaasamisplaan%202026_pdf.pdf.
[45] "Avatud valitsemise teekaart," [Open Government Roadmap], Government Office, 2023, https://www.riigikantselei.ee/media/2566/download.
[46] A similar process applies to other types of government documents, such as governmental regulations, strategies, or action plans.
[47] See the Good Practice of Engagement: https://riigikantselei.ee/kaasamise-hea-tava; "Open Government Roadmap," Government Office, 2023, https://www.riigikantselei.ee/media/2566/download.
[48] The inter-institutional coordination is a mandatory process where policy drafts are shared with other government institutions for their opinions. This process is regulated in Chapter 2 of the Rules of Procedure of the Government of the Republic, see: https://www.riigiteataja.ee/en/akt/514062019001.
[49] For EIS, see: https://eelnoud.valitsus.ee/main#biOIJyGC; https://eelnoud.valitsus.ee/main#hpxfPJ2t; Note that this figure only concerns legislative initiatives; together with other types of government documents, the number of public consultations in this period was 14; Marten Lauri, written comments during the report's pre-publication period, 1 October 2026.
[50] "Open Government Roadmap," Government Office; According to the 2021 Ministry of Justice and Digital Affairs' annual overview of compliance with the Basic Principles of Legislation in legislative practice (OPPA), in 62% of draft bills, stakeholders were engaged solely through the EIS; in 24% of cases, other information channels such as email and websites were used in addition to the EISl; and in 11% of cases, separate discussions and consultations with stakeholders took place. For 3% of the draft bills, no public engagement took place before the draft was sent to the Ministry of Justice and Digital Affairs for approval; "Open Government Roadmap," Government Office, 2023, https://www.riigikantselei.ee/media/2566/download.
[51] "IRM Design Report: Estonia 2018–2020," Open Government Partnership.
[52] See: https://eelnoud.valitsus.ee/main#xAsyolU4.

[53] "Uus digikeskkond SÄTLA muudab seaduste tegemise inimestele selgemaks ja vähendab bürokraatiat," Ministry of Justice and Digital Affairs, 9 April 2026, https://www.justdigi.ee/uudised/uus-digikeskkond-satla-muudab-seaduste-tegemise-inimestele-selgemaks-ja-vahendab.
[54] "Explanatory memorandum to the amendment of the Riigi Teataja Act," Government Office, https://www.riigikogu.ee/download/95bdf7e8-2215-4cbc-8c2a-a4ffa7bbc0b6.
[55] See: https://www.riigikogu.ee/haaletustulemused/67433cad-0aa2-4e6c-a8f5-f4b62a3326b9/
[56] See: https://www.riigikogu.ee/download/2116861d-9c5e-434a-b911-83afacfdb4f6; Note that legislative initiatives containing state secret or classified foreign information are exempt from this obligation.
[57] See: https://www.riigikogu.ee/download/95bdf7e8-2215-4cbc-8c2a-a4ffa7bbc0b6.
[58] "Explanatory memorandum to the amendment of the Riigi Teataja Act," Government Office.
[59] Ehasoo, interview.
[60] Ehasoo, interview.
[61] Ehasoo, interview.
[62] Public Information Act, see: https://www.riigiteataja.ee/en/akt/525032026001; Public Information Act, § 3^1, see: https://www.riigiteataja.ee/en/akt/525032026001.
[63] "Muud väärtuslike andmestike kategooriad, nende andmestike nimekirjad ning avaldamise ja taaskasutamise tingimused ja kord," [Explanatory memorandum to the draft government regulation], Ministry of Justice and Digital Affairs, https://eelnoud.valitsus.ee/main#3GXGUy4E
[64] Language data in this case would include name and word lists, terminology databases, specialized glossaries, dictionaries, translations, speech data, and audio records of parliamentary sessions.
[65] These services include any digital services using Estonian-language chatbots, machine translation, providing multilingual access, involving automatic validation of the accuracy of the names of places or organizations; "Explanatory memorandum to the draft government regulation," Ministry of Justice and Digital Affairs.
[66] "Andmete ja tehisintellekti valge raamat 2024-2030," Ministry of Education and Research, Ministry of Justice and Digital Affairs, and Ministry of Economic Affairs and Communication.
[67] Sofia Paes (Data Policy Advisor at the Ministry of Justice and Digital Affairs), interview by IRM researcher, 8 April 2026.
[68] "Explanatory memorandum to the draft government regulation," Ministry of Justice and Digital Affairs.
[69] The directive defined six high-value data categories (geospatial): Earth observation and environment, meteorological, statistics, companies and company ownership, and mobility data) and specified datasets that public bodies are required to publish free of charge in easily reusable formats. This includes providing the data as machine-readable open data, providing access via Application Programming Interfaces (APIs) and bulk download options where relevant.
[70] Commission Implementing Regulation (EU) 2023/138 of 21 December 2022 laying down a list of specific high-value datasets and the arrangements for their publication and re-use (Text with EEA relevance), C/2022/9562, see: http://data.europa.eu/eli/reg_impl/2023/138/oj; "Directive (EU) 2019/1024," European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information (recast), PE/28/2019/REV/1, http://data.europa.eu/eli/dir/2019/1024/oj.
[71] "Keeleprogramm 2025–2028," Ministry of Education and Research, https://www.hm.ee/sites/default/files/documents/2025-01/Keeleprogramm%202025-2028.pdf.
[72] "Estonia's Open Government Partnership Action Plan 2025–2029," Government Office, 15 January 2026, https://www.opengovpartnership.org/documents/estonia-action-plan-2025-2029.
[73] As of May 2026, a few months into the seventh action plan term, the total number of open datasets in the portal has already risen to over 8,100, at: https://andmed.eesti.ee.
[74] "Estonia's Open Government Partnership Action Plan 2025–2029," Government Office of Estonia.
[75] Paes, interview.
[76] "Andmete tegevuskava 2025–2026," Ministry of Justice and Digital Affairs, https://e964029b-7c32-42a7-817c-37c391a3b976.filesusr.com/ugd/2d9e67_8e52776da2b94a1ea5e53950a732f193.pdf.
[77] Risto Hinno (Board Member of Open Knowledge Estonia), interview by IRM researcher, 6 July 2026.
[78] Hinno, interview.
[79] Madis Vaikmaa (Digital Platforms Advisor at the Consumer Protection and Technical Regulatory Authority), correspondence with IRM researcher, 20 May 2026.
[80] Kaarel Sepp (Project Manager at the Ministry of Justice and Digital Affairs), interview by IRM researcher, 8 April 2026.
[81] Sepp, interview.
[82] Kristen Maisey (Advisor at the Government Office), interview by IRM researcher, 10 April 2026.
[83] Maisey, interview.
[84] Mari-Liis Sööt (Acting Deputy Secretary-General of the Ministry of Justice and Digital Affairs), correspondence with IRM researcher, 19 May 2026.
[85] "Avatud valitsemise teekaart," 2023, https://www.riigikantselei.ee/media/2566/download.

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[86] See Commitment 1.1 in: "Estonia's Open Government Partnership Action Plan 2022–2024," Government Office of Estonia, 2 September 2022, https://www.opengovpartnership.org/documents/estonia-action-plan-2022-2024.
[87] "Open Government Challenge Areas," Open Government Partnership, https://www.opengovpartnership.org/the-open-gov-challenge/open-government-challenge-areas/#toc05.
[88] Martin Kulp (Director of the Public Administration Department at the Ministry of Finance), correspondence with IRM researcher, 29 May 2026.
[89] Monika Tamla (Advisor at the Government Office), Ave Kala (Head of Civil Service Leadership Excellence at the Government Office), interview by IRM researcher, 13 April 2026.
[90] Kristi Madismäe (Director of Department at the State Shared Service Center) and Aire Õismäe (Project Manager at the State Shared Service Center), interview by IRM researcher, 4 May 2026; Kätlin-Chris Kruusmaa (Anti-Corruption Policy Team Lead at the Ministry of Justice and Digital Affairs), interview by IRM researcher, 6 May 2026; and correspondence with the IRM researcher, 18 May 2026; Külli Tammur (Advisor at the Government Office), interview by the IRM researcher, 25 May 2026.
[91] Kruusmaa, interview.
[92] Rules for Good Legislative Practice and Legislative Drafting, see: https://www.riigiteataja.ee/en/akt/508092025003.
[93] Pilleriin Lindsalu (Advisor at the Ministry of Justice and Digital Affairs), interview by IRM researcher, 16 April 2026.
[94] Ehasoo, interview.
[95] Pilleriin Lindsalu (Advisor at the Ministry of Justice and Digital Affairs), interview by IRM researcher, 16 April 2026.
[96] "Kuidas ma hakkama saan?" Dialoogiringid, https://kogu.ee/dialoogiringid-kuidas-ma-hakkama-saan/
[97] "Finland Action Plan 2019–2023," Open Government Partnership, 27 September 2019, https://www.opengovpartnership.org/documents/finland-action-plan-2019-2023.
[98] Citizens' Panel on Good Life, see: https://rahvakogu.info/en/goodlife.
[99] Marten Lauri (Advisor at the Government Office & OGP Point of Contact), interview by IRM researcher, 10 March 2026.
[100] Koosloomeranits, see: https://riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/poliitikakujundamise-tooriistad/koosloomeranits.
[101] "OGP Participation and Co-Creation Standards," Open Government Partnership, 2021, https://www.opengovpartnership.org/ogp-participation-co-creation-standards.

Section III. Methodology

This product is a concise, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, represent a high priority for country stakeholders, acknowledged as a priority in the national open government context, or a combination of these factors.

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In the Action Plan Review, the IRM reviews commitments using three indicators:

1. Verifiability: The IRM determines whether a commitment is verifiable as written in the action plan. The indicator is assessed as:

- **Yes/No:** Are the stated objectives and proposed actions sufficiently clear and include objectively verifiable activities to assess implementation?
- Commitments that are not verifiable are considered not reviewable, and no further assessment is carried out.

2. Open Government Lens: The IRM determines if the commitment relates to the open government values of transparency, civic participation, and/or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance. Based on a close reading of the commitment text, the indicator is assessed as:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform, influence or co-create policies, laws and/or decisions? Will the government create, enable, or improve participatory mechanisms for minorities, marginalized or underrepresented groups?

  Will the government improve the enabling environment for civil society (which may include NGO laws, funding mechanisms, taxation, reporting requirements, et cetera)?

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Will the government improve legal, policy, institutional, or practical conditions related to civic space such as freedom of expression, association and peaceful assembly that would facilitate participation in the public sphere?

Will the government take measures which counter mis- and disinformation, especially online, to ensure people have access to reliable and factual information (which may include digital and media literacy campaigns, factchecking, or fostering an independent news media ecosystem)?

- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

3. Potential for Results: The IRM analyzes the expected results and potential that would be verified in the IRM Results Report after implementation. Potential for results is an early indication of the commitment's possibility to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area. The indicator is assessed as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review focuses its analysis on promising commitments. Promising commitments are verifiable, have an open government lens, and at least a modest potential for results. Promising commitments may also be a priority for national stakeholders or for the particular context. The IRM may cluster commitments with a common policy objective or that contribute to the same reform or policy issue. The potential for results of clustered commitments is reviewed as a whole.

This review was prepared by the IRM in collaboration with Maarja Olesk as researcher and Mary Francoli as external expert reviewer. During the internal review process, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).[1] The IRM methodology, product quality, and review process are overseen by the IEP.[2] This report was prepared in accordance with the IRM Procedures Manual[3] and guidance on artificial intelligence. For more information, refer to the IRM webpage[4] or the glossary of IRM and OGP terms,[5] or contact the IRM at irm@opengovpartnership.org.

[1] "International Experts Panel," Open Government Partnership, accessed 15 July 2024, https://www.opengovpartnership.org/about/who-we-are/international-experts-panel.

[2] For more information, see: "Overview – Independent Reporting Mechanism," Open Government Partnership, accessed 15 July 2024, https://www.opengovpartnership.org/irm-guidance-overview.

[3] IRM Procedures Manual. Independent Reporting Mechanism. https://www.opengovpartnership.org/wp-content/uploads/2025/06/IRM-Procedures-Manual-2025-EN.pdf.

[4] "IRM Overview," Open Government Partnership, https://www.opengovpartnership.org/irm-guidance-overview/.
[5] "OGP Glossary," Open Government Partnership, https://www.opengovpartnership.org/glossary/.

Annex I. Commitment Data[1]

Commitment 1.1: Developing policymakers' cooperation and engagement skills

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 1.2: Increasing the role of the Open Government Development Committee in promoting open governance

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 2.1: Using data and new technologies for decision-making

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Substantial

Commitment 2.2: Increasing the transparency of public decision-making

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

Commitment 2.3: Improving the quality of public digital services and developing the GovTech ecosystem

- Verifiable: Yes
- Does it have an open government lens? No
- Potential for results: Unclear

Commitment 2.4: Reducing bureaucracy in cooperation with the private sector

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

[1] Editorial note: For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, not individual commitments. Commitment short titles may have been edited for brevity. For the complete text of commitments, please see: https://www.opengovpartnership.org/documents/estonia-action-plan-2025-2029.

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Annex II. Action Plan Co-Creation

The IRM uses the OGP Participation and Co-Creations Standards to assess countries' participatory practices throughout the action plan cycle.[1] Countries are encouraged to aim for the full ambition of the standards and to meet the minimum requirements.[2] The OGP Criteria and Standards Subcommittee determines if a country has acted according to OGP process.[3]

Table 2. Compliance with Minimum Requirements

Minimum requirement	Met?
1.1 Space for dialogue: The Open Government Development Committee (ARVAK) continued to serve as the multi-stakeholder forum for the action plan development process.[4] During co-creation, ARVAK and the OGP CSO Roundtable met four times: in October and November 2024, and in February and June 2025.[567] The government also met with NENO and the Estonian Cooperation Assembly to discuss the OGP action plan in November 2025.[8] ARVAK's basic rules are described on the national OGP website.[9]	Yes
2.1 OGP website: The Government Office maintains a publicly accessible website dedicated to Estonia's participation in OGP, which contains all action plans since Estonia joined OGP, including the latest one, in HTML and PDF formats.[10]	Yes
2.2 Repository: The Government Office's OGP website includes a repository of information on OGP action plans.[11] The repository is updated at least twice a year and includes information on action plan co-creation and implementation. The first update regarding the implementation of the 2025–2029 action plan is scheduled for July 2026.[12]	Yes
3.1 Advanced notice: The Government Office published the co-creation timeline and public participation opportunities on the national OGP website.[13] The Government Office shared information on the start of the co-creation process at the MSF meeting of 28 October 2024,[14] two weeks before the first co-creation meeting with the OGP civil society roundtable on 13 November 2024.[15]	Yes
3.2 Outreach: The Government Office shared calls to submit ideas to the seventh action plan in the MSF's mailing list[16], press releases[17] and public events. See the list under Minimum Requirement 3.3.	Yes
3.3 Feedback mechanism: During a year-long co-creation process, the Government Office collected input from stakeholders beyond the MSF through a meeting with the OGP civil society roundtable in November 2024, a 3-week online idea crowdsourcing campaign in January-February 2025[18], a full-day stakeholder engagement workshop in May 2025[19], a seminar for local municipalities in March 2025[20] and meetings with regional civil society consultants in November and December 2024.[21]	Yes
4.1 Reasoned response: The Government Office documented stakeholders' contributions to the action plan and published written feedback on how they were considered on the national OGP website in October 2025.[22] It also published the response to comments submitted by other government institutions and CSOs during the inter-institutional approval and public consultation of the final action plan in January 2026.[23]	Yes
5.1 Open implementation: The IRM will assess whether meetings were held with civil society stakeholders to present implementation progress and enable civil society to provide comments at least twice a year.	Not applicable

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[1] "OGP Participation and Co-Creation Standards," Open Government Partnership. 2021. https://www.opengovpartnership.org/ogp-participation-co-creation-standards/.
[2] "IRM Guidelines for the Assessment of Minimum Requirements," Independent Reporting Mechanism, 2022. https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf.
[3] On 1 August 2025, the OGP Criteria and Standards Subcommittee adopted a resolution on Temporary Suspension of the Enforcement of Time-Bound Minimum Requirements for Participation and Co-Creation, for all members currently implementing plans delivered on or after 1 January 2024. ; For information on the OGP Procedural Review Policy see: https://www.opengovpartnership.org/procedural-review/#IC.
[4] "Avatud riigivalitsemise arengukomisjon," Government Office, https://riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/valitsuse-too-toetamine/avatud-valitsemise-partnerlus.
[5] ARVAK met on 28 October 2024 and 3 June 2025. The government met with the OGP CSO roundtable on 13 November 2024 and 19 February 2025.
[6] Marten Lauri (Advisor at the Government Office & OGP Point of Contact), email invitation and online meeting link to the MSF mailing list to attend ARVAK's meeting on 28 October 2024, with the IRM researcher in attendance.
[7] Open Government Development Committee, meeting minutes, 3 June 2025, see: https://dhs.riigikantselei.ee/avalikteave.nsf/documents/NT003F9E62/%24file/ARVAK25P1.pdf; Marten Lauri, response to government email invitation to attend government – OGP CSO roundtable on 19 February 2025.
[88] Hea Kodanik [Good Citizen], Vabaühenduste Liidus 47. Nädalal [Week 47 at the Association of Non-Governmental Organizations], 17 November 2025, https://heakodanik.ee/uudised/vabauhenduste-liidus-47-nadalal-2025/.
[9] "Avatud riigivalitsemise arengukomisjon," Government Office.
[10] "Avatud riigivalitsemise arengukomisjon," Government Office.
[11] "Avatud riigivalitsemise arengukomisjon," Government Office.
[12] "2025-2029 tegevuskava tegevuste ülevaade, Avatud valitsemise partnerlus," Government Office, https://riigikantselei.ee/valitsuse-too-planeerimine-ja-korraldamine/valitsuse-too-toetamine/avatud-valitsemise-partnerlus#11-kasvatame-polii.
[13] Maarja Olesk, Action plan timeline and participation opportunities, 5 February 2025, screenshot from Riigikantselei - Avatud valitsemise partnerlus.
[14] Lauri, email invitation and online meeting link.
[15] Marcus Ehasoo (Network of Estonian Nonprofit Organizations), email to the OGP civil society roundtable mailing list, 12 November 2024.
[16] Marten Lauri (Advisor at the Government Office & OGP Point of Contact), email to the MSF mailing list, 29 January 2025.
[17] "Riigikantselei kutsub osalema ideekorjel," Government Office, 29 January 2025, https://riigikantselei.ee/uudised/riigikantselei-kutsub-osalema-ideekorjel; "Eesti uus avatud valitsemise tegevuskava seab eesmärgiks läbipaistvama ja lihtsama riigiga asjaajamise," Government Office, 22 October 2025, https://www.riigikantselei.ee/uudised/eesti-uus-avatud-valitsemise-tegevuskava-seab-eesmargiks-labipaistvama-ja-lihtsama-riigiga.
[18] "Eesti avatud valitsemise partnerluse tegevuskava 2025–2029 ideekorje," Government Office, https://riigikantselei.ee/sites/default/files/documents/2025-05/AVP%20ideekorje%20veebi.pdf.
[19]"Avatud valitsemise partnerluse kaasamisseminar tõi kokku avaliku sektori ja vabaühenduste esindajad," Network of Estonian Nonprofit Organizations, 2 June 2025, https://heakodanik.ee/uudised/avatud-valitsemise-partnerluse-kaasamisseminar-toi-kokku-avaliku-sektori-ja-vabauhenduste-esindajad.
[20] "KOV: kohaliku osaluse võimalused," Inspiratsioonipäev, 26 March 2025, https://kogu.ee/kov-inspiratsioonipaev-vol-3-26-03-2026.
[21] Marten Lauri (Advisor at the Government Office & OGP Point of Contact), interview by IRM researcher, 10 March 2026.
[22] „Eesti avatud valitsemise partnerluse tegevuskava 2025–2029 tagasiside," Government Office, https://riigikantselei.ee/sites/default/files/documents/2025-10/Eesti%20AVP%20tegevuskava%202025-2029%20tagasiside%20veebi.pdf.
[23] "Kooskõlastustabel," Government Office, https://riigikantselei.ee/sites/default/files/documents/2026-01/Koosk6lastustabel_EISi_14.01.pdf; linked to the "Eesti avatud valitsemise partnerluse tegevuskava 2025−2029," Ministry of Justice and Digital Affairs, https://eelnoud.valitsus.ee/main#F17ULudm.