



riigikontroll  
National Audit Office of Estonia

# Organisation of public transport (follow-up audit of county public transport)

Does county public transport form a whole with the remaining transport network and has the service been developed efficiently and in consideration of people's mobility needs?

## Summary

### Did you know that...

since 1 July 2023, the management of public transport is a responsibility of the Ministry of Regional Affairs and Agriculture; before that, the Ministry of Economic Affairs and Communications was responsible for the area.

**Public transport centre** – a non-profit association jointly established and financed by local authorities (except Saaremaa Municipality Government and Hiiumaa Municipality Government) and the state, to which the founders may delegate relevant tasks with an administrative contract, based on the need for a more efficient organisation of regional public transport.

In Saaremaa and Hiiumaa, county public transport is organised by the local authorities. In the report, public transport centres include Saaremaa and Hiiumaa Municipality Governments.

Source: Public Transport Act, § 15 (1) and (2)

**The Ministry of Regional Affairs and Agriculture has not managed the area of public transport in a manner that proceeds from the actual mobility needs of people. County public transport is not integrated with the rest of the transport network and there is also no single ticketing system. The Ministry of Regional Affairs and Agriculture has not set standards for public transport service levels, which define the level of connections that must be guaranteed with existing funding – below which the frequency of departures and connections must not fall.**

According to public transport satisfaction surveys, the main bottleneck for people in public transport is that the timetables do not meet their needs.<sup>1</sup> This means that the timetable is too infrequent, the departure times or the route are not suitable. Although the national goal has been to increase the number of people using public transport, the data of Statistics Estonia show that the use of public transport by commuters has been declining over the past decade.

**Considering the needs of the people who already use county bus services is not enough to get more people to use public transport.**

Although more research is being done on the patterns of people's actual movements than in the past, few **public transport centres** have identified the needs of those who do not use public transport. Analysing mobility patterns throughout Estonia using, for example, mobile positioning or traffic counting data, would help plan a more efficient public transport system and increase the number of public transport users.

**Timetables that integrate the different modes of transport into a coherent whole would allow shorter waiting times and make transfers more convenient, which would make public transport more competitive, but the Ministry of Regional Affairs and Agriculture has not managed to coordinate public transport nationwide.**

The current bus route network and timetable planning tends to be focus on single counties and does not support inter-county and intermodal mobility. The analysis of the routes selected by the National Audit Office showed that the average waiting time for transfers was 26.5 minutes and sometimes reached an hour.

The need for a single nationwide ticketing system has been talked about for years, but so far it has not been created. The connection of the timetables of different modes of transport (county, long-distance and local bus services, planes, ferries, trains) should be centrally

<sup>1</sup> Source: The survey "Nationwide satisfaction of residents with the living environment and the public services of local authorities" commissioned by the Ministry of Regional Affairs and Agriculture in 2024.

coordinated. At present, the timetables are prepared on different grounds and within the competences given to the organiser, leading to fragmentation and inconsistencies between timetables. Changing modes of travel would be made easier by light traffic paths and car parks, but usually there are none near bus stops.

**Creating a route network that better meets people's needs is difficult to achieve, as the current funding arrangements do not ensure that the route network can be maintained even at the current level, as funding the obligations assumed with public transport contracts is already a struggle.** In 2024, the state subsidised the transport of passengers by public transport with €148.5 million in total: €72 million was spent on bus services, €40.8 million on rail transport, €28.7 million on ferry routes and €7 million on air routes. The public transport subsidy has increased year on year and the forecast of the Ministry of Regional Affairs and Agriculture shows that the need for support of all modes of transport continues growing.

For years, less money has been allocated for public transport from the state budget to the basic budget of the Ministry of Regional Affairs and Agriculture, i.e. the starting point of budgeting, for covering the fixed costs and liabilities of the Ministry than is necessary for the performance of the obligations assumed with contracts, although the necessary amounts have largely been known at the time the state budget is planned. In the last four years, an additional €83.7 million has been allocated from [the reserve fund of the Government of the Republic](#) to cover the deficit in the core public transport budget.

The draft of the 2026 State Budget Act is being discussed in the Riigikogu at the time of publication of the report. The draft includes plans to increase the support for public transport in the budget of the Ministry of Regional Affairs and Agriculture in comparison to previous years in order to fund the obligations assumed with contracts.

**As the current size of the basic budget of the Ministry of Regional Affairs and Agriculture meant for funding public transport is not sufficient to allow providing the service at the same level in the coming years, the Ministry must establish, taking into account the money available for use, what kind of service the state wants and can provide at all, and develop solutions for a more efficient organisation of county bus transport.** The Ministry explained that the large gap between the revenues and costs of public transport can mainly be reduced by reducing the volume of public services, i.e. by shortening routes, reducing frequencies, closing routes or raising the fares.

[Reserve fund of the Government of the Republic](#) – resource of money from which allocations are made only for expenditure and investments that could not have been foreseen when the state budget was prepared, and for financing the specific activities approved by the Government of the Republic.

Source: Government of the Republic Regulation No 123 "Procedure for allocation of funds from the reserve fund of the Government of the Republic".

**Demand-responsive transport (DRT)** – the National Audit Office defines demand-responsive bus transport as transport without a regular route or timetable.

**Public transport infrastructure** – a bus or railway station, port, passenger terminal, quay, platform, shelter, stop, information or communication system and other route facilities and equipment and the fixtures and fittings intended or necessary for their operation.

Light traffic paths and car parks are built to improve accessibility and facilitate transfers and are not included in public transport infrastructure.

Source: Public Transport Act, § 11 (1)

In order to better plan and justify costs and revenues, it is important for the Ministry of Regional Affairs and Agriculture to clearly define at the legislative level what service the state expects for the money allocated to public transport and in which cases maintaining a route should be considered unreasonably expensive and to offer people **demand-based transport**, for example. The low and unclear funding of public transport does not allow the Ministry of Regional Affairs and Agriculture and public transport centres to plan the maintenance of the current network or develop public transport in the longer term.

The organisation of public transport still includes duplication of tasks, such as accounting, the organisation of procurement, data collection and the commissioning of studies. The clear definition of responsibilities is also made more complicated by the institutional fragmentation of the planning of **public transport infrastructure**.

**The classification of bus services is not clear.** The Public Transport Act does not make it clear which routes – county, long-distance or municipal – must be managed and financed by the state and which by the local authority. The concept of an on-demand or demand-responsive bus service is not mentioned in law at all. It should be clear to all parties, in a manner that can be legally interpreted, who must manage route transport and what it must be like, who must pay for certain routes and in which cases the service must be provided by county or local bus services.

**The tasks of public transport organisers overlap and responsibility is fragmented.** There is duplication of tasks in the management of public transport, including in the provision of supporting services, data collection and commissioning of studies. The clear definition of responsibilities is also made more complicated by the institutional fragmentation of the organisation of public transport, particularly in the planning of public transport infrastructure, which is a task of the areas of government of the Ministry of Regional Affairs and Agriculture and the Ministry of Climate at the same time.

### Recommendations of the National Audit Office to the Minister of Regional Affairs and Agriculture:

- develop a procedure for sharing data with public transport centres in order to study the mobility needs of people who use public transport as well as those who do not; and set up a nationwide system to coordinate all modes of transport (including ferries, planes, trains, county and local bus transport);
- establish standards for the level of service of public transport and to set uniform principles for the financing of the route network based on service levels, including the limits in the case of which maintaining a route is unreasonably expensive;

- agree, in cooperation with local authorities, on the unambiguous content and distribution of county bus, long-distance, local authority and on-demand services, and on the principles of financing.

**Response of the Minister of Regional Affairs and Agriculture:** All in all, the Ministry of Regional Affairs and Agriculture welcomes the recommendations made by the National Audit Office and considers that the audit of the organisation of public transport supports the resolution of the problems raised by the public transport reform initiated by the Ministry in 2024.

The Ministry of Regional Affairs and Agriculture does not consider it necessary to develop a separate procedure for data sharing, as it has provided public transport centres with a practical solution in the form of a web-based software for analysing the route network, which can display relevant statistics and mobility data in different layers of maps to assess the impact of route network changes. The report on the use of stops, based on validation data from county routes, will be ready for use by public transport centres in the near future. The Ministry will then continue to analyse other indicators based on the validation data, using the Power BI tool, which helps study the available data dynamically and better assess the feasibility of the routes.

The development of service level standards is underway and a single network of routes is already being developed as part of the mobility reform. It is planned to change the definitions of routes and services with an amendment to the Public Transport Act in order to divide responsibility and funding principles more clearly.

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## Trends in public transport development

### Goals of the development plan and their achievement

1. The goal set in the Transport and Mobility Development Plan 2021–2035 is to increase the share of commuters who use public transport, cycle and walk to 55% by 2035.

2. The audit “County Public Transport” published in 2021 showed that the share of commuters using public transport among all commuters had not increased. The situation has not improved.

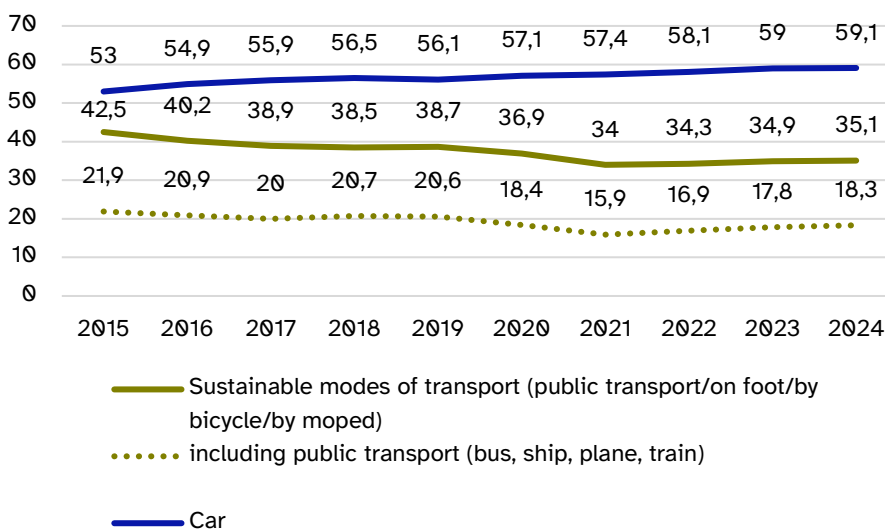
3. Despite the introduction of free transport on public county bus services from 2019–2024, there has not been a significant increase in the use of sustainable transport among commuters. Although the share of commuting by public transport, walking and cycling increased slightly in 2024 compared to the previous year, the increase was due to a decrease in the share of remote working, not a decrease in car use, and thus the trend of car ownership and use will continue (see Figure 1).

### Did you know that...

The traffic count data of the Transport Administration for 2024 show that overall traffic volumes have increased by 8.4% compared to 2020.

Source: Teede Tehnokeskus AS, traffic count results in 2024.

Figure 1. Share of sustainable mobility and car users (%) of all commuters, 2015–2024



Source: Employed people by gender and manners of commuting. Statistics Estonia TT230, 2024

4. According to Statistics Estonia, the share of public transport users has been on a downward trend over the last decade. Due to the COVID-19 crisis, the use of public transport was severely restricted in the period 2020–2021 and the number of users fell further. To date, the number of people using public transport has not reached the pre-crisis levels.

5. In 2018, free bus travel was established for all residents in most counties. As of January 2024<sup>2</sup>, a fare for working-age people was

<sup>2</sup> In Põlva and Võru County, working-age people had to start paying for tickets a couple of months later than in other counties, i.e. from April 2024, due to the change of carrier.

established on county bus services. Pupils, people over 63 years of age, people with partial or no capacity for work and disabled people can still travel free of charge across Estonia.

6. Transfer of responsibility for organizing public transport. A significant management change occurred in the public transport policy and organisation in 2023. At the implementation level, the task of organising national public transport (excluding infrastructure) was transferred from the Transport Administration and the task of organising passenger transport by rail was transferred from the Ministry of Economic Affairs and Communications to the Ministry of Regional Affairs and Agriculture.

7. At the policy-making level, the development of national public transport policy moved from the Ministry of Economic Affairs and Communications to the area of government of the Ministry of Regional Affairs and Agriculture. Investments in public transport infrastructure and international public transport policy became the responsibility of the area of government of the Ministry of Climate.

8. An analyst, support staff and supervision specialists engaged in the organisation of public transport still work at the Transport Administration after the change made in 2023. All policy-making competences concerning public transport, including national and international public transport, which were in the Ministry of Economic Affairs and Communications, are in the Ministry of Climate since 2023 and were not transferred with the tasks to the Ministry of Regional Affairs and Agriculture.

9. According to the Ministry of Climate, the Ministry of Economic Affairs and Communications did not have any officials working full-time on tasks related to public transport. Tasks in the area of public transport were divided between different officials who also had to perform tasks related to other areas.

10. According to the Ministry of Climate, the officials who moved from the Transport Administration to the Ministry of Regional Affairs and Agriculture had sufficient policy-making competence (except in the area of railways), as they were also involved in policy discussions.

11. Tasks related to the organisation of procurement of regular services under public service contracts in public transport and the management of contracts are currently the responsibility of both the implementation and policy-making levels.

12. Whilst the contracting partners for the public service contracts for route transport (excluding railway) since 2021 were carriers on one side and implementation level authorities, such as the Transport Administration and public transport centres, on the other side, it was decided to bring the organisation of procurement and the management

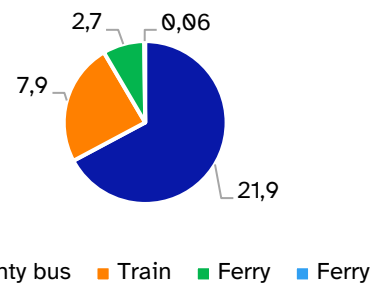
of contracts in the areas of maritime and air traffic back to the ministerial level, i.e. to the Ministry of Regional Affairs and Agriculture from 2023. In bus transport, the public transport centres remained the contracting partners..

The costs of managing public transport have risen more than projected

13. The costs of route transport provided under public service contracts are mainly covered by subsidies allocated for public route transport from the state budget or the budget of the local authority and by ticket revenue.

14. In 2024, the state subsidised the carriage of passengers by bus with €72 million, by rail with €40.8 million, by ferry with €28.7 million and by air with €7 million. Almost two thirds of all state-subsidised public transport journeys are made by county buses (see Figure 2).

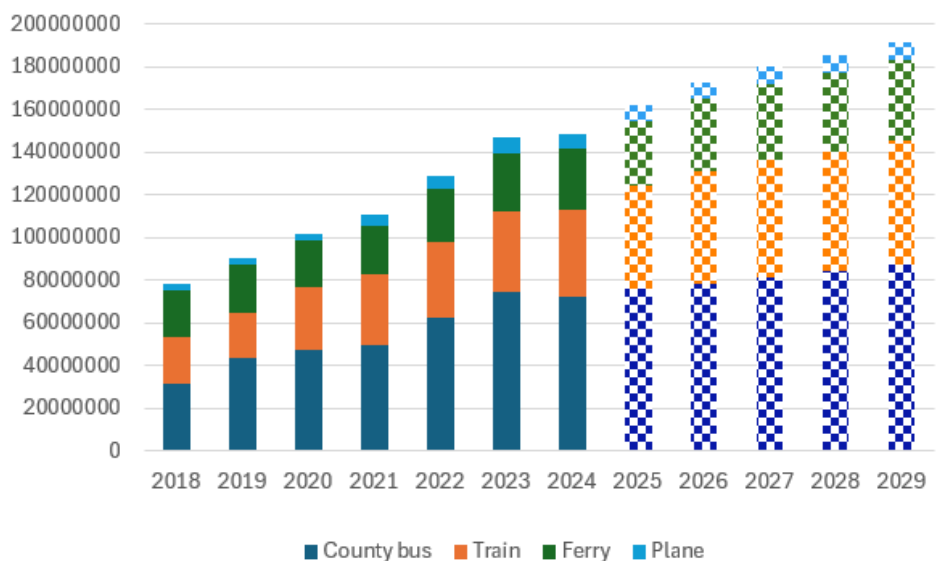
Figure 2. Number of passengers by type of public transport financed from the state budget in 2024 (million)



Source: Reports on the use of the 2024 subsidy by public transport carriers

15. The data provided by the Ministry of Regional Affairs and Agriculture show that the subsidies for public transport have been steadily increasing and the forecast shows a continued increase in the need for subsidies across all modes of transport (see Figure 3).

Figure 3. Public transport subsidies by mode of transport



\* A forecast is given from 2025 onwards.

16. Support for county bus transport has increased the most compared to 2019. The forecast presented to the National Audit Office in the audit published in 2021 showed that the expected financial need for organising county bus transport in 2024 is €64.6 million. However, the subsidies given in 2024 already reached €72 million. The Ministry of Regional Affairs and Agriculture forecasts a further increase in the cost of county bus transport, with €87.1 million expected to be spent by 2029.

17. The main reason for the increase in the cost of county bus transport is the sharp rise in the price indices in the current transport contracts, i.e. the consumer price index, the fuel index and the average wage index, as well as the need to replace commercial routes following the introduction of free county bus transport.

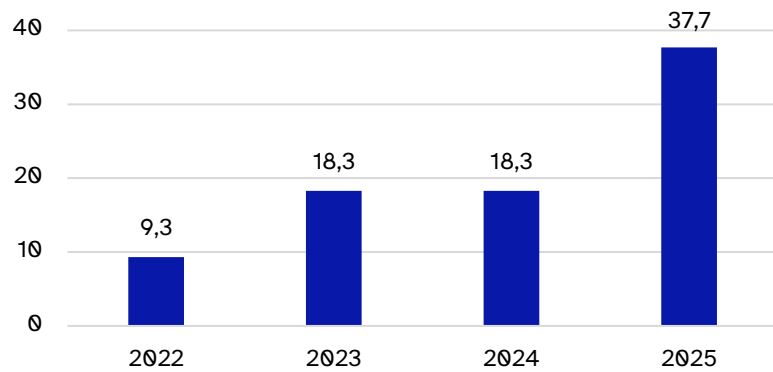
18. The increase in rail, air and maritime transport costs is mainly affected by the increase in the charges for the use of infrastructure, i.e. railway, airport, port. In rail transport, costs will increase due to the introduction of 16 new electric trains ordered by the rail company AS Eesti Liinirongid (Elron) and the Tartu-Riga train service, which is scheduled to open by the end of 2025.

19. For years, less money has been earmarked in the state budget for public transport than is needed to meet the commitments entered into in the contracts, even though the amounts are to a large extent predictable on the basis of the public service contracts concluded with the carriers and known at the time the state budget is planned.

20. Money has been allocated from the reserve fund of the Government of the Republic from 2022–2025 to cover the shortfall in the public transport subsidy (see Figure 4). However, the reserve fund should be for unforeseen costs, not for covering costs related to the performance of known obligations.

Figure 4. Funds allocated from the reserve fund of the Government of the Republic to cover the total public transport shortfall, 2022–2025 (€ million)

The shortfall in public transport funding has long been covered from the reserve fund of the Government of the Republic



Source:  
Ministry of Regional Affairs and Agriculture

21. At the Cabinet meeting on 07.02.2025, the principles of funding public transport from the state budget developed by the Ministry of Regional Affairs and Agriculture (hereinafter referred to as the funding model) were approved.

22. The funding model, which is expected to be implemented from 2026, foresees that the cost of public transport will be planned from the state budget to the extent corresponding to the volume of the commitments undertaken under public service transport contracts. According to the model, the reserve fund of the Government of the Republic would in the future cover only those costs that are difficult to foresee in the budgeting process, such as increases in infrastructure charges, taxes and price indices.

23. The National Audit Office published an audit on the management of county public transport in 2021, and the National Audit Office also examined the resolution of the problems identified in this audit (see Annex A for details).

24. The National Audit Office investigated whether, in the organisation of county bus services, the mobility needs of people have been identified, a user-friendly ticketing system has been created and the timetables have been coordinated with the timetables of rail, water and air routes, and local and long-distance bus services.

25. In addition, the National Audit Office analysed the clarity of the roles and responsibilities of public transport organisers, the situation of transfers, including the duration of transfers, the possibilities of parking cars and bicycles at bus stops, the connections to light traffic routes and whether the financing of public transport makes it possible to develop a public transport service that meets the needs of people.

The National Audit Office audited the financing and organisation of public transport and the compliance of county bus transport with the mobility needs of people

## The organisation of public transport does not guarantee a service that meets people's expectations

### Reasons for dissatisfaction with public transport

#### Did you know that...

the conclusions of the Estonian Mobility Study 2021 of the Transport Administration are the same as the ones of the satisfaction survey carried out by the Ministry of Regional Affairs and Agriculture in 2024. The top three reasons for choosing a car over public transport were:

- travelling by public transport is too time-consuming (64%);
- public transport does not go where people need to go (54%);
- the timetables of the services do not match the movements of people (41%).

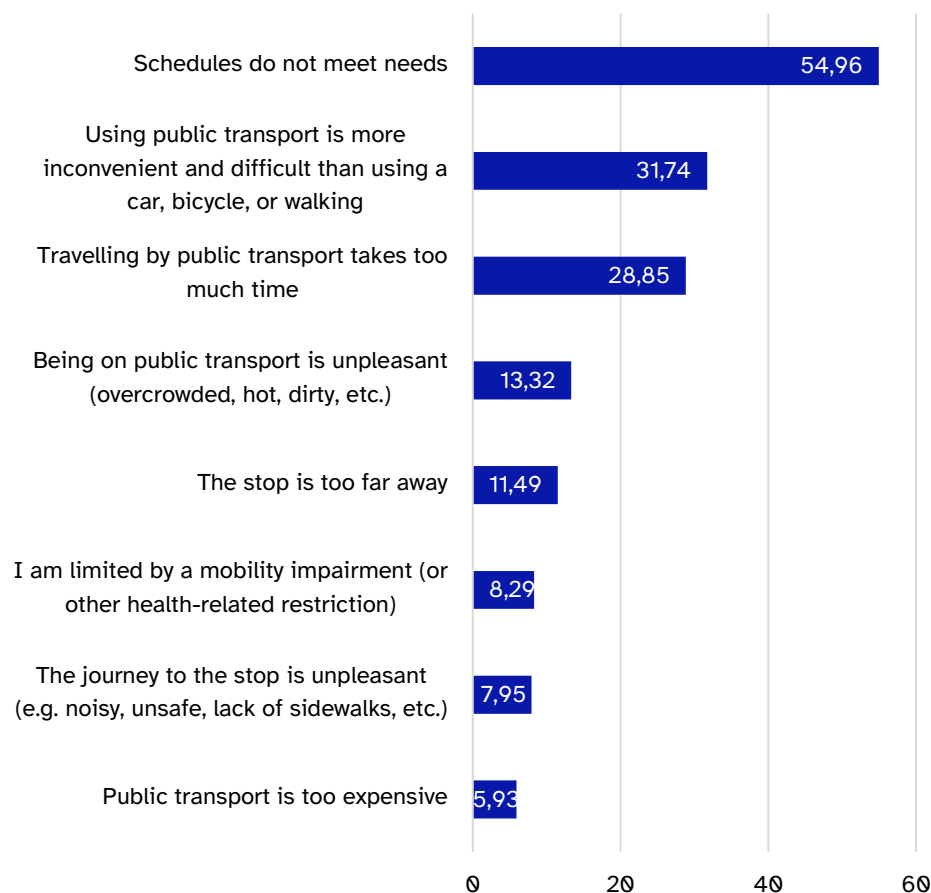
Source: Estonian Mobility Study 2021 of the Transport Administration

26. The public transport satisfaction surveys commissioned by the Transport Board and referred to in the audit published in 2021 showed that people were the least satisfied with the routes and transfer options on county bus services and the arrangements for parking cars and bicycles at bus stops.

27. According to the study “Nationwide satisfaction of residents with the living environment and the public services of local authorities” commissioned by the Ministry of Regional Affairs and Agriculture in 2024, the biggest bottlenecks in public transport at present are the non-compliance of timetables with people's needs and the inconvenience of travelling by public transport (see Figure 5).

28. The reasons for dissatisfaction with public transport timetables cited by 55% of the respondents are that the timetables are too infrequent, the vehicles run at the wrong times or do not cover a suitable route.

Figure 5. People’s reasons for dissatisfaction with public transport in 2024 (%)\*



\* A random sample of 9713 people took part in the study. The study was carried out as an online and telephone survey. 20% of respondents said that nothing bothers or hinders them. The study does not specify the mode of public transport (train, plane, boat, long-distance bus, country or local bus) for which respondents have given their opinions.

Source: National Audit Office based on the study “Nationwide satisfaction of residents with the living environment and the public services of local authorities” commissioned by the Ministry of Regional Affairs and Agriculture

### The mobility needs of people who have not yet used buses for their journeys have generally not been studied or taken into account in the management of county bus transport

#### Criterion

**Study of mobility needs** – the analysis carried out to clarify the actual mobility patterns of people and to plan mobility expediently and sustainably has been considered the study of mobility needs in the audit

**29.** In order to prepare a timetable that meets the mobility needs of residents, those needs must be first identified. The Ministry of Regional Affairs and Agriculture is obliged to carry out both national and county-level **studies of mobility needs** and the Ministry of Regional Affairs and Agriculture has delegated the latter to the public transport centres by means of an administrative contract.

**30.** The National Audit Office investigated whether the Ministry of Regional Affairs and Agriculture and the public transport centres have analysed the mobility patterns of residents when developing the

timetables of county bus services, what data are used for this purpose and whether the results of the analyses have been used to adjust the routes and times.

31. Compared to the audit published in 2021, people's needs to move around by county bus transport have been studied more. The audit showed that, in general, all public transport centres analyse mobility needs as part of their day-to-day work. Six public transport centres have used external help to identify mobility needs, including commissioning mobility studies, using data from third-party work or gaining new knowledge from the graduation theses of students.<sup>3</sup> Four public transport centres have carried out surveys themselves.

32. According to the Tartu County Public Transport Centre, the Ministry of Regional Affairs and Agriculture has announced that there is currently no money to open new routes or to increase service frequency of existing routes, and therefore the Tartu County Public Transport Centre has no motivation to outsource studies.

33. The responses to the survey of the National Audit Office (see Annex B) show that studies of mobility needs have been used as a basis for making changes to the route network, and that in the period 2020–2024, the public transport centres of Järva, Pärnu, Jõgeva, Kagu and Viljandi have made changes to their route networks and timetables based on such studies..

34. However, it became evident that if the results of a study recommend the opening of a new route that needs additional funding, it is up to the Ministry of Regional Affairs and Agriculture to decide whether or not the public transport centre can implement the change. The North-Estonian Public Transport Centre stated that it has not received money even to open routes that are likely to have high demand, such as the new developments in the surroundings of Tallinn.

35. Public transport centres use passenger validation data, passenger and carrier feedback to plan routes, i.e. mainly to change routes and travel times. A weakness in analysing this data is that the public transport centres only have the right to view the data of their own administrative area and have no information on how many people from the region of the public transport centre travel to another county. In addition, these data do not reflect the mobility patterns of people who do not use public transport.

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<sup>3</sup> For example, the topics of bachelor's and master's theses have included the feasibility of implementing demand-based public transport in regions, analysis of the route network, planning a new route network, the impact of planned service level standards on the public route network.

### Did you know that...

On 1 April 2025, bus number 27 started operating in Viljandi County, connecting Matapera Village, where no public bus transport had been provided before, and the Päre summer cottage region with Viljandi City. The line was set up on the basis of mobile phone mobility data.

Source: [Viljandi Public Transport Centre](#)

### Did you know that...

the next nationwide mobility study is planned in the 2025 budget of the Transport Administration in cooperation with the City of Tallinn

Source: Transport Administration

### Opinion of the National Audit Office

36. Mobile positioning, commuting and other data describing the mobility patterns of residents, which would also take into account the needs of those who do not travel by bus, are mostly not used (with the exception of the Viljandi Public Transport Centre and the Southeastern Public Transport Centre), although the Ministry of Regional Affairs and Agriculture has access to the data. According to the North-Estonian Public Transport Centre, there is currently no money or human resources to analyse these data. The Ministry of Regional Affairs and Agriculture itself has not analysed the data because, according to the Ministry, it does not have the necessary analytical expertise and outside help has not been used for analyses.

37. According to rail company Elron, adapting existing studies to plan their timetables is standard practice. Elron finds that there should be a single database of studies. For example, when the Transport Administration orders mobility studies but they cannot be found in a single database, Elron may not be aware of the existence of a study and may order a similar one itself.

38. In 2021, the Transport Administration carried out a nationwide population survey. Based on the data of the survey, the Ministry of Regional Affairs and Agriculture has not made any proposals to the public transport centres for changes to the county route network, as the surveys did predominantly not provide any new information.

39. The results of the survey were used to prepare the concept of the public transport reform. For example, a cooperation project on public transport routes in Saaremaa and Lääne-Harju is being planned and its main objective is to develop the principles for designing the route network. Based on the survey data, the Transport Administration has started to develop a nationwide mobility model for 2025 in cooperation with the Ministry of Regional Affairs and Agriculture.

40. Mobility needs have been studied both by the Ministry of Regional Affairs and Agriculture (previously the Transport Administration) at the national level and by the public transport centres at the county level, also after the 2021 audit. For the public transport centres, analysing people's mobility needs is part of their day-to-day work. However, the clarification of the mobility needs of people who do not use public transport but who would need it has not progressed in all public transport centres. The public transport centers have cited as the reason the fact that no additional funding is provided for increasing service frequency in the route network.

41. Nevertheless, according to the National Audit Office, possibilities for more efficient use of money should be sought in the budgets of the public transport centres and thus make changes in the timetables. For

example, demand-based transport could be used to optimise the current network at places where passenger numbers are small.

42. The Ministry of Regional Affairs and Agriculture can provide the public transport centres with access to the county-based data from nationwide surveys, so that the public transport centres would not have to commission surveys from their own budgets to obtain the same data. This would allow the public transport centres to study people's mobility patterns more sustainably.

43. In the opinion of the National Audit Office, an analysis that only includes data on the current users of public transport is not sufficient to develop timetables that meet the actual mobility needs of the population, as this analysis does not show the mobility patterns of people who do not use public transport but could start to do so. At present, approximately 60% of working people commute by car – the mobility needs of these people are not reflected in the data on the use of stops or directly in the data on the location of services.

**44. Recommendation of the National Audit Office to the Minister of Regional Development and Agriculture:** develop a procedure for sharing data with public transport centres in order to study the mobility needs of people who use public transport as well as those who do not.

**Response of the Minister of Regional Affairs and Agriculture:** We produce regular annual reviews, which we share with the public transport centres. The report on the use of stops, based on validation data from county routes, will be ready for use by public transport centres in the near future. We will then continue to analyse other indicators based on the validation data, using the Power BI tool, which helps study the available data dynamically and better assess the feasibility of the routes.

In addition, the Ministry of Regional Affairs and Agriculture has provided the public transport centres with an online route network analysis software, which can display different data, such as the location of people's places of residence, schools and kindergartens, as map layers. We also plan to add validation data, i.e. the usage of stops, as a data layer. As new data are generated, we add new data layers to the analysis software. In addition, there is the possibility to use mobile positioning data.

The Ministry of Regional Affairs and Agriculture does not consider it necessary to develop additional procedures, as all information exchange runs smoothly on a day-to-day basis and, as new IT solutions become available, these tools will immediately be made available to the public transport centres.

## It is difficult to coordinate the timetables of different modes of public transport because there is no central coordination

### Criterion

#### Did you know that...

in 2021, 14.3% of all people in employment travel from their county of residence to work in another county, and there are such people in all counties (see Annex C).

Source: Statistics Estonia

#### Public transport centres are not expected to organise bus services across county borders

45. Synchronised timetables and an integrated nationwide network require coordinated planning between the route organisers of different modes of transport. The organisation of the public transport network and timetables must allow passengers to make connections with reasonable waiting times.

46. There are people in all counties whose place of work is not in the county of residence.

47. The National Audit Office examined whether, given the current distribution of tasks, it would be possible to develop county bus services in such a way that people could move between different counties and transfer between different modes of transport using local bus and coach services, as well as train, boat and air services.

48. The Ministry of Regional Affairs and Agriculture coordinates the development of public transport in counties and nationwide, designs the route network of public transport services in the counties linked to the network of municipality and urban routes, and long-distance services, and issues route licences to commercial operators and approves timetables for bus services on county, national long-distance and international services.

49. In addition, the Ministry of Regional Affairs and Agriculture is the competent authority for the carriage of passengers on the county bus services operated under public service contracts and by the long-distance bus services. Among other things, the competent authority organises a public procurement to find a carrier.

50. Under administrative contracts concluded with the Ministry, public transport centres have been entrusted with overseeing and coordinating, in cooperation with the Ministry of Regional Affairs and Agriculture, the development of public transport in the county; approving the timetables of the county's bus services operated by commercial operators, taking into account the timetables of long-distance bus routes, municipality and urban routes, ferries, planes and trains, and the proposals of the local authorities concerned; and designing the route network of public bus services in the county linked to the national and local networks.

the North Estonian Public Transport Centre is the largest public transport hub, whose region covers Harju, Rapla, Lääne and Lääne-Viru counties.

The Southeastern Public Transport Centre operates bus services in Põlva and Võru counties. The public transport centres of Pärnu, Jõgeva, Järva, Valga, Ida-Viru, Viljandi and Tartu counties, and Saare Municipality Government and Hiiu Municipality Government have regions based on a single county.

Source: Statutes of public transport centres, public law contracts

There is no systematic approach and no unified co-ordination for aligning the timetables of county bus and other services

51. However, in practice, most of the public transport centres (except Saaremaa, Hiiumaa) operate services that start in one county and end in another. There are 392 bus routes organised by public transport centres that cross county borders (including 39 between more than two counties and 353 between two counties), representing 20% of all routes (1,918).

52. The Ministry of Regional Affairs and Agriculture itself does not organise public procurement for long-distance bus services. It is therefore not clear at this stage on what basis the public transport centres organise and the Ministry of Regional Affairs and Agriculture finances the carriage of passengers on long-distance bus routes.

53. All the public transport centres are trying to take other modes of transport into account when planning their county bus routes and have tried to make them compatible.

54. In the survey of the National Audit Office, the most cited obstacle to the smooth interconnection of county bus traffic with other modes of transport was the fact that trains and ferries do not adhere to the agreed timetables. In the case of trains, the public transport centres have cited railway repairs as the reason for this, and in the case of ferries, weather conditions (ice, strong winds, etc.), which either prevent ferrys from adhering to timetables or lead to cancellations.

55. The responses of the Ministry of Regional Affairs and Agriculture to the National Audit Office's inquiry about the basis on which timetables are prepared revealed that the timetables of trains, commercial bus services and ferries do not take into account the actual mobility needs of the people in the county, and are based on the organiser's own network of routes. For example, according to Elron, train timetables also depend on the capacity of the railway infrastructure, which makes changing the timetable on the railways less flexible compared to buses.

56. In addition, changing the traffic schedule and increasing capacity on the railways is a more long-term process. For example, it will take a minimum of five years to procure new trains, and these trains cannot be fully operational until the electrification of the Tallinn-Tartu and Tallinn-Narva lines is completed.

57. Long-distance bus services are mainly operated on commercial basis, i.e. according to the carrier's own wishes about the centres between which it wants to provide services, which stops it adds in the timetable, on which days of the week to operate the service, etc. The carrier considers its business interests when managing commercial services. The carrier submits an application for a licence to provide long-distance bus services to the Ministry of Regional Affairs and Agriculture, which proceeds from the principles of discretion for issuing long-distance licences and approving timetables. However, there are no

criteria in the principles of discretion to motivate commercial carriers to align their services with county bus transport.

58. The ferry timetables are prepared by carriers who, according to the terms and conditions of their contracts concluded with the Ministry of Regional Affairs and Agriculture, coordinate these plans with the relevant local authorities and submit them to the Ministry of Regional Affairs and Agriculture for approval. If local authorities do not grant their approval, the timetable applied in the same period of the previous year is used. Situations where the opinion of local authorities cannot be taken into account are rather common.

59. The public transport centres are usually informed of changes to train, ferry, air, local and long-distance bus timetables. However, public transport centres have pointed out that, for example, in the case of trains, the notice period is often too short to change the timetables of bus services in the region. According to the contract concluded with the carrier, the public transport centres need information at least 30 days in advance to make changes to the timetable. According to the Southeastern Public Transport Centre, they sometimes receive information three days in advance in practice.

60. Elron has a contract with AS Eesti Raudtee for the use of railway infrastructure, which sets out, among other things, the process and deadlines for approving the timetable. According to this agreement, AS Eesti Raudtee must notify Elron of the repair work schedules and other planned changes to the traffic schedule 60 days before the changes enter into force and submit a draft of the amended traffic schedule 30 days before it enters into force.

61. According to Elron, they do not always receive notifications and draft traffic schedules from the infrastructure operator in time, and even if the information arrives on time, there are cases where it is later changed (location of a closed section or the dates of works are changed).

62. According to Elron, the advance notice period agreed in the current operating contract does not provide sufficient time for informing passengers, let alone the public transport centres, and does not make it possible to sell tickets sufficiently long in advance.

63. The National Audit Office analysed selected routes with transfers (see the description of the sample in the audit description) to find out how long the average waiting time for transfers can be when moving from one county to another using different modes of public transport. The analysis of the selected routes showed that the average waiting time for transfers was 26.5 minutes and sometimes reached an hour.

According to studies, the nationwide route network should be designed by a single authority

64. The Ministry of Regional Affairs and Agriculture has carried out a nationwide analysis of the possibilities for connecting different modes of transport into a coherent and functioning system. The underlying principle of such a network structure is the coherence of timetables and the assumption of fixed interval scheduling, which means departures at certain intervals.

65. In this case, the main mobility needs would be covered by a frequent national rail service, supported by a county bus service, which takes passengers to the trains, as well as fixed interval carriage service between regional centres. Trains, buses, on-demand bus services and also ferries must operate as a whole, with fast and convenient transfers between routes.

66. The Ministry of Regional Affairs and Agriculture believes that the transition to a fixed interval schedule needs centralised management to allow the development of a nationwide system of linked timetables that people can easily understand when using any mode of transport.

67. In its legislative intent for the development of the draft act amending the Public Transport Act, the Ministry of Regional Affairs and Agriculture has pointed out that at present, routes only form a set of individual routes – there is no comprehensive system as the alignment of timetables is mostly random. Current timetable coordination is voluntary for the compilers of timetables and is based on their own route networks, rather than taking into account the nationwide route network.

68. Various analyses have shown that, from the state's perspective, the national route network should be designed by a single authority, as this would better meet people's need to move outside counties.

69. For example, in the 2016 analysis of state functions concluded that a single authority would not face territorial obstacles when designing the route network; a study on alternative administrative models for the management of public transport published in 2024 points out that the passenger-centred solution is based on a single authority, where all modes of transport are managed in all regions in such a way that different modes of transport do not compete with each other.

70. Despite the results of the analyses, the Ministry of Regional Affairs and Agriculture made a proposal to the public transport centres to merge into regional public transport centres in 2025, so that local authorities retain their voting rights in the public transport centres. The study of administrative models does not support this solution, as the parties have no common vision of possible regions.

71. The public transport centres oppose regional mergers because the point of merging the public transport centres is not clear to them, and

## Did you know that

Organisation of public transport (follow-up audit of county public transport)

the Minister of Regional Affairs and Agriculture has stated on 17.09.2025 that the plan is to consolidate the current public transport centres under one or two control centres.

Source: [Terras: basic funding for public transport will increase by €54 million next year. ERR, 17.09.2025](#)

## Opinion of the National Audit Office

there has been no guidance from the Ministry on how and on what principles the merger should take place.

72. The Ministry of Regional Affairs and Agriculture has currently put the merger of the public transport centres on hold, although the administrative changes should be completed by early 2026 according to the schedule of the concept of the public transport reform. The merger was put on hold because the Ministry of Regional Affairs and Agriculture had not yet developed a clear position or determined the merger process.

73. The Ministry of Regional Affairs and Agriculture has so far failed to lead the development of nationwide public transport. The current timetables are prepared on a different basis for each mode of transport and within the operational limits of the service organiser. This is why coordinating the timetables of the services is difficult and time-consuming, and the parties also lack the motivation for this.

74. Although timetables depend on, among other things, a number of unforeseeable circumstances (e.g. rail infrastructure failures, storms at sea), the large number of organisers of different modes of transport means, in the opinion of the National Audit Office, that it is essential that the Ministry of Regional Affairs and Agriculture establishes a functioning coordination system to connect all these timetables.

75. The current county-based route network and timetables do not support the movement of people by different means of transport and between different counties. Given Estonia's small size, at least the route network in mainland Estonia, which would cover different modes of transport, could be designed by a single authority. The fact that public transport should be planned across counties is also confirmed by practice – most of the long-distance bus services of the public transport centres already cover different counties, even though they are not obliged by the administrative contracts to provide such a service.

### **76. Recommendations of the National Audit Office to the Minister of Regional Affairs and Agriculture:**

- ensure the functioning of a single nationwide public transport service covering different modes of transport (including ferry, train, county and local bus services), which also includes the creation of a central timetable coordination system;
- if the use of the current public transport model continues, amend the administrative contracts with the public transport centres so that they have the right to organise transport beyond their own county's borders.

**Response of the Minister of Regional Affairs and Agriculture:** We also see the need for nationwide coordination of all modes of transport.

The plan is to resolve the hierarchy of routes and the nationwide timetable coordination system by amending the Public Transport Act. The administrative contracts with the public transport centres will also be reviewed, while the current contracts do not prohibit the opening of cross-border routes by the public transport centres.

**Comment of the National Audit Office:** The National Audit Office points out that the public transport centres are competent to manage those public functions that are entrusted to them by the administrative contracts. At present, the Ministry has not delegated the management of long-distance bus services to the public transport centre in the administrative contracts, although the Ministry has this option.

### The lack of the necessary infrastructure (e.g. car parks) and of a single ticketing system makes the journeys with transfers inconvenient

#### Criterion

**Special need** – according to the accessibility concept based on the life cycle, the accessibility needs that may emerge during a person's entire life cycle, e.g. parents of small children, the elderly, temporarily injured people, etc., could be added to the view of disabled people.

Source: final report of the Accessibility Task Force, Government Office

#### No single nationwide ticketing system has been created

77. In order to ensure convenient and accessible transfers from one way of travelling (e.g. walking, public transport, car, bicycle) or means of transport (e.g. bus, train, boat) to another, it is necessary to develop stops that are well-connected and also meet the **special needs** of people, and to at least create a single ticketing system, which allows passengers to use different modes of transport on their journey with one ticket.

78. One of the objectives of the Transport and Mobility Development Plan 2021–2035, similar to the previous period (2014–2020), is to create a single nationwide ticketing system for all modes of transport, where the same ticket products can be used for both public and commercial services regardless of the mode of transport (e.g. cross-usable tickets on buses, trains, ferries).

79. One of the important activities in the public transport programme in the period 2025–2028 is, in addition to the development of a single nationwide ticketing system, the development of a fare system (including monthly passes, zone tickets, etc.) to encourage passengers to transfer.

80. The audit showed that, to date, there is still no environment where it is possible to buy a single ticket for all modes of transport on a nationwide route with transfers. Each public transport service provider operates independently and there is generally no cooperation on ticketing (except for the combination of long-distance bus services and ferry services operated on a commercial basis).

**MaaS X-Road** – a secure data exchange layer connecting all public transport providers (bus, train, etc.). The objective of the development of the MaaS X-road is to create the prototype of a software that mediates travel requests and connects mobility services, and to test it as a mediation channel to connect different transport service providers and to create single tickets, travel rights or discount products for the participants in the system.

Source: [website](#) of the Government Office

**Only a small number of stops are connected to light traffic paths or parking facilities**

81. In order to integrate different ticketing platforms, the Transport Administration has initiated the **MaaS X-road** project in cooperation with the Ministry of Climate and the Ministry of Regional Affairs and Agriculture, which is an important prerequisite in the context of the public transport reform for a single cross-carrier ticketing system to work. According to the Ministry of Regional Affairs and Agriculture, the state primarily wants to create a base or mediation platform, but at the moment it is not known whether there is a commercial party on the market interested to manage the user interface for the ticketing software.

82. The prototype of the MaaS X-road should be ready by January 2026 and the plan is to implement the full version from October 2026. The full version does not mean that the system should immediately cover all market participants. According to the concept of the public transport reform, it would be practical to start with the integration of train and county bus ticketing via MaaS X-road, to which other service providers would gradually be added.

83. In addition to the integration of ticketing systems, the concept of the public transport reform prepared by the Ministry of Regional Affairs and Agriculture in 2024 aims to create a nationwide system of uniform fares, zones and discounts on county bus, local bus and train services by October 2026 at the latest, in order to facilitate the use of different types of public transport.

84. Although a single system of fares, zones and discounts has been discussed for more than a decade, fares and discounts continue to vary from region to region. The Ministry of Regional Affairs and Agriculture wants to harmonise the discounts, but agreeing on the same discounts requires an agreement between the Ministry of Regional Affairs and Agriculture, the public transport centres and local authorities, which is difficult due to the multitude of the parties involved. The possibility of uniform tariffs and discounts depends on the degree of cooperation between local authorities and on policy choices (e.g. travel concessions often apply to local residents).

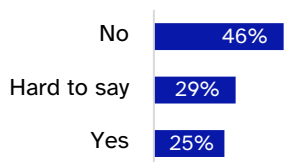
85. A goal of the public transport reform is to view the passenger journey as a whole that does not start or end at a public transport stop. It is also important to ensure that connections and the start and end of the journey are smooth and easy. In order to make transfers more convenient, it is possible to develop cycle and pedestrian paths leading to the stops, ensure that a car park is close to the stop.

**Did you know that...**

the possibility of combining cycling and rail transport is a viable alternative to car travel and could therefore increase the number of rail passengers. In the Netherlands, 40% of passengers arrive at the train station by bicycle and 10% of passengers continue their journey by bicycle when leaving the train. 14% of bus passengers also use a bicycle to get to the bus stop.

Source: the manual “Increasing the Proportion of Cycling in City Transport in Small and Medium-sized Cities of Central and Eastern Europe by 2020

**Figure 6. Possibility to use park-and-ride car parks**



Source: Estonian Mobility Study 2021 of the Transport Administration

**86.** The National Audit Office investigated whether the Transport Administration as the planner of transport and mobility infrastructure objects, and the Ministry of Regional Affairs and Agriculture as the coordinator of public transport development, have an overview of the condition of the equipment of bus stops, footpaths, cycle paths and car parks in the county. The National Audit Office looked at the stops of county bus routes that had departures to see whether and how many had footpaths, cycle paths and car parks nearby to allow for better access.

**87.** Neither the Transport Administration itself nor the Ministry of Regional Affairs and Agriculture has a complete overview of the access infrastructure of the stops on county bus routes, or information on their use. The Transport Administration knows which stops have car parks nearby. Information on the frequency of boarding at bus stops on county routes, i.e. the frequency of use of the stops, is also known. However, it is not known, for example, what the occupancy rate of car parks is and how well equipped they are with bicycle racks.

**88.** According to the Transport Administration, neither it nor the Ministry of Regional Affairs and Agriculture has an exhaustive database of pedestrian and cycling paths and the data provided to the road register of local authorities is incomplete.

**89.** Based on the analysis of the data on car parks in the map layer of points of interest of the Land Board and the data on light traffic paths in the road register (see the description of the analysis in the audit characterisation), the National Audit Office found that, for example, 23.6% of light traffic paths and 5% of car parks are within a radius of 50 metres<sup>4</sup> of the surveyed stops (see also Figure 6). Of all the stops surveyed, 37.3% have a light traffic path and 25.8% have a car park within a radius of one kilometre.

**90.** According to the Transport Administration, not every stop on a county bus route necessarily has to have a car park or light traffic path nearby. The idea is to solve access on most roads on an as-needed basis by moving along the roadside and not by a separate footpath.

**91.** From 2021, the budget of the public road maintenance plan also includes funding for the measure “Construction of infrastructure promoting more sustainable mobility”, which is used to finance the construction of pedestrian and cycling paths and the creation of conditions to encourage changing the ways of travelling or mode of transport, including the construction of mobility centres and park-and-

<sup>4</sup> In Estonia, there is no agreement on how far an onward connection should be from a car park. However, the Transport Administration has published on its website an Estonian translation of the Finnish guide “Design of pedestrian and cycle paths”, according to which the majority of bicycle spaces should be built no more than 50 metres from the onward connection.

ride car parks. The Ministry of Climate also supports the construction of public transport hubs and cycle paths through the European Regional Development Fund.

92. Sites have been financed for €4.3 million from 2022–2024. During this time, twelve light traffic paths, one park-and-ride car park and four bus stops have been built. There are plans to build four sites in 2025.

93. In order to fund the most important and high-impact sites, the objective principles of prioritising them must be established. The Transport Administration has the model “Potential travel by foot and bicycle”, which is used to select the sections of cycle paths and footpaths with the highest potential for use, taking into account public transport stops. The list of selected objects may also include sites that comply with the criteria presented in the guide “Light Traffic Infrastructure Planning” of the Transport Administration.<sup>5</sup>

94. In accordance with the procedure for selecting state road infrastructure sites that promote sustainable modes of transport established by the Transport Administration, proposals for the list of other sites related to public transport are made by the Ministry of Regional Affairs and Agriculture. The priority for the Ministry of Regional Affairs and Agriculture are sites that act as a mobility hub, i.e. a place where passengers can transfer from one mode of transport to another (bus-train, county-local bus, etc.). Mobility hubs will be prioritised according to their regional impact and the number of passengers affected.

95. According to the Public Transport Act, one of the starting points for planning and managing public transport is to ensure that the supply of public transport meets the demand, which arises, among other things, from the mobility needs of people with disabilities, the elderly and schoolchildren.

96. The National Audit Office investigated whether the people with special mobility needs have been taken into account in the organisation of the county bus service.

A more systematic approach to people with special needs is needed

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<sup>5</sup> In county centres and around towns with at least 10,000 inhabitants, on the light traffic paths leading towards the town centre if there is a town with at least 1,000 residents on the outbound route, which is located up to 10 km from the town border.

### Did you know that...

the Ministry of Climate will allocate €2.5 million to 34 municipalities to address the accessibility and safety bottlenecks in public transport infrastructure sites identified in the analysis of the accessibility of transport and the artificial environment in 2020 by 2028 at the latest.

Source: Minister of Infrastructure Directive of 07.08.2025 "Support to local authorities for improvement of accessibility of public transport"

97. The public transport centres that set conditions for buses in their procurement have highlighted, from the viewpoint of special needs, the problems related to the winter maintenance of bus stops, the lack of light traffic paths leading to bus stops, the lack of a waiting area and lighting (see also paragraphs 166–170 on bus stops) in their replies to the survey. From the list of problems presented by the Estonian Chamber of Disabled People, the unwillingness of bus drivers to help, the unsuitability of the bus fleet for disabled people, such as narrow aisles and problems with fastening wheelchairs, were also highlighted.

98. Buses with low floors allow better access to public transport for disabled people, as well as the elderly, children and people with prams and pushchairs. According to the final report of the Accessibility Task Force of the Government Office of 2021, the percentage of low floor buses on the county bus services operated by the public transport centre was only 29%. According to the Ministry of Regional Affairs and Agriculture, the share of low floor buses on county bus routes has increased to 60% in 2024, and the target for the end of 2027 is 79%.

99. However, the Southeastern Public Transport Centre pointed out that, following the acquisition of low floor buses, it has become apparent that in some cases buses cannot pull up to the edge of the waiting platform to open the door, because the waiting platform is higher than the lower edge of the bus door (see recommendation in paragraph 185).

100. The concept paper on the public transport reform of the Ministry of Regional Affairs and Agriculture indicates that the Ministry does not know how many bus stops are wheelchair-accessible and how many need to be rebuilt. According to the Ministry of Regional Affairs and Agriculture, the Ministry has an overview of the bus stops reviewed in the analysis "Accessibility of transport and the artificial environment" of 2020, i.e. 2.4% (401 bus stops out of the 16,642 bus stops in the sample) of all bus stops.

101. There are no metrics against which to assess the state of accessibility, and ensuring accessibility is currently not monitored at stops. According to the Ministry of Regional Affairs and Agriculture, what makes the adaptation of stops difficult is the fact that the Public Transport Act does not clearly define who is responsible for bringing stops into conformity with requirements (see also paragraphs 166–170).

102. There have been plans to implement a nationwide single ticketing system and a system of uniform fares, zones and discounts since at least 2014. New deadlines have been set time and again, but there is still no single ticketing system and no uniform pricing principles. At the same time, it is still inconvenient for the passenger to navigate between different modes of public transport, as connecting routes where several

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counties need to be crossed by several means of transport cannot usually be covered by a single ticket.

103. The creation of a single ticketing system would also make sense because the operators of the various modes of transport have had to invest in the development of ticketing software in parallel with the Ministry. The Ministry of Regional Affairs and Agriculture, in cooperation with the Transport Administration, has initiated the creation of a data interchange layer, which is a positive step towards a single ticketing system, but until there is clarity on who is responsible for the creation of the user environment for ticketing, there is no certainty that it will be possible to buy tickets from a single central place in 2026.

104. In the opinion of the National Audit Office, achieving the objective described in the public transport programme – the creation of a nationwide system of uniform fares, zones and discounts – in its current form is not realistic. In order to create a single fare system across local authority and county borders, a solution is also needed to include the municipality and urban routes of local authorities.

105. In the opinion of the National Audit Office, the attractiveness and usability of county bus transport can be improved if the service is developed in such a way as to ensure better access to the bus stop and smooth and safe movement to the bus stop and boarding the bus, including for people with special needs. At present, few bus stops on county routes are connected to car parks and light traffic paths, which means that there are often no possibilities to park a car or bicycle, or to safely cycle or walk to the bus stop.

106. The Ministry of Regional Affairs and Agriculture does not have exhaustive information on the accessibility of public transport infrastructure and services for people with special needs. On the positive side, a targeted financing measure for the development of infrastructure has been established to encourage the use of public transport, which has clearly defined principles for prioritising sites that facilitate the use of public transport infrastructure. In addition, the increasing use of low floor buses deserves recognition.

## The Ministry of Regional Affairs and Agriculture has not set standards for public transport services or common rules for their organisation

107. In order to increase the number of people using public transport, it is important to develop public transport (including increase the frequency of traffic schedules, invest in stops and other infrastructure) so that it meets people's actual mobility needs.

108. State support has increased significantly for all modes of transport, so it is important that taxpayers' money spent on public transport is used as economically and efficiently as possible.

**In order to develop public transport, the Ministry of Regional Affairs and Agriculture must define the services that the state is prepared to ensure**

## Criterion

109. In order to develop and invest in the route network, it is important to have clear and long-term principles for planning and financing the public transport network. However, this requires agreement on what is the frequency and level of demand for the regular route transport that the state must guarantee, i.e. which routes must be provided and financed by the state and which ones by the local authorities.

110. Service level standards are the basis for creating a route network that meets the needs of the population and is economically viable, as they can be used to assess where the bus service is essential and where it can be optimised or reorganised – for example, by decreasing frequency in the route network or providing an on-demand service.

111. The state must manage, including optimise, the route network across Estonia on the basis of uniform principles so that regular route transport is provided precisely where and when they are needed most, without wasting resources on redundant or underused routes.

112. In its response to the audit published in 2021, the Transport Administration confirmed that it is planning to develop service level standards for regional public transport, which will determine the population density of regions that warrants ensuring the mobility of residents with regular bus route transport and the regions where more economically efficient solutions should be sought.

113. The National Audit Office clarified whether the Ministry of Regional Affairs and Agriculture has developed service level standards and whether the principles of financing routes are understandable and uniformly applied.

## There are no service levels for public transport provision

114. The audit showed that although the Minister of Regional Affairs and Agriculture has the authority to establish service level standards, the Ministry of Regional Affairs and Agriculture has not set the minimal base level below which the frequency of departures and connections must not fall.

115. In addition, it emerged that according to the administrative contracts, the public transport centres themselves must, where necessary, set and enforce the public transport service standards on the public county bus routes. As the administrative contracts with the public transport centres are worded in such a way that the public transport

centre performs its tasks within the borders of the county, this would entail different service standards, including route network design practices (e.g. use of on-demand services). In practice, none of the public transport centres have set standards for service levels in their regions.

### Did you know that...

according to the proposal of the public transport centres, the following should be guaranteed at the base level:

- journeys to the centre every day (1–2 round trips);
- connections to major long-distance/county traffic terminals in the county centre for work or other important purposes at key times.

Source: Service level proposal of the public transport centre, 2025

### The division of responsibility for the management of county and local public transport remains unclear

116. Although the public transport centres have proposed service levels and submitted them to the Ministry of Regional Affairs and Agriculture in April 2024, there is still no agreement on where, how many people and how often the bus should reach as a minimum. The proposal of the public transport centre includes, among other things, a basic level that should meet the most basic mobility needs of residents who do not own cars, i.e. their journeys to centres.

117. The Ministry has sent its inputs for improving the service level standards proposal to the public transport centres, but the standards have not yet been approved. The Ministry has taken the view that the standards drawn up by the public transport centres may be indicative.

118. The National Audit Office found in its audit published in 2021 as well as in the present audit that the definitions of county bus route, long-distance route and local and urban route formulated in the Public Transport Act give a wide scope for interpretation and the concept of an on-demand bus service is not included in the Act at all. Therefore, it is still not clear which routes must be managed and financed by the state and which by the local authority.

119. Until now, the public transport centres and local authorities have interpreted the borders of the organisation of bus routes differently, because the border where the responsibility of one party in the organisation of a bus route starts and the responsibility of the other party ends remains unclear. This has led to an unequal situation where the routes of some local authorities are urban and municipality routes managed and financed by the local authorities themselves, while the bus routes of other local authorities with similar characteristics are county bus routes managed and financed by the state.

120. The Southeastern Public Transport Centre highlighted in the survey that there are bus routes funded from the state budget that cover one local authority as well as routes where 90% of the stops are in one county and 10% in another.

## Did you know that...

Organisation of public transport (follow-up audit of county public transport)

there are a number of problems from the user's point of view in managing demand-responsive transport:

- an on-demand stop must be ordered in advance;
- it is difficult to understand in the peatus.ee environment whether or not a bus service is on-demand;
- it is difficult to predict the time and duration of a trip.

The Ministry of Regional Affairs and Agriculture, in cooperation with Pärnu County, Tartu County and the Southeastern public transport centres and Saaremaa Municipality, is planning to complete a software development in 2026 that will make ordering on-demand transport more automated and easier to use.

Source: Response of the public transport centres to the survey carried out in 2025, Ministry of Regional Affairs and Agriculture

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121. According to the concept of the public transport reform prepared by the Ministry of Regional Affairs and Agriculture, on-demand bus services should provide an elementary connection at the base level and be a local service that takes people to stops on the main routes. However, the Ministry of Regional Affairs and Agriculture has still not analysed the additional cost to local authorities if they had to use local budgets to finance the on-demand stops or entire on-demand services of county bus routes, which were hitherto managed by the public transport centres from the state budget (see also paragraphs 137–139).

122. This year, the Ministry of Regional Affairs and Agriculture has initiated the legislative intent for the development of an act amending the Public Transport Act to bring the definitions of routes into line with the actual situation. It has been suggested that routes could be divided into long-distance, regional and local bus routes.

123. However, the implementation of the definitions given in the legislative intent requires a change in the administrative model of public transport management and a more precise definition of the financing rules, as the change may increase the burden on the budgets of the local authorities.

124. The National Audit Office finds that although the concept of the public transport reform sets the goal of guaranteeing access to services, education and jobs for people, the Ministry of Regional Affairs and Agriculture has not yet set standards for the level of service or a baseline for when people's travel needs must be met by regular county bus route transport.

125. Unless legally enforceable standards are agreed, it will not be possible to decide uniformly on which routes will be financed and on what conditions. It should be clear to all parties, in a manner that can be legally interpreted, who must manage regular bus route transport and what they must be like, who must pay for certain routes and in which cases the service must be provided by county or local bus services.

126. In the opinion of the National Audit Office, the service level standards, which are optional for the organisers and financiers, do not create certainty for the users of public transport in terms of the availability of the service and for the organisers in terms of the volume of the service. Therefore, it is necessary to establish at least a minimum basic level of service that has legal force.

127. It is important that the service standard of public transport is maintained, even where the budget for service provision is limited, as this will help avoid unjustified regional disparities and ensure that people in different regions are offered the service at least at the minimum level.

128. It is also important for the state to set clear rules on the management and financing of on-demand services, so that it is known at what point a route or a part of a route becomes on-demand and whether demand-responsive transport should be financed by the state or by local authorities.

**129. Recommendations of the National Audit Office to the Minister of Regional Affairs and Agriculture:**

- set standards for public transport service levels and implement them uniformly across Estonia;
- develop the principles for managing and financing demand-responsive transport to make county public transport more cost-efficient;
- agree, in cooperation with local authorities, on the unambiguous content and distribution of county bus, long-distance, local authority and on-demand services, and on the principles of financing.

**Response of the Minister of Regional Affairs and Agriculture:** the goal of the Ministry of Regional Affairs and Agriculture is that the service level standards ensure support for the implementation of the public transport reform. The development of service level standards is underway and the planned deadline is next year. A pilot project for demand-responsive transport is underway in Saaremaa, and an analysis of the results of this project can be used as a basis for drawing up more general principles for the organisation of demand-responsive transport. However, the organisation of demand-responsive transport may not always be a more cost-efficient solution, because it serves a small number of passengers at a time. It is planned to change the definitions of routes and services with an amendment to the Public Transport Act in order to divide responsibility and funding principles more clearly.

**The Ministry of Regional Affairs and Agriculture has not developed public transport cost-efficiently**

**Criterion**

130. As it will not be possible to provide the service at the same level in the coming years with the current budget, the Ministry of Regional Affairs and Agriculture must develop solutions for the management of public transport more economically, given the money available.

131. One option to maintain the county route network sustainably is to identify and close or shorten unreasonably expensive routes.

132. The National Audit Office clarified whether the Ministry of Regional Affairs and Agriculture has developed criteria for the optimisation of the route network and whether the public transport centres have optimised the use of the route network according to the criteria. In addition, the National Audit Office looked at whether the public transport centres

have considered the use of alternative travel options for the purpose of optimisation and whether the Ministry of Regional Affairs and Agriculture has guided the public transport centres to do so.

The Ministry of Regional Affairs and Agriculture has not analysed the route network indicators or set cost limits for the optimisation of the route network

133. The Ministry of Regional Affairs and Agriculture has so far not established common principles for optimisation, including for example the cost limit per passenger that, when exceeded, indicates the need to reorganise routes, refuse to open them or stop subsidising them from the state budget.

134. Since the transfer of public transport tasks to the Ministry of Regional Affairs and Agriculture, the Ministry has not had the capacity to analyse the economic feasibility of the route network. The public transport centres have been analysing the performance of routes based on ticket validation data since April 2024.

135. Almost a year and a half after the transfer of public transport management tasks to the Ministry of Regional Affairs and Agriculture, an analyst started working at the Ministry, whose tasks include analysing the cost and usage of routes. The Ministry is planning to start analysing the usage of the route network for public transport centres during 2025, but at the time of preparation of the audit report, such analyses have not yet been carried out.

136. Responses to the survey of public transport centres showed that the principles of optimisation differ from region to region. For example, on the routes of the Southeastern Public Transport Centre, the cost per passenger per trip on any one route should not exceed ten euros. Instead, the North-Estonian Public Transport Centre monitors bus occupancy, for example reacting if there are fewer than five people per bus trip on a route.

Public transport centres are offering increasingly more on-demand stops

137. All public transport centres have made county bus routes or parts of them demand-responsive for the purposes of optimisation. For example, the Pärnu County Public Transport Centre has reorganised regular bus route transport so that the end or beginning of less busy routes are served on demand.

138. According to a survey by the National Audit Office, demand-responsive transport is used the most in Hiiumaa and the least compared to others in the region of the North-Estonian Public Transport Centre (see Table 1).

Table 1. Share of on-demand services among county services operated on the basis of public service contracts

Public transport centre	Number of county routes	Number of on-demand routes	Share of on-demand routes (%).
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Hiiumaa Municipality Government	69	63	91
Järva County Public Transport Centre	34	21	62
Pärnu County Public Transport Centre	98	40	41
Ida-Viru County Public Transport Centre	53	20	38
Viljandi County Public Transport Centre	100	32	32
Tartu County Public Transport Centre	329	101	31
Järva County Public Transport Centre	176	53	30
Southeastern Public Transport Centre	350	94	27
Saaremaa Municipality Government	123	21	17
Valga County Public Transport Centre	152	24	16
Northern Estonia Public Transport Centre	235	Lääne 8; Lääne-Viru 1; Harju 2; Rapla 1	5

\* The National Audit Office has also included routes where only some of the stops are served on demand among on-demand routes.

Source: Response of the public transport centres to the survey carried out in 2025

139. According to public transport centres, demand-responsive transport may be more expensive if the cost per route kilometre per passenger is taken into account, but savings can still be made on the account of unnecessary route kilometres. For example, the Tartu County Public Transport Centre has estimated that approximately €22,000 could be saved per month, which could be used to provide more services on other routes.

Reducing the volume of bus services and increasing the fares could reduce the number of public transport users

140. The Ministry of Regional Affairs and Agriculture explained that the large gap between the revenues and costs of public transport can mainly be reduced by reducing the volume of route transport – shortening routes, reducing frequencies, closing routes – or raising the fares. The county bus service contracts include the possibility to reduce the volume of the contract by up to 20%, but so far the Ministry of Regional Affairs and Agriculture has not instructed the public transport centres to reduce the volume of routes.

141. According to the Ministry of Regional Affairs and Agriculture and considering the trend to stop providing some services (including

schools, shops) in smaller settlements, the need for public transport continues to grow.

142. Public transport centres are cautious about making cuts to the route network, because stability is important for people using public transport. Routes are interconnected, so a cut on one route affects the other. Making big changes to the established route network will reduce the trust of people and they choose cars or lose the opportunity to travel to destinations that are important to them.

#### Did you know that...

in cooperation with Elron, a westbound clock-face train service is tested since April 2025, which means that departures take place at fixed intervals.

Source: [website](#) of AS Eesti Liinirongid

143. On the other hand, there are plans to increase the capacity of rail traffic and make the timetables more frequent by adding new trains in 2026. According to Elron, the introduction of new trains depends on the completion of infrastructure investments (e.g. electrification), but also on the state's ability to finance the additional capacity of Elron's routes. Priority is given to increase capacity on the high-demand Tallinn-Tartu and Tallinn-Narva routes, where train occupancy is high. The plan to increase the frequency of the train timetable is also in line with goal of the Ministry of Regional Affairs and Agriculture to offer more fixed intervals services.

144. According to the financing plan developed by the Ministry of Regional Affairs and Agriculture, the revenue from tickets should cover 25% of all public transport costs on average in 2025 and the share should increase to 28% by 2030. According to the concept of public transport reform, the state hopes to increase ticket revenue by increasing the attractiveness and accessibility of the service, and through faster and more frequent train and bus services.

145. At the same time, the Ministry of Regional Affairs and Agriculture estimates that the ticket revenue on county bus routes is likely to fall in 2025 compared to 2024 due to a decrease in the number of passengers. 30% of all passengers currently pay for a ticket. People older than 63, pupils, people with partial or full incapacity for work and disabled people currently travel free of charge.

146. While in 2024 the train fare covered about 35% of the operating and capital costs of the train, it only accounted for approximately 9% of the costs of county bus routes.

147. In order to cover 25% of the costs of county bus routes by the fare, the ticket price would have to be increased by approximately three times, assuming that the number of passengers and the concession rates remain the same. The revenue base could also be increased by reducing concessions for students, residents aged over 63, and people with partial or no capacity for work and disabled people.

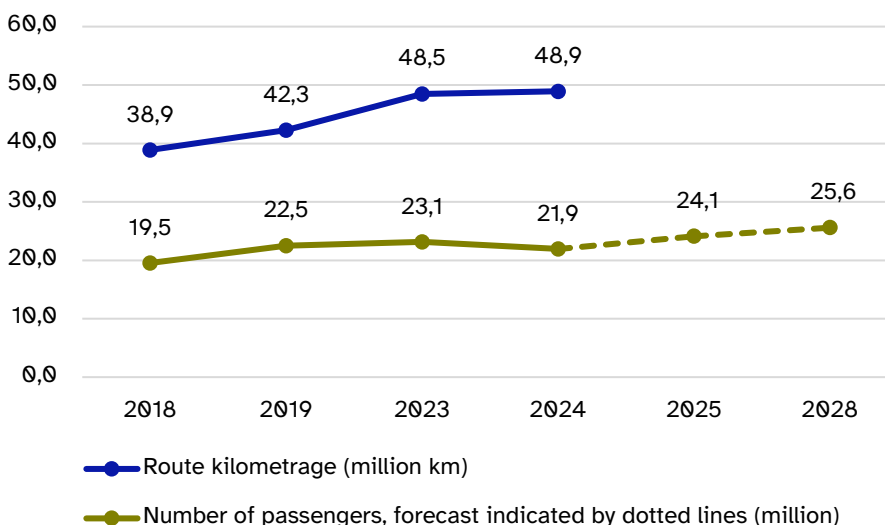
**Did you know that...**

there are no plans to raise fares for county bus services or ferries in 2025. The price of train tickets was increased both in early 2024 and in 2025. The price of airline tickets increased from 1 February 2025. For example, a regular ticket to Kuressaare costs €36 instead of the former €30. A change in train fares entered into force in March: The fares on longer trips on long-distance routes decreased by 16%, while on some routes, the price increased by up to 23%.

Source: Ministry of Regional Affairs and Agriculture

148. The fare policy has affected the number of passengers on county bus routes, which increased following the decision of the Government of the Republic to allow residents to travel free of charge on county bus routes from the second half of 2018. In 2024, a fare for working-age people was established again, leading to a slight decrease in the number of passengers thereafter. However, there has been a steady increase in the number of kilometres travelled. The Public Transport Programme 2025–2028 still forecasts a further increase in the number of passengers on county bus routes (see Figure 7).

Figure 7. Number of passengers and route kilometrage on county bus routes 2018–2024 and expected growth in passenger numbers



Source: Reports on subsidies for public regular services for road transport and the Public Transport Programme 2025–2028

149. The concept of the public transport reform foresees increasing the share of commercially operated bus services as one of the options to reduce the need to subsidise public transport. In the case of increased commercial initiative, the role of the state would remain first and foremost to determine the need for the service to be covered by monitoring it.

150. According to the public transport centres, commercial operators are currently not interested in resuming the operation of routes between hubs without public co-financing, as it is not financially viable. The Union of Estonian Automobile Enterprises, which brings together the enterprises operating major bus services, has confirmed that commercial bus services will not return to the levels seen before the introduction of free public transport in the foreseeable future at current fare levels.

**Opinion of the National Audit Office**

151. According to the National Audit Office, public transport should be financed according to uniform principles and the state should not pay for unnecessary or too expensive routes. This means that the Ministry of

Regional Affairs and Agriculture must establish rules on when maintaining a route should be considered unreasonably expensive or when routes should be reorganised.

152. In the opinion of the National Audit Office, it is positive that public transport centres are analysing the economic feasibility of the routes in their region and have increasingly made bus routes or parts of bus routes in the region demand-responsive in order to save money. At the same time, the optimisation criteria (e.g. minimum number of passengers, passenger cost per route kilometre) set by the public transport centres are not uniform and should be set by the Ministry.

153. Reducing the number of routes or increasing the fares may actually mean a reduction in the number of public transport users, contrary to the objectives. Nevertheless, and given that there is no money in the Ministry's basic budget to cover the current commitments and that the shortfall in public transport funding, i.e. the gap between the costs and revenues of public transport, is increasing, the Ministry of Regional Affairs and Agriculture should still analyse whether the state can provide county bus services at the current level and with the current concessions.

154. Although a concept for the public transport reform has been prepared in order to achieve cost-efficiency and increase the attractiveness of public transport, the National Audit Office is not confident that the actions described in the concept would help keep costs under control unless fares are increased, concessions are cut or a solution is found to replace public routes with commercial routes.

**155. Recommendations of the National Audit Office to the Minister of Regional Affairs and Agriculture:**

- identify options for reducing the funding shortfall and assess the impact of possible actions to be taken for this purpose on the use of public transport, including analyse impacts if county bus routes and concessions were reduced and demand-responsive transport was developed;
- develop funding rules to clarify the economic considerations on which public money will not be used to subsidise the continued operation of routes.

**Response of the Minister of Regional Affairs and Agriculture:** we will analyse ways to generate additional revenue and optimise costs in public transport. The activities of the public transport reform are also aimed at the development of a cost-efficient funding model. The co-creation activities of the public transport reform are currently underway in seven counties in order to analyse changes to the route network. In order to reduce the costs of bus traffic, it is advisable to optimise the

route network and to discontinue departures with low occupancy rates, or to replace these routes with on-demand services where possible.

## Responsibility in the management of public transport is fragmented and there is overlap in the performance of tasks

### Did you know that...

the tasks of the Government of the Republic in the organisation of public transport are:

- the establishment of the procedures for granting travel fare concessions to passengers and for paying them compensation from the national budget, unless this is delegated to the minister;
- the establishment of a national public transport register.

Source: Public Transport Act, § 33, § 36 (5), § 73

### Criterion

### Did you know that...

domestic public transport is an important part of the mobility service. The Ministry of Regional Affairs and Agriculture explained that in the redistribution of responsibilities between institutions, public transport component was separated from sustainable mobility and transferred to the Ministry of Regional Affairs and Agriculture, whilst cycling and walking remained in the area of government of the Ministry of Climate.

Source: Ministry of Regional Affairs and Agriculture

156. The management of public transport is regulated by the Public Transport Act, pursuant to which the Ministry of Regional Affairs and Agriculture, the Ministry of Climate, the Government of the Republic and local authorities are the authorities that plan and organise public transport.

157. When public transport is organised by several authorities, there is a risk that different actors perform similar tasks, which wastes both money and human resources; there is no incentive to seamlessly combine modes of transport because of different interests and priorities; and the monitoring of the performance of tasks is more complex because responsibility is dispersed.

### There is an overlap of tasks in public transport organisation and no clear legal basis for the allocation of some of these tasks

158. Economically viable and comprehensive public transport requires determining the division of tasks, responsibilities and competencies on legal grounds and in a form that can be interpreted by all actors in the same manner whilst avoiding duplication.

159. The National Audit Office clarified which tasks are performed by the ministries, the public transport centres and the Transport Administration, on what basis, and whether and which activities are duplicated.

160. The task of the Ministry of Regional Affairs and Agriculture is to develop and implement county and nationwide public transport policies (excluding infrastructure) for all modes of transport, including train, bus, boat and air. The task of the Ministry of Climate is to develop and implement international public transport policy and to plan and implement mobility services, including public transport infrastructure investment and procurement. The task of local authorities is to organise public transport in the administrative territory of their town, city or municipality.

161. The Ministry of Regional Affairs and Agriculture has delegated its tasks in the field of county bus services to public transport centres, which are established in cooperation with local authorities and mostly

operate within the county boundaries.<sup>6</sup> In addition to county bus services, the Tartu County Public Transport Centre is also authorised to carry out tasks in the area of small vessel passenger transport.

An overlap seems to be primarily in the execution of the tasks entrusted by the Ministry of Regional Affairs and Agriculture to the public transport centres under administrative contracts

162. The analysis conducted by the National Audit Office indicated that there are currently overlaps in the performance of several tasks (see Table 2). For example, while the delegation of tasks to the public transport centres still leaves the responsibility to the Ministry, it turns out that there are tasks that the Ministry of Regional Affairs and Agriculture has delegated to the public transport centres, but which it also performs at least partly in parallel with the public transport centres.

Table 2. Overview of the practices of the managing parties in carrying out their tasks

Activity	Ministry of Regional Affairs and Agriculture	Public transport centre	Transport Administration
Studies of mobility needs	organises nationwide mobility needs and public transport surveys, which also cover the counties	organises surveys of the mobility needs of the population within the county	plans mobility to meet mobility needs, including organises mobility studies, of which public transport is an important part
Organisation of supervision (see also paragraphs 186–198)	organises supervision of compliance with the requirements of administrative contracts in bus traffic	organises supervision of compliance with public service contract in cooperation with the Ministry of Regional Affairs and Agriculture	
Requirements for compiling timetables	prepares the sample form of the mandatory procedure for preparation of timetables for public transport centres	establishes the requirements for the preparation of timetables for public county bus services and the procedure for submitting, reviewing, amending and approving those timetables	
Organisation of procurements	organises procurement to find carriers for the operation of recreational craft,	organises procurement to find carriers for county bus services	

<sup>6</sup> Pursuant to § 15 (2) of the Public Transport Act, local authorities and the state authorise a regional public transport centre to perform under a administrative contract relevant functions for the management of county public transport and upon carriage of passengers by ferry, small vessels, ferry and air.

	ferry and air services		
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Source: National Audit Office

The administrative contracts currently include tasks that cannot be delegated to public transport centres

163. In addition, all public transport centres procure support services separately, such as IT and accounting services.

164. In addition to the overlapping tasks, the National Audit Office found that there are tasks that the Ministry of Regional Affairs and Agriculture cannot delegate to the public transport centres by means of administrative contracts.

165. Under the administrative contracts with public transport centres, compliance with the requirements of the long-distance and country bus route transport licences granted by the Ministry of Regional Affairs and Agriculture are monitored in cooperation with the Ministry. However, such a task has not been assigned to the Ministry by the Public Transport Act. According to the Public Transport Act, this is a task of the Transport Administration, which cannot delegate it to the public transport centres.<sup>7</sup>

166. According to the Public Transport Act, it is a task of the Transport Administration to organise the planning and management of infrastructure sites for county bus routes and long-distance bus routes and to take measures to create favourable traffic conditions for public transport vehicles. The same task is assigned by the Act to local authorities within the borders of their administrative territories. In addition, local authorities are responsible for building the infrastructure.

167. Although the Ministry of Regional Affairs and Agriculture has not been assigned such tasks by the Public Transport Act, the administrative contracts concluded by the Ministry of Regional Affairs and Agriculture assign the planning, construction, maintenance and operation of the infrastructure of county bus routes to the public transport centres. The Ministry of Regional Affairs and Agriculture has also paid a small grant to the public transport centres for the management of public transport infrastructure.

168. In practice, the public transport centres themselves generally do not organise the planning, construction and maintenance of public transport infrastructure (except for the Pärnu County Public Transport Centre, which has built the Pärnu bus station and seven countywide 'mini-bus stations'). According to the public transport centres,

<sup>7</sup> Public Transport Act, § 17<sup>1</sup>(1).

complaints or suggestions from people about infrastructure are passed on to the road owner or road maintenance partner.

169. Whilst the Ministry of Regional Affairs and Agriculture is responsible for planning and implementing public transport policy, the Ministry of Climate is responsible for planning and procuring the public transport infrastructure<sup>8</sup>. This is why the Ministry of Regional Affairs and Agriculture has no mechanism to directly steer decisions on infrastructure. Thus, the public transport service for which the Ministry of Regional Affairs and Agriculture is responsible depends on the task of the Ministry of Climate to make the necessary public transport investments.

170. For example, the Ministry of Regional Affairs and Agriculture cannot independently assign tasks to the Transport Administration for planning the infrastructure sites of county routes and long-distance routes, as it is not its area of government. The decision-making process is therefore slower and depends on the level of cooperation between the ministries.

171. For example, the Ministry of Regional Affairs and Agriculture plans and organises the procurement for regular ferry services. The construction of the state's ferries operating between the big islands and the mainland is at the same time planned and managed by the Ministry of Climate, which does not itself manage domestic public transport services.

172. The Ministry of Regional Affairs and Agriculture finds that the best solution to boosting competition is that the ferries are owned by the state and an operator is found for them. I.e. if the transport service contract already concluded expires in 2033, the Ministry of Regional Affairs and Agriculture considers that it would be necessary for the state to have five new ferries available by that time.

173. However, the Ministry of Climate has said that it has no plans to procure four new ferries, only one ferry is being procured and it will sail between the big islands. However, it is not within the competence of the Ministry of Climate to decide how many ferries the state needs to own in order to provide public transport services. The Ministry of Regional Affairs and Agriculture, however, claims that it is up to the Ministry of Climate to decide whether or not the purchase of new ferries is planned. Final financing decisions for the purchase of ferries will be made by the Government of the Republic.

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<sup>8</sup> According to § 6 of the Statute of the Ministry of Climate, the Ministry is responsible for planning and implementing mobility and mobility services (including public transport).

## Maintenance of public transport infrastructure requires a clearer division of responsibilities between the parties

Photo 1. Bus stop with fixtures



Source: Website of Lizmet OÜ

### Did you know that...

the number of stops with passenger boardings between January and May 2024 is 12,223.

There are 269 car parks of the Transport Administration.

There are 2,535 light traffic paths in the road register, of which 548 are owned by the state.

Source: Data of the ticketing system of Ridango AS, the Land Board, the road register

## Opinion of the National Audit Office

174. According to the Public Transport Act, the manager of an object of public transport infrastructure ensures that it is maintained and that the necessary information is available to passengers. In the case of infrastructure built on a public road, the role of the manager of the site is performed by the Transport Administration, and the local authority is the manager in the administrative territory of the local authority.

175. The administrative territory of a local authority is also crossed by public roads, which is why the current wording of the Act makes the management of infrastructure along public roads the responsibility of both the local authority and the state. For example, in the case of bus stops, it is unclear who is responsible for the accessibility of the infrastructure, including maintenance and adaptation to special needs.

176. According to the Ministry of Climate, the Transport Administration is responsible for the reconstruction and maintenance of public roads and their facilities, i.e. waiting platforms, bus lay-bys, etc. According to the Administration, the maintenance of bus stop platforms on public roads is the responsibility of the Transport Administration, as the platforms are part of the road, but the approach to bus shelters varies from region to region.

177. For bus stops with a shelter, notes about the manager of the shelter (either the local authority or the Transport Administration) are entered in the road register. The road register shows that most of the bus stops with a shelter are maintained by local authorities, while about 250 bus stops with a shelter are not maintained by anyone, i.e. they are neither managed by a local authority nor by the Transport Administration.

178. The Transport Administration is trying to give the responsibility for maintaining public transport infrastructure to local authorities. According to the Transport Administration, local authorities that are voting members of the public transport centres have more control over the planning of the county route network than the state.

179. For the period 2021–2024, the Transport Administration has signed a total of 176 indefinite personal right of use contracts with local authorities. Light traffic routes (262) and bus stops or shelters and platforms (36) have mostly been the objects of the contracts. The approach has mostly been applied to newer bus stops that are still being built, which is why the practice has not been applied uniformly across Estonia.

180. There is no clear division of responsibilities and tasks for the economically viable organisation of county bus transport. Therefore, the same task is at least partly performed by several authorities in practice, the application of uniform principles across Estonia is not ensured, and the competence to organise support services, in particular procurement, is spread across different authorities.

181. In the opinion of the National Audit Office, the legality of the administrative contracts concluded with public transport centres must be reviewed and the administrative contracts renewed. At present, the administrative contracts contain tasks for the delegation of which the Public Transport Act does not provide a basis, so under the current law, the Ministry of Regional Affairs and Agriculture should not assign such tasks to the public transport centres.

182. In addition, the Ministry of Climate and the Ministry of Regional Affairs and Agriculture should work together to consider how to divide the responsibilities for mobility services, infrastructure and monitoring so that public transport policy making in road, rail, water and air transport is not fragmented between several areas of government and the Ministry of Regional Affairs and Agriculture can organise public transport comprehensively.

**183. Recommendation of the National Audit Office to the Minister of Regional Affairs and Agriculture and the Minister of Infrastructure:** prepare a proposal on how to divide the responsibilities for mobility services, infrastructure and monitoring between the Ministry of Climate and the Ministry of Regional Affairs and Agriculture, so that public transport policy making in road, rail, water and air transport is not fragmented between several areas of government, i.e. the responsibility is clearly divided.

**Response of the Minister of Regional Affairs and Agriculture:** as we amend the Public Transport Act, we will review the responsibilities and tasks and, in cooperation with the Ministry of Climate, make proposals to amend the Act accordingly.

**Response of the Minister of Infrastructure:** with the amendments to the Government of the Republic Act and the Public Transport Act, the Riigikogu has decided that from July 2023, two ministries will have responsibilities related to public transport in addition to local authorities: the Ministry of Regional Affairs and Agriculture and the Ministry of Climate. The Ministry of Regional Affairs and Agriculture is the main responsible authority and manager of public transport, and its task is to develop and implement public transport policy (see also § 65<sup>1</sup> of the Government of the Republic Act and § 16 (1) 1<sup>1</sup> of the Public Transport Act). Pursuant to the Public Transport Act, the Ministry of Climate makes and implements the international public transport policy (§ 17 (1) 1) of the Public Transport Act). In addition, pursuant to the Government of the Republic Act, the Ministry of Climate has been granted the right to 'empower' the public transport sector in the field of public transport infrastructure investments, as the Ministry of Climate has been given general competence by law to invest in transport infrastructure (§ 61 of the Government of the Republic Act).

Thus, it is only relatively recently that the Government of the Republic has sought to change the division of the areas of government of ministries, and the legislator has established this at the level of laws. In managing public transport, the Ministry of Climate and the Ministry of Regional Affairs and Agriculture must proceed from the tasks and competences laid down in the Government of the Republic Act and the Public Transport Act; the law does not provide for the possibility of transferring the tasks assigned to the Ministry of Climate to the Ministry of Regional Affairs and Agriculture, or vice versa.

The Ministry of Climate has also not seen the materialisation of the risk that there is no will for cooperation as highlighted by the National Audit Office. In order to mitigate the risks highlighted by the National Audit Office in paragraph 157, the ministries and agencies cooperate closely, both on a daily basis and in the framework of case-based discussions, as appropriate.

**Comment of the National Audit Office:** In the opinion of the National Audit Office, the current wording of the Government of the Republic Act and the Public Transport Act does not preclude ministers from proposing amendments to the legislative acts in order to more clearly delimit the tasks shared by the two ministries – those related to mobility services, infrastructure and supervision. In the present case, the Ministry of Climate plans the infrastructure, but the Ministry of Regional Affairs and Agriculture organises the passenger transport. However, it is not clear how, for example, the Ministry of Climate ensures that passengers start using the infrastructure. The National Audit Office considers it important to emphasise that it must be clear who is ultimately responsible for the overall solution, i.e. the infrastructure and service, and what levers are in place to achieve the objectives.

**184. Recommendations of the National Audit Office to the Minister of Regional Affairs and Agriculture:**

- consider implementing the practice of joint organisation of support services, including procurement, to achieve economies of scale, concentrate currently dispersed competences in a single authority and foster professional capacity building, among other things;
- analyse the tasks assigned to public transport centres by the administrative contracts to make sure they are legitimate and appropriate and that duplication of activities is avoided.

**Response of the Minister of Regional Affairs and Agriculture:** we agree with the recommendation to assess the uniform organisation of support services (e.g. ticketing systems). The review and renewal of the administrative contracts with the public transport centres is on the agenda of the Ministry. In connection with this, we will also give attention to the centralisation of support services and review the tasks

assigned to public transport centres. We will start work on the renewal of the administrative contracts already this year and plan to finalise them in the course of the next year.

**185. Recommendation of the National Audit Office to the Minister of Infrastructure:** in cooperation with the Ministry of Regional Affairs and Agriculture, agree on the management of bus stops along state roads and their fixtures, so that it is clear who is responsible for the maintenance of bus stops and, if necessary, for bringing them into compliance with requirements, and implement the principles developed uniformly throughout Estonia.

**Response of the Minister of Infrastructure:** as we pointed out in our previous response, the Ministry of Regional Affairs and Agriculture is the main responsible authority and manager of public transport, whose tasks include developing and implementing public transport policy, and the Ministry of Climate has the overall competence for transport investments, including investments in public transport infrastructure. At the same time, it makes sense that the Ministry of Regional Affairs and Agriculture also has the competence and the right to deal with public transport investments, as this is essentially part of the implementation of the public transport policy, and § 24 of the Public Transport Act also provides for the possibility to finance the construction, renewal or management of objects of infrastructure from the earmarked subsidy for public transport allocated in the state budget.

Pursuant to the Government of the Republic Act, the responsibility of the Ministry of Climate for the state's public transport investments is broader, which is why the Public Transport Act also grants the authorisation to deal with public transport infrastructure investments. At the same time, the legislator has left investment in public transport within the area of government of both ministries as well as local authorities, so that it can be managed and designed in the most effective way in cooperation. Such combined competence also makes it possible to use the funding sources available to public transport authorities, including external funding, more efficiently and reduce the risk that, for example, time-critical public transport infrastructure construction or improvement is delayed due to the exhaustion of the budgetary possibilities of one authority, if the respective task was stipulated only in the area of competence and responsibility of a single authority. This flexibility in the management of public transport infrastructure is therefore also in the direct interest of passengers.

In addition, we would like to clarify that the maintenance of the waiting platforms of the bus stops of county and long-distance routes by state roads and their compliance with the accessibility requirements is generally managed by the Transport Administration under § 17<sup>1</sup> of the Public Transport Act. Bus stops, which only serve urban or county routes

operated by the local authority, may also be located alongside state roads, for example, if they are located in a settlement and are very frequently used, and where the roads leading to the bus stop are local roads the maintenance of which is managed by the local authority. In such cases, it may be practical for the local authority, by agreement with the Transport Administration, to manage the maintenance of the platforms in order to better meet the needs of organising local life. There are also many 'hybrid' stops used by long-distance and/or county, urban and/or municipality services, where the competent authorities have agreed to ensure that the stop is managed according to the specific needs of the regular bus routes.

Thus, the management of bus stops on state roads is organised according to the current legal basis, with the competent parties being the Transport Administration and the local authority of the administrative territory concerned, and this allows for a better reflection of local circumstances and needs. The agreement between the Minister of Infrastructure and the Minister of Regional Affairs and Agriculture recommended by the National Audit Office cannot replace the competences already provided for by law.

**Comment of the National Audit Office:** based on the comments of the Ministry of Climate, the National Audit Office has amended paragraph 167 regarding the role of the Ministry of Regional Affairs and Agriculture in making small-scale investments. The National Audit Office notes that although the Ministry of Regional Affairs and Agriculture and the Ministry of Climate are both investing in public transport infrastructure, it is not clear from the legislation which ministry is responsible for which investments and where the border between large and small-scale public transport investments lies. See also the comment of the National Audit Office on shared responsibility in paragraph 183.

The National Audit Office points out that the competences for the maintenance of bus stops are not clearly enough divided at present, and although according to the Public Transport Act the manager of the object of infrastructure is responsible for the maintenance of the object, it is often not even clear who the manager is. In the case of bus stops, responsibility is shared between two ministries – the Ministry of Climate deals with investments in bus stops and the Ministry of Regional Affairs and Agriculture uses the bus stop to provide a service – and local authorities. The current wide margin of interpretation of competences creates disagreements between public transport authorities and the possibility to refuse to carry out tasks related to the maintenance of bus stops. In addition, it is difficult for the passenger to understand who to contact and in which cases in order to obtain or give information about a stop. At the same time, all information on problems with service quality should be brought together in one place.

## Supervision of public transport centres is obstructed by a lack of clarity on the content of tasks in contracts and funding applications

### Criterion

186. Supervision of administrative contracts helps to prevent the abuse or waste of resources and to make sure that the contract is being performed according to the agreed terms.

187. The National Audit Office examined whether the Ministry of Regional Affairs and Agriculture supervises the performance of the tasks entrusted to the public transport centres by the administrative contracts.

188. Administrative supervision was carried out by the Transport Administration until the transfer of the public transport supervision tasks (except for inspection of the right to travel, compliance with the route permits for long-distance, county and international bus services) to the Ministry of Regional Affairs and Agriculture. The employees who supervised the performance of the administrative contracts stayed in the Transport Administration, although the tasks moved to the Ministry of Regional Affairs and Agriculture.

189. At present, the Ministry of Regional Affairs and Agriculture exercises little supervision over the organisation of public transport. On a few occasions in 2024, the Ministry has supervised the performance of the tasks set in the administrative contracts<sup>9</sup> by checking whether the names and locations of stops are correct in the public transport register, which is used by the portal peatus.ee, Google maps and others.

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<sup>9</sup> According to the administrative contracts concluded with the public transport centres, the public transport centres are responsible for ensuring, together with the carriers, the availability of the necessary information at bus stops and the sale of tickets on public county bus routes, and for submitting data to the public transport register.

### Did you know that...

Government of the Republic Regulation No 17 of 26.02.2016 "Procedure for subsidising public transport from the state budget, reporting on the use of subsidies and repayment subsidies" has been established to regulate the procedure for applying for subsidies from the state budget and reporting on the use of subsidies. The audit revealed that the content of the regulation is misleading, outdated and does not provide a clear overview of how funding for public transport is actually to be applied for from the state budget, nor how the use of subsidies is reported and verified in practice..

Source: Government of the Republic Regulation No 17 "Procedure for subsidising public transport from the state budget, reporting on the use of subsidies and repayment subsidies".

### Opinion of the National Audit Office

**190.** As a possible solution, the Ministry of Regional Affairs and Agriculture sees delegating at the level of law, the supervision of the performance of public service contracts concluded in long-distance, county, municipality and urban transport and the supervision of the compliance of public transport vehicles in bus and coach transport to the Transport Administration, because the competence is available there.

**191.** According to the Transport Administration, the exercise of supervision and requiring compliance with administrative contracts is obstructed in their practice by the fact that the activities are not unambiguously understandable, which means that the tasks the performance of which can be required at all is not clear.

**192.** In addition, the public transport centres only have to carry out the tasks for which the Ministry of Regional Affairs and Agriculture has allocated funds. However, the costs for which the money is requested, including the tasks that the public transport centres would have to perform under the administrative contract, have not been specifically outlined in the applications filed by public transport centres to receive subsidies for public bus services. Therefore, the public transport centres have a certain discretion on how to use the money allocated to them.

**193.** There are many examples that all the costs that must be planned for the performance of the tasks provided for in the administrative contracts cannot be detailed in the applications for subsidies. For example, only five public transport centres have identified the cost of changing timetables in 2023 in their applications, and four public transport centres have identified the cost of route studies.

**194.** This is well illustrated by the requirement to display information at bus stops. Some public transport centres put the information up at all stops, but others have made their own arrangements that information is only displayed at stops with a certain number of service users. The Ministry of Regional Affairs and Agriculture believes that timetable information should be kept up to date at all stops. During the supervision of administrative contracts, the Transport Administration pointed out that the public transport centres were not fulfilling their obligation because, in the opinion of the centres, no money had been allocated for this.

**195.** The supervision of the activities of the public transport centres by the Ministry of Regional Affairs and Agriculture is weak and this is why there is no assurance that the administrative contracts are being performed as agreed in the terms of the contract. The Ministry of Regional Affairs and Agriculture does not have a defined procedure or human resources to supervise the activities of the public transport centres.

196. In addition, requiring the performance of the administrative contracts is obstructed by the vague connection between the tasks and the financing, i.e. the tasks for the performance of which the public transport centres have been given money and the amount of the money are not clear.

197. In the opinion of the National Audit Office, the applications for subsidies for public route transport should be reviewed, if only because the regulation that regulates the calculation of the need for the subsidies for public transport allocated from the state budget, the submission of the relevant applications and the inspection of the use of subsidies from the state budget has not yet been updated. When reviewing applications, the Ministry of Regional Affairs and Agriculture must ensure that the practices of performance of the administrative contracts by the public transport centres are consistent everywhere and that the information provided in the applications is sufficiently detailed to avoid disputes during the supervision of the performance of an administrative contract.

**198. Recommendations of the National Audit Office to the Minister of Regional Affairs and Agriculture:**

- distinguish the costs listed under other costs in the applications for subsidies for public route transport filed by public transport centres so that money is allocated in the budget for the performance of all the tasks stipulated in the administrative contracts;
- develop a policy and work plan for the annual supervision of the performance of administrative contracts.

**Response of the Minister of Regional Affairs and Agriculture:** the costs of the public transport centres themselves and other projects and activities are broken down in great detail in the applications submitted by the public transport centres to the Ministry of Regional Affairs and Agriculture. All cost lines are reviewed one by one and their necessity is assessed when the applications are reviewed with the Ministry of Regional Affairs and Agriculture and the public transport centres. We will review the administrative contracts with public transport centres to ensure that the budget corresponds to the tasks to be carried out.

We agree that supervision of public transport centres is weak. Making supervision more efficient includes regular inspection of the performance of the obligations assigned in the administrative contracts and in-depth audits of the subsidies allocated to the public transport centres. We will apply for separate resources to carry out these tasks.

/digitally signed/

Ines Metsalu-Nurminen  
Director of Audit, Audit Department

## Recommendations made by National Audit Office and responses of the auditees

Based on the audit, the National Audit Office made a number of recommendations to the Ministry of Regional Affairs and Agriculture and the Ministry of Climate. The Minister of Infrastructure and the Minister of Regional Affairs and Agriculture sent their responses to the recommendations of the National Audit Office between 29.09.–01.10.2025. Saaremaa Municipality Government sent its comments on audit report.

### General comments on audit report

#### **Opinion of the Saaremaa Municipality Government on the draft audit report:**

Reading the topics covered in the audit and dealing with public transport issues on a daily basis, one of the major bottlenecks is the IT capacity of the state. This concerns several areas from analytics to route planning and demand-responsive solutions. Saaremaa analyses passenger mobility trends on a continuous basis, but today's solutions require a lot of time resources, which could be more efficiently covered with modern IT solutions.

In 2026, we plan to launch a procurement to find a partner to carry out a new mobility survey covering the whole Saare County in 2027.

In paragraph 74, it would make sense if the Ministry of Regional Affairs and Agriculture created a functioning coordination system to link the timetables of commercial and public county routes.

Returning to paragraph 70: in 2025, the Ministry of Regional Affairs and Agriculture suggested that public transport centres could merge into regional public transport centres, but it would be sensible instead (paragraph 74) to create a capacity within the structure of the Ministry of Regional Affairs and Agriculture that could integrate the timetables of the counties into a whole. This paragraph is already supported by paragraph 57 (the Ministry of Regional Affairs and Agriculture issues route licences for long-distance bus services).

We support the idea, which we have already communicated to the Ministry of Regional Affairs and Agriculture, to implement a single ticketing system throughout Estonia (on urban and county buses, trams, trains, ferries, airplanes and commercial services), which would make it easier for passengers to choose their desired route between the start and end points and would support the use of public transport more broadly.

Paragraph 101 – responsible stop owner: the state (Transport Administration) or local authority. The state should define more clearly the legal conditions for the management and maintenance of bus stops.

Paragraph 182 – mobility services under one ministry!

The state should centralise ICT tasks and ticketing solutions in the state as a whole. The state could integrate central views on different transport connections (bus, train, ferry, plane) so that people can plan journeys, book and buy tickets and monitor timetables in real time, as people want to use more and more services on a streaming platform/app in the future.

Improve and standardise data collection so that data analyses can be made easier and similar. The objective is to reduce manual work in data collection and move towards artificial intelligence (AI) or automatic data transmission. The transfer to paid public transport showed that local authorities or public transport centres could not/were not allowed to use the personal data in national databases and the latter had to request the existing personal data and enter them manually again in order to obtain travel fare concessions, even though all the data were available in the national databases. The end result was a heavy workload and compliance with the required data security rules may have been overlooked in data processing.

Saaremaa Municipality as the manager of county public transport has considered and assessed whether it would be sensible to centralise procurement and support services under one authority or to join a public transport centre instead. Today, Saaremaa Municipality manages public transport for the whole Saaremaa County (15 merged local authorities plus Muhu Municipality). Saaremaa Municipality has already established additional capacities in the ICT, legal, administration, transport, finance, supervision, communication, roads, social and educational services, support services, development, construction and planning areas, which creates cost efficiency and ensures sufficient organisational support for the proper performance of tasks. The Civitta survey shows that satisfaction with public transport varies widely by county, while satisfaction in Saaremaa is already slightly higher. The survey also shows that Saaremaa has a good average bus occupancy rate (23%), which is also one of the highest in Estonia. The transfer of the Saare management model to a public transport centre will not give substantial savings, as someone will still have to stay on the island to coordinate this area. At the same time, by moving jobs out of the municipality, the public transport centre will have to deal with other topics and support

issues, which are well covered by the municipality's budget, day-to-day work and presence. Therefore, in summary, Saaremaa, Hiiumaa and Muhu municipalities do not see the merger as practical, because the islands have many specificities that relate to both maritime and air transport. On the islands, there are currently no local routes that cross county borders or duplication in public transport, so the cross-use of public transport is mainly by ferry and air. The main strengths in Saaremaa, Muhu and Hiiumaa are the high level of local competence and a rational management line, which ensures the operability of the service and a high level of local situational awareness. In many cases, changes to service arrangements need to be made quickly in the school year, during crowded events or other occasions, as the start of school or changes to the work schedules of companies can require crucial changes in regional timetables and travel needs.

All in all, the municipalities of Saaremaa, Muhu and Hiiumaa consider it expedient to continue with the current model of public transport administration on the big islands in order to ensure a sustainable management of high-quality local public transport. The shared view of the municipalities is that combining the management of public transport on the islands will not create economic, social or logistical benefits and will not create any advantages in management. In our opinion, centralisation would create more bureaucracy, more layers of management, a loss of local expertise, less user-friendly and operational services, and weaken the accessibility of services in the region.

**Response of the Minister of Regional Affairs and Agriculture:**

All in all, the Ministry of Regional Affairs and Agriculture welcomes the recommendations made by the National Audit Office and considers that the audit of the organisation of public transport supports the resolution of the problems raised by the public transport reform initiated by the Ministry in 2024 and the implementation of the suggested solutions.

The Ministry of Regional Affairs and Agriculture does not consider it necessary to develop a separate procedure for data sharing, as it has provided public transport centres with a practical solution in the form of a web-based software for analysing the route network, which can display relevant statistics and mobility data in different layers of maps to assess the impact of route network changes. The report on the use of stops, based on validation data from county routes, will be ready for use by public transport centres in the near future. We will then continue to analyse other indicators based on the validation data, using the Power BI tool, which helps study the available data dynamically and better assess the feasibility of the routes.

The development of service level standards is underway and a single network of routes is already being developed as part of the mobility reform. It is planned to change the definitions of routes and services and the related rules of conduct with an amendment to the Public Transport Act in order to divide responsibility and funding principles more clearly.

Recommendations of the National Audit Office	Responses of auditees
<p><b>Route network design</b></p> <p><b>44. Recommendation of the National Audit Office to the Minister of Regional Development and Agriculture:</b> develop a procedure for sharing data with public transport centres in order to study the mobility needs of people who use public transport as well as those who do not. paragraphs 29–39</p>	<p><b>Response of the Minister of Regional Affairs and Agriculture:</b></p> <p>We produce regular annual reviews, which we share with the public transport centres. The report on the use of stops, based on validation data from county routes, will be ready for use by public transport centres in the near future. We will then continue to analyse other indicators based on the validation data, using the Power BI tool, which helps study the available data dynamically and better assess the feasibility of the routes.</p> <p>In addition, the Ministry of Regional Affairs and Agriculture has provided the public transport centres with an online route network analysis software, which can display different data, such as the location of people's places of residence, schools and kindergartens, as map layers. We also plan to add validation data, i.e. the usage of stops, as a data layer. As new data are generated, we add new data layers to the analysis software. In addition, there is the possibility to use mobile positioning data.</p> <p>The Ministry of Regional Affairs and Agriculture does not consider it necessary to develop additional procedures, as all information exchange runs smoothly on a day-to-day basis and, as new IT</p>

	<p>solutions become available, these tools will immediately be made available to the public transport centres.</p>
<p><b>Route network design</b></p> <p><b>76. Recommendations of the National Audit Office to the Minister of Regional Affairs and Agriculture:</b></p> <ul style="list-style-type: none"> <li>ensure the functioning of a single nationwide public transport service covering different modes of transport (including ferry, train, county and local bus services), which also includes the creation of a central timetable coordination system;</li> <li>if the use of the current public transport model continues, amend the public law contracts with the public transport centres so that they have the right to manage transport beyond their own county's borders.</li> </ul> <p>paragraphs 45–72</p>	<p><b>Response of the Minister of Regional Affairs and Agriculture:</b></p> <p>We also see the need for nationwide coordination of all modes of transport. The plan is to resolve the hierarchy of routes and the nationwide timetable coordination system by amending the Public Transport Act. The administrative contracts with the public transport centres will also be reviewed, while the current administrative contracts do not prohibit the opening of cross-border routes by the public transport centres.</p> <p><b>Comment of the National Audit Office:</b> The National Audit Office points out that the public transport centres are competent to manage those public functions that are entrusted to them by the administrative contracts. At present, the Ministry has not delegated the management of long-distance bus services to the public transport centre in the administrative contracts, the Ministry has this option.</p>
<p><b>Route network funding</b></p> <p><b>129. Recommendations of the National Audit Office to the Minister of Regional Affairs and Agriculture:</b></p> <ul style="list-style-type: none"> <li>set standards for public transport service levels and implement them uniformly across Estonia;</li> <li>develop the principles for managing and financing DRT to make county public transport more sustainable;</li> <li>agree, in cooperation with local authorities, on the unambiguous content and distribution of county bus, long-distance, local authority and on-demand services, and on the principles of financing.</li> </ul> <p>paragraphs 109–123</p>	<p><b>Response of the Minister of Regional Affairs and Agriculture:</b></p> <p>the goal of the Ministry of Regional Affairs and Agriculture is that the service level standards ensure support for the implementation of the public transport reform. The development of service level standards is underway and the planned deadline is next year. A pilot project for demand-responsive transport is underway in Saaremaa, and an analysis of the results of this project can be used as a basis for drawing up more general principles for the management of demand-responsive transport. However, the management of demand-responsive transport may not always be a more sustainable solution, because it serves a small number of passengers at a time. It is planned to change the definitions of routes and services with an amendment to the Public Transport Act in order to divide responsibility and funding principles more clearly.</p>
<p><b>Route network funding</b></p> <p><b>155. Recommendations of the National Audit Office to the Minister of Regional Affairs and Agriculture:</b></p> <ul style="list-style-type: none"> <li>identify options for reducing the funding shortfall and assess the impact of possible actions to be taken for this purpose on the use of public transport, including analyse impacts if county bus routes and concessions were reduced and DRT was developed;</li> <li>develop funding rules to clarify the economic considerations on which public money will not be used to subsidise the continued operation of routes.</li> </ul> <p>paragraphs 130–150</p>	<p><b>Response of the Minister of Regional Affairs and Agriculture:</b></p> <p>we will analyse ways to generate additional revenue and optimise costs in public transport. The activities of the public transport reform are also aimed at the development of a cost-efficient funding model. The co-creation activities of the public transport reform are currently underway in seven counties in order to analyse changes to the route network. In order to reduce the costs of bus traffic, it is advisable to optimise the route network and to discontinue departures with low occupancy rates, or to replace these routes with on-demand services where possible.</p>
<p><b>Management of public transport</b></p> <p><b>185. Recommendation of the National Audit Office to the Minister of Regional Affairs and Agriculture and the Minister of Infrastructure:</b></p>	<p><b>Response of the Minister of Regional Affairs and Agriculture:</b></p> <p>as we amend the Public Transport Act, we will review the</p>

<p>prepare a proposal on how to divide the responsibilities for mobility services, infrastructure and monitoring between the Ministry of Climate and the Ministry of Regional Affairs and Agriculture, so that public transport policy making in road, rail, water and air transport is not fragmented between several areas of government, i.e. the responsibility is clearly divided.</p> <p>paragraphs 158–179</p>	<p>responsibilities and tasks and, in cooperation with the Ministry of Climate, make proposals to amend the Act accordingly.</p> <p><b>Response of the Minister of Infrastructure:</b> with the amendments to the Government of the Republic Act and the Public Transport Act, the Riigikogu has decided that from July 2023, two ministries will have responsibilities related to public transport in addition to local authorities: the Ministry of Regional Affairs and Agriculture and the Ministry of Climate. The Ministry of Regional Affairs and Agriculture is the main responsible authority and manager of public transport, and its task is to develop and implement public transport policy (see also § 65<sup>1</sup> of the Government of the Republic Act and § 16 (1) 1<sup>1</sup>) of the Public Transport Act). Pursuant to the Public Transport Act, the Ministry of Climate makes and implements the international public transport policy (§ 17 (1) 1) of the Public Transport Act). In addition, pursuant to the Government of the Republic Act, the Ministry of Climate has been granted the right to ‘empower’ the public transport sector in the field of public transport infrastructure investments, as the Ministry of Climate has been given general competence by law to invest in transport infrastructure (§ 61 of the Government of the Republic Act).</p> <p>Thus, it is only relatively recently that the Government of the Republic has sought to change the division of the areas of government of ministries, and the legislator has established this at the level of laws. In managing public transport, the Ministry of Climate and the Ministry of Regional Affairs and Agriculture must proceed from the tasks and competences laid down in the Government of the Republic Act and the Public Transport Act; the law does not provide for the possibility of transferring the tasks assigned to the Ministry of Climate to the Ministry of Regional Affairs and Agriculture, or vice versa.</p> <p>The Ministry of Climate has also not seen the materialisation of the risk that there is no will for cooperation as highlighted by the National Audit Office. In order to mitigate the risks highlighted by the National Audit Office in paragraph 157, the ministries and agencies cooperate closely, both on a daily basis and in the framework of case-based discussions, as appropriate.</p> <p><b>Comment of the National Audit Office:</b> In the opinion of the National Audit Office, the current wording of the Government of the Republic Act and the Public Transport Act does not preclude ministers from proposing amendments to the legislative acts in order to more clearly delimit the tasks shared by the two ministries – those related to mobility services, infrastructure and supervision. In the present case, the Ministry of Climate plans the infrastructure, but the Ministry of Regional Affairs and Agriculture manages the carriage of passengers. However, it is not clear how, for example, the Ministry of Climate ensures that passengers start using the infrastructure. The National Audit Office considers it important to emphasise that it must be clear who is ultimately responsible for the overall solution, i.e. the infrastructure and service, and what levers are in place to achieve the objectives.</p>
<p><b>Management of public transport</b></p> <p><b>184. Recommendations of the National Audit Office to the Minister of Regional Affairs and Agriculture:</b></p>	<p><b>Response of the Minister of Regional Affairs and Agriculture:</b> we agree with the recommendation to assess the uniform management of support services (e.g. ticketing systems). The</p>

<ul style="list-style-type: none"> <li>• consider implementing the practice of joint management of support services, including procurement, to achieve economies of scale, concentrate currently dispersed competences in a single authority and foster professional capacity building, among other things;</li> <li>• analyse the tasks assigned to public transport centres by the public law contracts to make sure they are legitimate and appropriate and that duplication of activities is avoided.</li> </ul> <p>paragraphs 158–168</p>	<p>review and renewal of the public law contracts with the public transport centres is on the agenda of the Ministry. In connection with this, we will also give attention to the centralisation of support services and review the tasks assigned to public transport centres. We will start work on the renewal of the public law contracts already this year and plan to finalise them in the course of the next year.</p>
<p><b>Management of public transport</b></p> <p><b>185. Recommendation of the National Audit Office to the Minister of Infrastructure:</b> in cooperation with the Ministry of Regional Affairs and Agriculture, agree on the management of bus stops along state roads and their fixtures, so that it is clear who is responsible for the maintenance of bus stops and, if necessary, for bringing them into compliance with requirements, and implement the principles developed uniformly throughout Estonia.</p> <p>paragraphs 174–179</p>	<p><b>Response of the Minister of Infrastructure:</b> as we pointed out in our previous response, the Ministry of Regional Affairs and Agriculture is the main responsible authority and manager of public transport, whose tasks include developing and implementing public transport policy, and the Ministry of Climate has the overall competence for transport investments, including investments in public transport infrastructure. At the same time, it makes sense that the Ministry of Regional Affairs and Agriculture also has the competence and the right to deal with public transport investments, as this is essentially part of the implementation of the public transport policy, and § 24 of the Public Transport Act also provides for the possibility to finance the construction, renewal or management of objects of infrastructure from the earmarked subsidy for public transport allocated in the state budget.</p> <p>Pursuant to the Government of the Republic Act, the responsibility of the Ministry of Climate for the state’s public transport investments is broader, which is why the Public Transport Act also grants the authorisation to deal with public transport infrastructure investments. At the same time, the legislator has left investment in public transport within the area of government of both ministries as well as local authorities, so that it can be managed and designed in the most effective way in cooperation. Such combined competence also makes it possible to use the funding sources available to public transport authorities, including external funding, more efficiently and reduce the risk that, for example, time-critical public transport infrastructure construction or improvement is delayed due to the exhaustion of the budgetary possibilities of one authority, if the respective task was stipulated only in the area of competence and responsibility of a single authority. This flexibility in the management of public transport infrastructure is therefore also in the direct interest of passengers.</p> <p>In addition, we would like to clarify that the maintenance of the waiting platforms of the bus stops of county and long-distance routes by state roads and their compliance with the accessibility requirements is generally managed by the Transport Administration under § 17<sup>1</sup> of the Public Transport Act. Bus stops, which only serve urban or county routes operated by the local authority, may also be located alongside state roads, for example, if they are located in a settlement and are very frequently used, and where the roads leading to the bus stop are local roads the maintenance of which is managed by the local authority. In such cases, it may be practical for the local authority, by agreement with</p>

	<p>the Transport Administration, to manage the maintenance of the platforms in order to better meet the needs of organising local life. There are also many ‘hybrid’ stops used by long-distance and/or county, urban and/or municipality services, where the competent authorities have agreed to ensure that the stop is managed according to the specific needs of the regular bus routes.</p> <p>Thus, the management of bus stops on state roads is organised according to the current legal basis, with the competent parties being the Transport Administration and the local authority of the administrative territory concerned, and this allows for a better reflection of local circumstances and needs. The agreement between the Minister of Infrastructure and the Minister of Regional Affairs and Agriculture recommended by the National Audit Office cannot replace the competences already provided for by law.</p> <p><b>Comment of the National Audit Office:</b> Based on the comments of the Ministry of Climate, the National Audit Office has amended paragraph 167 regarding the role of the Ministry of Regional Affairs and Agriculture in making small-scale investments. The National Audit Office notes that although the Ministry of Regional Affairs and Agriculture and the Ministry of Climate are both investing in public transport infrastructure, it is not clear from the legislation which ministry is responsible for which investments and where the border between large and small-scale public transport investments lies. See also the comment of the National Audit Office on shared responsibility in paragraph 183.</p> <p>The National Audit Office points out that the competences for the maintenance of bus stops are not clearly enough divided at present, and although according to the Public Transport Act the manager of the object of infrastructure is responsible for the maintenance of the object, it is often not even clear who the manager is. In the case of bus stops, responsibility is shared between two ministries – the Ministry of Climate deals with investments in bus stops and the Ministry of Regional Affairs and Agriculture uses the bus stop to provide a service – and local authorities. The current wide margin of interpretation of competences creates disagreements between public transport authorities and the possibility to refuse to carry out tasks related to the maintenance of bus stops. In addition, it is difficult for the passenger to understand who to contact and in which cases in order to obtain or give information about a stop. At the same time, all information on problems with service quality should be brought together in one place.</p>
<p><b>Organisation of supervision</b></p> <p><b>198. Recommendations of the National Audit Office to the Minister of Regional Affairs and Agriculture:</b></p> <ul style="list-style-type: none"> <li>distinguish the costs listed under other costs in the applications for subsidies for public regular services filed by public transport centres so that money is allocated in the budget for the performance of all the tasks stipulated in the public law contract;</li> </ul>	<p><b>Response of the Minister of Regional Affairs and Agriculture:</b> the costs of the public transport centres themselves and other projects and activities are broken down in great detail in the applications submitted by the public transport centres to the Ministry of Regional Affairs and Agriculture. All cost lines are reviewed one by one and their necessity is assessed when the applications are reviewed with the Ministry of Regional Affairs and Agriculture and the public transport centres. We will review the administrative contracts with public transport centres to ensure that the budget corresponds to the tasks to be carried out.</p>

<ul style="list-style-type: none"><li>• develop a policy and work plan for the annual supervision of the performance of public law contracts.</li></ul> paragraphs 186–194	<p>We agree that supervision of public transport centres is weak. Making supervision more efficient includes regular inspection of the performance of the obligations assigned in the administrative contracts and in-depth audits of the subsidies allocated to the public transport centres. We will apply for separate resources to carry out these tasks.</p>
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## Characterisation of audit



### Purpose of audit

The objective of the audit was to find out whether the changes in the organisation and financing of county bus services that have taken place after the audit “County Public Transport” of the National Audit Office published in 2021 have ensured that the route network is accessible to people and meets their needs.

The audit sought to answer two main questions:

- Does the management of bus services in counties ensure a route network is accessible to people and meets their needs?
- Is the funding of public transport sufficient for the preservation and development of the current route network?

### Assessment criteria

In the opinion of the National Audit Office, the organisation of county bus routes has ensured that the route network is accessible to people and meets their needs, provided that the actual mobility needs of people have been regularly identified with mobility studies and these studies have been used as a basis for developing timetables. The use of public transport is also more attractive to people if the organisation of the county bus service includes demand-responsive transport, combines different modes of transport, ensures convenient accessibility for people with special needs, and provides access infrastructure at transfer points for journeys involving county bus services and other modes.

In the opinion of the National Audit Office, the financing of public transport makes it possible to preserve and develop the current route network, provided that targets connected to the budget have been approved for development; the amount of money needed to maintain the status quo is known; a list of necessary investments for the development of facilities (bus stops, car parks, access roads) on the county bus routes has been established; and the planned basic funding corresponds to the cost of preserving and developing public transport. If there is a budget shortfall, funding solutions have been developed, including proposals for cuts, a plan to increase fare revenue, etc. for the region; the use of the route network, including the number of passengers, and the economic viability of the routes have been analysed; the results of the analysis have been used to optimise the network and to consider alternative transport options (demand-responsive transport, taxi service or social transport). Responsibilities and tasks have been defined for a more cost-efficient organisation of county bus services and they are not duplicated by the parties.

### Scope of audit

The auditees included the Ministry of Regional Affairs and Agriculture, the Transport Administration, the public transport centres and the local authorities of Saaremaa and Hiiumaa. Procedural steps were also taken in AS Eesti Liinirongid (Elron). The audit covered the period 2021–2024.

## Focus of audit

The analysis of timetables used the data from the public transport register on departures from stops to calculate the number of departures in the area of the public transport centre at the beginning of the working day (07:00–08:30) to counties where the workplaces are located and at the end of the working day (17:00–19:00) to counties where homes are located. The data on the jobs and counties of the employed people were obtained from the data on people’s place of residence and place of work in the census of 2021.

Using the travel planning tools Google Maps and Peatus.ee, the following was clarified for one to three routes with transfers starting from the region of each public transport centre: how much time will getting from point A to point B take when compared to a car, how long is the waiting time for transfers, whether and how can information on the fare for the entire route be obtained and whether a single ticket can be used on different modes of transport. A total of 20 routes were analysed and the data of the routes in Google Maps and Peatus.ee were mostly similar.

In order to identify modes of mobility combined with county bus services, data was collected on bus stops, light traffic paths and car parks, and spatial data analysis was carried out. The original plan was to take the coordinates of stops, light traffic paths and car parks from the road register. A comparison of the stops data from the public transport register, the road register and the Ridango ticketing system showed that the number of stops differs (see Table 3). Therefore, it was decided to use the data from the ticketing system on boardings at stops from January to May 2024 for the analysis. More up-to-date data were requested from the Ministry of Regional Affairs and Agriculture, but the Ministry was still in the early stages of analysing the data.

**Table 3. Number of stops based on data from the public transport register, road register and ticketing system**

	Public transport register	Road register	Data of the ticketing system
Number of stops	11,522	15,708	12,223

Source: Public Transport Register, Transport Administration’s map “Use of stops” and Road Register

At least all the stops on state roads are also in the road register. Comprehensive nationwide data on stops are available in the public transport register. However, the downside of the data in the public transport register is that it shows active stops, i.e. you cannot see the ones that are not in use. A stop is sometimes entered in the public transport register before it is actually built.

According to the Transport Administration, the light traffic paths along state roads are well mapped in the road register, but the light traffic paths of local authorities are not. The map layer of car parks used in the analysis, where the car parks are represented as dots, was obtained from the map layer of the Land Board (extract made on 03.02.2025). According to the Land Registry, there are 2,234 car parks (478 private car parks, 952 car parks in the case of which it is not specified whether they are private, municipal or Transport Administration’s car parks). There are more car parks on the map layer of the Land Board than in the road register of the Transport Administration. In addition to the road register, the data of the Land Board also includes private car parks.

In order to find out how many bus stops are close to light traffic paths and car parks, buffers of the following sizes were created around each bus stop: 1 m, 10 m, 50 m, 100 m, 200 m, 500 m, 1000 m.

In addition to the sources already described, the following documents were used in the audit:

- sectoral legislation, in particular Public Transport Act, and the related procedural information (legislative intent, explanatory memoranda, verbatim reports, minutes of meetings);
- state budgets and state budget strategies, and their explanatory memoranda;
- the Road Maintenance Plan 2024–2027 of the Transport Administration;
- Transport and Mobility Development Plan 2021–2035 and Public Transport Programme 2025–2028;
- administrative contracts between the Ministry of Regional Affairs and Agriculture and the public transport centres;
- contract for the use of railway infrastructure between Elron and AS Eesti Raudtee;
- statutes of public transport centres;
- statutes of the Ministry of Climate, the Transport Administration, the Ministry of Regional Affairs and Agriculture;
- reports on public regular passenger transport subsidies 01.01.2021–31.12.2024;
- public service contracts between the public transport centres and public bus operators;
- the supervision analyses of the Transport Administration 01.01.2021–01.07.2023 and the Ministry of Regional Affairs and Agriculture 01.07.2023–31.12.2024;
- studies of mobility needs of residents, mobility studies from 2021–2024;
- decisions made on the basis of the study of alternative management models for public transport;
- accessibility analyses, including accessibility analysis of transport and the artificial environment;
- concept for the public transport reform, including the action plan;
- “Instructions for preparation of timetables” established by the Director General of the Transport Administration on 03.01.2020;
- analyses of the use of subsidies 01.01.2021–31.12.2024;
- proposal of public transport service level requirements to the Ministry of Regional Affairs and Agriculture, legislation on fares, concessions, cost analyses, cost-benefit analyses of routes, explanatory memoranda, and other documents;
- responses of public transport centres to the survey of the National Audit Office;
- stop usage data from the Ridango ticketing system as at 01.06.2024;
- road register data on bus stops as at 01.01.2025;
- division of settlement regions and data of the 2021 census from Statistics Estonia;
- open data in the public transport register.

Table 4. Interviews conducted during the audit and its preliminary explanation

Authority	Interviewed	Date of meeting
Ministry of Regional Affairs and Agriculture	Andres Ruubas, Head of Public Transport Department Hannes Luts, Adviser, Public Transport Department Aini Proos, Adviser, Public Transport Department	26.09.2024
Ministry of Regional Affairs and Agriculture	Andres Ruubas, Head of Public Transport Department Hannes Luts, Adviser, Public Transport Department	06.11.2024
Transport Administration	Martin Lengi, Director of Strategic Planning Reet Reili, Director of Support Services	06.12.2024, 21.01.2025
Union of Estonian Automobile Enterprises	Kersten Kattai, Director	20.11.2024
North-Estonian Public Transport Centre	Andrus Nilisk, CEO	03.10.2024
Estonian Chamber of Disabled People	Mari Puuram, Accessibility Advocacy Advisor	03.12.2024

Ministry of Regional Affairs and Agriculture	Andres Ruubas, Head of Public Transport Department Aini Proos, Adviser, Public Transport Department Pille Pikner, Area Manager, Public Transport Department Jaak Simon, Adviser, Public Transport Department	22.01.2025
Pärnu County Public Transport Centre	Andrus Kärpuk, Director	06.02.2025
AS Eesti Liinirongid	Jaagup Ainsalu, Mobility and Partnerships Manager	28.11.2024
Southeastern Public Transport Centre	Sander Saar, Director	27.03.2025
Tartu County Public Transport Centre	Maikl Aunapuu, Director	27.03.2025
North-Estonian Public Transport Centre	Terje Villemi, Consultant, Development Department Mikk Räli, Planner, Development Department	27.02.2025

## Time of completion of audit

The audit procedures were finalised on 10.09.2025.

## Audit team

Audit Manager Silver Jakobson, auditors Silja Einberg, Meeli Saksing

## Contact information

Further information on the audit is available from the Communication Unit of the National Audit Office telephone: +372 640 0777; email: riigikontroll@riigikontroll.ee

An electronic copy of the audit report (PDF) is available online at [www.riigikontroll.ee](http://www.riigikontroll.ee).

A summary of the audit report is also available in English.

The number of the audit report in the record management system of the National Audit Office is 80143.

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## Earlier audits of National Audit Office in the area of public transport

25.02.2021 – County public transport services

All reports are available on the website of the National Audit Office at [www.riigikontroll.ee](http://www.riigikontroll.ee).

## Annex A. Main observations of the 2021 audit on county public transport and their implementation

Observations of the National Audit Office	Status in 2024
<p>The public transport route network may not meet the needs of all residents, as few studies have been carried out to identify actual mobility needs.</p>	<p>The clarification of mobility needs has improved: for the period 2021–2024, six public transport centres have either commissioned mobility studies, use data from third-party work or have been involved in graduation theses. Four public transport centres have carried out surveys. The three public transport centres that responded that they had not commissioned surveys analyse mobility needs themselves during their day-to-day work (except for the Valga County Public Transport Centre).</p> <p>For route planning, i.e. mainly for changing the routes and timetables, all public transport centres analyse the validation data of the passengers and the information received from the passengers (surveys, feedback, suggestions), most of them also mentioned the information received from the carriers and the local authorities. Mobile positioning, commuting, etc. data describing the mobility patterns of the residents are mostly not used. Few public transport centres have taken the people who do not use public transport into account in their analyses. Based on the responses to the survey, the North-Estonian Public Transport Centre, Southeastern Public Transport Centre and Viljandi Public Transport Centre take into account the location of points of interest and population, including mobile positioning and commuting data in route planning . (See paragraphs 29–34)</p>
<p>Convenient use of public transport is not supported by bus and train timetables that do not take each other into account, nor is it facilitated by complex and fragmented ticketing.</p>	<p>All the public transport centres are taking other modes of transport into account when planning their county bus services and have tried to make them compatible. The Ministry of Regional Affairs and Agriculture has analysed the possibilities for connecting different modes of transport into a coherent and functioning system, where transfers would be quick and convenient. For example, fixed interval traffic, where vehicles depart at a fixed interval, has been considered. A westbound fixed interval timetable has been tested in cooperation with Elron from 2025. At the same time, it must be taken into account that the current instability and frequent changes in the timetables of trains caused by frequent repairs of the rail infrastructure and in the timetables of ferries that depend on the weather make linking them to bus routes more difficult. There is no single ticketing system, which means that passengers have to buy a separate ticket for each mode of transport. (See paragraphs 45–76.)</p>
<p>Free public transport has boosted demand for travel, but has not increased the number of commuters and has rather increased the number of repeat users.</p>	<p>According to Statistics Estonia, the share of public transport users has been on a downward trend over the last decade. Due to the COVID-19 crisis, the use of public transport was severely restricted in the period 2020–2021 and the number of users fell further. To date, the number of public transport users has not reached the pre-crisis levels. (See paragraphs 1–4.) The Ministry of Regional Affairs and Agriculture estimates that bus ticket revenue will likely fall in 2025 compared to 2024 due to the shift to paid public transport, meaning that working-age people will use public transport less and prefer to travel to work by car (see paragraph 145).</p>
<p>The basic level of the organisation of county public transport has not been agreed, i.e. there is no agreement on the required number of passengers and population in a region, or the cost to the</p>	<p>The Ministry of Regional Affairs and Agriculture has not set standards for service levels, including a minimum baseline for the frequency of departures that the state wants to guarantee. Although the public transport centres have proposed service levels and submitted them to the Ministry of Regional Affairs and Agriculture in April 2024, there is still no agreement on where,</p>

<p>state at which regular bus services should be provided in counties.</p>	<p>how many people and how often the bus should reach as a minimum. The proposal of the public transport centre includes, among other things, a basic level that should meet the most basic mobility needs of the people who do not own cars, i.e. their journeys to centres. (See paragraphs 110-117.)</p>
<p>The parties that organise public transport have not agreed on criteria for deciding in which regions more economically viable alternatives to regular bus route transport should be considered.</p>	<p>The public transport centres are making increasingly more routes or parts of routes demand-responsive in order to save money. At the same time, the state has so far not set clear rules for the organisation and financing of the on-demand services. At present, it is not known at what point a route or a part of a route becomes on-demand and whether demand-responsive transport should be financed by the state or by local authorities. (See paragraphs 121-123; 137-139.)</p>
<p>In some regions, the state also pays for routes that are not necessary for the operation of the county route network and should be financed by the local authority. The definition in the Public Transport Act, which divides bus routes into county and local routes and determines whether the state or the local authority pays for the organisation of the route, can be interpreted in different ways. In practice, the definition of routes has been approached on a case-by-case basis.</p>	<p>Although the Public Transport Act defines the different types of routes, i.e. county, long-distance and municipal, the definition still leaves a wide margin for interpretation. This means that, it is still not clear which routes must be managed and financed by the public transport centre and which by the local authority. So far, public transport centres have interpreted the ownership of the route services differently, which has caused an unequal situation and the services of some local authorities are urban and municipality routes managed and financed by the local authorities themselves, while the services of other local authorities with similar characteristics are county routes financed by the state. (See paragraphs 118-120.)</p>

## Annex B. Summary of the survey National Audit Office

The National Audit Office carried out a survey of public transport centres to get a better overview of the public transport sector. The survey was sent to all public transport centres and the municipalities of Saaremaa and Hiiumaa. Public transport centres responded via the electronic survey platform Netsurvey. All 11 recipients responded to the survey. There were 59 questions in total, most of which were multiple-choice ones. The most important questions and the answers given are shown in Table 5.

Table 5. Summary of the survey sent to public transport centres

Question	Possible responses	Number of public transport centres that chose the answer
<b>Management of public transport and cooperation</b>		
What are the main shortcomings in the cooperation between the organisers of different modes of public transport? (different options could be selected)	Changes to the timetables of the organisers of different modes of public transport	7
	Cooperation with the Ministry of Regional Affairs and Agriculture	7
	Other (cooperation with the Ministry of Regional Affairs and Agriculture, public transport register not functioning properly, lack of a single ticketing system, problems with information exchange)	5
Does the public transport centre organise routes that cross the border of the centre's area of management?	Yes	9
	No	2
During the period 2020–2024, were there any routes planned to operate crossing the public transport center's service area that were ultimately not launched?	Yes	9
	No	2
Has the public transport centre considered merging with other public transport centres?	Yes	6
	No	5
Why has the public transport centre not merged with another public transport centre? (different options could be selected)	The merger does not add value	6
	The right to make decisions disappears in a larger management area	3
	Local authorities do not have the necessary support	3
What are the biggest problems for the public transport centre in terms of funding the organisation of public transport? (different options could be selected)	Uncertainty of funding, no long-term goal	6
	There is no money for route network development	3
	Other (unequal funding of public transport centres, fuel price increases, no service level standards)	3
<b>Route network planning</b>		
Have any surveys been commissioned to identify mobility needs?	Yes	6
	No	5
	Yes	5

Based on the surveys of mobility needs carried out from 2020–2024, have any changes been made to the services?	No	5
Data sources used for route planning, i.e. which data are mainly used to change the routes and timetables of services (different options could be selected)	Passenger transport statistics, including occupancy of routes	11
	Input from passengers	11
	Input from bus drivers	6
	Input from local authority	8
	Other (location of population, schools, institutions and companies, train and long-distance bus timetables, proposals from carriers)	9
<b>Alternative travel options</b>		
Has the public transport centre offered demand-responsive transport, including on-demand services, from 2020–2024?	Yes	11
	No	0
Who funds the on-demand services organised by the public transport centre (Ministry of Regional Affairs and Agriculture, local authority, or other) (different options could be selected)	Ministry of Regional Affairs and Agriculture	11
	Local authority	6
Based on your experience, what are the advantages of organising demand-responsive transport, including on-demand services? (different options could be selected)	Cost of route kilometres saved	8
	Providing people with a travel option	9
	Other (providing a bigger volume of travel options, reducing the environmental footprint)	3
Based on your experience, what are the disadvantages of organising demand-responsive transport, including on-demand services? (different options could be selected)	Ordering demand-responsive transport is cumbersome and information is not easy to access	8
	Planning the service is cumbersome and people do not understand it	4
	Other (additional cost, additional reporting obligation, no remuneration component for the carrier)	4
What modes of transport does the public transport centre combine bus timetables with? (different options could be selected)	Train	9
	Ferry	5
	Plane	2
	Local routes	9
	Long-distance routes (across county borders)	11
<b>Route network optimisation</b>		
Has the public transport centre analysed the economic feasibility of the network, including the cost of running the services and the number of passengers?	Yes	11
	No	0
What changes have you made to the route network based on the results of the economic feasibility analyses? (different options could be selected)	The routes of services have been changed	5
	Routes or parts of routes have been changed to on-demand	9
Has the public transport centre developed criteria for optimising the network?	Yes	7
	No	4

<b>Supervision</b>		
Does the public transport centre carry out contractual supervision of carriers?	Yes, it does	11
	No, it does not	0
What are the main problems or obstacles in supervising carriers? (different options could be selected)	Lack of resources (including people, time, money)	5
	No processing rights	3
	Other (credibility of complaints, problems with passengers, accuracy of validation)	3
<b>Organisation of infrastructure</b>		
Is the public transport centre aware of any problems with the maintenance of bus stops?	Yes	11
	No	0
Please describe any known problems with the maintenance of bus stops? (different options could be selected)	Winter maintenance, slippery, unploughed snow	4
	Damaged untidy bus stop	6
	Lack of bus stop facilities, e.g. a bench	3

## Annex C. Place of residence and place of work of employed persons by region

Table 6. Employed people according to place of residence and place of work on 31.12.2021

County	Employed people in county	Place of work				
		In another county	Tartu	%	Tallinn	%
Harju County	312987	3.92%	2892	0.92	234,671	74.98
Tartu County	77366	15.65%	48805	63.1	7100	9.18
Ida-Viru County	55407	19.76%	546	0.99	6895	12.4
Pärnu County	39377	20.20%	617	1.57	4730	12.01
Viljandi County	20645	21.85%	793	3.84	1933	9.36
Saare County	14791	22.15%	260	1.76	2117	14.31
Lääne-Viru County	26969	27.21%	538	1.99	4162	15.4
Võru County	15220	28.90%	1106	7.27	1620	10.7
Lääne County	9386	30.50%	126	1.34	1760	18.8
Järva County	13501	30.79%	370	2.74	2030	15
Hiiu County	4182	32.76%	83	1.98	846	20.2
Valga County	11740	35.63%	1211	10.3	1204	10.3
Jõgeva County	12228	35.71%	1384	11.3	1280	10.5
Põlva County	10649	41.28%	1650	15.5	934	8.77
Rapla County	16074	44.94%	161	1.00	4482	27.9

Source: Statistics Estonia