

SHINING A LIGHT ON LOBBYING IN LITHUANIA

DATA, RISKS, AND REGULATIONS

Transparency International Lithuania (TI Lithuania) is an active member of the global Transparency International Movement with more than 20 years of activity.

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Integrity Watch 3.0 is funded by the European Union's Internal Security Fund — Police.

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EXECUTIVE SUMMARY

In the past 15 years, the level of bribery in Lithuania has decreased three-fold falling to the all-time low. Yet, high-level political corruption such as nepotism and political patronage has remained widespread. For example, the Global Corruption Barometer shows that 6 out of 10 residents think that Lithuania's Government is run by a few big interest groups looking out for themselves first.

As an attempt to better understand who influences decision-makers in Lithuania, in 2017, for the first time, Transparency International Lithuania reviewed publicly available parliamentarians' agendas. The first analysis showed that more than a half of parliamentarians did not even have publicly accessible work calendars. As a consequence, TI Lithuania continued this initiative by regularly reviewing work calendars and sending personal emails to MPs inviting them to share information about meetings with interest groups and registered lobbyists. Additionally, TI Lithuania published the best performing MPs and political groups on political transparency platform ManoSeimas.lt which now offers the opportunity to access information on nearly 250,000 parliamentary meetings dating back to 2017, of which over 7,000 involve interactions with interest groups and registered lobbyists.

„ManoSeimas.lt“ („My Parliament“) is a user-friendly online tool dedicated to making the country's political scene more transparent and understandable. In its renewed version, the mission to better inform society and increase political integrity is implemented through collection, analysis and visualisation of extensive data about parliamentarians' work and decision-making processes in Lithuania. On this platform, any interested party can easily find out what interests' groups and registered lobbyists participate in any particular decision-making process, how accountable members of the Parliament are, who is trying to influence legislation. Data obtained from various sources (e.g. data received from institutions by the Freedom of Information Requests) is systemised and can be easily compared, using interactive charts.

By collecting and analysing data on MPs' meetings and lobbying activities, as well as publicly sharing the results, TI Lithuania has been witnessing the change. For example, the current Parliament started its term more actively than the previous one. During the spring session of 2021, half of the parliamentarians (70) announced 654 meetings with interest groups and registered lobbyists. Four years ago, in spring 2017, 45 MPs reported 475 such meetings. This was the first time that all members from one political group declared at least one meeting with representatives of interest groups during a session. Most meetings were held with business representatives and business associations (199). Every fourth meeting (172 out of 654) was with NGOs and other non-profit organizations.

In order to increase transparency in decision-making and to prevent illegal lobbying activities, an amended Law on Lobbying Activities entered into force in 2021. Therefore, TI Lithuania requested lobbying data (list of registered lobbyists, lobbyist declarations and declarations of lobbying influence) from the Chief Official Ethics Commission under the Freedom of Information Act. The platform ManoSeimas.lt now provides a more detailed look into lobbying data, which includes information on 330 registered lobbyists, 1963 lobbyist transparency declarations and 792 declarations of lobbying experience published by politicians and civil servants.

KEY FINDINGS

- **Over the past two and a half years, lobbyists have declared 2.5 times more declarations (1963) than individuals who have experienced lobbying influence (792).** The majority of declared lobbying activities pertain to the Law on Pharmacy and legislation related to trade in marketplaces, lotteries, electronic communications, and the regulation of tobacco and tobacco products.

- **Since 2021, the number of registered lobbyists has nearly tripled — from 122 lobbyists in December 2020 to 330 lobbyists in August 2023.**
- **The Lithuanian Business Confederation published the most declarations of all registered lobbyists** (265 declarations), followed by the Lithuanian Industrialists' Confederation (115 declarations), Vytenis Butkevičius (83 declarations), Kristina Nemaniūtė-Gagė (74 declarations), Arnas Neverauskas (66 declarations), and the association Investors' Forum (66 declarations). Three out of five registered lobbyists did not publish a single transparency declaration.
- **In total, 174 politicians and civil servants published at least one declaration.** The most active in this regard were the Vice Minister of Economy and Innovation Ieva Valeškaitė (48 declarations), Member of the Parliament Lukas Savickas (33 declarations), Minister of Agriculture Kęstutis Navickas (32 declarations), Minister of the Environment Simonas Gentvilas (28 declarations), and Member of the Parliament Andrius Bagdonas (25 declarations). Representatives from **three out of sixty** municipalities (Kaišiadorys district, Kaunas city, Vilnius city) published declarations noting lobbying activities carried out in their respect.
- **Members of the parliament are more active in publishing meetings with interest groups and registered lobbyists during current parliamentary term (2020-2024) compared to the previous one (2016-2020).** The ruling majority has published approximately four times more meetings than the opposition during the current parliamentary term.

KEY RECOMMENDATIONS

- Ensure the interoperability for and quality of all opened political integrity data to create a better legislative footprint;
- For each open political integrity dataset provide information on the limitations of data;
- Discuss the possibility of expanding the scope of legal entities that have to declare lobbying activities;
- Open company ownership data in open data format clearly identifying who the owners of specific companies are;
- Integrate parliamentarian's agendas together with the lobbying register;
- Prepare detailed guidelines on how to interpret General Data Protection Regulation in terms of providing and opening data related to public interest.

POLITICAL INTEGRITY DATA AVAILABILITY IN LITHUANIA

Overall, data opening in Lithuania is carried out in accordance with the Law of the Republic of Lithuania on the Right to Obtain Information from State and Municipal Institutions and Agencies, which was amended and renamed as the Law of the Republic of Lithuania on the Right to Access Information and Reuse of Data (hereinafter – the Law) on 17 July 2021. The Law foresees that open data may be used by any person for any purpose, provided that the original data source is indicated. The open data requirement applies to all state and municipal authorities and to the entities controlled by the state and municipalities, in particular: (1) state authorities and institutions; (2) municipal authorities and institutions; (3) bodies performing public functions; and (4) companies where 50% or more of the shares are held by the state or municipalities.

Some exceptions are foreseen as well: (1) data which is not within the public function of the institution, except for salary information; (2) data to which third parties have intellectual property rights; (3) data the disclosure of which is prohibited or restricted by law, e.g. confidential data of a state, official, banking, commercial or professional secret, personal data; (4) data consisting solely of logos, ornaments and/or emblems; and (5) other data provided for in Article 2(2) of the Law.

In general, the majority of data related to political integrity in Lithuania is publicly available via websites of various institutions (Annex no 1). Data is usually free of charge and does not require registration. From the assessed datasets, government budget and spending information seems to be provided in the most convenient and detailed way.

Approximately half of the datasets assessed in 2022 were not available in open data format and even more lacked accompanying documentation with sufficient information to understand the source and analytical limitations of the data. It could be noticed that various institutions have been making their own decisions whether specific data should be available in open data format. For example, the Chief Official Ethics Commission decided to open lobbying data in open data format, however, the extent of data provided in such format is smaller compared to the publicly available data in a non-machine-readable format. It seems that institutions' decisions on what data could be opened also depends on the interpretation of the General Data Protection Regulation. For instance, the Parliament in Lithuania opened names and surnames of MPs in open data format, but the names and surnames of MPs are not available in open data in the lobbyists' declarations.

However, it should be noted that while some datasets are not publicly available in open data format and/or are incomplete, they could be requested via a Freedom of Information Act request and obtained for free with more detailed units/items/subjects. One of the most challenging areas regarding data still remains interoperability. For example, in the lobbyists' declarations the same institutions/business associations are written in various ways, politicians and civil servants do not have their ID numbers, legal acts are referred to in a non-unified format (e.g., in some cases only the number of the legal act is given, and in others the official name or only its acronym), etc.

Since 2022, there have not been many changes in terms of the availability and accessibility of political integrity data, with one main exception of the beneficial ownership registry. From January 2022 a new UBO Register (Information Sub-system of Legal Entities Beneficial Owners – JANGIS) has been launched in Lithuania (the last registration phase for all the types of legal entities from 1st August 2022). Data on beneficial owners may be received from JANGIS by state and municipality institutions and agencies entitled, legal entities that have provided data on their beneficial owners, beneficial owners of legal entities and collective investment undertakings, other natural persons and legal entities who are entitled to get data in cases established by laws. Mainly data could be obtained as a PDF unless web service can be used.

From the assessed datasets, TI Lithuania chose to mainly analyse lobbying data. Lithuania is one of a few countries in Europe that has been regulating lobbying activities by law for more than two decades (the Law on Lobbying Activities was first adopted in 2001). However, throughout the years, only a small share of influence was captured with very few lobbyists registered (e.g., in 2020, Lithuania had approximately 100 registered lobbyists leaving many de facto lobbyists such as business associations off record because of a narrow definition of lobbying). **In 2021, the Law on Lobbying Activities was amended aiming to bring more transparency and clarity into decision-making processes. For the first time, it introduced a so-called cross-declaration system where both lobbyists and politicians / civil servants have to report on lobbying activities.**

More concretely, lobbyists in Lithuania are natural persons, legal persons and other organizations or a division thereof engaged in lobbying activities. It does not, however, include activities of state politicians, state officials or civil servants when initiating, preparing, considering draft legal acts and adopting legal acts carried out in accordance with their official functions assigned to them pursuant to the procedure laid down by legislation; activities of non-governmental organizations of public benefit; activities of religious communities and associations in cooperation with competent state institutions in matters of education, culture, family, social, morals and protection of human dignity, and some more listed under article 7 of the Law. A lobbyist shall declare lobbying activities by submitting a declaration of transparent legislative processes for each draft legal act no later than within seven days after starting lobbying activities regarding a specific draft legal act in the Transparent Legislative Process Information System SKAIDRIS.

In addition, it is important to mention that the President of the Republic, members of the Seimas and the Government, Vice Ministers, Chancellors of ministries, Heads of parliamentary political parties, Mayors, members of municipal councils, Directors and Deputy Directors of municipal administrations shall declare to the Chief Official Ethics Commission lobbying activities carried out in their respect in the Transparent Legislative Process Information System SKAIDRIS. Lobbying activities shall be supervised by the Chief Official Ethics Commission in accordance with the procedure prescribed by laws.

Overall, the new approach to regulating lobbying in Lithuania has been effective as witnessed by the increased number of lobbyists as well as a higher number of declarations. However, it's evident that ensuring the quality and interoperability of lobbying data is crucial for promptly identifying discrepancies. In addition, Lithuania could start discussing whether the scope of those that have to declare lobbying activities should be expanded to more legal entities.

Aiming to measure whether the new Law and its unique approach work, and to better manage possible corruption risks in politics and decision-making processes, the methodology was primarily based on lobbying dataset. In addition to this, TI Lithuania aimed to ensure sustainability of ManoSeimas.lt, and as such updated information on Parliamentarian's work calendars aiming to better grasp how accountable political leaders are, and what interest groups (that are not covered by the Law on Lobbying Activities) are aiming to influence decision-making processes in the Parliament. Additionally, TI Lithuania worked with MPs meetings data collected from their public working calendars (which has not been initially indicated in the data scoping table).

WHAT DOES LOBBYING AND MPS' MEETINGS DATA TELL US

Parliamentarians' work calendars: MPs meetings with interest groups and registered lobbyists

The platform ManoSeimas.lt created by Transparency International Lithuania offers the opportunity to access information on nearly 250,000 parliamentary meetings since 2017, **of which over 7,000 involve interactions with interest groups and registered lobbyists**. It allows to compare data between different parliamentary terms (2016-2020 and 2020-2024) showing that current parliamentarians (MPs) tend to disclose more meetings with interest groups and registered lobbyists than MPs from previous parliamentary term (respectively 2,531 meetings and 3,255 meetings).

The following analysis is based on the most recent data from the spring session of 2023, which best reflects the current situation:

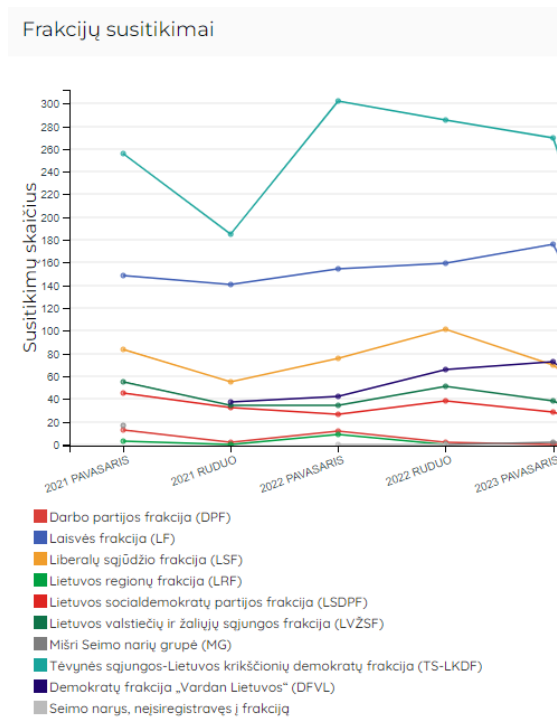


Table no. 1. Number of meetings reported by political groups (ManoSeimas.lt).

The highest number of meetings with interest groups and registered lobbyists published by the Homeland Union - Lithuanian Christian Democrat Political Group, the Freedom Political Group, and the Liberal Movement Political Group (refer to Table No. 2). **These three groups, all part of the ruling majority, collectively published 2,464 meetings** with interest groups and registered lobbyists since the start of the parliamentary term in autumn 2020. In comparison the opposition groups publicly disclosed **1,322 meetings**. Only one political group, i.e., Freedom Political Group, had all its members declare at least one meeting (176 meetings in total). 4 out of the 9 chairs of political groups and 8 out of the 17 chairs of parliamentary committees published their meetings with representatives of interest groups.

Top five MPs with the highest number of meetings accounted for nearly one-third of all meetings with interest groups and registered lobbyists. The top 10 MPs include nine representatives from the coalition and one from the opposition. The majority of meetings were disclosed by prominent figures such as Aušrinė Armonaitė, who serves as both an MP and the Minister of Economy and Innovation, Simonas Gentvilas, an MP and the Minister of the Environment, and Viktorija Čmilytė-Nielsen, who holds the position of Speaker of the Seimas. Notably, **one-third of the MPs did not provide any information about their meetings with interest groups or registered lobbyists** since the beginning of this term.

The majority of meetings reported were with business representatives and business associations. MPs announced a total of 185 meetings with these stakeholders, including 67 with business associations registered on the lobbyists' list. Additionally, 169 meetings were held with NGOs and communities, 147 with representatives of educational institutions, 145 with representatives from various sectors like medicine, art, sports, and other interest groups, 39 meetings with trade unions, and 9 meetings with registered lobbyists.

In addition, **approximately half of the parliamentarians who propose the most amendments to legislation reported having zero meetings** with interest groups and registered lobbyists. In the 2023 spring session, this was the case for four MPs, and in the 2022 autumn session, it applied to five MPs. These figures raise questions regarding the justification of MPs' legislative proposals and the depth of their decision-making within the Parliament. On the other hand, it is worth mentioning that, in accordance with the Law on Lobbying Activities, Parliamentarians are legally required to maintain working calendars, although they are not obliged to fill them out.

Lobbying

The ManoSeimas.lt platform also provides users with valuable insights into lobbying activities in Lithuania. In 2021, a new Law on Lobbying Activities came into effect in Lithuania, introducing significant changes. More precisely, the Law expanded the scope of who can register on the lobbyists' list. While in the past, only natural persons could do so, now legal entities can also register. Another notable feature of the updated Law is the introduction of a so-called cross-declaration, a mechanism that requires both the lobbyist and the lobbied person to declare their lobbying activities. According to the Law, lobbied persons shall mean the President of the Republic, members of the Seimas of the Republic of Lithuania, the Government of the Republic of Lithuania, Vice Ministers, Chancellors of the Government and ministries, Heads of parliamentary political parties, Mayors, members of municipal councils, Directors and Deputy Directors of municipal administrations, other civil servants, state officers and other persons, who, in accordance with the official functions assigned to them, take part in the preparation, consideration and adoption of draft legal acts in accordance with the procedure established by legal acts.

Lobbying: List of Lobbyists

In August, 2023, the lobbyists' list contained 330 registered lobbyists, with 178 being legal persons and 152 being natural persons. The highest number of declarations of lobbying activity has been submitted by **the Lithuanian Business Confederation, The Lithuanian Confederation of Industrialists, Vytenis Butkevičius, Kristina Nemanaitė-Gagė, Arnas Neverauskas and Investors' Forum** (Table no. 2).

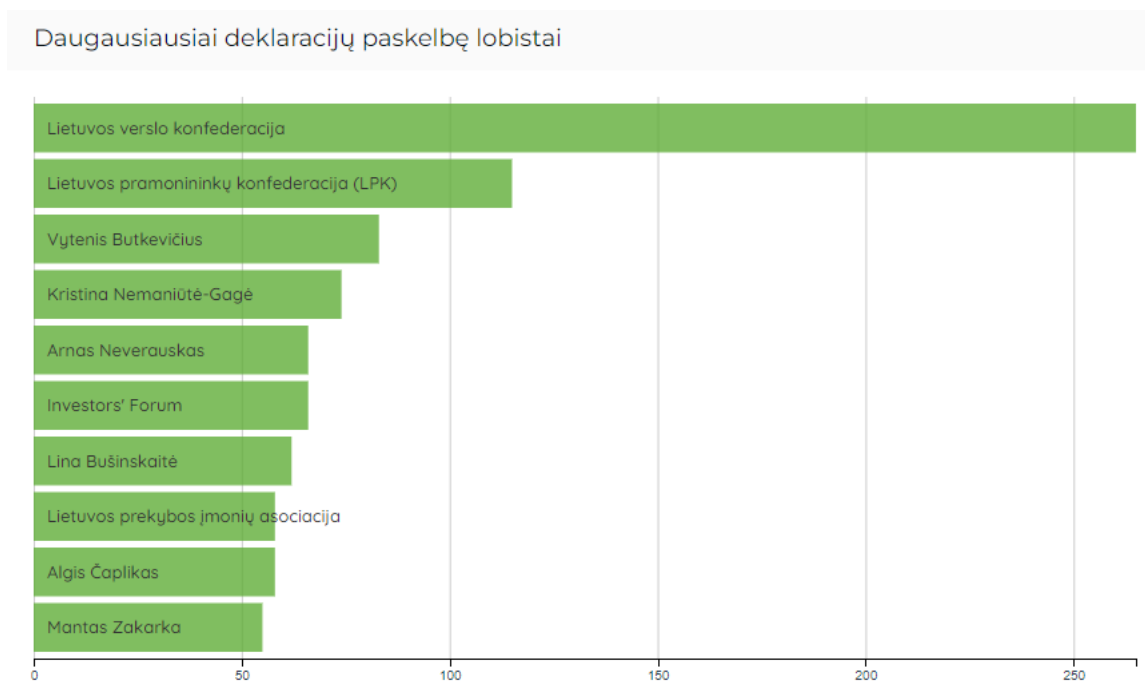


Table no. 2. Lobbyists with the highest number of declared lobbying activities (ManoSeimas.lt).

Lobbying: Declarations of lobbyists, and politicians and civil servants

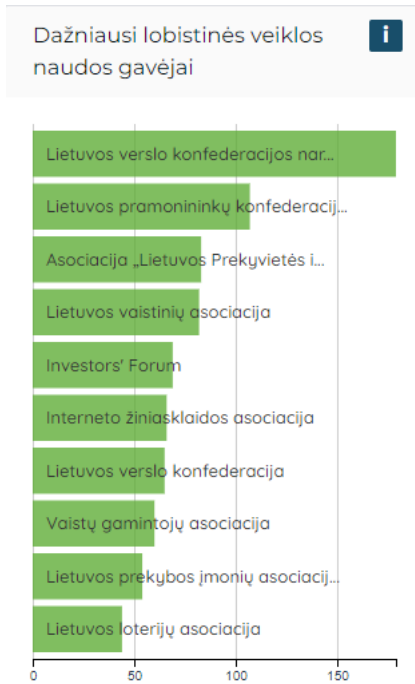


Table no. 3. The most frequently identified beneficiaries of lobbying activities (ManoSeimas.lt).

Between January, 2021, and August, 2023, **135 lobbyists declared their lobbying activities a total of 1,963 times**. This marks a significant increase, as it is five times more than all the electronic declarations in the previous years combined.

Among the most frequently identified **beneficiaries of lobbying activities** identified by lobbyists are members of The Lithuanian Business Confederation, members of The Lithuanian Confederation of Industrialists, The Association "Lithuanian Marketplaces and Farmers' Markets", The Lithuanian Pharmacies Association, Investors' Forum (Table no. 3).

Often, **business associations that are registered lobbyists state that the clients or beneficiaries of lobbying activities are members of the association**. It is not always clear which members' interest are being represented in particular if at all. For example, the Lithuanian Business Confederation (as of 27 September, 2023) has 110 members in total. The Confederation represents both state-owned enterprises, e.g., LITEXPO, municipality-owned enterprises, e.g., Kauno švara, UAB, educational institutions, e.g., Vytautas Magnus University, Vilnius Private School, other business associations, e.g., Lithuanian Gaming Business Association, and other lobbyists, e.g., UAB Meta Advisory Lithuania.

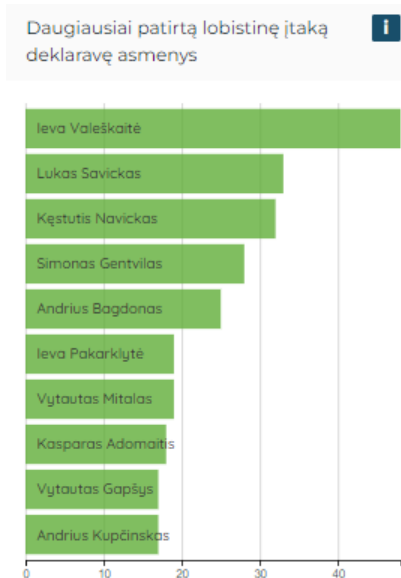


Table no. 4. The "TOP 10" lobbied persons who have declared the most lobbying activities (ManoSeimas.lt).

Since the new Law came into force on January 1, 2021, a total of **175 individuals submitted a total of 792 declarations noting lobbying activities carried out in their respect**.

The highest number of people declaring lobbying influence are affiliated with the Parliament, the Ministry of Economy and Innovation, the Ministry of Environment, the Ministry of Agriculture, and the Ministry of Health.

Within the "TOP 10" lobbied persons who have declared the most lobbying activities, are 9 MPs, with 2 of them also holding ministerial positions, and 1 Vice Minister (Table no. 4). The most declarations were made by Ieva Valeškaite, Vice Minister of Economy and Innovation.

Those who have been lobbied sometimes do not know or indicate the clients of the lobbying activities they have experienced, accounting for approximately 7 per cent of declarations. Similarly, they do not always know or specify the beneficiaries of the lobbying activities they have encountered, which constitutes around 8 per cent of declarations.

As previously mentioned, the Law foresees a cross-declaration of lobbying activities as such allowing for comparison between some of the data provided by lobbyists and politicians / civil servants. Comparing information from “Lobbyists’ declarations” and “Politicians and civil servants declarations”, the following insights emerge. Lobbyists’ declarations show that **Parliamentarians, Vice-Ministers and Ministers are the most lobbied persons**. It is similar to the declarations submitted by the politicians and public officials. (Table no. 5). Other roles significantly influenced by lobbyists include ministerial staff, the Prime Minister, and the Speaker of Parliament. It is similar to the declarations submitted by the politicians and civil servants. The majority of declarations are submitted by the Members of Parliament, Vice Ministers, and Ministers (Table no. 6). In comparison, the number of declarations from politicians at local government level is extremely low.

Daugiausiai lobistinės įtakos patyrusių asmenų pareigos



Table no. 5 Lobbyists’ declarations: positions of those who have been lobbied the most (ManoSeimas.lt).

Daugiausiai patirtą lobistinę įtaką deklaravusių asmenų pareigos

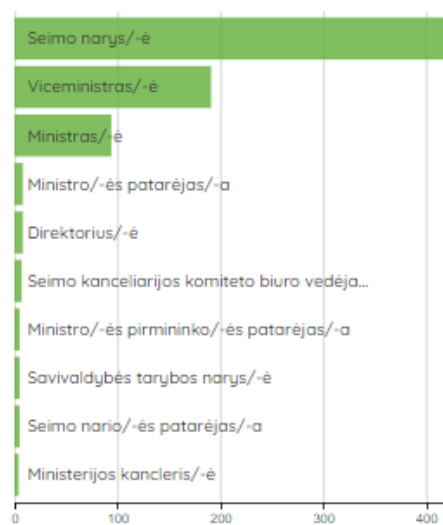


Table no. 6 Declarations of lobbying influence: positions held by those who declare the most experienced lobbying influence (ManoSeimas.lt)

In addition, the 'TOP 10' legal acts listed in the declarations of both lobbied persons and lobbyists largely overlap. The majority of declared lobbying activities pertain to **legislation concerning pharmaceuticals, market regulations, lotteries, electronic communications, health insurance, road safety, public information provision, tobacco, and tobacco products**. Additionally, there is a substantial number of declarations related to the Civil Code, regulations in the renewable energy sector, and health insurance. **The majority of declared lobbying influence pertains to legislation related to pharmaceuticals, electronic communications, tobacco, and tobacco products**. Additionally, a substantial number of declarations also mention regulations concerning market regulations, lotteries, renewable energy, road safety, excise duties, alcohol control, and the Civil Code.

KEY FINDINGS

Lobbyists declared 2.5 times more declarations than individuals who experienced lobbying influence

Since the beginning of 2021, when a new Law on Lobbying activities came into force, the model of so-called cross-declarations has been introduced, which requires both the lobbyist and the lobbied person to declare lobbying activities. The new system allows to identify cases where lobbying activities have been declared by only one concerned party - the lobbyist or the lobbied person. If, in a particular case, a lobbyist or a lobbied person has declared a lobbying activity, but there is no declaration from the other side, this could potentially indicate a breach of the Law on Lobbying activities. According to the Law, lobbying activity is illegal if a lobbyist has failed to declare lobbying activities in accordance with the procedure established by the Law. When declaring lobbying activities, lobbied persons have to provide the number of the lobbyist declaration declaring the relevant lobbying activity. However, as of August, 2023, there are 300 out of 792 declarations from lobbied persons that lack lobbyist declaration numbers, indicating they were not matched with the lobbyists' declarations (Table no. 7).

Patirtos lobistinės įtakos deklaracijos								
Nr	Lobistinė veiklą patyręs asmuo	Pareigos	Institucija	Teisės aktai	Lobistas	Užsakovas	Naudos gavėjas	Lobistų deklaracija
1	Adomas Bužinskas	Savivaldybės administracijos direktorius/-ė	Vilniaus miesto savivaldybė	Vilniaus miesto savivaldybės administracijos direktoriaus įsakymas „Dėl Reklaminių įrenginių įrengimo ir naudojimo Vilniaus mieste viešų konkursų nuostatų tvirtinimo“	Vytautas Kisielius	UAB „Baltic Communication Group“, kurios dukterinė UAB „Baltijos vaizdinė reklama“ Vilniuje užsiima išorinės reklamos verslu	Baltic Communications LLC	▶
2	Agnė Bilotaitė	Ministras/-ė	LR Vidaus reikalų ministerija	LR Motorinių transporto priemonių registracijos mokesčio įstatymas	Ramūnas Mackevičius	UAB „Autopretenzija“	Lietuvos Respublikos fiziniai ir juridiniai asmenys	▶
3	Agnė Širinskienė	Seimo narys/-ė	LR Seimas	LR Saugaus eismo automobilių keliais įstatymas	Šarūnas Frolenko	Bolt Operations OÜ	Asociacija „Lietuvos Prekyvietės ir Turgavietės“	▶
4	Agnė Širinskienė	Seimo narys/-ė	LR Seimas	Dėl galimo kreipimosi į Konstitucinį Teismą	Lina Bušinskaitė	Interneto žiniasklaidos asociacija	Interneto žiniasklaidos asociacija	

Table no. 7. Declarations of politicians and civil servants (ManoSeimas.lt).

The declaration of lobbying influence on the ManoSeimas.lt platform can be marked with green flags. If there is a green flag, the lobbying activity has been declared both by the person lobbied and the lobbyist.

When declaring lobbying influence experienced, lobbied persons must provide the declaration number of the lobbyist who carried out the activity. Four out of ten lobbied persons do not indicate the number of the lobbyist declaration for the lobbying activity in question (i.e., they are red flagged), this means that the lobbying has not been declared by the lobbyist, or the lobbied persons do not indicate that the lobbying has been declared by the lobbyist. 140 of the 300 declarations of lobbied persons that do not include a lobbyist declaration number are declared by persons working in the Ministries. Most of these lobbied persons are Vice Ministers (76) and Ministers (51). 137 of the 300 declarations of lobbied persons that do not include a lobbyist declaration number are declared by Members of the Parliament.

While the work of these politicians attracts significant attention, it is important to note that lobbyists do not always declare the influence they have on decision-making processes. On the other hand, lobbied persons may not always fully comprehend how to complete declarations with the lobbyist's declaration number, especially if they rarely engage in this process. This situation may be indicative of a broader issue – a lack of a transparent lobbying culture in the country.

2 out of 3 lobbyists did not declare any lobbying activities

Examining cases in which registered lobbyists do not declare any lobbying activities is crucial for identifying potential risks of illegal lobbying. In such cases, lobbyists may benefit from the rights granted by being on the register of lobbyists (to receive information from state or municipal authorities and institutions on draft legal acts being prepared, to be involved in drafting legal acts and to draft them, submit proposals and explanations on the content of draft legal acts or their drafting, and more), without fulfilling the obligation to declare the influence they have on decision-making processes. By failing to declare their lobbying activities, lobbyists hide their influence on legislative processes. Such withholding of information can give them an advantage over competitors and potentially undermine the equal access of interest groups to decision-making processes. Based on data provided by the Chief Official Ethics Commission from January 2021 to August 2023, **60 per cent of registered lobbyists (203 out of the 330) on the lobbyists' list have not declared any lobbying activity** since the new Law came into force in 2021 (Table no. 8).

Lobistai					
Nr	Lobistas	Juridinio asmens atstovai	Veiklos sričių skaičius	Deklaracijų skaičius	
1	Renginių industrijos asociacija	8	3	0	
2	Lietuvos komunalinių ir atliekų tvarkytojų asociacija	7	3	0	
3	Lietuvos akvakultūros produktų gamintojų asociacija	6	3	0	
4	Komunikacijos industrijos asociacija	6	1	0	
5	UAB „Busturas“	6	1	0	
6	UAB Neste Lietuva	5	1	0	
7	Lietuvos statybos inžinierių sąjunga	4	4	0	
8	Asociacija „Kauno vežėjų klubas“	4	1	0	
9	Lietuvos medicininės įrangos gamintojų asociacija	4	1	0	

Table no. 8. Registered lobbyists without a single declaration (ManoSeimas.lt).

Case example: One of the registered lobbyists that has not declared any lobbying activities is the Lithuanian Employers' Confederation. [This Confederation](#) is a non-governmental, non-profit organisation representing the largest small and medium-sized businesses in Lithuania. It promotes their interests and facilitates their access to capital. The organisation also states that it cooperates closely in working groups on legislation and other issues of importance to Lithuania. The Confederation was established on 24 April 1999 as a result of the merger of the two largest confederations representing small and medium-sized enterprises - the Lithuanian Confederation of Employers of Businesses and the Lithuanian National Confederation of Businesses. Moreover, the Confederation is one of the largest business associations in Lithuania, a member of the Lithuanian Business Council, which aims to mobilise the experience, knowledge and expertise of associated business structures and to submit balanced proposals to the Government and the Parliament of the Republic of Lithuania to help the country to maintain the economic growth, to improve the business conditions, to increase competitiveness and to create a favourable investment environment. Of all the lobbying organisations affiliated to the Lithuanian Business Council, the Lithuanian Employers' Confederation is the only one that has not declared any lobbying activities.

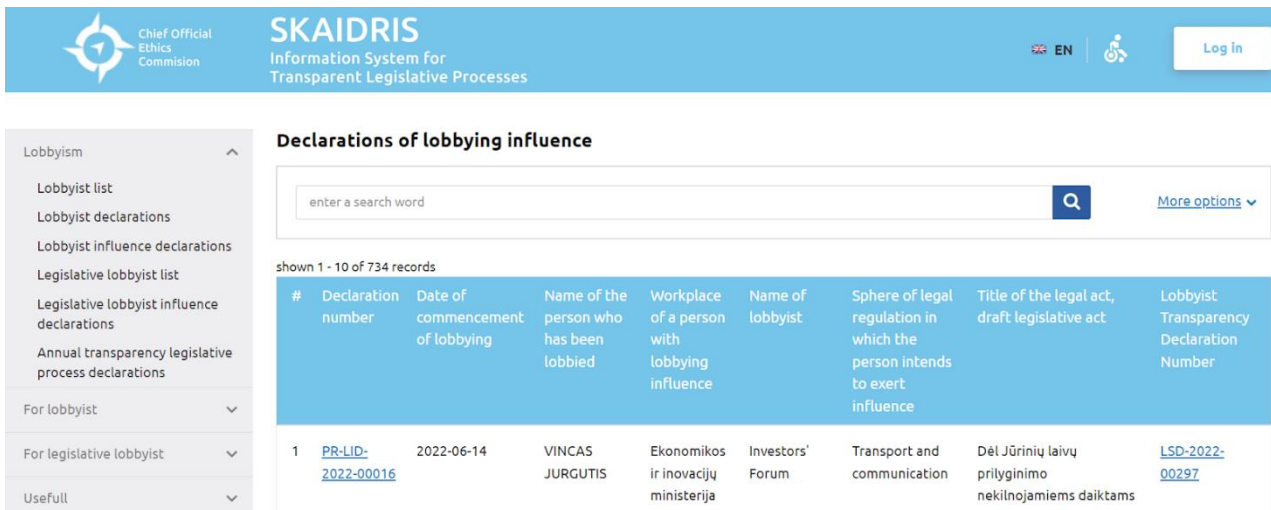
Reviewing the information in the work calendars of MPs, it can be noted that at least 4 MPs indicated that they had met with the Confederation at least 5 times. In both 2021 and 2022, a Member of Parliament Justas Džiugelis had stated that he had met with the Confederation. The working calendars of MPs Ieva Kačinskaitė-Urbonienė, Andrius Mazuronis and others indicate that in 2021 their political group (Labour Party Political group) had a meeting with representatives of the Lithuanian Employers' Confederation. Another MP, Tomas Vytautas Raskevičius, had a meeting with representatives of the Confederation in January 2023.

In addition, the Confederation is also active in the media on legislative and political matters, issuing press releases, commenting on political events, for example, in [2021](#) Confederation called for the resignation of the Minister for Agriculture over lack of support for rural businesses, in [2022](#) following the proposal to oblige employers to grant up to five working days of unpaid leave per year for employees' self-learning, the Confederation argued that these five days would be for laziness, in [2023](#) opposed to raising the minimum wage, in [2023](#) together with other business

associations, criticised the proposed tax reform, arguing that the changes will have an unavoidable impact on the investment climate, undermine the development of the Lithuanian economy and the well-being of its citizens. Based on the Lithuanian elite opinion survey, the annual list of Lithuania's most influential businessmen and economists also includes the Confederation's representative, Danas Arlauskas, in 6th place in [2022](#) and 8th-9th place in [2023](#).

More MPs publicly declare more meetings with interest groups

Parliamentarians in Lithuania are required to have work calendars, but are not obliged to fill them in. Only about half of MPs publish in their official calendars which interest groups and registered lobbyists they meet. These meetings include not only meetings with lobbyists, as regulated by the Law on Lobbying Activities, but also with other interest groups such as NGOs. Nonetheless, MPs who have been lobbied are required to declare it on the Chief Official Ethics Commission's platform SKAIDRIS (Table no. 9). However, in some cases, MPs publish meetings with interest groups and registered lobbyists on their official work calendars, whereas meetings with lobbyists are not declared on the SKAIDRIS platform. This may indicate possible breaches of the Law on Lobbying Activities, as lobbied persons are required to declare the lobbying influence experienced. Furthermore, some MPs declare the lobbying they have experienced in SKAIDRIS, but do not publish meetings with lobbyists in their official work calendars. In this case, the public may not be aware of who is influencing a politician's decisions and proposed legislation, as these influences are not shown in their official work calendars.



The screenshot shows the SKAIDRIS platform interface. The header includes the logo of the Chief Official Ethics Commission and the text 'SKAIDRIS Information System For Transparent Legislative Processes'. There is a search bar and a 'Log in' button. A sidebar on the left lists various categories like 'Lobbyism', 'Lobbyist list', and 'Legislative lobbyist list'. The main content area is titled 'Declarations of lobbying influence' and shows a search bar with the text 'enter a search word'. Below the search bar, it indicates 'shown 1 - 10 of 734 records'. A table displays the following data:

#	Declaration number	Date of commencement of lobbying	Name of the person who has been lobbied	Workplace of a person with lobbying influence	Name of lobbyist	Sphere of legal regulation in which the person intends to exert influence	Title of the legal act, draft legislative act	Lobbyist Transparency Declaration Number
1	PR-LID-2022-00016	2022-06-14	VINCAS JURGUTIS	Ekonomikos ir inovacijų ministerija	Investors' Forum	Transport and communication	Dėl Jūriinių laivų prilyginimo nekilnojamiems daiktams	LSD-2022-00297

Table no. 9. Declarations of politicians and civil servants on the Chief Official Ethics Commission's platform SKAIDRIS (Skaidris.vtek.lt).

During the entire current parliamentary term from autumn 2020, 42 MPs did not declare any meetings with interest groups and registered lobbyists their work calendars. Among the 42 MPs who did not publish meetings in their work calendars, 18 declared lobbying influence on SKAIDRIS. Those 18 MPs published 93 declarations. A total of 81 MPs declared their meetings with lobbyists on the SKAIDRIS platform.

To enhance public awareness regarding the activities of parliamentarians, it is worth exploring the possibility of integrating SKAIDRIS data on politicians' meetings with lobbyists into their official work calendars or other way round. According to the Eurobarometer, [8 out of 10](#) Lithuanian's citizens lack trust in the Parliament, and [9 out of 10](#) citizens believe that close ties between business and politics contribute to corruption. Increased visibility of parliamentarians' activities and improved transparency in lobbying endeavors could play a crucial role in rebuilding trust in the Parliament.

Annex no 1.

Data scoping table as of July, 2022

Dataset	Exist	Data	Timeliness	Completeness	Granularity	Formats	Openness	Accessibility	Interoperability	Metadata	Document	Extent	Total score
Lobbying register	Y	Y	Y	Y	Y	Y(a)	Y	Y	N	Y	N	Y	10
Asset and interests of public officials	Y	Y	Y	Y	Y	N(b)	N	Y	N	N	N	Y	7,5
Company registers	Y	Y	Y	Y	N	Y(a)	Y	Y	Y	Y	Y	Y	11
Beneficial ownership	N	N	N	N	N	N	N	N	N	N	N	N	0
Public officials	N/A												
Government budget	Y	Y	Y	Y	Y	Y(a)	Y	Y	Y	Y	Y	Y	11,5
Government spending	Y	Y	Y	Y	Y	Y(a)	Y	Y	Y	Y	Y	Y	11,5
Public procurement	Y	Y	Y	Y	Y	N(b)	Y	Y	Y	N	N	Y	9,5
Political financing	Y	Y	Y	Y	Y	Y(a)	Y	Y	Y	Y	N	Y	11
Voting records	Y	Y	Y	Y	Y	Y(b)	Y	Y	N	Y	N	Y	10,5
Land registers and real estate register	Y	Y	Y	N	N	Y(a)	Y	Y	N	Y	N	Y	8