

# Lithuania Market Compliance TF

## Meeting minutes

10 June 2025



### Minutes and Actions

#### Meeting of the Fleet Cards Market Compliance Task Force on Lithuania

10 June 2025, 09:30 am (CEST)

<b>Location</b>	Online	
<b>Chair</b>	Antonio Chiesa, DKV	
<b>Attendance</b>	Thomas Hölscher, DKV Ondrej Jancarik, Eurowag Diana Jescanina, E100 Arturas Michejenko, DKV Roland Schwengebecher, Edenred	<u>Secretariat:</u> Aurélie Decker Peigneur, FCE  <u>External advisers :</u> Jokasas Deividas, TGS Baltics Gintautas Dulskas, Fabula Paulius Zapolskis, TGS Baltics
<b>Apologies</b>	Eva Adamcova, Corpay Pauline Gain, Edenred Ramon Weistroffer, DKV	
<b>Content</b>	1. Review of the Ministry of Energy proposed amendments 2. Next steps	

#### 1) Review of the Ministry of Energy proposed amendments

- TGS Baltics presented the proposed amendments and the Ministry of Energy's comments to the group. Overall, the Ministry proposal includes only minor changes to FCE proposal, indicating that the Ministry supports the revision and has developed a certain understanding of the business model.
- In its draft, the Ministry appears to aim at narrowing the permit exemption only to retail trade by removing references to "wholesale trade" and "intermediation activities." It is specified that in Lithuania retail trade definition includes both B2B and B2C activities as long as it serves the final purchaser.
- From the group discussion, it became clear that this revised wording is more restrictive than the version initially proposed by FCE. While the current language seems to accommodate the ABC model, it does not extend to the ABCD model—even though the document refers to the "final purchaser." TGS Baltics advises against broadening the scope to include the ABCD model unless absolutely necessary.
- Further discussion is needed with Mr. Varkala to determine how best to address his concerns regarding the responsibility for ensuring that undertakings benefiting from the

permit exemption comply with legal requirements.

#### New Action

Members are requested to assess internally whether they can proceed with the narrower wording as currently proposed, keeping the approach simple, or whether adjustments are needed to broaden the scope in a way that ensures all members are comfortable with the final version.

Members are to share their comments on the draft amendments with the group via email by end of business on Thursday, 12 June.

## 2) Next steps

- Comments on the draft amendments should be submitted to Mr. Varkala by 17 June. These will then be circulated within the Ministry and, once approved internally, forwarded to Parliament for adoption.
- The group will reconvene on Monday 16 June at 17:00 CEST to discuss and align on the best strategy moving forward.