

Lithuania Market Compliance TF

Meeting minutes

16 June 2025



Minutes and Actions

Meeting of the Fleet Cards Market Compliance Task Force on Lithuania

16 June 2025, 17:00 (CEST)

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

1) Review of the Ministry of Energy proposed amendments

- It was clarified to the group that, despite numerous changes in the English version received last week the substance of the document remains unchanged. The discrepancies are primarily due to translation, as the Lithuanian version shows minimal and non-substantive changes. For example, the replacement of “*bulk petroleum products*” with “*non-fuel oil*” in the English version is solely a translation matter.
- Mr. Varkala’s comment regarding “another similar contract” will be addressed in writing at a later stage by E100, as it is primarily their concern.
- The group discussions focused on the Ministry’s new wording, which appears to narrow the permit exemption exclusively to retail trade. Members expressed concern that this revised language could potentially exclude the ABC model. There was a shared view that any reference to “retail” should be minimized or ideally avoided altogether, including distinctions between retail and wholesale, in order to preserve broader applicability.
- TGS Baltics reminds that the fuel station have retail permit only and that’s why the

reference to retail was added to the text by the Ministry. They will investigate how likely it is that in the ABC model, the AB buy and sell action could be qualified as “wholesale” and therefore denied permit exemption to fuel cards companies. Or if it is possible to have some kind of acknowledgement of the hybrid model in which the ABC model belongs to.

- TGS Baltics reminded the group that fuel stations operate under retail permits only, which is why the Ministry included a reference to retail in the text. They will look into how likely it is that, under the ABC model, the transaction from company A to B could be classified as “wholesale,” potentially disqualifying fuel card companies from the permit exemption. Additionally, they will explore whether it is possible to obtain formal recognition of the hybrid nature of the ABC model, or alternatively, to confirm without ambiguity that the A-to-B transaction qualifies as retail.
- Regarding the point about the National Energy Regulatory Council verifying whether the criteria are met, the group agreed that such oversight should not be necessary, as the permit exemption itself should suffice—making additional checks redundant. It is important that the Ministry avoids introducing an over-engineered solution or imposing unnecessary administrative burdens on fuel card companies. In practical terms, the only verifiable criterion would be the existence of a purchase contract between the fuel station and the fuel card company.

New Action

TGS Baltics will analyse how the document can be revised to address the various concerns raised by members and will revert to the group with the requested clarifications and a proposed revised wording.

2) Next steps

- TGS Baltics will share its analysis with the group within the next couple of days. Based on this analysis, the group will agree on a consolidated response to be submitted to the Ministry shortly.
- In the meantime, Fabula will request a short extension from Mr. Varkala to allow FCE to provide consolidated and coordinated feedback.