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EUROPEAN COMMISSION FOR DEMOCRACY THROUGH LAW
OF THE COUNCIL OF EUROPE
(VENICE COMMISSION)

LITHUANIA

DRAFT LAW NO. XVP-1247(2) AMENDING THE LAW ON THE LITHUANIAN NATIONAL RADIO AND TELEVISION AND ACCOMPANYING DOCUMENTS

Unofficial translation from the Lithuanian language

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I. Draft Law No. XVP-1247(2) amending the Law on National Radio and Television of Lithuania

REPUBLIC OF LITHUANIA AMENDMENT TO THE LAW ON NATIONAL RADIO AND TELEVISION OF LITHUANIA LAW NO. I-1571 AMENDMENT LAW

2026, d. No., Vilnius

Article 1. Addition of Article 2(1) to the Law
Add Article 2[1] to the Law:
"Article 2[1]. LRT mission
The mission of LRT is to ensure the public's right to reliable, objective and diverse information, a variety of opinions, to create conditions for free public discussion and to contribute to the preservation and development of the Lithuanian language and national culture by making content available in all regions and to various population groups. This mission is carried out independently and impartially, without political or other external influence on content and editorial decisions."

Article 2. Amendment to Article 3
1. Add a new paragraph 1 to Article 3:
"1. In implementing the mission defined in this Law, LRT shall operate on a non-commercial basis as a public service broadcaster. The scope and nature of LRT's activities shall be proportionate to this mission, without prejudice to the principles of fair competition."
2. The former paragraphs 1–3 of Article 3 shall be considered paragraphs 2–4, respectively.

Article 3. Amendment to Article 5
Amend Article 5(12) and word it as follows:
"12. Other **media outlets (**~~radio and television stations, Internet distribution channels)~~ shall not be allowed to operate on the channels used by LRT and **on the LRT website.**"

Article 4. Amendment to Article 6
Amend Article 6 and reword it as follows:
"**Article 6. Advertising and commercial audiovisual messages on LRT programmes and the LRT website**

1. Advertising, political advertising and commercial audiovisual messages or other similar types of public information preparation and dissemination for remuneration or free of charge on LRT programmes and the LRT website are prohibited, except in cases where when LRT disseminates advertising and commercial audiovisual messages or broadcast sponsorship messages **free of charge** in accordance with the procedure and conditions established by the Council, in fulfilment of its contractual obligations regarding the acquisition or granting of broadcasting rights for sporting, cultural or other events of public interest.
2. ~~Cultural, social and educational information may be disseminated on LRT programmes and the LRT website.~~ **Cultural, social and educational information may be disseminated free of charge on LRT programmes and the LRT website, in accordance with the procedure established by the Council in order to ensure the public interest.**
3. Cultural, social and educational information is information disseminated publicly ~~for a fee or other remuneration or~~ free of charge, which aims to ~~propogate~~ **promote** cultural, sporting, social and/or educational activities or initiatives. LRT programmes and the LRT website may display the names and logos of sponsors of such information or events when publishing cultural, social and educational information or broadcasting cultural and sporting events. ~~LRT may be paid for the dissemination of this information~~. The procedure and conditions for the dissemination of cultural, social and educational information shall

be established by the Council, and the implementation of the provisions of this article shall be monitored by the Lithuanian Radio and Television Commission.

Article 5. Amendment to Article 10

1. Amend Article 10(1) and word it as follows:

"1. The Council is the highest collegial body that performs the functions of management and supervision of LRT and represents the interests of the public. The Council must act in the interests of LRT and the entire public, comply with the law, the statutes of LRT and other legal acts. The Council shall consist of ~~12~~**15** persons – public, scientific and cultural figures appointed for a term of 6 years. A member of the Council may serve no more than two consecutive terms."

2. Amend Article 10(2) and reword it as follows:

"2. The Council shall consist of: four persons appointed by the President of the Republic; four persons appointed by the Seimas (two of whom shall be appointed from among candidates proposed by opposition factions); seven ~~four~~ members appointed (one each) by the following organisations: the Lithuanian Science Council, the Lithuanian Education Council, the Lithuanian Artists' Association, the Lithuanian Bishops' Conference, **the Lithuanian Union of Community Organisations, the Tripartite Council**, **and a representative of Lithuanian organisations of persons with disabilities**. Council members are appointed in accordance with the procedure established by the appointing institutions, which is published on the websites of these institutions. The Chair of the Council shall inform the institutions appointing Council members in writing of the need for Council members with the missing competences. The institutions appointing Council members must publish information about candidates for Council membership on their websites in advance, in accordance with the requirements set out in paragraph 3 of this article. The Council members shall elect and appoint the Chair and Vice-Chair of the Council for a term of three years by a simple majority of all Council members. The Chair and Vice-Chair of the Council may serve no more than two consecutive terms. Where the remaining term of office of the elected and appointed Chair or Deputy Chair of the Council is less than three years, they shall remain in office until the end of their term as a member of the Council. When they are appointed to a second term as a member of the Council before the end of the three-year term of the Chair or Deputy Chair of the Council, they shall continue to perform the duties of the Chair or Deputy Chair of the Council for the entire three-year term.

3. Amend Article 10(3) and reword it as follows:

"3. Only citizens of the Republic of Lithuania of impeccable reputation who have obtained a university degree, hold a master's degree or equivalent higher education qualification and have 5 years of work experience **in the fields of management and administration, science, media or culture.** A person shall not be considered to be of impeccable reputation if they do not meet the requirements of impeccable reputation established in the Law on Civil Service of the Republic of Lithuania for heads of institutions or persons aspiring to become heads of institutions**, or if the person has committed a breach of professional ethics for which he or she has been held liable in accordance with the procedure established by law**.

4. Amend Article 10(4) and word it as follows:

"4. If a person appointed as a member of the Council is a member of a political organisation, he or she must suspend his or her membership in that organisation for the duration of his or her term as a member of the Council. The following persons may not be members of the Council: members of the Seimas, the Government, municipal councils, the European Parliament, the Lithuanian Radio and Television Commission, the mayor, the Inspector of Journalist Ethics, members of the Public Information Ethics Commission, political (personal) appointees, the Director General of LRT, the Deputy Director General, **employees of the Council's Office or** other LRT employees, persons whose employment is related to radio and/or television programme broadcasters, radio and/or television programme broadcasters,

managers and/or participants of information society media (legal entities), members of management bodies, auditors or employees of audit companies participating and/or having participated in the audit of LRT, which was performed less than two years ago.

Article 6. Amendment to Article 11
Amend Article 11(6) and word it as follows:
"6. The Council shall publish and submit to the Seimas an annual report on the activities of LRT by **30 April** ~~1 July~~ each year. This report shall include reports on the implementation of income and expenditure estimates. The LRT activity report must contain detailed data on the number of funding sources and the amount of all income received from the provision of non-public services, as well as the expenses related to the provision of non-public services. When LRT resources are used to provide both public and non-public services, the expenses must be allocated accordingly as the difference between the total expenses of the institution and the total expenses for the provision of non-public services. The Chairman of the Council shall report on the activities of LRT once a year at a sitting of the Seimas.

Article 7. Amendment to Article 12
Amend Article 12(5) and word it as follows:
"5. ~~In cases specified in the Council's rules of procedure, public Council meetings may be held, which may be broadcast live on the LRT website.~~ **Council meetings shall be public and broadcast live on the LRT website, except in cases where the meetings deal with issues related to information whose disclosure is prohibited or restricted by law."**

Article 8. Addition of Article 12(1) to the Law
Add Article 12[1] to the Law:
"Article 12[1]. Council Office

1. **The activities of the Council shall be supported by the Council Office. The structure and working procedures of the Council Office shall be laid down in the Council's rules of procedure. The powers, functions, rights and obligations of the Council Office shall be laid down in the Council Office's regulations, which shall be approved by the Council. The staff of the Council Office shall be directly subordinate and accountable to the Council. The work of the Council Office shall be organised by the Chair of the Council.**
2. **The main task of the Council Office is to assist the Council in performing its functions and to ensure its smooth operation.**
3. **In addition to the functions specified in its regulations, the Council Office shall perform the following functions in order to fulfil its assigned tasks:**
   1) **provide technical support for the meetings of the Council and, when instructed, the meetings of the Council's committees and working groups, and ensure the management of documents falling within the competence of the Council, the Council's committees and working groups;**
   2) **prepares materials and analytical information necessary for the activities of the Council and, when instructed, the Council's committees and working groups, and submits proposals on the compliance of LRT programmes and the content of the LRT website with the requirements for the implementation of LRT good governance principles and other measures aimed at increasing the efficiency and transparency of LRT activities; the implementation of LRT good governance principles, and other actions aimed at increasing the efficiency and transparency of LRT activities;**
   3) **prepares draft documents falling within the competence of the Council, its committees and working groups, assesses the compliance of draft documents with the laws of the Republic of Lithuania, other legal acts and legal technical requirements, and ensures the dissemination of these draft documents;**

4) **coordinates and monitors the implementation of decisions, requests and other tasks assigned by the Council, and, where delegated, by Council committees and working groups;**
5) **performs other functions specified in the regulations of the Council's Office.**

4. **The salaries of the Council Office staff shall be paid from the funds of the LRT. The funds allocated for the activities of the Council Office shall be provided for in the annual income and expenditure estimate of the LRT and shall be used only for the performance of the functions of the Council Office.**

Article 9. Amendment to Article 13

1. Amend Article 13(2) and word it as follows:

"2. The Director General of LRT shall be appointed for a term of five years and dismissed by the Council ~~by open vote~~ following a public competition. If the required number of votes is not obtained, a new competition shall be organised. Only a citizen of the Republic of Lithuania of impeccable reputation who has obtained a university degree or equivalent education, holds a master's degree or equivalent higher education qualification and has 5 years of managerial work experience may be appointed as Director General. A person shall not be considered to be of impeccable reputation if he or she does not meet the requirements of impeccable reputation established in the Civil Service Law for heads of institutions or persons aspiring to become heads of institutions**. The Director General of LRT may serve no more than two consecutive terms.**"

2. Amend Article 13(4) and reword it as follows:

"4. If the person elected as Director General of LRT is a member of a political organisation, he or she must suspend his or her membership in that organisation for the duration of his or her term as Director General. Furthermore, members of the Seimas, the Government, the Lithuanian Radio and Television Commission, and civil servants in positions of political (personal) trust may not be elected as Director General. Persons who have employment relationships with radio and television programme broadcasters, as well as managers and participants of radio and/or television programme broadcasters, information society media (legal entities), members of management bodies, Council members **and Council Office employees** must immediately resign from their current positions when appointed as Director General. Auditors or employees of audit companies who are involved and/or have been involved in auditing LRT within the last two years may not be elected as Director General. The Director General may not work in business, commercial or other institutions, companies or organisations, and may not receive any remuneration other than the salary established for the position held, remuneration for scientific and pedagogical work, and royalties for creative work.

3. Amend Article 13(5) and reword it as follows:

"5. The Director General of LRT may be dismissed from office before the end of his term of office on grounds of no confidence only if ~~the Council bases its no confidence on public interest~~ **he fails to perform the functions of Director General properly, as provided for in Article 14 of this Law, or due to a violation of the public interest, if the Council bases its vote of no confidence on a gross violation of duties or a violation of the requirements of impeccable reputation,** and if at least two-thirds of all Council members vote in favour of such a vote of no confidence."

Article 10. Amendment to Article 15

Amend Article 15(4) and word it as follows:

"4. If a person appointed as the LRT Ethics Controller is a member of a political organisation, he or she shall suspend his or her membership in that organisation for the duration of his or her term as LRT Ethics Controller. The following persons may not be appointed as LRT Ethics Controller: members of the Seimas, the Government, the European Parliament, the Lithuanian Radio and Television Commission, the mayor, the Inspector of Journalist Ethics, members of the Public Information Ethics Commission, political (personal) appointees, members of

municipal councils, the Director General of LRT, his deputy or other LRT employees, as well as persons whose employment is related to radio and/or television programme broadcasters, as well as radio and/or television programme broadcasters, information society media (legal entities) and/or their participants, members of management bodies, members of the Council, **employees of the Council's Office**, auditors or employees of audit companies participating and/or having participated in the audit of LRT, which was performed less than two years ago.

Article 11. Amendment to Article 16
Amend Article 16(1)(6) and reword it as follows:
"6) ~~respond~~ to questions submitted by the Director General of LRT or the Council regarding the professional ethics of LRT journalists;".

Article 12. Addition of Article 17[1]
Add Article 17[1] to the Law:
"Article 17[1]. LRT employees

1. **LRT employees, except those specified in paragraph 2 of this article, Article 15(2) and Article 17(2), shall be appointed and dismissed by the Director General of LRT. LRT employees shall be appointed through a public competition or internal selection process. The procedure for organising and conducting public competitions and internal selection shall be established by the Director General of LRT.**
2. **Employees of the Internal Audit Service and the Council Office shall be appointed and dismissed by the Council. Employees of the Internal Audit Service and the Council Office shall be appointed by public competition or internal selection. The procedure for organising and conducting public competitions and internal selection shall be established by the Council.**

Article 13. New version of the Law of the Republic of Lithuania on National Radio and Television No. I-1571

To amend the Law on National Radio and Television of the Republic of Lithuania No. I-1571 of the Republic of Lithuania on Lithuanian National Radio and Television and to word it as follows:

REPUBLIC OF LITHUANIA
LAW ON THE LITHUANIAN NATIONAL RADIO AND TELEVISION

CHAPTER I
GENERAL PROVISIONS

Article 1. Purpose of the Law

1. This Law establishes the legal status, management, activities, reorganisation and liquidation procedures, duties, rights and responsibilities of Lithuanian National Radio and Television (hereinafter referred to as LRT).
2. LRT shall base its activities on the Law on Public Information of the Republic of Lithuania, the Law on Public Institutions of the Republic of Lithuania, other legal acts, unless otherwise provided for in this Law, as well as the Articles of Association of LRT.

Article 2. Concept and status of LRT
LRT is an independent public institution, the sole shareholder of which is the state.

Article 3. Mission of LRT
The mission of LRT is to ensure the public's right to reliable, objective and diverse information, a variety of opinions, to create conditions for free public discussion and to contribute to the preservation and development of the Lithuanian language and national culture by making

content available in all regions and to various population groups. This mission is carried out independently and impartially, without political or other external influence on content and editorial decisions.

Article 4. Principles of LRT's activities

1. In implementing the mission as defined in this Law, LRT shall operate on a non-commercial basis as a public service broadcaster. The scope and nature of LRT's activities shall be proportionate to this mission, without prejudice to the principles of fair competition.
2. LRT shall base its activities on respect for the individual and the state, legality, impartiality, accountability, transparency, efficiency, democracy, objectivity, political neutrality, independence and other principles of the rule of law. LRT shall ensure freedom of speech and creativity.
3. LRT must collect and publish information about Lithuania and the world, familiarise the public with the diversity of European and world cultures and the foundations of modern civilisation, strengthen the independence and democracy of the Republic of Lithuania, create, nurture and preserve the values of national culture, foster tolerance and humanism, a culture of cooperation, thinking and language, strengthen public morality and citizenship, and foster the country's ecological culture. LRT programmes and the LRT website must reflect a variety of views and beliefs. People of different beliefs have the right to participate in LRT programmes and the LRT website and express their views. LRT programmes and the LRT website must respect human dignity and rights and not violate moral and ethical principles.
4. The reception area of LRT radio and television programmes covers the entire territory of the Republic of Lithuania.

Article 5. Requirements for the content of LRT programmes and the LRT website

1. LRT programmes and the LRT website must ensure a diversity of topics and genres. The content of LRT programmes and the LRT website must be aimed at different segments of society, people of different ages, nationalities and beliefs. LRT programmes and the LRT website must not allow one-sided political views to prevail. The information presented in LRT news programmes, commentaries and on the LRT website must be well-founded, reflect a variety of political views, and opinions and factual information must be authorised, verified and comprehensive.
2. LRT radio and television programmes give priority to national culture, as well as information, world culture, journalism, analysis, educational, art and sports programmes.
3. The proportion of European audiovisual works and audiovisual works created by independent producers in LRT television programmes is determined by the Law on Public Information. The broadcasting of European audiovisual works must comply with a targeted European cultural dissemination policy. The content of LRT broadcasts and the LRT website must reveal the diversity of the history and present of the peoples of Europe.
4. Audiovisual works broadcast in languages other than Lithuanian must be translated into Lithuanian or shown with Lithuanian subtitles. The proportion of audiovisual works broadcast in languages other than Lithuanian that must be translated into Lithuanian or shown with Lithuanian subtitles shall be determined by the LRT Council (hereinafter referred to as the Council).

Article 6. Rights and obligations of LRT

1. LRT is the successor to the rights and obligations of Lithuanian Radio and Television, established by the Seimas of the Republic of Lithuania. There can be no other shareholders of LRT. The functions of the LRT general meeting are entrusted to the Council.
2. LRT has broadcasting rights and the right to record and broadcast, free of charge, the sessions of the Seimas and the Government of the Republic of Lithuania, as well as official state ceremonies, and to dispose of the recordings at its discretion.

3. LRT shall have the right to provide teletext services, freely prepare and broadcast short (no longer than 90 seconds) news reports on events of public importance in Lithuania and other countries, including political, cultural, sporting and other events, for which other television broadcasters have acquired exclusive rights to provide information to the public.
4. LRT has the right to organise competitions, festivals, conferences, seminars, create art collectives, establish direct links with foreign organisations and companies, participate in the activities of international organisations, organise radio and television programmes or individual programmes for foreign countries, to retransmit foreign radio and television programmes or individual programmes on the basis of agreements, to establish branches and correspondent offices, and to publish information about its activities.
5. LRT has the right to broadcast radio and television programmes on radio frequencies allocated for broadcasting and to broadcast two television and four radio programmes on terrestrial analogue radio frequencies (channels) specified in the plan. In order to ensure the broadcasting of television programmes produced by LRT, LRT shall also be allocated radio frequencies (channels) necessary for one national terrestrial digital television network. Only radio and television programmes produced by LRT shall be broadcast via this network. It is prohibited to use this network for other commercial activities or for the retransmission of other radio and television programmes. If the electronic communications resources allocated in the radio frequency allocation plan for the broadcasting and transmission of radio and television programmes are not used for the broadcasting and/or retransmission of programmes, the number of radio and television programmes broadcast and/or retransmitted by LRT shall not be limited. LRT shall have the right to broadcast and transmit radio and television programmes on the terrestrial digital radio frequencies (channels) provided for in the radio frequency allocation plan for radio and television programmes broadcast radio and television programmes, the number of which is determined by the Lithuanian Radio and Television Commission, following a proposal from the Council, adopted taking into account the funds allocated to LRT in the Law on the Approval of the Financial Indicators of the State Budget and Municipal Budgets of the Republic of Lithuania for the relevant year. The rights necessary to implement these provisions shall be granted to LRT on a priority basis by the Lithuanian Radio and Television Commission and the Communications Regulatory Authority of the Republic of Lithuania in accordance with the procedure established by the Law on Public Information and the Law on Electronic Communications of the Republic of Lithuania.
6. The services required for the provision and operation of LRT radio and television networks and the services for the transmission of radio and television programme signals to the public via electronic communications networks shall be provided by AB Lietuvos radijo ir televizijos centras. The prices of these services, taking into account a reasonable return on investment, shall be based on the costs incurred by AB Lietuvos radijo ir televizijos centras in providing the services. The procedure and conditions for the provision of these services, as well as the term of service provision, shall be governed by the European Commission Decision 2012/21/EU of 20 December 2011 European Commission Decision 2012/21/EU on the application of Article 106(2) of the Treaty on the Functioning of the European Union to State aid in the form of public service compensation granted to certain undertakings entrusted with the operation of services of general economic interest shall be established by the Government or an institution authorised by it. The Communications Regulatory Authority shall verify the reasonableness of the prices of these services in accordance with the procedure and conditions established by the Government or an institution authorised by it as specified in this section.
7. LRT shall provide airtime for the President of the Republic to speak on domestic and foreign policy issues in accordance with the procedure established by the Law on the President of the Republic of Lithuania. At the request of the Seimas, the Government or the leader of the opposition in the Seimas, LRT shall, as far as possible, provide airtime for official announcements by the Seimas, the Government or the opposition in the Seimas.

8. LRT provides airtime for Lithuanian traditional and state-recognised religious communities to broadcast religious ceremonies under the terms and conditions set out in bilateral agreements.
9. LRT prepares programmes for national minorities and content for the LRT website, providing an opportunity to disseminate the culture of national minorities.
10. LRT adapts its television programmes for persons with hearing and visual impairments. The monthly duration of such television programmes, excluding repeats, which are not included in the minimum broadcasting time for programmes adapted for persons with hearing and visual impairments specified in this section, shall be as follows:
    1) programmes with Lithuanian subtitles – at least 50 per cent of the total monthly broadcast time;
    2) programmes translated into Lithuanian sign language – at least 20 per cent of the total monthly broadcasting time;
    3) programmes adapted for persons with visual impairments – not less than 10 per cent of the total monthly broadcasting time.
11. LRT shall prepare and broadcast special programmes for election campaigning at the national level in accordance with the conditions and procedures established in the Election Code of the Republic of Lithuania. LRT shall also prepare and broadcast programmes for referendum campaigning in accordance with the conditions and procedures established in the Constitutional Law on Referendums of the Republic of Lithuania.
12. Other media outlets shall not be allowed to operate on the channels used by LRT and on the LRT website without the permission of the Council. Persons who control other media outlets and/or are public representatives of other media outlets may participate in LRT content only in accordance with the editorial policy conditions approved by the LRT Council and after declaring any conflicts of interest.
13. LRT may broadcast its programmes to foreign countries.

Article 7. Advertising and commercial audiovisual messages on LRT radio and television programmes and on the LRT website

1. Advertising, political advertising and commercial audiovisual messages or other similar types of public information preparation and dissemination for remuneration or free of charge on LRT programmes and the LRT website are prohibited, except in cases where when LRT disseminates advertising and commercial audiovisual messages or broadcast sponsorship messages free of charge in accordance with the procedure and conditions established by the Council, in fulfilment of its contractual obligations regarding the acquisition or granting of broadcasting rights for sporting, cultural or other events of public interest.
2. Cultural, social and educational information may be disseminated free of charge on LRT radio and television programmes and LRT website in accordance with the procedure established by the Council in order to ensure the public interest.
3. Cultural, social and educational information is information disseminated publicly free of charge, which aims to promote cultural, sporting, social and/or educational activities or initiatives. LRT radio and television programmes and the LRT website may display the names and logos of sponsors of such information or events when publishing cultural, social and educational information or broadcasting cultural and sporting events. The procedure and conditions for the dissemination of cultural, social and educational information shall be established by the Council, and the implementation of the provisions of this article shall be monitored by the Lithuanian Radio and Television Commission.

Article 8. Sponsorship of LRT radio and television programmes and/or individual programmes and content published on the LRT website

LRT programmes and/or individual programmes and content published on the LRT website may not be sponsored in accordance with the procedure established by the Law on Public Information, except in cases where, in accordance with the procedure and conditions

established by the Council, LRT fulfils its contractual obligations regarding the acquisition or granting of broadcasting rights for sports, culture or other events of public interest.

Article 9. Specific features of LRT activities during strikes by LRT employees or in exceptional circumstances

1. When LRT employees are on strike, the provision of information to listeners, viewers and readers in LRT programmes and on the LRT website, as determined by the Council, must be ensured.
2. In the event of natural disasters, epidemics, states of emergency or war, LRT must publish official announcements from the President of the Republic, the Seimas, the Government, the Constitutional Court of the Republic of Lithuania and the Prosecutor General's Office of the Republic of Lithuania.

CHAPTER II
MANAGEMENT AND SUPERVISION OF LRT

Article 10. LRT bodies

The bodies of LRT are the Council, the Board and the Director General of LRT. The composition, competence, functions and activities of the bodies of LRT are established by this Law and the Articles of Association of LRT.

Article 11. Council

1. The Council is the highest collegial body that performs the functions of management and supervision of LRT and represents the interests of the public. The Council must act in the interests of LRT and the entire public, comply with laws, the statutes of LRT and other legal acts. The Council shall consist of 15 persons – public, scientific and cultural figures appointed for a term of six years. A member of the Council may serve no more than two consecutive terms.
2. The Council consists of: 4 persons appointed by the President of the Republic; 4 persons appointed by the Seimas (2 of whom shall be appointed from among candidates proposed by opposition factions); 7 members (one each) appointed by the following organisations: the Lithuanian Science Council, the Lithuanian Education Council, the Lithuanian Artists' Association, the Lithuanian Bishops' Conference, the Lithuanian Union of Community Organisations, the Tripartite Council of the Republic of Lithuania, and a representative of Lithuanian organisations of persons with disabilities. Council members are appointed in accordance with the procedure established by the appointing institutions, which is published on the websites of the appointing institutions. The Chair of the Council shall inform the institutions appointing Council members in writing of the need for Council members with the missing competences. The institutions appointing Council members must publish information about candidates for Council membership on their websites in advance, in accordance with the requirements set out in paragraph 3 of this article. The Council members shall elect and appoint the Chair and Vice-Chair of the Council for a term of three years by a simple majority of all Council members. The Chair and Vice-Chair of the Council may serve no more than two consecutive terms. Where the remaining term of office of the elected and appointed Chair or Deputy Chair of the Council is less than three years, they shall remain in office until the end of their term as a member of the Council. When, before the end of the three-year term, the Chair or Deputy Chair of the Council is appointed to a second term as a member of the Council, they shall continue to hold the office of Chair or Deputy Chair of the Council for the entire three-year term.
3. Only citizens of the Republic of Lithuania of impeccable reputation who have obtained a university degree, hold a master's degree or equivalent higher education qualification and have 5 years of work experience in the fields of management and administration, science, media or culture. A person shall not be considered to be of impeccable reputation if they do not meet the requirements of impeccable reputation established by the Law on Civil Service of the Republic of Lithuania for heads of institutions or persons aspiring to become

heads of institutions, or if the person has committed a breach of professional ethics for which they have been held liable in accordance with the procedure established by law.

4. If a person appointed as a member of the Council is a member of a political organisation, he or she must suspend his or her membership in that organisation for the duration of his or her term as a member of the Council. The following persons may not be members of the Council: members of the Seimas, the Government, municipal councils, the European Parliament, the Lithuanian Radio and Television Commission, mayors, the Inspector of Journalist Ethics, members of the Public Information Ethics Commission, civil servants in positions of political (personal) trust, the Director General of LRT, the Deputy Director General, members of the LRT Board, employees of the Council's Office or other LRT employees, persons related to radio and/or television programme broadcasters by employment relationships, radio and/or television programme broadcasters, managers and/or participants of information society media (legal entities), members of management bodies, auditors or employees of audit companies participating and/or having participated in the audit of LRT, which was performed less than two years ago.
5. A member of the Council may not be dismissed from office before the end of his or her term of office, except in cases where the member of the Council is dismissed by decision of the appointing authority for the following reasons:
   1) he or she has not participated in the work of the Council for more than four months without a valid reason;
   2) he or she loses Lithuanian citizenship;
   3) he loses his impeccable reputation or it becomes apparent that he does not meet the requirements set out in paragraph 4 of this article;
   4) the Supreme Commission for Professional Ethics adopts a decision on a gross violation of the provisions of the Law on the Coordination of Public and Private Interests of the Republic of Lithuania by a member of the Council.
6. The powers of a Council member shall terminate when:
   1) he resigns;
   2) his term of office expires;
   3) he or she dies;
   4) a decision is taken to dismiss the Council member on the grounds provided for in paragraph 5 of this article.
7. When a vacancy arises on the Council, the Chair of the Council shall request the institution that appointed the member of the Council whose term of office has been terminated to appoint a new member of the Council for the remainder of the term of office of the member whose term of office has been terminated.
8. The Council may resign *in corpore* before the end of its term of office. If the Council resigns *in corpore*, the term of office of all members of the Council shall end when the newly constituted Council holds its first meeting.
9. When the Council resigns *in its entirety*, the Seimas Committee on Culture shall organise the formation of a new Council. The Seimas Committee on Culture shall, within 10 days, request the institutions that appointed the members of the Council to appoint new members within a period not exceeding one month. The Seimas Committee on Culture shall convene the first meeting of the Council, at which the members of the Council shall elect the Chair and Deputy Chair of the Council. The Deputy Chair of the Council shall be elected in the same manner upon the recommendation of the Chair of the Council.
10. The Council operates in accordance with the Council's rules of procedure, which are approved by the Council.
11. The Council shall be financed from LRT funds received from the state budget. The funds allocated to the Council shall be provided for in the LRT annual income and expenditure estimate and shall be used only for the performance of the functions of the Council as provided for by law.
12. The Council shall analyse and evaluate its activities on an annual basis; independent external experts shall be engaged to carry out the evaluation at least once every four years.

Article 12. Functions, rights and accountability of the Council

1. In performing its tasks, the Council shall carry out the following functions:
   1) formulate the strategy for LRT programmes and the LRT website;
   2) approve the statutes of LRT or amendments thereto;
   3) approves the annual report on LRT activities;
   4) approves the strategic plan and annual activity plans of LRT;
   5) sets editorial, privacy, sustainability and other requirements for LRT programmes;
   6) approves the description of the procedure for the dissemination of cultural, social and educational information by LRT;
   7) approves the LRT journalists' code of ethics upon the recommendation of the LRT ethics controller;
   8) approves LRT's annual income and expenditure estimates and reports on their implementation;
   9) supervises the implementation of the objectives and tasks of LRT set out in this Law, compliance with the requirements of LRT programmes established by the Council and other requirements established in other laws for public information producers and/or disseminators;
   10) supervises and evaluates the activities of the Director General of LRT in accordance with criteria established in advance by the Council, including the legality and effectiveness of financial and organisational decisions;
   11) considers the conclusions of the State Audit Office of the Republic of Lithuania and ensures their public disclosure on the LRT website;
   12) approves the terms and conditions of the public tender for the audit of LRT's financial statements;
   13) approves the description of the procedure for the management, use and disposal of LRT assets;
   14) upon the recommendation of the Board, revokes decisions of the Director General that are contrary to legislation, the LRT statutes, or resolutions of the Council or the Board.
   15) may establish Council committees and working groups, appoint the chairpersons of these committees and working groups, approve the members of the committees and working groups, and the rules of procedure of the committees;
   16) appoints and dismisses members of the Board;
   17) approves the structure of LRT or changes thereto;
   18) appoints and dismisses the Director General of LRT, sets his or her tasks, salary and performance evaluation criteria;
   19) appoints and dismisses the LRT Ethics Controller and the Head of the Internal Audit Service, sets their tasks, remuneration and performance evaluation criteria;
   20) approves the procedures for organising public competitions for the positions of LRT Ethics Controller and Head of the Internal Audit Service, as well as other positions approved by the Council, and publishes them on the LRT website;
   21) approves the regulations governing the activities of the LRT Ethics Controller and the LRT Internal Audit Service;
   22) has the right to establish the LRT Content Committee, appoint its chairperson from among the members of the Council, and approve its rules of procedure;
   23) approves the terms and conditions for the procurement of LRT programme development and production services;
   24) provides recommendations to the Director General of LRT on the implementation of good governance principles and increasing the transparency and efficiency of its activities;
   25) makes decisions on bank loans, guarantees provided and the fulfilment of related LRT financial obligations;
   26) makes decisions on the performance of internal audits of LRT;
   27) takes other decisions on LRT activities that are not assigned to the competence of other LRT management bodies by this Law or the LRT Articles of Association.

3. The Council's decisions on matters within its competence are binding on other LRT bodies, LRT employees and LRT.
4. If the Director General or the Board of LRT disagrees with a resolution of the Council, the Director General or the Board of LRT may submit a reasoned request to the Council to review the resolution, except for a resolution of the Council on the resignation of the Council. The Council shall consider the request of the Director General or the Board of LRT within 10 days. If more than half of all Council members vote repeatedly for the same resolution, the Director General and the Board of LRT shall be obliged to implement the resolution.
5. The Council shall have the right to send its representatives to meetings of the LRT administration and the Board, as well as to receive from the LRT administration, the Director General of LRT, the Board, the LRT Internal Audit Service, the LRT Ethics Controller, state and municipal institutions and agencies.
6. The Council shall publish and submit to the Seimas an annual report on the activities of LRT by 30 April each year. This report shall include reports on the implementation of income and expenditure estimates. The annual report on the activities of LRT shall contain detailed data on the number of sources of funding and the amount of all income received from the provision of non-public services, as well as the expenses related to the provision of non-public services. Where LRT resources are used to provide both public and non-public services, the costs are allocated accordingly as the difference between the total costs of the institution and the total costs of providing non-public services. The Chair of the Council reports on the activities of LRT once a year at a sitting of the Seimas.

Article 13. Council Office

1. The activities of the Council shall be supported by the Council Office. The structure and working procedures of the Council Office shall be laid down in the Council's rules of procedure. The powers, functions, rights and duties of the Council Office shall be laid down in the Council Office's regulations, which shall be approved by the Council. The staff of the Council Office shall be directly subordinate and accountable to the Council. The work of the Council Office shall be organised by the Chair of the Council.
2. The main task of the Council Office is to assist the Council in performing its functions and to ensure its smooth operation.
3. In addition to the functions specified in its regulations, the Council Office shall perform the following functions in order to fulfil its assigned tasks:
   1) provide technical support for the meetings of the Council and, when instructed, the meetings of the Council's committees and working groups, and ensure the management of documents falling within the competence of the Council, the Council's committees and working groups;
   2) prepares materials and analytical information necessary for the activities of the Council and, when instructed, the Council's committees and working groups, and also submits proposals on the compliance of LRT programmes and the content of the LRT website with the requirements for the implementation of LRT good governance principles and other measures aimed at increasing the efficiency and transparency of LRT activities; the implementation of LRT good governance principles, and other actions to increase the efficiency and transparency of LRT activities;
   3) prepares draft documents falling within the competence of the Council and, when instructed, the Council's committees and working groups, assesses the compliance of draft documents with the laws of the Republic of Lithuania, other legal acts and legal technical requirements, and ensures their dissemination;
   4) coordinates and monitors the implementation of decisions, requests and other assignments of the Council and, when assigned, of the Council's committees and working groups;
   5) performs other functions specified in the Council Office regulations.
4. The salaries of the Council Office staff shall be paid from the funds of the LRT. The funds allocated for the activities of the Council Office shall be provided for in the annual income

and expenditure estimate of the LRT and shall be used only for the performance of the functions of the Council Office.

Article 14. Council meetings and adoption of resolutions

1. Council meetings shall be convened at least once a month by the Chair of the Council, and when he or she is unable to do so, by the Deputy Chair of the Council on his or her own initiative or at the request of at least one-third of all Council members.
2. Council meetings shall be considered valid when more than half of the Council members are present.
3. Council resolutions shall be adopted by a majority of more than half of all Council members, except in the cases specified in Article 17(5), Article 19(5) and Article 21(5) of this Law. If the votes are evenly divided, the chair of the Council meeting shall have the casting vote.
4. Council meetings shall be minuted, except in cases provided for by law.
5. Council meetings shall be public and broadcast live on the LRT website, except in cases where the meetings deal with issues related to information whose disclosure is prohibited or restricted by law.
6. Council resolutions shall be published on the LRT website in accordance with the procedure laid down in the LRT statutes.

Article 15. LRT Board

1. The LRT Board is a collegial body of LRT that supervises the implementation of the strategy, strategic and annual activity plans approved by the Council and submits conclusions and proposals to the Council on matters within its competence.
2. The Board shall consist of 5 independent members.
3. Board members are appointed and dismissed by the Council by a majority vote of more than half of all Council members.
4. Members of the Board shall be appointed for a term of 5 years.
5. A person of impeccable reputation who has a university degree and at least 5 years of managerial experience may be appointed as a member of the Board.
6. A person shall not be considered to be of impeccable reputation if they do not meet the requirements for impeccable reputation set out in the Civil Service Law.
7. Members of the Board must be independent. The following persons may not be members of the Board: members of the Seimas, the Government, municipal councils or the European Parliament, mayors, civil servants in positions of political (personal) trust, members of the Council, members of the Council's office, the Director General of LRT, his deputies or other LRT employees, persons related to radio and/or television programme broadcasters or other public information producers and disseminators by employment relationships, managers, participants or members of management bodies of these legal entities, auditors or employees of audit companies who participated in the audit of LRT, if less than two years have passed since the audit was performed.
8. The Board shall elect the Chair of the Board from among its members by a simple majority of all Board members for the entire term of office of the Board.
9. If the powers of the Chair of the Board are terminated prematurely, a new Chair of the Board shall be elected for the remainder of the term of office.
10. A member of the Board may not be dismissed from office before the end of his or her term of office, except in cases where he or she:
    1) fails to participate in the activities of the Board for more than 4 months without a valid reason;
    2) loses their Lithuanian citizenship;
    3) loses his or her impeccable reputation or it becomes apparent that he or she does not meet the requirements set out in paragraphs 5-7 of this article;
    4) the Supreme Commission for Professional Ethics adopts a decision on a gross violation of the Law on the Coordination of Public and Private Interests.

11. Members of the Board may be dismissed *in corpore* if the Board fails to perform the functions of the Board established by this Law or if the results of the Board's activities do not substantially comply with the objectives of the strategic and annual activity plans approved by the Council, and if more than half of all members of the Council vote in favour of such a decision.
12. The Council's decisions on the dismissal of Board members must be justified and may be appealed in court. The Board member(s) shall be informed of the intended dismissal no later than 30 calendar days in advance.
13. The powers of a member of the Board shall terminate when:
    1) he resigns;
    2) his term of office expires;
    3) he or she dies;
    4) a decision is taken to dismiss him in accordance with paragraph 10 or 11 of this article.
14. If individual members of the Board are dismissed or resign, new members of the Board shall be appointed for a new term of office of the Board.

Article 16. Functions of the LRT Board

In performing its tasks, the Board shall carry out the following functions:

1) prepare or consider draft amendments to the LRT Articles of Association submitted by the Director General of LRT and submit them to the Council for approval;
2) discusses the draft annual report on the activities of LRT prepared by the Director General of LRT and, together with its conclusions, submits it to the Council for approval;
3) considers the draft LRT strategic plan and annual activity plans prepared by the Director General of LRT and submits them to the Council for approval, together with its conclusions;
4) evaluates and submits to the Director General of LRT its conclusions on the implementation of the strategic activity plan and annual activity plans of LRT;
5) prepares the annual report on the activities of the Board and submits it to the Council for approval;
6) considers the draft procedure for the dissemination of cultural, social and educational information by LRT prepared by the Director General of LRT and, together with its conclusions, submits it to the Council for approval;
7) considers the draft annual income and expenditure estimates of LRT prepared by the Director General of LRT and the reports on their implementation, and submits its conclusions to the Council;
8) evaluates the information submitted by the Director General of LRT on the financial situation of LRT, the results of its economic activities, asset accounting and other data related to asset management;
9) makes decisions on the conclusion of LRT contracts when the value of the transaction exceeds EUR 50,000;
10) approves the results of competitions for the preparation of LRT programmes upon the recommendation of the Director General;
11) considers the draft terms and conditions of the public tender for the audit of LRT financial statements prepared by the Director General of LRT and, together with its conclusion, submits it to the Council for approval;
12) assesses the risks of LRT's activities and submits proposals to the Council on measures to strengthen LRT's internal control and risk management;
13) supervises the activities of the Director General of LRT, submits conclusions on the activities of the Director General of LRT to the Council and proposals for their improvement;
14) submits proposals to the Director General of LRT to amend his decisions that are contrary to legislation, the statutes of LRT, or the resolutions of the Council or the Board, and if he fails to take the proposal into account, applies to the Council for the annulment of the decision of the Director General of LRT.

15) approves the number of positions for LRT creative staff working under fixed-term employment contracts, as well as staff recruited through a competition;
16) prepares and submits drafts of the LRT structure or changes thereto to the Council for approval;
17) prepares and submits to the Council for approval draft terms and conditions for the procurement of LRT programme development and production services;
18) approves the list of information considered to be LRT commercial (production) secrets and confidential information;
19) approves the description of the procedure for organising a public competition for the position of LRT Director General and publishes it on the LRT website;
20) at the request of the Council, provides conclusions and proposals on other issues whose resolution falls within the competence of the Council;
21) provides the Council with documents, data and other information at its disposal relating to the activities of LRT, as requested by the Council;
22) supervises and evaluates how the Director General of LRT implements the objectives and tasks of LRT as set out in the laws, the resolutions of the Council and the Board, the strategy and activity plans of LRT;
23) implements the Council's decisions and carries out other tasks assigned to it by the Council;
24) performs other functions provided for in laws and the LRT statutes.

Article 17. Director General of LRT

1. LRT shall be managed and represented by the Director General of LRT. The Director General of LRT shall be responsible for the activities of LRT, the programmes prepared and broadcast by LRT, as well as for the implementation of the resolutions of the Council and the Board.
2. The Director General of LRT shall be elected, appointed and dismissed by the Council for a term of 5 years through a public competition. If the required number of votes is not obtained, a new competition shall be organised. Only a citizen of the Republic of Lithuania of impeccable reputation who has obtained a university degree or equivalent, holds a master's degree or equivalent higher education qualification and has 5 years of managerial work experience may be appointed as Director General of LRT. A person shall not be considered to be of impeccable reputation if they do not meet the requirements for impeccable reputation established in the Law on Civil Service of the Republic of Lithuania for heads of institutions or persons aspiring to become heads of institutions. A person may hold the position of Director General of LRT for no more than two consecutive terms.
3. Only a citizen of the Republic of Lithuania of impeccable reputation may be appointed as Deputy Director General of LRT, who has obtained a university degree or equivalent, has a master's degree or equivalent higher education qualification and 5 years of managerial work experience. A person shall not be considered to be of impeccable reputation if he or she does not meet the requirements of impeccable reputation established for civil servants in the Civil Service Law. Deputy Directors General of LRT shall be appointed for the term of office of the Director General of LRT.
4. If a person elected as Director General of LRT is a member of a political organisation, they must suspend their membership in that organisation for the duration of their term as Director General of LRT. Furthermore, members of the Seimas, the Government, the Lithuanian Radio and Television Commission, and civil servants in positions of political (personal) trust may not be elected as Director General of LRT. A person who has an employment relationship with radio and television broadcasters, as well as a manager and participant of radio and/or television broadcasters, information society media (legal entities), a member of their management bodies, a member of the LRT Board, a member of the Council and an employee of the Council Office must immediately resign from their current positions if they are appointed as Director General of LRT. Auditors or employees of audit companies who are involved and/or have been involved in auditing LRT within the last two years may not be elected as Director General of LRT. The Director General of LRT

may not work in business, commercial or other institutions, companies or organisations, and may not receive any remuneration other than the salary established for their current position, as well as remuneration for scientific and pedagogical work and royalties for creative work.

5. The Director General of LRT may be dismissed from office before the end of his term of office if he fails to perform the functions of Director General of LRT as provided for in Article 18 of this Law, or due to a violation of the public interest, if the Council bases its vote of no confidence on a gross violation of duties or a violation of the requirements of impeccable reputation, and if at least two-thirds of all Council members vote in favour of such a vote of no confidence.
6. The Director General of LRT may resign before the end of his term of office. Upon the resignation of the Director General of LRT, the Deputy Directors General of LRT shall also be dismissed from their positions.
7. Upon the resignation of the Council *in corpore*, the Director General of LRT and the Deputy Directors General of LRT shall be dismissed from their positions. Upon the resignation of the Council or the Director General of LRT, or upon the expiry of the term of office of the Director General of LRT, or upon his death or loss of Lithuanian citizenship, the Council shall assign the Director General of LRT or another person to perform the duties of the Director General of LRT until a new Director General of LRT is appointed.
8. The powers of the Director General of LRT shall terminate when:
   1) he is dismissed from office upon expiry of his term of office;
   2) he dies;
   3) he loses his Lithuanian citizenship;
   4) he is dismissed from office upon his resignation;
   5) he is dismissed from office due to a vote of no confidence.

Article 18. Functions, rights and accountability of the Director General of LRT

1. The Director General of LRT shall perform the following functions in implementing the tasks set for LRT:
   1) manages the activities of LRT, represents LRT in the Republic of Lithuania, foreign countries and international organisations, concludes contracts on behalf of LRT, issues orders and controls their implementation;
   2) at the initiative of the Council, prepares and submits draft amendments to the LRT statutes or amendments thereto to the Board for consideration;
   3) prepares a draft annual report on LRT's activities and submits it to the Board for consideration;
   4) prepares drafts of the LRT strategic plan and annual activity plans and submits them to the Board for consideration;
   5) organises the implementation of the resolutions of the Council and the Board;
   6) implements LRT's goals, objectives and the strategy for LRT programmes and the LRT website established by the Council;
   7) ensures compliance with the editorial, privacy, sustainability and other requirements set for LRT programmes;
   8) prepares and submits to the Board for consideration a draft description of the procedure for the dissemination of cultural, social and educational information by LRT;
   9) at the request of the Council and/or the Board, informs the Council and/or the Board about the implementation of the objectives and tasks of LRT as set out in the laws, and the implementation of the resolutions of the Council and the Board;
   10) prepares and submits to the Board for consideration draft estimates of LRT's annual income and expenditure and reports on their implementation;
   11) submits the results of competitions for the preparation of LRT programmes to the Board for approval;
   12) implements the Council's recommendations on the implementation of good governance principles and increasing the transparency and efficiency of activities;

13) prepares and submits to the Council for approval draft regulations on the activities of the LRT Ethics Controller and the LRT Internal Audit Service, and familiarises the Board with them;
14) prepares draft terms and conditions for a public tender for the audit of LRT financial statements and submits them to the Board for consideration;
15) ensures the creation and proper functioning of the LRT internal control system in accordance with the provisions of the Law on Internal Control and Internal Audit of the Republic of Lithuania;
16) decides on other issues assigned to the competence of the Director General of LRT in this Law and the Articles of Association of LRT.

2. The Director General of LRT shall have the right to participate in meetings of the Council, the Board and committees without the right to vote.

Article 19. LRT Ethics Controller

1. The LRT Ethics Controller, guided by the principles of legality, impartiality, fairness, independence and transparency, supervises how LRT journalists comply with the basic rules and principles of professional ethics set out in the LRT Journalists' Code of Ethics, promotes compliance with professional ethics, and, within the scope of his or her competence, examines and prepares responses to complaints from individuals regarding violations of journalistic ethics rules.
2. The LRT Ethics Controller is elected, appointed and dismissed by the Council for a five-year term through a public competition. A person may serve as LRT Ethics Controller for no more than two consecutive terms.
3. Only a citizen of the Republic of Lithuania with an impeccable reputation, holding a master's degree in humanities or social sciences or an equivalent higher education qualification and at least 5 years of work experience in the acquired profession may be appointed as an LRT ethics controller. A person shall not be considered to be of impeccable reputation if he or she does not meet the requirements for impeccable reputation set for civil servants in the Civil Service Law.
4. If a person appointed as the LRT Ethics Controller is a member of a political organisation, they shall suspend their membership in that organisation for the duration of their term as LRT Ethics Controller. Members of the Seimas, the Government, the European Parliament, the Lithuanian Radio and Television Commission, the mayor, the Inspector of Journalist Ethics, members of the Public Information Ethics Commission, civil servants of political (personal) trust, members of municipal councils, the Director General of LRT, his deputy or other LRT employees, as well as persons related to radio and/or television programme broadcasters by employment relationships, as well as radio and/or television programme broadcasters, managers and/or participants of information society media (legal entities), members of management bodies, members of the LRT Board, members of the Council, employees of the Council's Office, auditors or employees of audit companies participating and/or having participated in the audit of LRT, which was performed less than two years ago.
5. The LRT Ethics Controller may be dismissed from office before the end of his term of office due to a vote of no confidence by the Council, if at least two-thirds of all Council members vote in favour of this.
6. The LRT Ethics Controller may not be dismissed before the end of his term of office, except in the following cases:
    1) he loses his Lithuanian citizenship;
    2) he or she fails to meet the requirements of impeccable reputation or it becomes apparent that he or she does not meet the requirements set out in paragraph 4 of this article.
7. The powers of the LRT Ethics Controller shall terminate when:
    1) he resigns;
    2) he is dismissed from office at the end of his term of office;
    3) he dies;

4) he is dismissed on the grounds specified in paragraph 6 of this article.

8. The LRT Ethics Controller shall be paid from LRT funds. The funds allocated to the LRT Ethics Controller shall be provided for in the LRT annual income and expenditure estimate and shall be used to perform the functions of the LRT Ethics Controller as provided for in this Law.

Article 20. Functions, rights and accountability of the LRT Ethics Controller

1. The LRT Ethics Controller shall:
   1) supervise how LRT journalists comply with the basic rules and principles of professional ethics set out in the LRT Journalists' Code of Ethics;
   2) examine and prepare responses to complaints from individuals regarding the content of LRT radio and/or television programmes;
   3) examine requests from the Council, the Board, the Director General of LRT, the LRT administration or employees and provides conclusions on the activities of LRT journalists and possible violations of the professional ethics provisions set out in the LRT Journalists' Code of Ethics;
   4) examine, on its own initiative, cases of possible violations of professional ethics by LRT journalists;
   5) evaluate the activities of LRT journalists in accordance with the LRT Journalists' Code of Ethics, taking into account the actual content of their activities, which includes information published in LRT programmes and the media;
   6) provide answers to questions submitted by the Director General of LRT, the Board or the Council regarding the professional ethics of LRT journalists;
   7) submit proposals for amendments to the LRT Journalists' Code of Ethics;
   8) submit an annual report on its activities to the Council;
   9) organise professional ethics training for LRT employees.
2. The LRT Ethics Controller shall have the right to receive the resolutions, meeting materials and minutes of the LRT Board and Council, orders of the LRT Director General and other documents and information necessary for the performance of his functions, and may participate, without voting rights, in meetings of the LRT Board, Council and other meetings where issues related to the activities of the LRT Ethics Controller are discussed.
3. The functions, rights and duties of the LRT Ethics Controller and the procedure for organising his work shall be laid down in the LRT Ethics Controller's Rules of Procedure, which shall be approved by the Council.
4. The decisions of the LRT Ethics Controller regarding professional ethics or other violations shall be published on the LRT website.

Article 21. Head of the LRT Internal Audit Service

1. The Head of the LRT Internal Audit Service shall be guided in his activities by the Law on Internal Control and Internal Audit of the Republic of Lithuania, other legal acts regulating internal audit, unless otherwise provided for in this Law, as well as the LRT Statutes and the Regulations of the LRT Internal Audit Service. The Head of the LRT Internal Audit Service is directly subordinate and accountable to the Council.
2. The head of the LRT Internal Audit Service is appointed and dismissed by the Council. The head of the LRT Internal Audit Service is elected by public competition for a term of 5 years. A person may hold the position of head of the LRT Internal Audit Service for no more than two consecutive terms.
3. Candidates for the position of head of the LRT Internal Audit Service, as well as persons appointed to this position, shall be subject to the same requirements as those applicable to the head of the Internal Audit Service under the Law on Internal Control and Internal Audit, unless otherwise provided for in this Law. The Council may establish additional requirements applicable to the head of the LRT Internal Audit Service, which shall be published in the terms and conditions of the public competition.
4. The head of the LRT internal audit service shall perform the functions assigned to the head of the internal audit service under the Internal Control and Internal Audit Act, unless

otherwise provided for in this Act. The competence, rights and duties of the head of the LRT internal audit service and the procedure for organising their work shall be established in the LRT statutes and the regulations of the LRT internal audit service, which shall be approved by the Council.

5. The head of the LRT internal audit service may be dismissed from office before the end of his term of office due to a vote of no confidence by the Council, if at least two-thirds of all Council members vote in favour of such dismissal.
6. The head of the LRT Internal Audit Service may not be dismissed before the end of his term of office, except in the following cases:
    1) he loses his Lithuanian citizenship;
    2) he loses his impeccable reputation or it becomes apparent that he does not meet the requirements set out in paragraph 3 of this article.
7. The powers of the head of the LRT Internal Audit Service shall terminate when:
    1) he is dismissed from office at the end of his term of office;
    2) he resigns;
    3) he dies;
    4) he is dismissed on the grounds specified in paragraph 6 of this article.
8. The remuneration of the head of the LRT Internal Audit Service shall be paid from LRT funds. The funds allocated for the activities of the LRT Internal Audit Service shall be provided for in the LRT annual income and expenditure estimate and shall be used only for the performance of the functions of the LRT Internal Audit Service as provided for by law.

Article 22. LRT employees

1. LRT employees, except those specified in paragraph 2 of this Article, paragraph 2 of Article 19 and paragraph 2 of Article 21, shall be appointed and dismissed by the Director General of LRT. Persons shall be selected for LRT employee positions through a public competition or internal selection process. The procedure for organising and conducting public competitions and internal selection processes shall be established by the Director General of LRT.
2. Employees of the LRT Internal Audit Service and the Council Office shall be appointed and dismissed by the Council. Persons shall be appointed to the positions of employees of the LRT Internal Audit Service and the Council Office by public competition or internal selection. The procedure for organising and conducting public competitions and internal selection shall be established by the Council.

CHAPTER III
LRT PROPERTY, FINANCIAL AND ECONOMIC ACTIVITIES

Article 23. Principles of management, use and disposal of LRT assets

1. Long-term tangible assets owned by the state and necessary for the activities of LRT shall be transferred to LRT under a trust agreement in accordance with the procedure established by the Government. The decision on the transfer of assets under a trust agreement shall be taken by the Government. Unless otherwise provided in this Law, LRT shall manage, use and dispose of the property transferred by the state under a trust agreement in accordance with the Law on the Management, Use and Disposal of State and Municipal Property of the Republic of Lithuania.
2. In addition to the property specified in paragraph 1 of this article, LRT shall also manage, use and dispose of property owned by it. The property managed, used and disposed of by LRT on the basis of ownership rights shall be:
    1) state-invested property;
    2) income received from LRT's commercial and economic activities;
    3) funds and other property received as support in accordance with the Law on Charity and Support of the Republic of Lithuania;
    4) other monetary funds, except for state budget funds;

5) assets acquired from state budget funds and from the funds specified in points 2, 3 and 4 of this section, except for immovable property acquired with European Union support, state budget funds and state funds;
6) donated property;
7) inherited property;
8) property rights arising from the results of intellectual activity;
9) income, property or other benefits received from the management, use and disposal of the funds or other property referred to in points 1 to 8 of this part, except in the cases specified in this Law.

3. LRT shall manage, use and dispose of the property referred to in paragraph 2 of this article in accordance with the procedure established by the Council and by concluding only such civil transactions that do not contradict the founding documents and objectives of LRT. LRT buildings and land may not be sold, transferred or mortgaged.
4. LRT may sell, transfer or write off long-term assets, except for LRT buildings and land, with a residual value of not less than EUR 50,000 per item, only with the permission of the Government.
5. LRT may sell, transfer or write off fixed assets, except for LRT buildings and land, with a residual value of less than EUR 50,000 per item, with the permission of the Council.
6. LRT may sell, transfer or write off fully depreciated fixed assets and current assets by order of the Director General of LRT.
7. LRT assets may not be used to secure the obligations of third parties.

Article 24. Financial and economic activities of LRT

1. LRT shall be financed from state budget appropriations, income received from the sale of programmes, sponsorship announcements, publishing, as well as from support and income received from commercial and economic activities.
2. LRT independently carries out commercial, economic and publishing activities in accordance with the procedure established by this Law.
3. The funds allocated to LRT in the state budget of the Republic of Lithuania shall be indicated in a separate line. The funds allocated from the state budget for the broadcasting of LRT programmes and the operation of the LRT website shall be indicated in a separate programme.
4. LRT shall not be subject to bankruptcy proceedings.
5. The amount of funds allocated to LRT from the state budget each year shall be 0.75 per cent of the state budget and municipal budget revenue from personal income tax and 0.8 per cent of excise duty revenue actually received in the previous year. The amount of appropriations allocated to LRT shall not be less than the average of the state budget appropriations allocated to LRT over the last three financial years.
6. In 2028, the state budget appropriations allocated to LRT shall be equal to the state budget appropriations allocated to LRT in 2027.

Article 25. Reorganisation and liquidation of LRT

LRT shall be reorganised or liquidated in accordance with the laws of the Republic of Lithuania.

Article 14. Entry into force, implementation and application of the Law

1. Paragraphs 1, 2 and 4 of Article 5, Article 8, Article 9(2) and Articles 10 and 12 of this Law shall enter into force on 1 January 2027.
2. Article 13 of this Law shall enter into force on 1 January 2028.
3. The members of the Board of Lithuanian National Radio and Television (hereinafter referred to as LRT) shall be appointed by 1 July 2027 in accordance with the procedure laid down in Article 15 of the Law of the Republic of Lithuania on Lithuanian National Radio and Television, as amended by Article 13 of this Law, and their employment contracts shall enter into force on 1 January 2028.
4. The members of the LRT Council appointed by the Lithuanian Union of Community Organisations, the Tripartite Council of the Republic of Lithuania and the Lithuanian

Organisations of Persons with Disabilities must be appointed by 31 December 2026 and shall take up their duties on the LRT Council on 1 January 2027.

5. The term of office of the person appointed to the position of Director General of LRT before 1 January 2028 shall be considered the first term of office.
6. The LRT Council shall adopt the legal acts necessary to implement the provisions of Article 12(1) of the Law on Lithuanian National Radio and Television set out in Article 8 of this Law by 31 December 2026, and the provisions of Article 13 of this Law, as amended, by 31 December 2027.[1] of the Law on Lithuanian National Radio and Television, and by 31 December 2027, the implementing legislation for the Law on Lithuanian National Radio and Television, as amended by Article 13 of this Law.

I hereby promulgate this law adopted by the Seimas of the Republic of Lithuania.

President of the Republic

II. Explanatory Note to Draft Law No. XVP-1427(2) amending the Law on the Lithuanian National Radio and Television

EXPLANATORY NOTE

REPUBLIC OF LITHUANIA LITHUANIAN NATIONAL RADIO AND TELEVISION LAW NO. I-1571 EXPLANATORY NOTE TO THE DRAFT LAW AMENDING THE LAW

1. Reasons for preparing the draft law, objectives and tasks of the draft:

The draft law amending Law No. I-1571 of the Republic of Lithuania on Lithuanian National Radio and Television (hereinafter referred to as the Draft) aims to fundamentally update and systematically review the legal regulation of Lithuanian National Radio and Television (hereinafter referred to as LRT), ensuring its clarity, consistency and compliance with modern public management and European Union legal standards.

The preparation of the Draft was prompted by both international and national factors. The European Media Freedom Act, adopted in 2024, set out mandatory requirements for Member States regarding the independence of public broadcasters, transparency of management, protection of editorial autonomy and protection from political and economic pressure. This regulation requires a clear system of responsibility, a transparent governance structure and effective accountability mechanisms.

On 31 October 2025 The State Audit Office published a report on the state audit of LRT (hereinafter referred to as the report), which stated that it was necessary to strengthen the control of LRT's activities and finances and to improve the legal regulation, prompting a fundamental review of the legal regulation of LRT and the preparation of the Draft. The report recommended reviewing the provisions of the law, clearly defining LRT's activity planning documents, the responsibilities of entities for their preparation and approval, determining who approves LRT's strategic activity plan, and ensuring a clear link between activity planning, financing and performance evaluation. It also recommends a systematic review of the provisions of the laws governing strategic management and LRT activities in order to clearly define responsibilities for activity planning, performance monitoring and their link to finances.

In view of this, the Draft aims to fundamentally update the LRT management model: a Board of Directors is to be established, the competences of the Council, the Board of Directors and the Director General are to be more clearly defined, and the Draft also strengthens the powers of the Council to exercise real supervision of activities, including the approval of the LRT structure, and ensures clear responsibility of the Director General for the creation and proper

functioning of an internal control system that complies with the provisions of the Law on Internal Control and Internal Audit of the Republic of Lithuania. In order to strengthen the institutional independence and administrative capacity of the Council , it is proposed to establish a Council office, the funding for which would be provided for in the LRT annual income and expenditure estimate, similar to the current funding of the Internal Audit Service.

The draft also aims to increase the national broadcaster's independence from political influence, its openness and accountability to the public, to create opportunities for experts in the fields of management and administration, science, media or culture, to improve self-regulation mechanisms and to regulate more clearly the activities of the LRT portal and the conditions for the use of other media on LRT channels. Taking into account changes in the public information market and technological developments, it is proposed that, without a decision by the Council, the channels and website used by LRT should not be used for the commercial promotion of other media outlets or their representatives.

The draft also improves the regulation of commercial communications broadcasting. It is proposed to abandon paid commercial communications, leaving the possibility to disseminate advertising, sponsorship, cultural, social and educational information free of charge, thus strengthening the non-commercial nature of the public broadcaster and implementing the State Audit Office's recommendation to devote a larger share of airtime to social issues.

The draft aims to create a clearer, more transparent and more effective model for the management and control of LRT, ensuring the proper use of public funds, stronger monitoring of results and higher standards for the activities of the public broadcaster.

2. **Initiators (institution, individuals or representatives authorised by citizens) and drafters of the bill:**

A group of members of the Seimas who signed the draft.

3. **How the legal relationships discussed in the draft law are currently regulated:**

The highest governing body of LRT is the Council, which currently consists of 12 members, 8 of whom are directly appointed by politicians. There are no specific qualification requirements for members of the LRT Council.

Currently, the LRT statutes are approved by the Council on the recommendation of the Director General. It is proposed that the approval of the LRT statutes be entrusted exclusively to the Council. The Council is empowered not only to approve, accept or reject, but also to consider all documents submitted by the Director General of LRT, as well as to supplement their list with essential documents for the operation of LRT.

Under the current legal framework, paid commercial communications are permitted in accordance with the procedure and conditions established by the Council. It is proposed to abandon them, leaving the possibility to broadcast advertising and commercial audiovisual messages or broadcast sponsorship messages free of charge, as well as to disseminate cultural, social and educational information only free of charge.

Currently, the Director General of LRT may be dismissed from office before the end of his term of office on grounds of no confidence only if the Council bases its no confidence on the public interest and if at least two-thirds of all Council members vote in favour of such no confidence.

4. **New legal provisions are being proposed, and positive results are expected.**

The draft proposes the following fundamental changes:

1) The draft law clearly defines the mission of LRT. The definition of the mission sets out the purpose of LRT as a public broadcaster – to serve the public interest, ensure the dissemination of objective, reliable and diverse information, foster democratic values, culture, language and national identity, and promote public education and critical thinking. A clear mission statement provides a basis for evaluating LRT's performance, planning strategic goals and ensuring that they meet the needs of society.

2) The draft proposes the establishment of a collegial management body – the Board. It shall be composed of five persons appointed for a term of five years. Board members shall be appointed and dismissed by the Council by a majority vote of more than half of all Council members. Only persons of impeccable reputation may be appointed as members of the Board. The criteria for determining when a person cannot be considered to be of impeccable reputation are defined in the Law on Civil Service of the Republic of Lithuania. Only persons who have obtained a university degree and have at least 5 years of managerial experience may be appointed as members of the Board.

3) The draft proposes the establishment of an LRT Council office. The Council office will provide the organisational and expert conditions for the Council to operate independently, professionally and systematically. The Office will provide ongoing analytical, legal and administrative support to the Council, enabling it to prepare targeted decisions, evaluate strategic documents, monitor performance indicators and the use of financial resources. This will strengthen the Council's ability to carry out real, rather than formal, supervision of activities and increase the soundness of decisions.

4) The draft proposes to increase the number of Council members to 15, which would make it possible to involve more public organisations in the activities of the LRT Council, such as the Lithuanian Union of Community Organisations, the Tripartite Council and representatives of Lithuanian organisations for persons with disabilities.

5) The draft proposes to regulate more clearly the responsibilities and conditions for dismissal of the Director General of Lithuanian National Radio and Television. It is established that the Director General of LRT may be dismissed before the end of his term of office if he or she fails to perform the functions set out in this law or violates the public interest, when the Council bases its vote of no confidence on a gross violation of duties or loss of impeccable reputation.

6) The draft (Article 6(12)) aims to strengthen the protection of the editorial independence and impartiality of the national broadcaster by establishing a broader understanding of conflicts of interest in line with international public broadcasting practice. This provision was drafted on the basis of the BBC Editorial Guidelines and the principles of editorial independence and conflict of interest management applied by other European national broadcasters, according to which conflicts of interest are not understood in a formal or narrow sense, but also assessed in terms of their potential impact on editorial independence and public trust. This provision aims to clearly establish that persons with connections to other media outlets may participate in LRT content, but must do so in accordance with the editorial policy conditions approved by the LRT Council and by declaring conflicts of interest. This enables the LRT Council to apply consistent, transparent and internationally compliant conflict of interest management practices without restricting freedom of expression and legitimate participation in public debate.

The adoption of the Draft will strengthen the transparency of LRT management, clarify responsibilities for strategic planning and performance, and ensure a more effective mechanism for controlling the use of public funds. A clear mission statement will provide a

basis for a targeted assessment of LRT's compliance with public objectives and democratic standards.

The project will create the conditions for strengthening the independence of the public broadcaster, while ensuring a higher level of accountability and operational efficiency. It is expected that the updated legal regulation will increase public confidence in LRT, strengthen its role as an institution representing the public interest, and ensure compliance with European Union law requirements.

5. **Results of the assessment of the impact of the proposed legal regulation, possible negative consequences of the adopted law and measures that should be taken to avoid such consequences.**

No negative consequences are expected from the adoption of the draft law.

6. **Possible impact of the adopted law on the crime situation and corruption.**

The draft law will have no impact on the crime situation and corruption.

7. **Possible impact of the adopted law on business conditions and development.**

The implementation of the draft law will have no impact on business conditions and development.

8. **Does the draft law contradict strategic planning documents?**

The draft law does not contradict strategic planning documents.

9. **Incorporation of the law into the legal system, what legal acts need to be adopted, what existing legal acts need to be amended or repealed.**

If the draft law is approved, there will be no need to adopt new laws, amend existing ones or repeal them.

10. **Compliance of the draft law with the requirements of the Law on the State Language of the Republic of Lithuania and the Law on the Fundamentals of Law-Making, assessment of the concepts and terms used in the draft law in accordance with the procedure established by the Law on the Terminology Bank and its implementing legislation.**

The draft law has been prepared in accordance with the requirements of the Law on the State Language of the Republic of Lithuania and the Law on the Fundamentals of Legislation of the Republic of Lithuania.

11. **Compliance of the draft law with the provisions of the Convention for the Protection of Human Rights and Fundamental Freedoms and European Union documents.**

The provisions of the draft law do not conflict with the provisions of the Convention for the Protection of Human Rights and Fundamental Freedoms. The draft law does not conflict with European Union legislation.

12. **Authorities and deadlines for adopting implementing legislation.**

If the draft law is approved, there will be no need to prepare implementing legislation.

13. Funding requirements from the state and municipal budgets and other state-established funds for the implementation of the law, savings.

No state funds will be required to implement the law. The functions of the board and council office will be ensured from the state's annual appropriations, on the basis of which the LRT budget is formed. The principles of LRT budget formation are not changed by the proposed law.

14. Expert assessments and conclusions received during the preparation of the draft law

No expert assessments and conclusions were received during the preparation of the draft law.

15. Key words to be included in the computer search system for the draft law, including terms, topics and areas from the European thesaurus Eurovoc.

Key words in the draft law: national broadcaster, Lithuanian Radio and Television, Board.

16. Other justifications and explanations deemed necessary by the initiators.

III. Conclusion of the Seimas' Legal Department on the Draft Law No. XVP-1427(2) amending the Law on the Lithuanian National Radio and Television

CHAMBER OF THE SEIMAS OF THE REPUBLIC OF LITHUANIA
LEGAL DEPARTMENT

CONCLUSION
ON THE DRAFT LAW AMENDING THE LAW ON NATIONAL RADIO AND TELEVISION OF THE REPUBLIC OF LITHUANIA NO. I-1571
DRAFT LAW

2026-03-05 No. XVP-1247(2)

Vilnius

Having assessed the draft's compliance with the Constitution, laws, legislative principles and legal technical rules, we offer the following comments.

1. Article 1 of the draft law amends Article 2^1 of the Law on National Radio and Television of the Republic of Lithuania (hereinafter referred to as the amended law), which defines the mission of LRT: "The mission of LRT is to ensure the public's right to reliable, objective and diverse information, a diversity of opinions, to create conditions for free public discussion and to contribute to the preservation and development of the Lithuanian language and national culture by making content available in all regions and to various population groups. This mission is implemented independently and impartially, without political or other external influence on content and editorial decisions. This provision should be considered in several respects.

Firstly, it should be noted that the proposed definition of LRT's mission partly repeats the principles of LRT's activities enshrined in Article 3 of the amended law: impartiality, objectivity, political neutrality and independence. Therefore, the relationship between the provisions of Article $2^{(1)}$ of the amended law, supplemented by Article 1 of the draft, and Article 3 of the amended law is unclear. The main difference between the mission and the operating principles

is that the mission defines the strategic directions and objectives of an institution or organisation, while the principles indicate values and modes of behaviour. In view of this, it should be considered whether the mission, defined as "to create conditions for free public discussion and to contribute to the preservation and development of the Lithuanian language and national culture by making content accessible in all regions and to various population groups", is not too narrowly defined, as such wording does not cover all elements of the rule of law and the pursuit of an open, just and harmonious civil society.

Secondly, it should be noted that the mission of LRT is broadly developed in the doctrine of the Constitutional Court (e.g. the Constitutional Court's ruling of 21 December 2006). It is important to note that the mission of LRT as a national public broadcaster is constitutional, i.e. to ensure the public interest – the public interest enshrined in the Constitution, which it defends and protects, to be informed. The mission and functions of a public broadcaster stem from various norms and principles of the Constitution and the values enshrined therein. This implies that a national public broadcaster must be established – it must provide relevant public services in such a way that they cover the whole of society and help to ensure national interests, are aimed at educating civil society and fostering culture (Constitutional Court ruling of 21 December 2006). A public broadcaster, in carrying out its constitutional mission, has important functions in contributing to the sovereignty of the nation, the implementation of democratic principles, as well as the security of society and the state, public order, the welfare of citizens, and the protection of their rights and freedoms. Public broadcasters also play an important role in the state's constitutional duty to support culture and science and to care for the protection of Lithuanian history, art and other cultural monuments and values. The Constitutional Court's ruling of 16 May 2019 states that the mission of the national public broadcaster is to disseminate information to the public at the national level, promoting constitutional and common human values, inter alia by defending national interests, strengthening democracy, fostering citizenship, respect for the law, openness and tolerance in society, promoting language and culture, and preventing disinformation; the activities of the national public broadcaster in implementing this mission must be based on, *inter alia*, the principles of pluralistic democracy, objectivity, impartiality, respect for human dignity and human rights, *inter alia* freedom of belief and expression, morality and ethics. In view of this, it is recommended to clarify and supplement the definition of the LRT's mission by specifying the requirements for the activities of a public broadcaster arising from the Constitution.

Thirdly, the aforementioned wording should also be clarified by inserting the word "Lithuanian" before the word "regions". Furthermore, the content of the abstractly worded provision "various population groups" is unclear, i.e. it is unclear which population groups are meant. Taking into account the requirement formulated in the doctrine of the Constitutional Court that the public services provided by a public broadcaster must cover the whole of society, it should be considered whether it is appropriate to specify separate "various" population groups in the definition of the mission.

A similar comment applies to the content of Article 3 of the new version of the Law on Lithuanian National Radio and Television (hereinafter referred to as the new version of the law) set out in Article 13 of the draft and its relationship with Article 4 of the new version of the law.

2. It is proposed to supplement Article 3 of the Law, as amended by Article 2 of the draft, with a new paragraph 1, stipulating that LRT, in implementing the mission defined in this Law, shall operate on a non-commercial basis as a public service broadcaster, and that the scope and nature of LRT's activities must be proportionate to this mission, without violating the principles of fair competition. The proposed provision is debatable in several respects.

Firstly, the phrase "operates on a non-commercial basis" can be understood and interpreted to mean that LRT does not follow the general commercial principles applied in the media

market (including in the areas of programme production, acquisition or distribution) in its activities. Therefore, it might be more appropriate to use the provision used in the doctrine of the Constitutional Court, namely that LRT programmes should not be oriented towards commercial success, i.e. LRT should not seek commercial gain in its activities, but to inform and educate the public and instil in it the civic and cultural values dictated to a public broadcaster by its constitutional mission.

Secondly, it is unclear why the law proposes to stipulate that the scope and nature of LRT's activities must be "proportionate" to this mission. It should be noted that all of LRT's activities, all of its programmes, and its website are dedicated to the provision of public services and the fulfilment of the constitutional mission entrusted to LRT. LRT does not carry out any other activities that are not related to its established goal, which is enshrined in the Constitution, namely to defend and protect the public interest in being informed. In view of this, it is considered that the scope and nature of LRT's activities should not be disproportionate, but should correspond to LRT's constitutional mission, i.e. the scope and nature of LRT's activities must be necessary and sufficient to achieve the tasks assigned to LRT.

It is also recommended that the word "national" be inserted before the words "public broadcaster" in Article 3(1) of the amended law.

A similar comment applies to Article 4(1) of the new version of the law.

3. Article 3 of the draft law amending Article 5(12) of the law proposes that no other media outlets be allowed to operate on the channels used by LRT or on the LRT website without the permission of the Council. This provision is vague and does not comply with the principles of legal clarity and proportionality, as it is unclear what kind of prohibition (use of technical infrastructure, right to disseminate information or content of the information disseminated) is meant in general. It is unclear whether, for example, it is prohibited to have an account on the LRT website or whether it is prohibited to disseminate certain content even when LRT cooperates with another public information provider. Furthermore, from a technological point of view, frequencies are often used to transmit television or radio programmes, so it would be more accurate to say that the channels used by LRT cannot be used to disseminate radio and television programmes of other broadcasters and/or retransmitters. However, it should be noted that Article 5(5) of the amended law already stipulates that only radio and television programmes produced by LRT may be broadcast via the terrestrial digital television network and that this network may not be used for other commercial activities or for retransmitting other radio and television programmes. In view of the above, the amended law should abandon such an undefined prohibition and establish clear criteria on the basis of which the Council would determine the procedure for broadcasting radio and television programmes or other content created by other broadcasters and/or retransmitters on channels used by the national public broadcaster (not on the terrestrial digital network) and on the LRT website.

It should also be emphasised that the term "media" used in this amended article of the law is neither defined nor used in this law, in the Law on Public Information of the Republic of Lithuania, or in other legal acts. In view of this and in order to harmonise the terms used in the laws, it is recommended that the term "media" be clarified by harmonising it with the terms defined in the Law on Public Information.

A similar comment applies to Article 6(12) of the new version of the law.

4. The amendments to Article 6 of the law, as amended by Article 4 of the draft, propose to establish that advertising, political advertising and commercial audiovisual messages or other similar types of public information, cultural, social and educational information may only be disseminated free of charge, should be assessed in the following respects.

Firstly, it is necessary to mention the doctrine developed by the Constitutional Court, according to which the status of a national public broadcaster and its constitutional mission do not mean that its activities cannot be profitable (if the radio and television market provides such opportunities). Nor does it mean that these activities can be loss-making, especially since they are usually financed by taxpayers' money (Constitutional Court ruling of 21 December 2006). Without questioning the feasibility and legitimacy of the proposed regulation, it should be assessed whether only non-remunerated commissioned advertising, cultural, social and educational information, thereby limiting LRT's ability to generate additional revenue, which in turn would be used to better fulfil the mission entrusted to LRT and the tasks set for it, would be appropriate. It should be noted that the State Audit Office, whose 31 October 2025 state audit report on LRT, which, as indicated in the explanatory memorandum to the draft, forms the basis for the legal regulation proposed in the draft, recommended not to completely abandon the dissemination of paid information, but only to allocate more broadcasting time to the dissemination of information on social issues free of charge.

Secondly, when harmonising the provisions of the amended law and taking into account the fact that Article 6(3) of the amended law already provides for the Council's obligation to establish the procedure and conditions for the dissemination of cultural, social and educational information, it is proposed that Article 6(2) of the amended law be worded as follows: "Cultural, social and educational information shall be disseminated free of charge on LRT programmes and on the LRT website". Taking this comment into account, the redundant and somewhat misleading word "free of charge" should be deleted from Article 6(3) of the amended law.
A similar comment applies to Article 7(2) and (3) of the new version of the law.

5. In Article 10(2) of the amended law, the word "representative" should be deleted after the words "Lithuanian organisations of persons with disabilities". The provision "Union of Lithuanian Community Organisations" should also be clarified, as it is unclear whether this refers to a specific organisation (if so, perhaps the "Union of Lithuanian Local Community Organisations" is meant).

A similar comment applies to Article 11(2) of the new version of the law.

6. Article 10(2) of the law, as amended by Article 5 of the draft, proposes that one representative of the LRT Council be appointed by *Lithuanian organisations of persons with disabilities*, i.e. no specific organisation is indicated (as in the case of the other 14 Council members), but rather a group of unidentified entities that should appoint one representative. When assessing this provision, it is unclear how this rule, which indirectly empowers any organisation whose activities are related to the protection of the rights of persons with disabilities to appoint one representative to the LRT Council, would be properly implemented. Such regulation may lead to a flawed situation where several Lithuanian organisations of persons with disabilities jointly or individually appoint their representative as a member of the LRT Council, as the law does not establish any criteria or conditions determining which appointed representative would be considered a legitimate member of the LRT Council.

A similar comment applies to Article 11(2) of the new version of the law.

7. Article 5 of the draft proposes to amend Article 10(3) of the law, stipulating that a person shall not be considered to be of impeccable reputation if they have committed a breach of professional ethics *for which they have been held liable in accordance with the procedure established by law*, is flawed, because the wording "held liable" is unclear as to the nature and extent of the legal consequences of the ethical violation. It should be specified more clearly what type of liability (administrative, disciplinary, official, material) and what legal relations are regulated by the procedure established by law. The content (scope) of the breach of professional ethics should also be clarified, as it is usually a material (gross) breach of professional ethics that is associated with certain legal liability.

A similar comment applies to Article 11(3) of the new version of the law.

8. We propose that Article $12^1$of the amended law, supplemented by Article 8 of the draft, be amended in the following respects. Firstly, for the sake of legal clarity, it should be clearly stated that the Council's office is a division of the LRT administration, i.e. its structural status should be clearly defined. Secondly, it is questionable whether the principles of organisation of the activities of a division of the LRT administration should be set out in the rules of procedure of the Council, which is the highest governing body of the LRT. In view of this, we propose combining the second and third sentences of this part into a single sentence, which would read as follows: "The structure, competence, functions, rights and obligations of the Council's office, as well as the procedure for organising its work, shall be established in the regulations of the Council's office, which shall be approved by the Council."

A similar comment applies to Article 13(1) of the new version of the law.

9. Article 8 of the draft amends Article 12^1 of the amended law, the redundant words "without the functions established for it in its regulations" should be deleted before the colon, as the fact that the Council Office also performs other functions established in the Council Office Regulations is enshrined in point 5 of this part.

A similar comment applies to the provision of Article 13(3) of the new version of the law before the colon.

10. Article 8 of the draft amends Article 12^1 of the amended law, it is proposed to establish that the Council Office shall service the meetings of the Council committees and working groups and perform other activities related to the activities of these bodies formed by the Council only when instructed to do so. In assessing the proposed regulation, it should be noted that the task of the Council Office is to assist the Council in performing its functions and to ensure its smooth operation, implies that the Council Office must also ensure the activities of the committees and working groups established by the Council, as these bodies are established by decision of the Council precisely in order to properly implement the functions and tasks assigned to the Council. In other words, the activities of the committees and working groups established by the Council are not an end in themselves, but are aimed at implementing the functions of the Council. Therefore, it should be considered that the tasks of the Council's office should undoubtedly include ensuring the activities of the committees and working groups established by the Council. In view of this, the words "upon assignment" should be deleted from points 1-4 of Article 12^1(3) of the amended law. If this comment is not taken into account, it should be clearly indicated on whose (which entity's) assignment the Council's office would perform the aforementioned functions.

A similar comment applies to points 1-4 of Article 13(3) of the new version of the law.

11. Article 8 of the draft law amending Article 12^1(3)(2) proposes that the Council's office, among other things, submit proposals on the compliance of LRT programmes and the content of the LRT website with the requirements. It is not clear from this wording whether it refers to the compliance of content with the law and the LRT mission (which is the supervisory function of the Council). For the sake of legal clarity, it is recommended to clarify and reword the wording as follows: "[...] compliance with the requirements set out in the law and the LRT mission".

A similar comment applies to Article 13(3)(2) of the new version of the law.

12. It should be noted that Article 8 of the draft law amending Article 12^1 duplicate the functions of the Council and the Director General of LRT, e.g. the Council Office submits

proposals on the implementation of good governance principles at LRT, which is analogous to the function of the Council as set out in the new version of the law; it is also stated that the Council's office prepares draft documents, although it is not clear what documents it prepares, as according to the proposed regulation in the new version of the law, most of the documents approved by the Council will be prepared by both the Director General of LRT and the Board. It is believed that the activities of the Council's office, which only performs auxiliary functions in support of the Council's work, should not duplicate any of the functions of LRT's management bodies.

A similar comment applies to Article 13(3) of the new version of the law.

13. The last sentence of Article 13(1) of the law, as amended by Article 9 of the draft, should be revised to read as follows: "The same person may serve as Director General of LRT for no more than two consecutive terms." A similar comment applies to Article 17(2) of the new version of the law.

14. Article 13(5) of the law amended by Article 9 of the draft proposes that the Director General of LRT may be dismissed from office before the end of his term of office if he fails to properly perform the functions of the Director General of LRT provided for in Article 14 of this law, or due to a violation of the public interest, if the Council bases its vote of no confidence on a gross violation of duties or a violation of the requirements of impeccable reputation, and if at least two-thirds of all Council members vote in favour of such a vote of no confidence. This provision is controversial for several reasons.

First, without questioning the right of the LRT Council, which is the highest collegial body performing LRT management and supervisory functions and representing the interests of the public, to dismiss the Director General of LRT before the end of his term of office, it is considered that the constitutional imperative of LRT's institutional independence implies certain requirements for the dismissal of the head of LRT. It should be noted that the Director General of LRT is not appointed on the basis of trust. The Director General of LRT is appointed through a public competition and must meet the requirements set out in the law. This implies a legitimate expectation on the part of the appointed Director General of LRT to perform his duties for the entire term of office specified in the law. In order to be able to perform their functions properly, the Director General must have sufficient guarantees of independence, thus ensuring both legal certainty and stability in the event of their proper management of LRT's activities. Although the prerogative of the LRT Council, as the highest governing body of LRT, which appoints the Director General of LRT, to dismiss the head of LRT in certain cases before the end of his term of office cannot be questioned, such dismissal must be based on clearly defined grounds, where the head no longer meets the requirements set for him or where the continuation of his duties would be simply incompatible with the mission entrusted to LRT and he would objectively no longer be able to ensure the implementation of the tasks set for LRT. Meanwhile, the grounds for dismissal of the Director General of LRT enshrined in the amended law, such as *improper performance of the functions* of the Director General or *violation of the public interest*, are very subjective, potentially very broad, vague and even open to different interpretations and applications. It should be noted that neither of these grounds is based on clear circumstances or conditions defined by law ( ), which would enable the uniform and appropriate establishment and application of these grounds for dismissal.

Attention should also be drawn to Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 Regulation (EU) 2024/1083 of the European Parliament and of the Council establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act). Article 5(2) of Regulation (EU) 2024/1083 lays down the obligation that Member States shall ensure that the procedures for the appointment and dismissal of the head of administration or members of the board of public media service providers are designed to ensure the independence of public media

service providers, and that decisions to dismiss the heads of public media service providers before the end of their term of office must be duly justified and may only be taken in exceptional cases where they no longer fulfil the conditions required for the performance of their duties in accordance with criteria established in advance at national level.

In this context, when assessing the grounds for dismissing the Director General of LRT before the end of his term of office, as provided for in Article 13(5) of the law amended by Article 9 of the draft law – if he or she fails to perform the functions of Director General of LRT properly or violates the public interest – it should be considered that, due to their subjective and vague content (since improper performance of duties can be interpreted and understood in very different ways, and, moreover, even a minor, insignificant breach of work duties may formally be considered as improper performance of duties) should not be considered objective and sufficient to justify the dismissal of the Director General of LRT before the end of his term of office.

Secondly, when assessing this provision, it is not sufficiently clear whether the grounds for dismissal of the Director General of LRT set out in Article 13(5) of the amended law are cumulative or alternative. In other words, it is unclear whether improper performance of duties would be grounds for dismissal only in cases where it is substantial and systematic and the Council considers such a breach of duty to be gross, or whether improper performance of the duties specified in Article 14 of the amended law should be understood and assessed as a separate and sufficient ground for dismissal. It is also unclear whether a violation of the public interest would be established only if it were based on a gross violation of duties or a violation of the requirements of impeccable reputation. In view of this, it should be considered whether, for the sake of legal clarity, the conditions for dismissal set out in Article 13(5) of the amended law, as amended by Article 9 of the draft, should be set out in separate paragraphs. It is also recommended to insert the words "fails to perform or" before the word "improperly".

Thirdly, it should be noted that the Director General of LRT performs his duties and works at LRT on the basis of an employment contract. Therefore, the provisions of the Labour Code apply to him in full, including the provisions governing the termination of an employment contract. It should be noted that Article 58(2)(1) of the Labour Code stipulates that the reason for terminating an employment contract on the initiative of the employer may be a gross violation of the employee's work duties. What constitutes a gross violation of work duties is clearly specified in Article 58(3) of the Labour Code. In view of the above, there is no need to include in the amended law redundant provisions already enshrined in the Labour Code regarding the possible termination of employment due to a gross violation of work duties by an employee.

A similar comment applies to Article 17(5) of the new version of the law.

15. In Article 15(4) of the amended law, as amended by Article 10 of the draft, the redundant words "Council office employees" should be deleted, as Council office employees are also considered LRT employees, and the fact that LRT employees cannot be appointed as LRT ethics controllers is already established in Article 15(4) of the amended law. If this comment were to be taken into account, Article 10 of the draft should be deleted altogether.

A similar comment regarding Council Office employees also applies to Article 10(4) of the amended law, Article 11(4) of the new version of the law, Article 15(7) and Article 19(4).

16. It should be considered whether, for the sake of legal clarity and consistency of the provisions of the amended law, Article 17^1 (or Article 12(3)) should specify that the Council also dismisses the persons referred to in this paragraph by a majority of at least two-thirds of the votes. A similar comment applies to Article 22(2) of the new version of the law.

17. In Article 2 of the new version of the law, the words "sole shareholder" should be replaced by the word "owner", because according to Article 4(2) of the Law on Public Institutions, if a public institution has only one shareholder, he is referred to as the owner of the public institution.

18. In Articles 4, 5 and other articles of the new version of the law, the terms "LRT programmes", "LRT radio and television programmes", "LRT broadcast radio and television programmes" and "LRT broadcast programmes" should be standardised.

19. Taking into account Article 19 of the Budget Structure Law, in Article 6(5) of the new version of the law, instead of the words "the Law on the Approval of the Financial Indicators of the State Budget and Municipal Budgets of the Republic of Lithuania for the Relevant Year" the words "the Law on the Approval of the Budget of the Republic of Lithuania for a given year" shall be inserted.

20. Article 6(12) of the new version of the law proposes that persons who control other media outlets and/or are public representatives of other media outlets may participate in LRT content only in accordance with the editorial policy conditions approved by the LRT Council and after declaring conflicts of interest. This provision is debatable for several reasons.

Firstly, it is not disclosed how the proposed ban on owners or representatives of other media outlets participating in LRT content is related to LRT's mission and the implementation of its tasks as set out in . It can be assumed that LRT's mission is to ensure the public interest – the interest of the public to be informed, as enshrined in the Constitution and defended and protected by it. This implies certain requirements specifically for the content of LRT programmes, rather than for the persons who prepare this LRT content.

Secondly, the content of the phrases "persons who control other media outlets" and "persons who are public representatives of other media outlets" is unclear not only because of the concept of "media outlet", but also due to the vagueness of the terms "who control" and "public representatives". It should be noted that, according to the proposed wording, even a person who owns a small, insignificant share of shares would no longer be able to participate in the creation of LRT programme content. Meanwhile, the content of the term "public representative of a media outlet" is generally unclear, and the proper implementation of this provision would be problematic.

Thirdly, it is probably meant that individuals should declare their private interests rather than conflicts of interest (because if a conflict of interest were declared, it would be natural that the individual would not be able to participate in the creation of LRT content).

Fourthly, the content of the restriction on "participating in LRT content" is unclear, i.e. it is unclear whether the restriction would apply to the dissemination (broadcasting) of LRT programmes according to which the manager or representative of another media outlet "should not be seen or heard" in broadcast LRT programmes, or whether the restriction would also apply to participation in the preparation of LRT programmes.

Fifth, the form and content of the editorial policy of LRT approved by the Council are unclear. Perhaps this refers to the editorial, privacy, sustainability and other requirements for LRT programmes set by the Council, as provided for in Article 12(1)(5) of the new version of the law. If the aim is to require the Council to approve another separate legal act, Article 12(1) should be amended accordingly.

21. The provision of Article 11(9) of the new version of the law, which stipulates that the Deputy Chair of the Council shall be elected in the same manner as the Chair of the Council, is questionable for several reasons. Firstly, it should be considered that it should be set out

not in paragraph 9 of this article, but in paragraph 2, which regulates the general procedure for the election of the Chair and Deputy Chair of the Council. Secondly, the provisions stipulating that the Deputy Chair of the Council shall be elected in the same manner as the Chair of the Council are flawed, as the procedure for electing the Chair of the Council is not provided for in the amended law at all. Furthermore, stipulating that the Vice-Chair is elected in the same manner as the Chair of the Council is flawed in that the Chair of the Council *is elected* from among the members of the Council, while the Vice-Chair *is appointed on the recommendation of the* elected *Chair of the Council*.

22. Taking into account the function of the Council set out in Article 12(1)(14) of the new version of the law to repeal decisions of the Director General of LRT that are contrary to legislation, the LRT statutes, or the resolutions of the Council or the Board, it should be considered whether should also provide for the right to revoke resolutions of the Board that are contrary to legislation, the LRT statutes, or the resolutions of the Council. Furthermore, it should be noted that the Council's right to revoke decisions of other LRT management bodies should be presented not as a function of the Council, but as its right.

23. In the new version of the law, the redundant abbreviation "LRT" should be deleted from Article 12(1)(3), the words "may establish" should be replaced by "may create" in Article 12(1)(15), and in point 22, the words "has the right to conclude" should be replaced by the word "concludes". It is also proposed that points 15 and 22 of Article 12(1) of the new version of the law be merged.

24. In Article 12(3) of the new version of the law, the word "management" should be inserted before the word "bodies".

25. In order to ensure the consistency of the provisions of the new version of the law, it is proposed that Article 12(1)(16) of the new version of the law stipulate that the Council shall determine the remuneration of the members of the Board (as stipulated in points 18 and 19 of this part).

26. The content of the provision of Article 14(4) of the new version of the law, which stipulates that the meetings of the Council must be minuted, except for the exceptions established by law, is unclear, as the laws do not provide for cases where the meetings of the management body of a legal person cannot be minuted.

27. In Article 15(1) of the new version of the law, the word "management" should be inserted before the word "body". Article 15(1) of the new version of the draft law stipulates that the LRT Board is a collegial body of LRT that *supervises* the implementation of the strategy, strategic and annual activity plans approved by the Council. For the sake of legal clarity, consistency and separation of management powers from those of the Council, it is proposed to replace the word "oversees" with the phrase "analyses and evaluates".

28. In order to ensure the conciseness and consistency of the provisions of the new version of the law, the provisions of Article 15(5) and (6) of the new version of the law should be set out in a single paragraph.

29. The first sentence of Article 15(7) of the new version of the law should be deleted as redundant, since the independence of the members of the Board is already established in paragraph 2 of this article. Furthermore, for the sake of legal clarity, the content of the ‘independence’ of the LRT Board should be clearly defined, i.e. it should be clearly stated from whom and to what extent they are independent in their activities.

30. The purpose of Article 15(8) of the new version of the law, which provides that the members of the Board shall elect and appoint the Chair of the Board by a simple majority of

all members of the Board, is unclear, as neither the Chairman of the Board nor any specific features of his status are mentioned in any other provisions of the new version of the law. Furthermore, the provision stipulating that the Chair of the Board shall be elected *for the entire term of office of the Board* is inaccurate, as Article 14 implies that the Board would be approved and operate not on an *in corpore* basis, but that the term of office of each member of the Board would be counted separately. In view of this, Article 15 (8) of the new version of the law should be amended to stipulate that a member of the Board shall be elected as Chairman of the Board for the term of his or her membership of the Board, and Article 15(9) should be deleted altogether.

31. It should be noted that Article 15 of the new version of the law should very clearly regulate the status of Board members, i.e. the nature of their relationship with LRT. The proposed regulation suggests that they, like other LRT officials and employees, would be appointed on the basis of an employment contract. In other words, the Council would not delegate them to their positions, but would appoint them to their positions and conclude employment contracts with them for their work on the LRT Board. Accordingly, the employment relationships between the members of the Board and LRT, including their dismissal (termination of employment contracts), should be in line with the specific features of employment relationships set out in the Labour Code. In view of the above, the provisions of Article 15(10) and (13) of the new version of the law should be amended, as the members of the Board would not be dismissed from their positions (as mentioned above, the Council does not delegate them, but appoints them to office by concluding an employment contract), but dismissed from office. It should be noted that the Labour Code allows for the establishment of other, special grounds for termination of an employment contract in laws, in addition to the general grounds for termination of an employment contract established in the Labour Code. In view of this, the provisions of Article 15(10) and (13) of the new version of the law should be revised to bring them into line with the provisions of the Labour Code.

32. Paragraph 2 of Article 15(10) of the new version of the law, which stipulates that a member of the Board may be dismissed from office if he or she loses Lithuanian citizenship, is inconsistent with paragraph 5 of this article, which does not set out any requirements regarding the citizenship of a member of the Board.

33. Article 15(10)(3) of the new version of the law should be worded as follows: "it becomes apparent that he or she does not meet the requirements set out in paragraphs 5 and 7 of this article".

34. When assessing Article 15(10)(4) of the new version of the law, which stipulates that a member of the Board may be dismissed from office when the Supreme Commission for Professional Ethics adopts a decision on a gross violation of the provisions of the Law on the Coordination of Public and Private Interests of the Republic of Lithuania by a member of the Board, it should be noted that, according to the Law on the Reconciliation of Public and Private Interests, a member of the LRT Board would not be considered a person working in the civil service, therefore, the Supreme Commission for Professional Ethics would not have the authority to investigate their activities in terms of violations of the Law on the Coordination of Public and Private Interests.

35. Assessing Article 15(11) of the new version of the law, which stipulates that the members of the Board may be dismissed *in corpore* if the Board fails to perform the functions of the Board as set out in this law or if the results of the Board's activities do not substantially correspond to the objectives of the strategic and annual activity plans approved by the Council, and if more than half of all Council members vote in favour of such a decision, it should be noted that a person would not be appointed to the position of a member of the Board on the basis of trust ( ). A person would be appointed to this position through a public competition and would have to meet the requirements set out in the law. This implies a legitimate expectation

on the part of the appointed Board member to perform their duties for the entire term of office established by law. In order to be able to perform their functions properly, employees must have sufficient guarantees of independence, thus ensuring both legal certainty and stability in the performance of their duties in the LRT management body. Although the prerogative of the LRT Council, as the highest governing body of LRT, which appoints members of the Board, to dismiss a member of the Board in certain cases before the end of their term of office cannot be questioned, such dismissal must be based on clearly defined grounds, where a member of the Board no longer meets the requirements set for him or her, or where the continued performance of his or her duties would be simply incompatible with the ability to properly perform the functions assigned to him or her. Meanwhile, the grounds for dismissing the entire Board *in corpore* – if the Board essentially fails to perform the functions assigned to it by this law – are too vague and subjective. The "failure to perform" functions can be interpreted and understood in very different ways, and such grounds for dismissal would not be based on any pre-established objective criteria. Furthermore, this provision probably means that the LRT Board could be dismissed if it failed to achieve the objectives set for it in the LRT strategic or annual activity plans or if the results of its activities did not meet those objectives. It is also unclear why the decision to dismiss members of the Board would be subject to a different majority vote of the Council members than decisions on other LRT employees appointed by the Council.

It should also be noted that the proposed provision may not be compatible with Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 Regulation (EU) 2024/1083 of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act). Article 5(2) of Regulation (EU) 2024/1083 lays down the obligation that Member States shall ensure that the procedures for the appointment and dismissal of the head of administration or members of the board of public media service providers are designed to ensure the independence of public media service providers, and that decisions to dismiss the heads of public media service providers before the end of their term of office must be duly justified and may only be taken in exceptional cases where they no longer fulfil the conditions required for the performance of their duties in accordance with criteria established in advance at national level.

36. Article 15(12) of the new version of the law should specify no later than 30 calendar days *before what legal fact* a member of the Board should be informed of.

37. Article 15(14) of the new version of the law should read as follows: "If the powers of a member (or members) of the Board are terminated prematurely, a new member (or members) of the Board shall be appointed for a new five-year term.

38. For the sake of legal clarity, the new version of the law should be supplemented with a new article regulating the essential provisions for the organisation of the work of the LRT Board, the conditions for the legality of meetings and decision-making.

39. It is proposed that points 13 and 22 of Article 16 of the new version of the law be merged into one.

40. In Article 17(2) and Article 19(2) of the new version of the law, the redundant word "renka" should be deleted, and in Article 21(2), the word "renkamas" should be replaced with the word "skiriamas". In addition, in Article 17(2) of the law, the words "of the Republic of Lithuania" should be deleted before the words "the Civil Service Law".

41. In Article 17(4) of the new version of the law, the redundant words "and Council office employee" should be deleted.

42. In Article 18(2) of the new version of the Law, the word "by resolution" shall be inserted before the word "initiated".

43. In Article 19(2) and Article 21(2) of the new version of the law, the words "the same" shall be inserted before the word "person".

44. In the title of Article 23 of the new version of the law, the word "use" should be inserted instead of the word "used".

45. Taking into account that Article 9(1) of the draft, which amends Article 13(2) of the law by establishing a new requirement that the same person may serve as Director General of LRT for no more than two consecutive terms, will enter into force immediately after the publication of the law, rather than on 1 January 2028, the wording "Until 1 January 2028" in Article 14(5) of the draft should be replaced with the wording "Until the entry into force of this law".

46. Please note that the Seimas has registered a draft law amending Articles 9, 10, 11, 13 and 14 of the Law on Lithuanian National Radio and Television No. I-1571 with Articles 12-1 and 12-2 (Reg. No. XVP-1243). In this context, attention should be drawn to the provisions of Article 137(4) of the Seimas Statute, which stipulates that if several draft laws amending or supplementing the same or different articles of the same law are received, they shall be presented and examined together at a Seimas sitting, and the main committee appointed by the Seimas may combine them and submit a single draft for consideration by the Seimas.

47. Given that the Ministry of Culture of the Republic of Lithuania formulates state policy in the field of public information, organises, coordinates and controls its implementation, it is recommended that the Government's opinion be sought on the draft.