

Practice Name:

**“Jonvabaliai”  
transparency  
initiative**

Country:

**Lithuania**

Practice category:

- Anti-fraud culture



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## **Fraud risk(s) countered**

- Others: fraud prevention - all fraud risks

## **Context and objective(s)**

“Jonvabaliai” (“Fireflies”) is the first voluntary initiative in the EU to encourage project promoters to be more open to the public and to seek greater transparency for themselves. EU project promoters from this initiative now report not only to various institutions, but also to the general public, and each resident of Lithuania can be sure that funds are invested and managed transparently.

Jonvabaliai was created by eight Lithuanian public organisations (including the Ministry of Finance and Transparency International Lithuania) with the support of the European Social Fund. Total investment for the “Transparency Initiative Jonvabaliai” project is €58,873, with the European Social Fund contributing €50,042 through the “Technical Assistance” Operational Programme for the 2007-2013 programming period.

## **Description of the practice**

The goal of the initiative is to encourage enterprises, institutions and organisations to share information on the use of EU funds and to improve transparency-budget spending for EU-funded projects. The initiative also aims to provide the public with more information on EU investments from the project promoters and to encourage joint efforts to achieve positive systemic changes in the area of transparency.

The main objectives of the initiative are:

- to seek greater transparency in the implementation and payment of EU-funded projects;
- to encourage project promoters to operate on the principles of integrity and openness and to make changes in the field of transparency;
- to rate project promoters according to the transparency of the use and settlement of investments, giving them a bonus (from 1 to 3);
- to present good examples of EU investment; and
- to increase public awareness of the use of EU funds in Lithuania.

The Jonvabaliai online platform ([www.jonvabaliai.lt](http://www.jonvabaliai.lt)) provides information on projects funded by the EU. More specifically, the platform includes maps that specify the location of each project and explain what the project does, how much money it received, and how this money is managed. Via a website, project managers can voluntarily submit information about project results, prices, public procurement, stakeholders, risk-management practices, etc.

Jonvabaliai (fireflies) are awarded based on the number of project promoters who fill in declarations and provide information about EU-funded projects and the organisation itself. The more information a project shares, the more “fireflies” it earns. One firefly given to a project means that the project is dedicated to

improving transparency, while three fireflies represent the highest level of transparency and openness to the public.

When a user visits the website, they see a map highlighting all EU-financed projects, with each project's number of fireflies being fully visible – giving them a clear visual understanding of how transparent a project is.

To join the network, the project promoter needs to appoint a person who will be responsible for answering citizens' questions about the use of EU investments and provide information about the project and the organisation.

## Unique features

The unique feature of Jonvabaliai is that it is a methodology developed for quantifying the transparency of project promoters in the form of fireflies. This methodology was developed by experts from the Lithuanian branch of Transparency International in close cooperation with the initiative's founding council.

The responsible authorities were consulted during the preparation of the methodology: The Financial Crime Investigation Service, the Special Investigation Service, the Public Procurement Service, the State Audit Office and others.



The methodology includes a set of questions and requests that promoters must respond to. They are as follows:

1. To be a participant of the initiative
  - Has this project received national / regional funding?
  - Please submit the project financing and administration agreement and its annex no. 1 or a reference to it.
  - Is the organisation / company that is implementing the project a contracting authority?
  - What is the amount of EU and state budget funds allocated for the implementation of the project?
  - What is the amount that the project promoter is self financing?
  - What was the goal of the project?
2. Questions for which 1 firefly is awarded
  - How does this project contribute to the 2007-2013 / 2014-2020 action program strategies, and how is such a contribution measured?
  - Does the company / organisation structure diagram show the head of the company / organisation and the structural units available on the company / organisation's website (if so, provide a link)?
  - Does the company / organisation make a public commitment not to violate the legal norms related to its activities, including anti-corruption norms (if so, provide a link)?
  - How many procurements were made for this project?
  - How many purchases were made in a published and unpublished way?
  - Were any breaches of public procurement procedures identified during the project implementation?
  - What is the result of the project (provide qualitative and quantitative indicators for measuring the results and where possible, provide references to results (photos, etc.))?
3. Questions for which 2 fireflies are awarded
  - Does your organisation have approved procurement rules (if so, please provide a link)?

- Have residents or other stakeholders been consulted prior to the start of this project (if so, please indicate who was consulted and when)?
  - Were financial corrections applied to the project (if so, what were they and for what amount)?
4. Questions for which 3 fireflies are awarded
- Were there any legal disputes regarding the procurement of goods, services or works for this EU project (if so, was the company a plaintiff / defendant)?
  - Is the project staff directly involved in the project's implementation and trained in anti-corruption risks / transparency standards (if so, which part)?
  - Did the project involve cooperation with socio-economic partners (if so, with which ones)?
  - Does the company's / organisation's website indicate who its shareholders are (if so, provide a link)?
  - Does the company's website list subsidiaries, primary companies and branches (if the company has such companies or branches)?
  - Does the company / organisation publish the communication channels (methods) available to its employees, as well as suppliers, agents, subcontractors and partners, to safely and confidentially report potential internal breaches or seek advice (hotlines) (if so, provide link)?
  - Does the company / organisation have a code of conduct or ethics (if so, provide a link; if you answered no, go to question 10)?
  - Does the company / organisation's code of conduct or ethics contain provisions governing the gift policy?
  - Does the company / organisation's code of conduct or ethics contain provisions governing its conflict of interest policy?
  - Has a cost-benefit analysis been carried out before the project starts?
  - If so, is the cost - benefit analysis publicly available (if so, please provide a link?)
  - Please submit the project financing and administration agreement and its annex no. 2 or a reference to these documents.
  - Provide detailed procurement reports.

## Outcomes and results

The Jonvabaliai project was launched in 2014. Currently, there are 633 projects mentioned on the website of the initiative that covers more than €655 million of funding.

Out of 633 projects registered on the platform, 388 projects are awarded three fireflies, 48 projects are awarded two fireflies, 25 projects have one firefly and 172 projects have no fireflies and are participating in the initiative.

The largest number of projects participating in the initiative was in 2014. However, Transparency International Lithuania highlights that the initiative as such is now in a dormant state due to a lack of financing for the continuation of dynamic promotion or other activities.

## Key success factors

Transparency International Lithuania assesses the Jonvabaliai initiative as a success in terms of results and outreach.

In a short period of time, the initiative raised a lot of interest among the Lithuanian project promoters. It significantly increased the transparency and accountability of project promoters. The cooperation of project promoters was ensured through win-win publicity: by taking part in the initiative and sharing information with the public, the promoters received free-of-charge publicity on the website, featuring the initiative as transparent and having trustworthy promoters. The initiative was promoted as highlighting transparency rather than corruption; such a positive message attracted project promoters to participate.

The initiative used several channels for dissemination and promotion of the initiative, including TV advertisement, radio and other broadcasting channels.

The team implementing the project consisted of different profiles:

- Project managers
- Experts on transparency to define the methodology
- Web-design and web-hosting experts
- Media and communication experts

## **Challenges encountered & lessons learned**

Sustainability challenges is one of the main lessons learnt highlighted by the practise owners. The project was procured by the Ministry of finance and proved to be a success. But once the financing ran out, no continuation strategy was developed by the Ministry. This led to a slow-down, and eventual termination of activities for the project.

In 2018 Transparency International Lithuania secured €10,000 in financing for the project, but it was not sufficient to revive all activities. Currently, Transparency International Lithuania is hosting and maintaining the website, however, no new activities or promotions were organised since 2014.

Transparency International Lithuania highlights that the methodology for assessing the transparency of project promoters is a key output of this initiative and could be replicated for similar projects elsewhere, with some adaptation to the context.

## **Potential for the transferability**

The initiative like Jonvabaliai has a high potential for transferability. The practice has a well-established methodology, that is well applicable to other contexts and countries. The practice owner is open to sharing their experiences and supporting other countries and authorities in sharing knowledge or recreating similar initiatives.

Importantly, the Jonvabaliai experience shows that sustainability and financial architecture of such projects are of great importance for their uptake and impact. Transparency International Lithuania highlights the driving role of project sponsors (e.g. respective Ministry or European Commission) in ensuring sustainability and continuity of projects like Jonvabaliai.

In terms of operational transferability and implementation, this initiative can have a fast takeover in smaller countries or if applied for specific sectors, rather than on a large scale all at once.