



Gas and Dirty Money

Russian Corrosive Capital in Latvia

Evija Djatkoviča



CEIAS
Central European Institute
of Asian Studies



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Author: Evija Džatkoviča | Latvian Institute of International Affairs

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Summary

- Geographic proximity, historic ties, and Russia's geopolitical interests expose Latvia, Lithuania, Estonia to Russian influence that reaches far beyond the financial impact.
- Russia is one of the main economic partners of the Baltic states. While Latvia attracts most of Russia's FDI among the Baltic states (approx. €1.5 billion), Lithuania cooperates extensively with Russia in trade. Russia is Lithuania's main trading partner (almost €9 billion trade turnover). Russia is among the top five trading partners for all three Baltic states.
- In Latvia, Russian corrosive capital typically takes hold in strategically important economic sectors in the form of non-transparent business transactions engaging local political and business elites.
- The most vulnerable economic areas are the energy sector, transport and logistic sector, and finance sector. Significant reforms were recently implemented in Latvia to decrease Russia's corrosive footprint in the energy sector and finance sector but the full spectrum of outcomes is still awaited and challenges remain.
- In the energy sector, Latvia and two other Baltic states almost exclusively depend on natural gas supply from Russia. Lack of alternative gas delivery routes isolates the Baltic countries from the European gas markets, turning them into 'energy islands'. Such a situation provides Russia with the political leverage and creates a grey zone for opaque business and political collaborations with Latvian entrepreneurial and decision-making circles.
- The transport and logistic sector in Latvia heavily relies on the Russian railway and seaport freight transit. Russia is the main rail cargo supplier

in Latvia, with Russian freight constituting around 60 percent of all rail transit. In the past, this sectoral dominance is used to punish Latvia for policies Russia deemed unfavorable.

- The finance sector in Latvia is intensely exploited for laundering illegally obtained money of Russian residents. More than \$20 billion have been wire transferred via Latvian banks to the West. Russian laundromat study depicted that Latvian banks had a leading position in moving dirty money out of Russia between 2011 and 2014. The ABLV bank case in Latvia and the Danske bank case in Estonia were among the largest money-laundering scandals in Europe and are striking examples of Russian corrosive capital in the Baltic states.

Recommendations

- Russian corrosive capital in Latvia, in particular, and the Baltic states, in general, is a complex phenomenon that is rooted in history. Addressing this problem, therefore, requires a collaborative effort by the private and public sectors to bring about structural change.
- To tackle Russian corrosive capital in strategically important sectors of the economy, historically oriented towards Russia, diversification of business partnerships and increase of business competitiveness should be prioritized at both governmental and private sector levels.
- To eliminate corruption and rent-seeking relations between Latvian and Russian business and political elites, the enhancement of overall transparency and accountability measures in Latvia is of utmost importance. Lobbying regulation should be introduced for determining legal and ethical aspects of private and public sector interaction.
- To reduce dependence on Russian natural gas in Latvia, the private sector should start orienting towards the European Green Deal strategic goal of abandoning natural gas and replace it with green alternatives. Preparatory work for establishing a local production of biomethane, biogas, and equivalent products can already be implemented. Steps like determining market needs, attracting workforce, obtaining technologies could be taken to facilitate long-term competitiveness and investment attraction.
- To stimulate local competitiveness, technological advancement, and green transition in the energy sector, support for research and development of green technology should be increased in accordance with the existing energy policy strategies. Investing in research and development, in general, is highly important for a country's overall economic progress. In the past years, funding for R&D did not exceed a

single percent of GDP in Latvia, while the EU suggests allocating around 3 percent.

- To reduce Russian pressure on the transport and logistic sector, as well as to ensure the sector's overall viability in light of Russian freight decline, governmental involvement is instrumental. After years of neglect, improving the business environment and competitiveness of provided services should be prioritized. In this respect, the rail cargo market should be liberalized by abolishing state monopoly and unfair competition practices. Long-awaited seaport reform should also be implemented. In the reforming process, both good governance and economic rationale must be equally considered for a successful outcome.
- To minimize the effects of transit favoritism of Russian cargo, private companies should focus on enhancing industrialization and added value generation instead of working with simple cross-country goods transfers. Cooperation with smaller transit players which provide diverse cargo types could also be helpful. Integration of local cargo businesses into the large European transit chains could be additionally considered.
- To combat Russian dirty money in the Latvian finance system and maintain finance services as an important export sector in the Latvian economy, banks and credit institutions should establish scrupulous internal AML procedures. Suspension of cooperation with non-existing businesses, i.e., shell companies is increasingly important in this regard. Sustainable business models based on competitive traditional banking services like crediting should be developed.

1 Introduction

Latvia and the two other Baltic states—Lithuania and Estonia—are located at the crossroads of the East and West. Their proximity to Russia, with which they share historic ties and proficiency in the Russian language, has attracted Russian money to the region, and vice versa. Latvia is an important economic partner of Russia. However, as this paper shows, Russia’s economic presence in Latvia often takes the form of corrosive capital.

While this analysis focuses exclusively on Russia’s malign economic footprint in Latvia, Moscow’s regional foreign policy toolkit, including ethnic Russian communities, and geopolitical ambitions expose the three Baltic states much more broadly to Russia’s influence.

Latvia attracts most of Russia’s Foreign Direct Investment (FDI) in the Baltic states. While Russia’s FDI stock in Latvia has increased exponentially over the past 20 years, the country has been particularly interesting for investors since 2014. Considering the changing investment climate in Russia, including the risks associated with international sanctions, following the annexation of the Crimean Peninsula, money flees Russia and many investment decisions were made in favor of the neighboring countries. In 2020, Russia was the third-largest investor in Latvia.¹ The accumulated Russian investment amount was €1.5 billion, and it accounted for 9 percent of Latvia’s total investment. The main investment areas include wholesale, retail trade, repair of motor vehicles, real estate, finance, and insurance, as well as electricity, gas, heat, and air conditioning.² Likewise, Russia has invested a significant amount of money in Estonia,³ but not as much in Lithuania where it has a relatively negligible share of the investment stock.⁴

Corrosive Capital: What Is It?

The notion of **corrosive capital** refers here to financing, whether state or private, that lacks transparency, accountability, and market orientation. It typically originates from authoritarian regimes (i.e., China, Russia), and exploits governance gaps to influence policymaking in recipient countries.

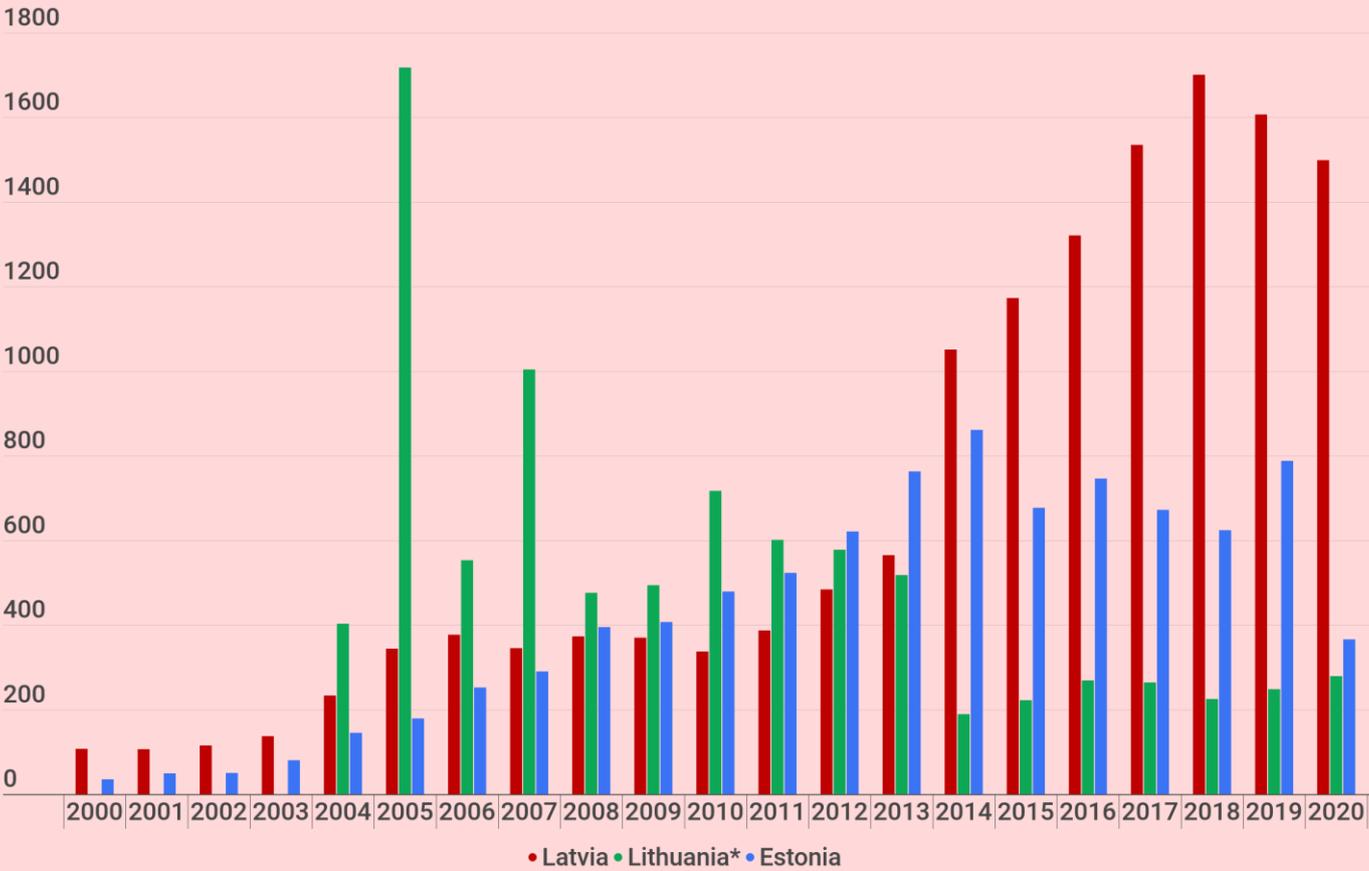
In opposition to corrosive capital stands so-called **constructive capital**, transparent financial flows that are governed by market principles. Constructive capital results in the creation of added value for recipient economies, while at the same time promoting principles of good governance, free market, and accountability.⁵

Russia is a strategic trading partner of all three Baltic states. It is their main partner in trade with third countries, and in the case of Lithuania, the most important partner in general (turnover almost €9 billion in 2019, negative trade balance).⁶

For Latvia, in 2020, trade turnover with Russia amounted to €2.5 billion, which placed the Eastern neighbor among its top five trade partners. The total value of exports was €1.4 billion, whereas the value of imports was around €1 billion. However, Russia's share in Latvian exports and imports did not exceed 10 percent.⁷ Estonia's trade partnership with Russia amounted to a little more than €1 billion with a negative trade balance.⁸

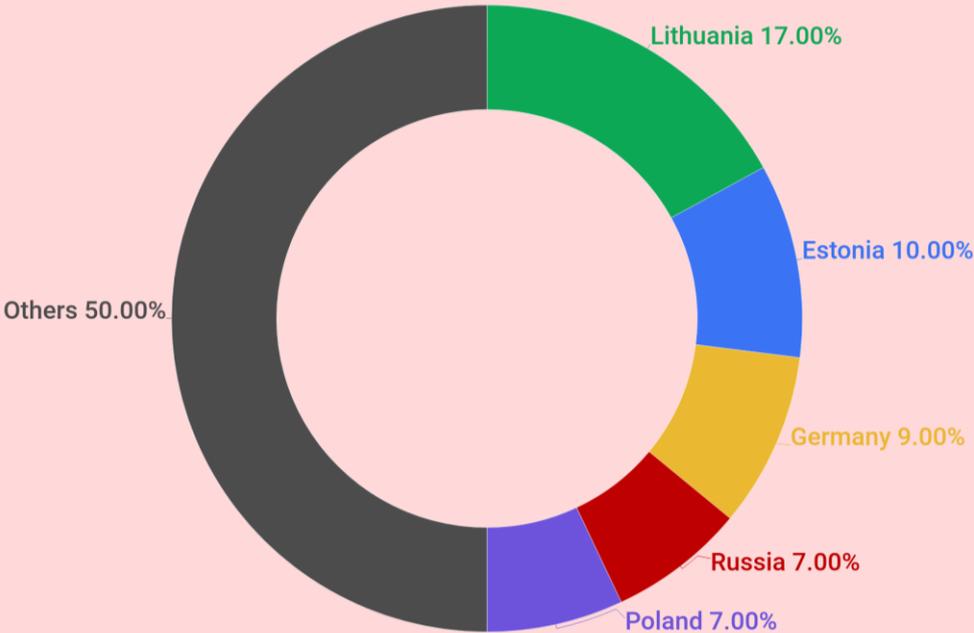
In other words, Russia's share in Latvia and the other two Baltic states' economies is significant. Given the autocratic nature of the Russian regime, and the adversarial relationship with the Baltic states, the Russian presence in Latvia's economy should not be seen only through the prism of economic opportunities, but as a potential security risk as well.

Figure 1: Russian FDI stock in the Baltic countries (2000-2020, EUR mil.)



Sources: Latvian Investment Development Agency, Eesti Pank, and Lietuvos Bankas
 * Data for Lithuania as of the fourth quarter of each year

Figure 2: Latvia's biggest trade partners in 2020



Source: Latvian Investment Development Agency

2 Russian Corrosive Capital at a Glance

Russian capital in Latvia is largely considered productive. The main economic contributors to the Latvian economy are small and medium-sized enterprises (SMEs). Foreign investors are welcome as long as they seek a constructive business partnership.⁹ However, considering Russia's economic might and geopolitical interests in the region, malign influence can be traced in specific, mostly critical, sectors of the economy – energy sector, transport and logistic sector, and finance sector.

Energy Sector

One of the most sensitive sectors is the energy sector. It is also one of the least transparent business areas in Latvia. A poll by Transparency International Latvia in 2014 depicted that the energy sector is the second most effectively lobbied strategic economic area in the country. Informal cooperation of business and political elites is mostly aimed at influencing policymaking and the public procurement processes.¹⁰

For more than 20 years, Russia possessed ultimate control over the gas market in Latvia. Gazprom, a Russian state-owned natural gas giant, was the key player in the monopolistic business. Along with Itera Latvija (a subsidiary of Russia's gas company Itera), the two companies together owned 50 percent of the shares of a sole gas market operator Latvijas Gāze. For a long time also the only underground gas storage (UGS) facility in the Baltic states—Inčukalna UGS was foreign-owned (including by Gazprom and Itera Latvija). The Latvian state had limited, if any, control over the supply and price of gas widely used to run the national economy, including the provision of electricity and heat.¹¹

In 2017, things changed with gas market liberalization following the European Union's (EU's) Third Energy Package. The preparation period for liberalization became a turning point for transformations aimed at enhancing national energy security and reducing Russia's sectoral influence. However, at least two major problems remain. Even though the market diversification enabled new vendors to enter, the gas source remains unchanged; Latvia imports its natural gas primarily from Russia.¹² Moreover, there are no competitive infrastructural solutions available for alternative supplies until a new pipeline (Gas Interconnection Poland-Lithuania; GIPL), which will connect the Baltic and Finnish natural gas transmission systems with the EU system, is built.

Dependency on Russian gas is a regional issue. The three Baltic states are often referred to as "energy islands" since all receive gas from a single pipeline and provider.¹³ Lithuania since recently is in a better position due to the liquified natural gas (LNG) terminal constructed in Klaipėda.

In the past decade, Russia has not openly used energy dependency as an instrument of political manipulation. There is some ambiguity though considering the past examples of leveraging gas dependency to achieve favorable decisions in the Baltics and beyond.¹⁴ This highlights the interconnected nature of corrosive capital, trade dependency, and energy security.

Russia's interests in Latvia have been represented by Russia-affiliated businessmen and political elites.¹⁵ The president of Itera Latvija, Juris Savickis – former KGB colonel, a possible candidate for Gazprom chairmanship in 2002, and friend of Russian President Vladimir Putin – strongly opposed the gas market liberalization.¹⁶ Supported by Savickis and Gazprom leadership, former Latvian Prime Minister Aigars Kalvītis was appointed head of Latvijas Gāze.¹⁷ Throughout the liberalization discussion, Latvijas Gāze put forward opposing arguments appealing at the purportedly costly and harmful consequences of liberalization. As a result, the decision-making process was turbulent and nontransparent.¹⁸

Transport and Logistic Sector

The transport and logistic sector is another realm with Russia's corrosive footprint. Today, the sector in total makes around 8 percent of Latvia's GDP.¹⁹ Around a fourth of this is produced by the shrinking transit business, which is heavily reliant on railway²⁰ and seaport²¹ cargoes entering the country from Russia (coal and oil products, in particular).

Economic influence provides Russia with political leverage that has been exercised to punish Baltic states for what Kremlin sees as unfriendly policies.²² Transit suspension has been used by Russia to punish Latvia for policies it deems unfavorable towards Russian interests.²³ Latvia saw a sharp drop in transit after its decision in 2018 to educate children only in the Latvian language.²⁴ Russia had a similar response when Estonia's government removed the Bronze Soldier monument, a Soviet-era war memorial in Tallinn in 2007. Of the three Baltic states, Lithuania has a deeper transit relationship with Belarus than with Russia.

For years, Russia has gradually reoriented transit from the Baltic states to its ports—Ust-Luga near St. Petersburg²⁵—but the most dramatic decline has been experienced since the European Union (EU) sanctioned Russia over its annexation of Crimea in 2014. The Baltic states supported the sanctions.

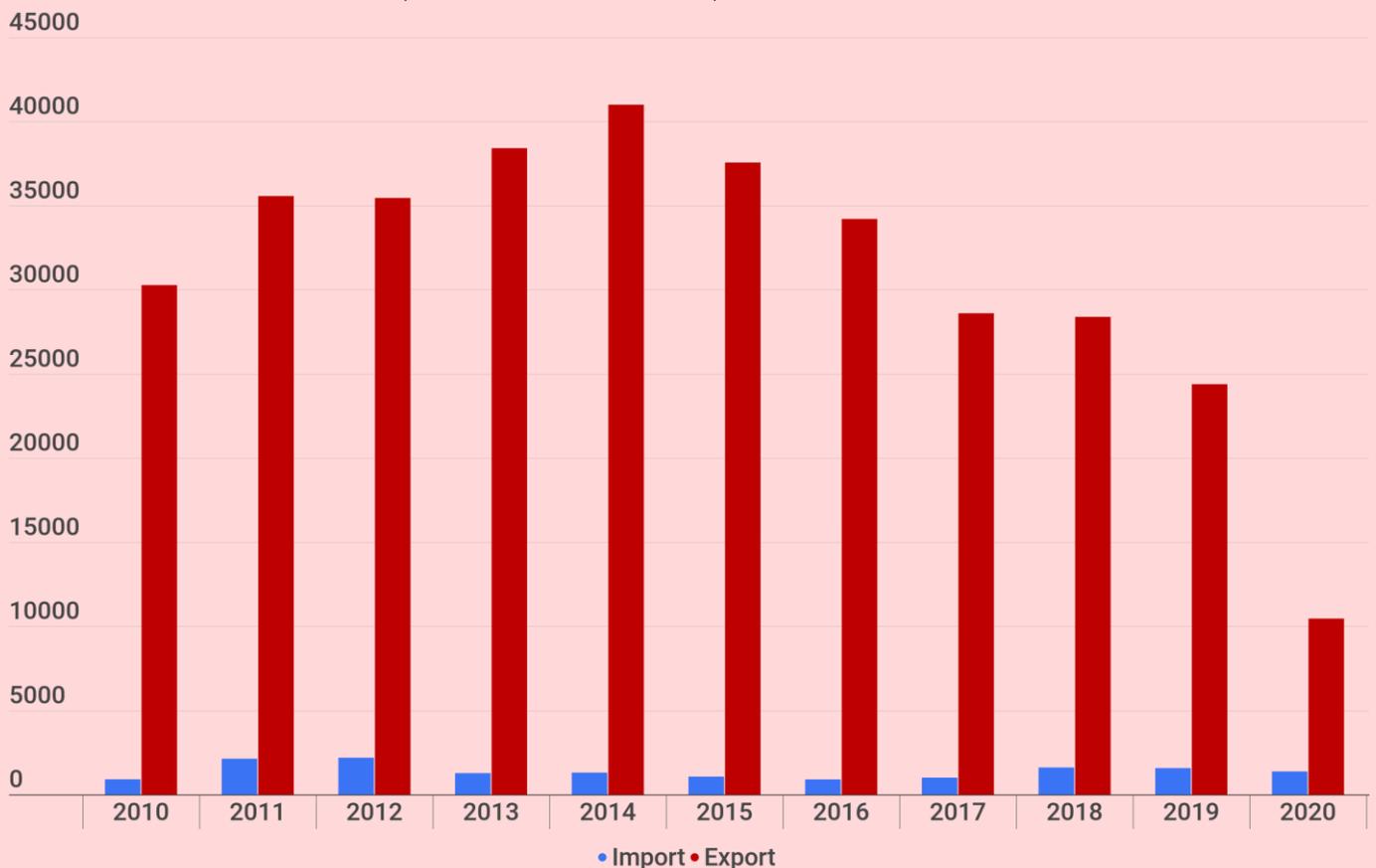
Latvia has historically had to balance values-based policies and economic pragmatism, and multiple players have been engaged on each side. Particular businessmen and politicians, however, have been in lasting favor of prioritizing economic expedience over value-based political stance. Sanctioning Russia in the post-Crimea period well-illustrated 'values vs interests' preferences of individual transit sector players.

Oligarchs possess significant influence in the ruling political circles. One of three Latvian oligarchs, Aivars Lembergs, imprisoned for corruption and sanctioned by the United States under the Magnitsky Act, is widely known for his pro-Russia economic beliefs, including in the post-Crimea period.²⁶ The vast share of turnover of Ventspils Freeport Authority, which was briefly sanctioned by the United States in December 2019, was generated by enterprises affiliated with Lembergs, a former Ventspils mayor.²⁷ The

seaport almost exclusively depends on Russia’s transit freight. The above-mentioned Juris Savickas was also a vocal opponent of sanctioning Russia over aggression in Crimea.²⁸

The transit sector is often affiliated with two other oligarchs and former high-level politicians. Ainārs Šlesers and Andris Šķēle have maintained influence in the railway segment, as well as Riga seaport. Both oligarchs reportedly carry out opaque business transactions with Russia’s state companies and wealthy individuals.²⁹ It is worth mentioning that their associate, Uģis Magonis, at the time chairman of the state-owned railway operator VAS Latvijas dzelzceļš, was detained in 2015 on suspicion of receiving a €500,000 bribe from Estonian businessman Oleg Ossinovski potentially intended for Russian Railways chief Vladimir Yakunin.³⁰ Both Magonis and Ossinovski were acquitted by a Latvian district court in January.

Figure 3: Latvia’s International Rail Freight Exchange with Russia (thousands of tonnes)



Source: Central Statistical Bureau of Latvia

Finance Sector

Russia's malign influence reaches into the financial sector as well. Since the 1990s, Latvia was building muscles as a regional finance center bridging, by and large, CIS countries' opaque money to the West. Vast proportion came directly or indirectly from Russian citizens and corruptive schemes often ended up in Latvian and Estonian banks. By 2012, foreign investment accounted for half of the total investments in Latvian banks. By offering financial logistics, i.e., serving short-term deposits, some of them made a fortune, and non-resident business accounted for 3-3.5% of the national GDP.³¹

According to the a study of Russian Laundromat by Organized Crime and Corruption Reporting Project (OCCRP), between 2011 and 2014, Latvia transited the largest amount of Russia's dirty money to the EU, Switzerland, and other countries. Several Latvian banks were involved in smuggling billions of dollars from Russia across borders.³²

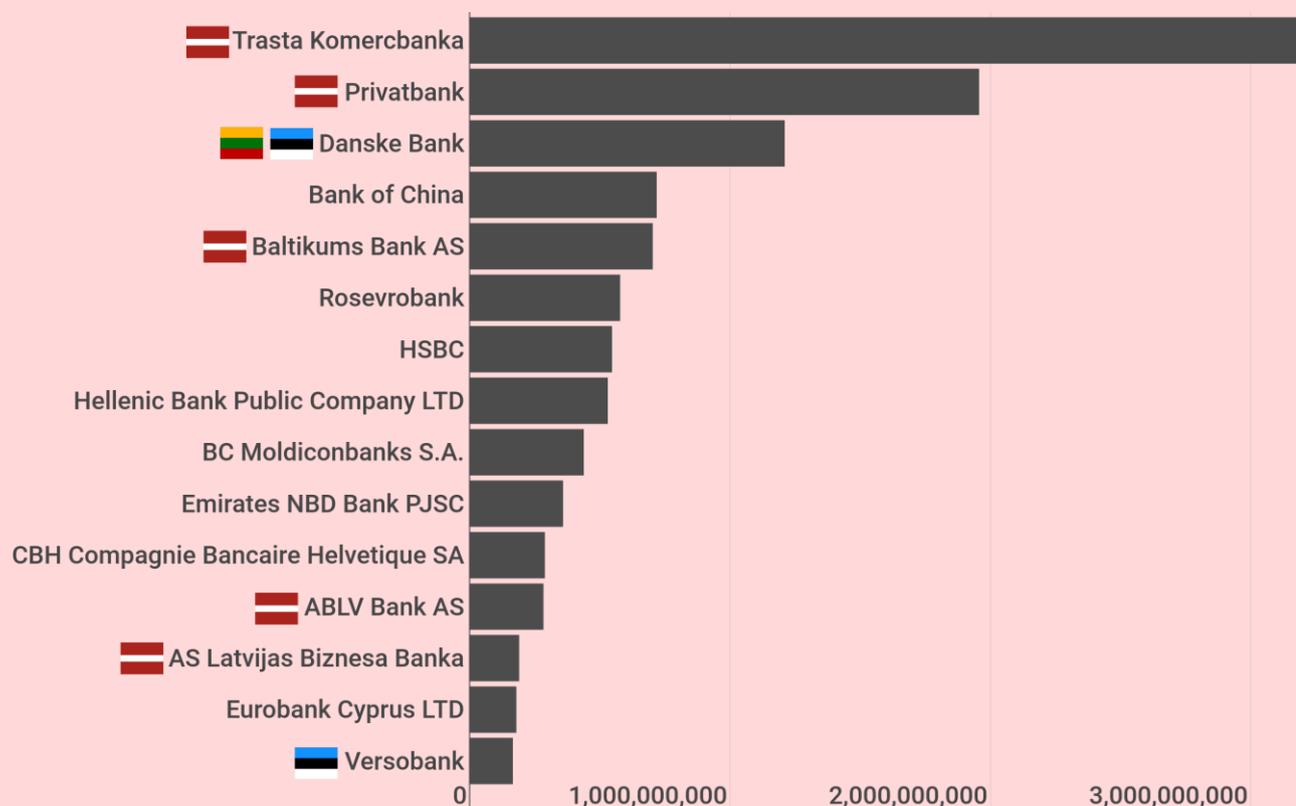
An absolute leader of opaque wire transfers in Latvia was ABLV– the biggest offshore bank in Latvia. In 2016, its turnover was close to Latvia's annual GDP (\$25 billion).³³ According to the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN), "90 percent of ABLV clients were shell firms in offshore jurisdictions conducting tens of billions of dollars in high-risk transactions from 2012 to 2017."³⁴ In 2018, after the US sanctioned the bank due to systematic money laundering, bribing of officials, and breaching the North Korea embargo, the bank started self-liquidating.³⁵ It is estimated that around \$20 billion had been smuggled via Latvian banks in the past years.³⁶

The money laundering business model has been replicated by banks in two other Baltic countries. Estonian banks have likewise been involved in large-scale illegal financial transactions. The most notorious case is linked to the division of Danske Estonia³⁷. It had reportedly carried out systemic money laundering amounting to as much as hundreds of billions of dollars in a nine-year-long period.³⁸ The Danske Bank case is one of the biggest money laundering scandals in European history.³⁹

The banking sector in Latvia was not extensively controlled until around 2015. The country saw a commercial opportunity instead. However, as the anti-money laundering policies were evolving internationally, Latvia gradually developed awareness of the national reputation risks, increased international crediting costs, and political implications deriving from the over-reliance on the high-risk economic realm dependent on a partner with disputable geopolitical ambitions. Major bank sector reorganization took between 2015 and 2018.⁴⁰ As a result, in 2019 share of foreign investments in Latvian banks shrank to less than 10% of total deposits.⁴¹

The issue has been the case in Estonia and Lithuania too but due to the larger banking sector, Latvia has been the leader.⁴²

Figure 4: Top 15 banks involved in Russian laundromat (2011-2014)



Source: Organized crime and corruption reporting project

3 Countering Russian Corrosive Capital

Russia's corrosive capital in Latvia, in particular, and the Baltic states, in general, is a complex phenomenon that is rooted in history. Addressing this problem, therefore, requires a joint effort by the private and public sectors to bring about structural change.

Overarching Strategic Recommendations

Corrosive impact on the national economy in Latvia is a result of inherited and long-lasting sectoral orientation, sometimes exclusive, towards Russia. Dating back to the Soviet and post-soviet years when few external cooperation opportunities were available, all eggs were put in one, the closest, basket. 30 years after the restoration of Latvian independence, business partnership diversification and increase of business competitiveness should be a national priority. WTO, EU, and lately OECD memberships provide suitable ground for revisiting existing collaboration portfolios and building new and productive economic ties.

The culture of rent-seeking relations between business and political, civil service elites has likewise retained from the Soviet era. They affect most economic realms, including those under malign pressure. Corruption trends have been worrisome in Latvia. The country is doing worse than its Baltic neighbors.⁴³ The situation is further exacerbated by the peculiarly close ties between politicians and businesspeople.⁴⁴ In light of this, the enhancement of transparency and accountability measures is the key aspect to eradicate opaque business traditions.

Private Sector Taking Charge

In recent years, the Latvian energy sector has undergone profound reforms aimed at diversification of natural gas suppliers and elimination of particular enterprises' dominance in the sector.⁴⁵ Essential homework has already been accomplished, and the outcomes of these reforms are still awaited.⁴⁶ Meanwhile, Latvian entrepreneurs could already look to the future and identify new energy business opportunities which, among other things, facilitate energy independence.

According to the European Green Deal, Latvia (alongside other EU member states), should become carbon neutral by 2050. The strategy entails the elimination of fossil fuels from everyday use. The period until 2030 has been determined to be a transition time, which could suit for reorienting and creating opportunities for carbon-neutral energy production businesses.

Such a scenario has been integrated into the National Energy and Climate Strategy 2021-2030.⁴⁷ To move ahead, private sector participation is essential.⁴⁸ Production of biogas, biomethane, hydrogen and renewables by the local enterprises is among the priorities. For instance, heating production in Latvia vastly depends on natural gas, though it can be produced from renewable sources like biogas or wood, straw, reeds, and peat, which are widely available in Latvia.⁴⁹ The bottom-up approach would be useful in this respect. It would enable a new business niche and create a competitive advantage to the 'early birds' who would have established an alternative production line by the time natural gas is no longer demanded. Steps like determining market needs, attracting workforce, obtaining technologies could be taken now to facilitate long-term competitiveness and investment attraction. Local replacement of natural gas could help to eliminate Russia's impact on transport, as well as electricity and heating production.

Latvia's finance sector similarly has experienced an overhaul to comply with global best practices in anti-money laundering (AML) counter-terrorist financing (CTF, and counter-proliferation financing (CPF).⁵⁰ Efforts have been internationally appreciated, though Latvia remains under observation⁵¹ and risks remain.⁵² According to FinCEN, Latvia has been on the grey list for years. Such banks as BlueOrange Bank (formerly Baltikums

Bank), Expobank (formerly LTB Bank), Industra Bank (formerly Meridian Trade Bank and SMP Bank), Reģionālā Investīciju Banka, Rietumu Banka, Rigensi have been monitored for long by the United States. Some of the laundering-associated banks were closed down, namely ABLV Bank (formerly Aizkraukles bank), PNB bank (formerly Norvik Banka un Lateko Banka), and Trasta Komercbanka.⁵³ Others like Swedbank, the largest bank in the Baltics, have invested in enhancing AML procedures and refused to work with clients outside the European Economic Area.⁵⁴

As a follow-up, the sector has shrunk significantly, and concerns arose about its overall viability. The main challenge for banking thereby is learning to function under the new rules of the game in a highly regulated environment.

The learning process should primarily include the enhancement of internal AML procedures at entities working with foreign investors. Nuanced but balanced risk-based client selection should be prioritized by service providers.⁵⁵ Businesses primarily working with investors from third countries should be especially scrupulous in determining their client income sources. Those collaborating with the local and European clients can be more flexible. Being aware of one's risks and ability to control them is of utmost importance for a successful continuation of the business. Another aspect is distancing from untraceable shell companies. Instead, working with real and de facto existing businesses should be prioritized.⁵⁶

The sustainability of both pathways will nevertheless depend on players' ability to implement more profound adjustments. New business models based on the competitive niche services in conventional banking segments, like crediting, could be useful. This will ensure the finance sector's future and to replace corrosive capital with productive capital.⁵⁷

The transport and logistic sector remains the most vulnerable of the three sectors researched. Unlike the energy and finance sectors, the port and railway industries have not transformed for years. In the existing environment, private businesses could nevertheless consider at least a few options to make a living without exclusive reliance on Russia's transit favoritism.

Industrialization and added value generation could be considered as the first option. Current transit business primarily relies on simple cross-country goods transfers – the least profitable entrepreneurship concept. More advanced frameworks that are built upon the existing assets and infrastructure (e.g. oil terminals, storage facilities) could be assessed. For instance, crude oil imports could be locally processed into oil products to meet local and external needs.⁵⁸ Lithuania's Mažeikiai refinery, which supplies gasoline to Latvia, uses such a production scheme.

Integration of local cargo transit companies into the large European transit chains could help to launch new business opportunities. The mainstream collaboration agreements are arranged with particular regional suppliers. As a result of focusing exclusively on individual contracts, Latvia has been isolated from the global transit and logistic markets. Integration pathway was chosen by the Latvian oil company Ventspils Nafta, in 2016 acquired by the Dutch oil giant Vitol Group. This has ensured workload for the company and jobs for local employees.⁵⁹

Relying on smaller transit players and diverse cargo types could also be advantageous. This has been the strategy of the Port of Liepāja, which has suffered less from the decline in Russia's cargo transited through Latvia. In the long run, new routes to transport goods from the neighboring European regions to Russia could also be considered.

Finalizing Reforms and Closing Governance Gaps

The government has implemented significant transformations in the energy and finance sectors in past years but has largely neglected the transport and logistic sector. Consequently, the reorganization of this sector should be prioritized.

The rail transit industry is dominated by the sole state-owned company Latvijas Dzelzceļš. It is ineffective in respect to rail infrastructure maintenance and ensuring competitive rail cargo transportation prices in the territory of Latvia. Port business, to its turn, is politically affiliated and oriented towards specific cargo types entering from Russia.⁶⁰ Considering this, Russia's reorientation to its own transit routes has been decreasing the country's physical sectoral presence while increasing pressure on the

sector since no replacement strategy for Russian freight has been worked out. Establishing more favorable and competitive rail and seaport business conditions could serve as a good starting point for attracting more cargo beyond those of CIS countries.

Liberalizing the transit carrier market should be among the priority tasks.⁶¹ This first of all implies establishing equal rail cargo service provision conditions for state and non-state business actors.⁶² Abolishing overpriced service practices and canceling unfair discount policies by Latvijas Dzelzsceļš are essential in this respect.⁶³

Pricing of cargo transit services could be revisited. Currently, a single price approach (higher than average in the region) is in place for all types of freight, and costs are measured according to travel distance. Given the different distances from the border to three Latvian ports (Rīga, Ventspils, Liepāja), it is worth considering a single “vignette” approach to create a single transit corridor. Segmented pricing according to the cargo type may also be advantageous to facilitate opportunities for alternative, less valuable freight transportation through the country.⁶⁴

Long-awaited seaport reform should also be concluded to depoliticize seaport business and determine predictable conditions for investors. In the process, both administrative and economic rationale should be considered as noted by the private sector players.⁶⁵

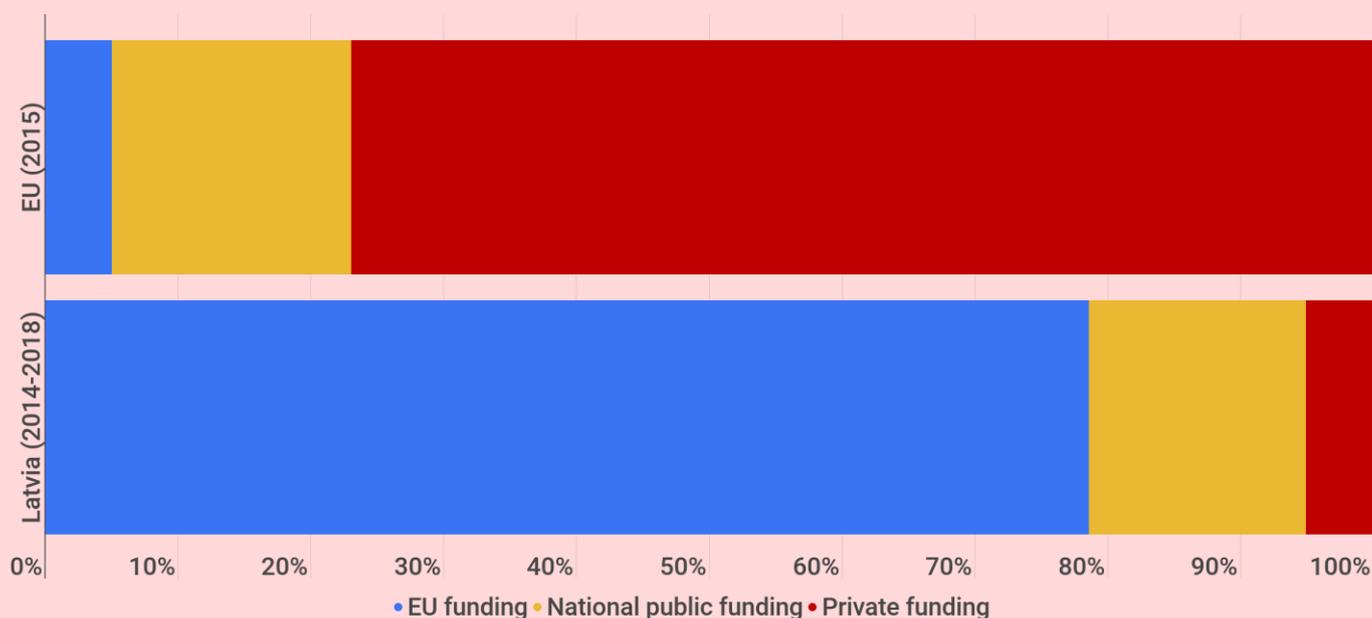
The energy sector could similarly receive additional stimulus for proceeding with the green transition. To promote local competitiveness and technological advancement, strategic investments in research and development (R&D) could be made available on a governmental level. The approach is of high importance for the country’s overall economic development.⁶⁶ In the past years, funding for R&D did not exceed a single percent of GDP in Latvia⁶⁷, while the EU suggests allocating around 3%.⁶⁸ Determination has been already expressed in the National Development Plan 2027. R&D investments should make around 2% of GDP and about a fourth should go for climate technology development, renewable energy sources, and green policies.⁶⁹ Commitments should respectively be fulfilled.

The private sector could also consider investing more in technological development as it normally leads to higher competitiveness. Recently, the share of private investments accounted for less than 10% of the total money influx in R&D, whereas in Europe almost 80% of investments were private.

Locally produced energy will, however, sustain only if gains for the private sector will outweigh the costs. In this respect, carefully assessed and scrutinized incentive systems including tax reliefs, grant programs could also be considered along with the EU's base principle 'polluter pays'.

Finally, combating corruption in the public sector should be placed on the top of the governmental priority list for reducing corrosive capital risks.

Figure 5: Public and private funding of research and development in the EU and in Latvia



Source: Latvia's National Energy and Climate Plan 2021-2030

The problem of corrosive capital is complex and has no sole remedy. It requires a comprehensive strategy underpinned by the political will to change the present status quo. While legislation already regulates official relations of foreign actors with sectors of national importance quite well, it does not provide oversight over the non-official endeavors. Lobbying law aimed at regulating legal and ethical aspects of private and public sector interaction together with a mandatory register for lobbying disclosures would be a valuable addition to the regulatory toolbox. Registers have been introduced in a number of European countries, including Lithuania and Poland.⁷⁰ The spectrum of other measures could vary from further capacity building of corruption prevention and law enforcement institutions to revisiting the public sector remuneration system.

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About the Author

EVIJA DJATKOVIČA | Research Fellow, Latvian Institute of International Affairs

Evija Džatkoviča's research interests cover EU's Eastern Partnership countries, Belarus in particular, regional security of the Baltic states, their hard and soft power relations with Russia and the role of NATO on Eastern flank.

She has a background in political science (University of Latvia). Since 2020, Evija holds a position of Research Fellow at the Latvian Institute of international Affairs and Riga Stradins University. Formerly she worked in policy consulting, at the OSCE ODIHR election observation missions and the Slovak Embassy in Latvia focusing on analysis of the Baltic states' policies.



evija.djatkovica@liia.lv

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