

European Rule of Law Mechanism:
additional questions to the country visit – ESTONIA

March 2022

Methodology of the evaluation on the guidelines for lobbying.

The disclosure of lobbying meetings will be analysed using 5 criteria:

1. Thoroughness of the information - a score is given for each meeting. The institution's final score is the average of the meetings.
2. Timeliness of disclosure.
3. User-friendliness of the information (how easy it is to find the information on the webpage).
4. Machine readability.
5. Willingness of the ministry or other public authority to provide information in addition to the public information (We are not yet sure whether we will include this criterion. We plan to request additional information from each obligated government agency and then we will evaluate how well and thoroughly they have responded).

General data on the participation in the online courses for the guidelines for conflict of interest.

As of 23.02.22, 1737 public officials have passed the e-test for the Moodle online course. In addition, there are between 4700-7800 views for each video in YouTube, depending on the topic. On 18.02.22, the Minister of Justice sent an e-mail with a reminder to all government ministers and their advisers that they must participate in and pass the test in the e-training course.

Political Party financing act - explanation in writing of the innovations that the draft would bring.

The draft bill to amend the Political Parties Act foresees the following:

- The investigative powers of the political party funding supervision committee would be extended, including through the provision of a legal basis for requesting documents, information and explanations from third parties, and for allowing persons to be invited to the office of the committee.
- A deadline would be introduced (proposal: 15 calendar days), during which a prohibited donation must be returned to the person who made the donation (upon expiry of the term, the prohibited donation would in any case be transferred to the state budget).
- The consequences applicable in the case of acceptance of a prohibited donation would be amended. This includes that orders of the committee requiring transfer of a prohibited donation into the state budget would be subject to compulsory enforcement. If a political party that receives a prohibited donation receives allocations from the state budget, a reduction in allocations would be introduced.
- The definition of an affiliated organization would be amended, that is, there would no longer be the requirement for a political party to be a founder or a member of an affiliated organization, and instead an affiliated organization would be defined based on its substantive affiliation with the party. There would be an expanded obligation for political parties to inform the committee quarterly of their affiliated organisations.
- Political parties and members of political parties would be prohibited from using public funds for political activities of the party. This currently only applies to election campaigns. The concept of public funds would be clarified to also include benefits financed from the state budget and municipality budgets.

Draft of the revolving doors legislation.

The proposed wording will be:

§ 12-1. Restriction on activities of member of Government of the Republic after expiry of term of office

- (1) A member of the Government of the Republic shall not act as a member of a management or control body in a legal person in private law whose field of activity falls within the area of government of the ministry, if the minister during his or her term of office has taken decisions with significant effects concerning the activities of that legal person or if the legal person has a contractual relationship with a ministry headed by him or her.
- (2) If a member of the Government of the Republic has been in office for less than one year, the restriction specified in subsection (1) shall apply for six months."

Further details regarding specialised trainings,(e.g. financial crime), such as number and frequency, received by the Internal Security Service.

Training is planned for once a month on average.

Training covers the following topics:

- financial investigations in connection with fraud and corruption cases;
- money laundering;
- virtual assets;
- detection of corruption;
- procurement procedures, corruption indications and red flags;
- use of forensic software like x-rays, etc.

In addition, members of the Internal Security Service participate in Cepol financial investigation and money laundering trainings if possible.

State authorities (afternoon session) – checks & balances, justice system and media pluralism

Powerpoint on the Co-creation workspace.



The exact name of the project funded by European Structural Fund, which supports the Co-creation workspace.

Phase II and phase III of the co-creation workspace project are funded by the European Regional Development Fund (ERDF). The exact names of the projects are: "*Riigi koosloome keskkonna arendusprojekti II etapp*" and "*Riigi koosloome keskkonna arendusprojekti III etapp*".

Data on COVID-19-related complaints and their follow-up.

- As of 23 FEB 2022 , 68 complaints have been submitted to the Administrative Courts on the measures and restrictions applied by the Government.
- In 6, the proceedings have been terminated, with 1 final decision and 5 termination of proceedings for other reasons.
- In 2 cases, a judgment has been made, but they have not yet become final.
- In 3 cases, a judgment has been made, but as of 23 FEB 2022, they have all been appealed to the Circuit Court by the applicants.
- In 45 cases, a decision on interim relief has been made. All requests by applicants for interim relief have been denied or decisions for interim relief have been appealed by the Government and have been overturned by the Circuit Court.

In 2021, have there been any changes in relation to the powers and independence of the Prosecutor's Office?

No, there have been no changes.

The written answers of Ms Kaidi LIPPUS, Director, Courts Division, Judicial Administration Policy Department.

State fees in civil procedure:

In your contribution, you also inform us about the increase of court fees for acts concerning the courts, commercial register, non-profit associations and foundations register and commercial pledge register. As presented in the 2021 EU Justice Scoreboard (Figure 25), Estonia is among the EU countries with high court fees for specific consumer and commercial cases. How much is the increase of the court fees and would this increase have effect on civil cases (incl. consumer and commercial ones)? Have you done an impact assessment of this legislative change that you can present to us (notably social and economic impact)?

The increase of state fees for addressing the courts and registration departments are in line with the changes in Estonia's economic indicators in recent years, and take into consideration ongoing economic growth, inflation and wage growth. State fees have increased by 40% on average in proportion with the increase in the average monthly salary.

State fees for addressing the courts increased by 40% on average. The increase of the state fees is not excessive, considering each state fee rate separately. State fees that increased over 40% were the lowest in absolute terms, and therefore the increase has a lower economic impact for the parties to the proceedings. For example, the state fees increased from 45 to 65 euros, 50 to 70 euros, 15 to 20 euros, 75 to 100 euros. The rate of the state fee remained unchanged for civil proceedings for actions by petition and in family matters.

State Fee Rates for Filing of Petitions in Judicial Proceedings

If the claim is 2000 euros, the fee is 315 euros. Last year this rate was 225 euros, and this increase was indeed 40%. If the claim is 10 000 euros, the fee is 700 euros. Last year the rate was 550 euros, and this increase was 27%. The highest state fee is 5000 euros, which was previously 3400 euros.

An analysis of the payment data of state fees on claims under the Law of Obligations Act reveals that the minimum state fee (for submitting a claim in expedited procedure for orders for payment) of 45 euros was paid most frequently, that is in 23 441 cases in 2018, 23 678 cases in 2019 and 24 186 cases in 2020. The second largest group of state fees paid was up to 75 euros, which was paid in 19 412 cases in 2018, 22 028 cases in 2019 and 24 695 cases in 2020. The highest rates of state fees (starting from 1001 euros) have been paid an average of 768 times per year between 2018 and 2020. Plaintiffs have the right to apply for State financial aid towards payment of the state fee.

Our analysis has determined that the increase in state fee rates has only a minor economic impact. The increase of state fees may have a small negative effect only on people who are required to pay a state fee for acts in the courts and registration departments. In 2020, a total of 73 228 state fee payments were made for acts in the courts, of which more than 60% were in an amount up to 75 euros. The registration department received a total of 98 102 state fee payments, of which less than 0.4% exceeded a rate of 190 euros.

The conditions for granting State financial aid remain the same, and thus the opportunities for people with lower incomes to address the courts are not diminished.

The increase of state fees would not have a significant economic impact on persons addressing the courts and registry departments in general, as the average increase of 40% is in line with economic indicators and is therefore not excessive.

The average person does not address the courts on a regular basis and therefore most people are not affected by the increase of state fees. The risk that people will not be able to address the courts due to the increased state fees is minimum.

By increasing the state fee rates, we would like to influence the behaviour of people addressing the courts. The need to address the court should be more thoroughly considered, and increasing the state fee should guide plaintiffs to endeavour to reach a settlement with defendants out of court.

According to information provided by our judges, addressing the court is no longer the last preference of plaintiffs, that is, a measure of last resort. Statements of claim are filed before negotiating with the other party and without considering whether the proceedings will be successful, as filing a claim has become cheaper compared to other services due to inflation and the increase of living standards. Our aim is to encourage the settlement of disputes at the earliest possible stage, before a statement of claim is filed.

Additional questions:

When a court is overrun by cases and it requests a transfer of cases to other courts, is it the file that is transferred or it is the judge from the other court who has to move to the initial court for the hearings?

The court case is registered in the courts information system, and if the characteristics of the case determine that that a particular case must be distributed to the judges of another first instance court, then the case is distributed by the courts information system randomly to a judge of a court with a lesser workload. Usually, documents are already in digital form. If they are on paper, the papers will be scanned. The judge may decide whether he or she wants to compile a court file on paper, and if so, then the file is sent to the court house where the judge works. The hearing usually takes place in the initial court, but if the parties to the proceedings and the judge agree then the hearing can take place in the court in which the judge works. These cases are usually adjudicated in written proceedings.

Could you share with us the draft law, which aims to establish a feedback system on the quality of work of 1st instance judge and also to regulate issues related to judges' health?

The draft bill was just signed by the Minister of Justice and was sent to the other ministries and to the courts and other organisations for consultation this week. At the end of March, the courts and other organisations will give us feedback, and then the Ministry of Justice will amend the draft and send it to the Government for approval. Once it is approved by the Government, it will be submitted to parliament. Issues related to the health of judges are not currently included in the draft bill. We would suggest translating the version of the draft law that will be sent to the Government.

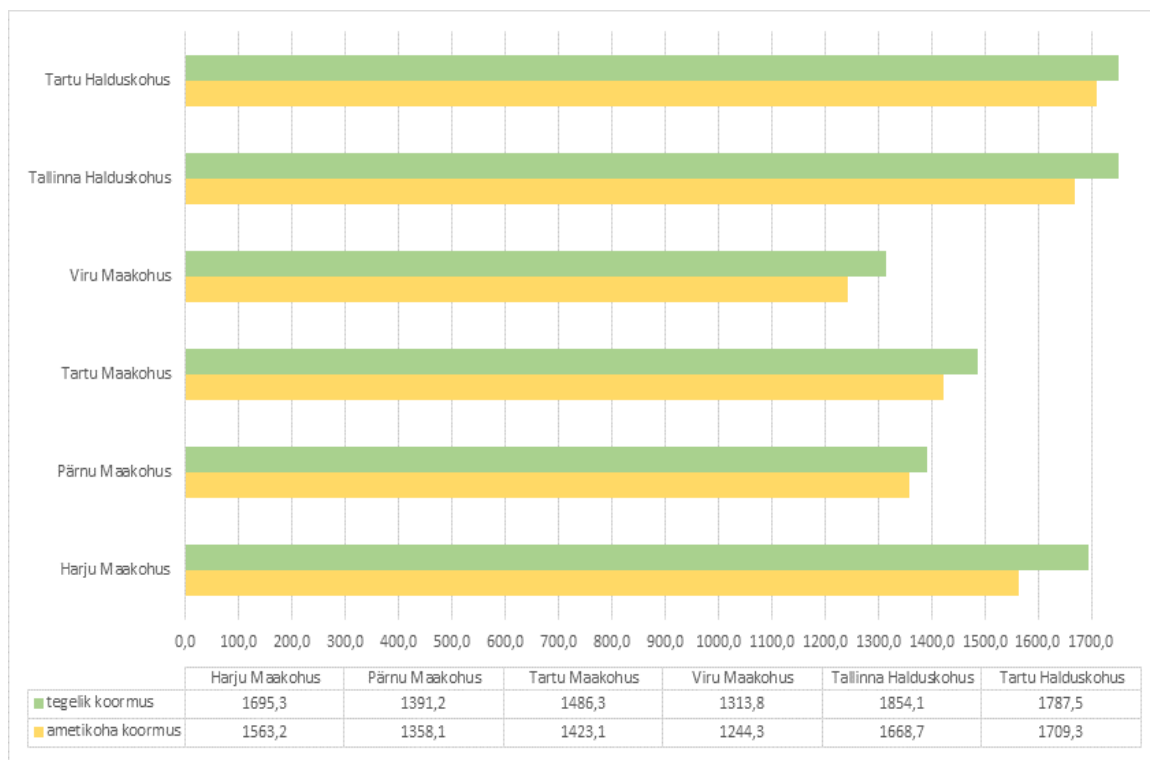
How many times, over the past two years, the Minister of Justice did not follow the opinion of the full court, when appointing a judge at a certain position?

This has occurred once, when the president of the Harju County Court was appointed. The full court did not support the candidate (less votes for than against), but the Council of Administration of the Courts gave its consent to the Ministry of Justice in accordance with the requirements of the Courts Act.

Do you consider that the workload currently faced by judges to be excessive, and could you please provide data that could substantiate or contradict this position?

In some courts the workload of the judges could be considered excessive. The workload is not currently equal between the courts. According to the workload methodology, the normal workload is 1600 working hours per judge per year. The table below demonstrates that in 2021, the actual workload (green) was higher in some courts and lower in other courts. Currently, there are 5 additional judge positions in the Harju County Court and 1 in the Tartu County Court. Judges will be appointed to these positions probably in May or June, and they will start working in the courts in August or September.

There will be an additional 4 judge positions added in the Harju County Court and 2 additional judge positions added in the Tartu County Court probably at the beginning of April, and the new judges will start working in the courts in January 2023. The Ministry of Justice has increased the number of judges because changes in criminal procedural law have led to an increased in the workload of criminal judges since January 2022 when the new law entered into force. As the workload in the Pärnu and Viru County Courts is lighter, no new judge positions are foreseen for these courts at this time.



Green = actual workload. Yellow = workload foreseen for the position. Halduskohus = administrative court. Maakohus = county court (court of first instance).

Any statistics that the Ministry of Culture may have on the impacts of the COVID-19 pandemic on the media sector / current state and development of the media sector in Estonia (for example, the increased digital revenues of newspapers that you mentioned).

Statistics on digital subscriptions for media Publications are provided by the Estonian Association of Newsmedia Enterprises (reported in the input for 2022 as “Estonian Media Alliance”) and are available at <https://meedialiit.ee/statistika/statistika-2021/>.

According to the statistics, there has been a substantial increase in paid digital subscriptions of members of the Estonian Association of Newsmedia Enterprises:

I 2020: **87 830**;

III 2020: 91 865

VI 2020: 100 745

IX 2020: 113 873

XII 2020: 126 601

Increase of paid digital subscriptions between **01.2020- 12.2020 = 30,6%**.

I 2021: 135 345

III 2021: 149 980

VI 2021: 110 261 - NB! From 01.04.2021, the Postimees Media Group no longer provides statistics to the Estonian Association of Newsmedia Enterprises)

IX 2021: 117 958

XII 2021: 123 080

Change between 01.2021- 12.2021: -9,07% (This is misleading due to the lack of information from Postimees Media group).

According to separate information published by the Ekspress Media Group on 12.01.2022, there was a substantial increase in digital subscriptions for their publications in the Baltic States. Compared to the previous year, this marked a 62% increase.

Company	Digital Subscriptions 31.12.21	Digital Subscriptions 31.12.20	CHANGE
Ekspress Meedia AS	74 873	49 696	51%
Õhtuleht Kirjastus AS	20 992	13 820	52%
Geenius Meedia OÜ	4 100	1 931	112%
Delfi AS (Latvia)	17 549	11 143	57%
Delfi UAB (Lithuania)	17 433	6 595	164%
TOTAL:	134 947	83 185	62%

Any updates concerning (the legislative framework for) fair and transparent allocation of state advertising in Estonia.

There are no specific provisions in Estonian law governing the allocation of state advertising, and there are currently no plans to introduce such legislation.

Information on the granularity of media ownership information included in the business register (whether it includes beneficial ownership).

Under subsections 77(1), (2) and (3) of the [Money Laundering and Terrorist Financing Prevention Act](#), general partnerships, limited partnerships, private limited companies (*osaühing* or OÜ in Estonian), public limited companies (*aktsiaselts* or AS in Estonian) and commercial associations are required to submit information on beneficial owners to the Commercial Register information system, which are then published in the Commercial Register information system under subsection 78(1). Thus, information on beneficial owners is indeed visible in the Commercial Register.

State authorities (morning session 2) – on anti-corruption framework and media pluralism

Could you explain in writing the way that the political fractions use part of the State budget for funding non-profit organisations? What is the legal basis and what are the formal/informal criteria?

The state budget is debated and adopted in parliament as a parliamentary Act pursuant to the State Budget Act. The Ministry of Finance drafts the state budget, submits it to the Government of the Republic for approval, after which the Government submits it to the parliament for adoption.

Between the second and third (final) reading of the draft budget Act for the coming year, in the due course of parliamentary proceedings it is possible for the Members of Parliament to propose contributions to support regional initiatives – projects, NGO-s, non-profit organisations, culture and sports events, etc. All MPs are entitled to make these proposals. The proposals will be discussed in the parliamentary groups, and *inter alia* the parliamentary groups will check that the proposed beneficiary recipients meet certain criteria (no tax debts, accounts submitted in due time, etc.). Thereafter, the parliamentary groups will submit their proposals to the finance committee of the parliament. It will be the

task of the finance committee of the parliament to review these proposals and to draft proposals to amend the draft state budget Act accordingly with a summarised list of recipients.

Thus, all of these proposals have to pass parliamentary discussions and review, although legislation does not provide for any extra formal procedures for such contributions. All of the proposals will be discussed by Members of Parliament in their parliamentary groups and parliamentary committees in the same manner as any other proposals for amendments to the draft state budget. All of the draft amendments will be reflected in the documentation of the proceedings for adoption of the state budget Act. It is up to the coalition to decide the total sum for such contributions and to the Members of Parliament and parliamentary committees to safeguard that there are no obstacles (possible outstanding tax bills, etc.) with regard to the background and other circumstances of the recipients.

Anti-Corruption Select Committee
European Commission: Rule of Law meeting
18 February 2022
9.30-10.30

1. Can you provide us with an update on the implementation of the Anti-corruption Action Plan? What are the main priorities for 2022?

It was on 15 March 2021 when Anti-Corruption Select Committee held an open meeting with its main partners: Ministry of Justice (as the main co-ordinator of anti-corruption activities) Political Parties Financing Surveillance Committee and Transparency International Estonia to establish the priorities for implementing the Anti-Corruption Action Plan.

As of today we are happy to report that:

- 1) On the basis of the GRECO V recommendations there have been enforced the amendments to the Anti-Corruption Act establishing to the political advisers of ministers the obligation to declare their economic and other interests. Upon the proposal of the Conservative People's Party of Estonia the deputy secretaries general of ministries have the same obligation now according to the amendments to the Anti-Corruption Act. By the first 2021 autumn meeting of the Anti-Corruption Select Committee verified all the declarations of the above officials (along with the new members of the Parliament) and when necessary additional questions were asked. We can summarise that it was a good idea to verify those declarations as soon as the obligation was enforced, *inter alia* in order to:
 - a) draw the attention of some ministries to the importance to insert the officials to the register of declarations of interest as soon as the obligation is enforced;
 - b) make a clear understanding about the tasks of political advisers – whether they advise on political or administrative issues or have other tasks;
 - c) find out that several ministries had made their deputy secretaries general to declare their interests for quite a number of years already.

Adhering to the GRECO V recommendations “Guidelines for Ministers and Their Advisers to Avoid Conflicts of Interests” along with the “Good Practice in Communicating with Lobbyists for Officials” were approved by the Government of the Republic on 18 March 2021. Thus, the documents drafted by the Ministry of Justice in close contact with the Anti-Corruption Select Committee have been in force almost a year, whereby the obligation to disclose lobbying meetings has been in force since summer 2021. According to the first summaries as presented by the Ministry of Justice – the lobbying meetings have been disclosed in a conscientious way and it is worth mentioning that the number of meetings with professional lobbyists (PR experts) is quite small. However, on the 14 February 2022 meeting of the Anti-Corruption Select Committee it was pronounced that it would be worthwhile to find out who the lobbyists are representing and where they get their finances from.

- 2) The Act on the Protection of Persons Reporting the Breaches of Law has been drafted and submitted to the parliament. Although the parliamentary discussions are passionate, we expect to harmonize the Estonian law with Directive 2019/1973 in spring 2022.
- 3) With regard to avoiding corruption risks in local governments the Local Government Organisation Act draft amendments provide for the intensification of the internal audit in local governments. On the 7 February 2022 meeting Anti-Corruption Select Committee met the minister responsible for drafting the amendments to the Local Government Organisation Act to discuss the issues pertaining to diminishing the corruption risks in local governments. Several proposals of the Anti-Corruption Select Committee have been taken on board – besides strengthening the internal control, the members of the council will be provided with more legal support to get all documents and data necessary for their work and there will no longer be the obligation to elect the chairman and vice-chairmen of a committee of council at the same time.
- 4) The transparency of financing political parties and other political activities has been important to the Anti-Corruption Select Committee, the issue has been repeatedly discussed with Political Parties Financing Surveillance Committee and Ministry of Justice. Within coming weeks we expect the Ministry of Justice to send out the draft amendments to the Political Parties Act to provide the Political Parties Financing Surveillance Committee with further powers to fulfil their duties – receive data from banks, interview third persons and receive data from third persons in order to find out about the financing details; the notion of prohibited donation has been elaborated as well as the outcome of the use of the prohibited donation (in case the forbidden donation will not be returned within 15 days, the political party has to pay interest for using the resource). As of today the use of public resources for elections has been forbidden, but according to the draft amendments the use of public resources for political activities as a whole will be prohibited. In autumn 2021 Anti-Corruption Select Committee met the Political Parties Financing Surveillance Committee before the elections of the councils of the local authorities in order to promote to the common understanding of fair election rules.
- 5) Ministry of Justice analysed the practise of Anti-Corruption Act to establish whether there are any issues needing legislative approach or just training or other measures for the meaningful application of the Act. E.g. whether to waive application of procedural restrictions on the daily activities of the providers of medical services and how to elaborate further some aspects of procedural restrictions. The possible solutions have repeatedly been discussed in the Anti-Corruption Select Committee. Anti-Corruption Select Committee has also promised to the Ministry of Justice that in case it deems necessary the urgent amendments could be initiated by the Committee without the due procedures usually preceding the parliamentary procedures.
- 6) With regard to the declarations of interests the Anti-Corruption Select Committee has initiated discussions on amending the declarations both ideologically (e.g. to include the possibility to declare contemporary financial interests, e.g. investments in crowdfunding – this will be reflected in the amendments to the Anti-Corruption Act drafted by the Ministry of Justice) as well as pointed out some possible technical amendments that could enhance the correct declaration of interest (e.g. make it possible for the declaring declarant to compare the data from previous declarations simultaneously, draw attention to obvious mistakes (in case one is declaring 50 EUR instead of 50 000 EUR, etc). Tax and Customs Board has admitted that it is worthwhile to amend the system, however the IT solutions are expensive, thus the issues are being considered.
- 7) Anti-Corruption Select Committee is going to learn on how to enhance the use of big data on providing more transparency. On 7 February 2022 meeting it was discussed with the Minister of Justice and confirmed that the issue needs thorough analysis of prospective IT-developments.
- 8) Anti-Corruption Select Committee is promoting transparent lobbying. Now there is being prepared a Roundtable Series on Legislative Transparency and Integrity in collaboration with

the US Embassy in Tallinn and Transparency International Estonia. The first roundtable taking place in March 2022 gives an overview of lobbying policies with speakers from GRECO and neighbouring countries and a panel discussion on the role of lobby in policymaking and how to deal with relevant risks. The roundtable in April 2022 focuses on the practical approach on lobbying and the prevention of conflicts of interest and elaborates specific examples of legislation and rules governing lobbying, preventing conflicts of interest in legislative activities as well as enhancing parliamentary transparency.

The roundtable in May 2022 aims at establishing the Estonia's way forward toward the increased transparency in legislative functions - mapping how Estonia can achieve further progress on lobbying and conflicts-of-interest reforms, be they legislative or policy changes. Concrete recommendations will be developed on this roundtable.

2. How is the cooperation with other national authorities working?

The cooperation with our national authorities is working well. Anti-Corruption Select Committee meets regularly with Police and Border Guard Board, Prosecutors Office, Ministry of Justice, Legal Chancellor, Internal Security Service, National Audit Office, Transparency International Estonia. Whenever we ask for information, the above are eager to provide us with information and expert opinions. However, when asking for information from other public authorities there have been some delays and dissenting opinions needing further discussions. Nevertheless, the spirit is cooperative and there is common understanding to promote the transparency.

3. Have you identified other specific challenges with regard the fight against corruption in the context of the Covid-19 pandemic?

COVID-19 pandemic-related challenges in the work of Anti-Corruption Select Committee were more characteristic of 2020, however there is an ongoing aftermath of COVID-19-related challenges still today.

It was in 2019 when the head of the Internal Security Service pointed out to the Anti-Corruption Select Committee that in times of stability the corruption differs a lot from the corruption in times of instability and crises.

Indeed, in the context of COVID-19 there have been different challenges.

We would like to point out the experiences of allocating the measures to diminish the impact of COVID-19 crisis on rural economy. In Estonia there is Rural Development Foundation – a foundation established by the Republic of Estonia to promote rural life – that received 200 000 000 EUR public resources for that purpose. Rural entrepreneurs meeting the requirements could apply for loans and guarantees from the Rural Development Foundation. It has remained a matter of discussion whether the initial purpose of the measures was to allocate working capital loans to compensate the decreasing turnover and how the decision to use the resources for allocating investment loans was made.

It was already in autumn 2020 when the Anti-Corruption Select Committee and National Audit Office studied the practices of the Rural Development Foundation on implementing the crisis measures and established that the rules for establishing the compatibility of the entrepreneur with the purpose of crisis measures were unclear and applied inconsistently. When discussing the implementation of the crisis measures by Rural Development Foundation with the Legal Chancellor we established that the application of administrative procedure when allocating public resources was applied unevenly and a substantial part of the whole understanding of Rural Development Foundation about the procedures of allocating public resources was questionable.

As of today, the former heads of Rural Development Foundation are suspected of the misuse of trust within the due course of criminal procedure. The rationale for suspecting them of the misuse of trust has not been elaborated to reflect corruption.

However, there is a big corruption case with regard to the implementation of crisis measures – Foundation KredEx (that will merge with Enterprise Estonia to become Estonian Business and Innovation Agency within 2022) had to allocate measures for entrepreneurs who suffered from crisis and with regard to one of the projects a criminal case including bribery and political corruption was initiated in January 2021.

Our conclusions are that in times of instability and crisis it is possible that one has to make quick decisions without clear knowledge on what will happen next. Thus, it is possible that there could happen some mistakes due to limited knowledge of all perspectives. However, it is important to have clear rules and correct procedures that could also be used in times involving unexpected circumstances.

COVID-19 cases have also drawn attention to issues promoting transparency that are worth being examined also for times of stability. E.g. the application of administrative procedures when making transaction with public resources. As of today some public entities whose statutory tasks include making transaction with public resources contend that they do not have to apply the principles of administrative procedures. Anti-Corruption Select Committee is going to study the issues *inter alia* with the assistance of National Audit Office, Legal Chancellor and some legal scholars.

It is important to take advantage of every crisis as a lesson.

4. The amendments to the Anti-corruption Act entered into force in April 2021. Do you have any data available on the first period of application?

Yes, it was in summer 2021 when the staff of the Anti-Corruption Select Committee verified the declarations of interests of the deputy secretaries general of the ministries and political advisors. Before the amendment they did not have the obligation to declare interests. Some of the declarants declared their interests with some delay and when necessary, additional questions were asked. We can summarise that it was a good idea to verify those declarations as soon as the obligation to declare interests was enforced, *inter alia* in order to:

- d) draw the attention of some ministries to the importance to insert the officials to the register of declarations of interest as soon as the obligation is enforced;
- e) make a clear understanding about the tasks of political advisors – whether they advise on political or administrative issues or other;
- f) establish that several ministries had made their deputy secretaries general to declare their interests for quite a number of years already.