CONFERENCE OF INGOs OF THE COUNCIL OF EUROPE
CONFÉRENCE DES OING DU CONSEIL DE L'EUROPE

COUNCIL OF EUROPE
CONSEIL DE L'EUROPE

30 September 2026

# Civil participation in the decision-making process

# First fact-finding visit to Montenegro

# 22-25 JUNE 2026

# REPORT

Endorsed by the Conference of INGOs
at its General Assembly of 28 September – 2 October 2026

# Table of Contents


Introduction ..... 3

Legal framework for the functioning of NGOs and its participation in the policy decision-making process ..... 6

- Legal framework for the functioning of NGOs ..... 6
  - A new Law on Non-Governmental Organisations ..... 8
- Legal framework for civil participation in policy decision-making process ..... 9
- Transparency of NGO funding ..... 12

Views expressed by NGOs – a critical perspective ..... 15

- Consultation processes and working groups ..... 15
- Public funding for NGOs ..... 18
- Sustainability and the donor environment ..... 23
- Feedback on NGO initiatives and advocacy ..... 23
- Access to information ..... 25
- Freedom of assembly ..... 25
- Pressure on the media and civil society ..... 27
- Sector-specific concerns ..... 27
- "The EU factor" ..... 28
- Rule of law and access to justice ..... 28

Conclusion ..... 32

- Condensed summary of civil society concerns ..... 34

Recommendations ..... 36

- For the Public Authorities of Montenegro ..... 36
- For Civil Society Organisations in Montenegro ..... 38
- For the Conference of INGOs ..... 39

Key references ..... 40

- International standards ..... 40
- European Union documents ..... 40
- Legislation of Montenegro ..... 40
- Strategic and policy documents of Montenegro ..... 41
- Reports of oversight and independent institutions ..... 42
- Monitoring reports and research ..... 42
- Websites ..... 42

APPENDIX - Agenda of the Visit ..... 44


AI notice: This report was drafted using generative AI tools (for checking for newer information related to legislation, bylaws and practice, and for spelling, editing, proofreading).

# Introduction

The Conference of INGOs of the Council of Europe visits Member States to better understand the cooperation between NGOs (associations, foundations, and endowments) and decision-makers. Discussion and exchange of experiences during the visits of the Council of Europe delegation are part of a wider analysis of the effectiveness of various forms of civil society participation in policymaking and decision-making processes (recognising that civil participation in policy decision-making is the right of every citizen, not just organised civil society).

During the visit, the delegation of the Conference of INGOs is mainly focused on:

- The arrangements for democratic participation and the actual ability of civil society to contribute to policies and laws, as well as the level and quality of dialogue between state and civil society actors. The delegation is assessing what are the opportunities offered to civil society to participate in policy-making (elaboration of laws and public policies, mechanisms for consultation/participation/co-decision, participation in the evaluation of impact of policies and legislation, how does it work in practice, mechanisms and actual situation at national and subnational/municipal level, partnership relations were certain activities are taken over by civil society organisations e.g. in the field of social/health/education/support to certain social groups) as well as tools used in practice including on-line and technological solutions to facilitate interactions.
- The current civic space and enabling environment for the operation of civil society – legal, financial and other aspects. This also includes organisational and other aspects of the general framework applicable to the activities of civil society organisations in general, the various forms of support available to CSOs, and the conditions under which these changes are recent and planned. The current political and societal context and environment in which CSOs currently operate is also covered.

The term "NGOs", which is referenced throughout the report, is consistent with a definition of NGOs in Recommendation 2007(14) of the Committee of Ministers of the Council of Europe to the Member States. According to the Recommendation, "*the NGOs are voluntary self-governing bodies or organisations established to pursue the essentially non-profit-making objectives of their founders or members. They do not include political parties*" (Art I.1).

In the context of this report, civil (citizen) participation in policy decision-making is considered as the associated right to freedom of public assembly and association, freedom of expression, right to petition and right to access of information of public significance. The references to international standards and best practices pertinent to the fact-finding mission are as follows:

- European Convention on Human Rights of the Council of Europe
- European Social Charter
- Convention on Access to Official Documents (2009)
- Convention on the Participation of Foreigners in Public Life at Local Level (1992)
- Recommendation Rec (2001)19 of the Committee of Ministers to member states on the participation of citizens in local public life
- Recommendation CM/Rec (2007)14 of the Committee of Ministers to member states on the legal status of non-governmental organisations in Europe
- Recommendation CM/Rec(2018)11 of the Committee of Ministers to member States on the need to strengthen the protection and promotion of civil society space in Europe
- OSCE/ODIHR-Venice Commission Guidelines on Freedom of Association
- OSCE Guidelines on the Protection of Human Rights Defenders (2014)
- Guidelines for civil participation in political decision-making, adopted by the Committee of Ministers of the Council of Europe on 27 September 2017
- Code of Good Practice for Civil Participation in the Decision-Making Process (2009)
- International Covenant on Civil and Political Rights of the United Nations
- UN Declaration on Human Rights Defenders (1998)
- UN Human Rights Council Resolution 38/12 (2018) on Civil Society Space

Each of the fact-finding visits is followed by a report which highlights the important and sometimes critical (socio-economic and political) issues identified in meetings with representatives of NGOs and the respective line ministries, as well as other public agencies of a host Member State. The report concludes with recommendations as to how to address those critical issues, taking into account the international standards governing freedom of public assembly and association, freedom of expression, right to petition and right to access of information of public significance, which are all instrumental to the right to civil participation in policy decision-making.

The first official visit of the Conference of INGOs to Montenegro was organised on 22-25 June 2026. The visit was facilitated by our partner, the Centre for Civic Education (CCE), who were responsible for the logistics and organisation of meetings with NGOs active in the field of justice, human rights, discrimination, media, migration and democracy. The delegation would like to extend special thanks to Ms Daliborka Uljarevic and Ms Mira Popovic Trstenjak of NGO the Centre for Civic Education, without whose thoughtful guidance we would never have had such a comprehensive and in-depth engagement with the key players.

Meetings with public authorities were organised with the assistance of the Permanent Representation of Montenegro to the Council of Europe. The delegation of the Conference of INGOs had meetings with Ms Dragana Kazanegra - Stanisic, State Secretary and her team in the Ministry of Interior, Mr Ernad Suljevic, Minister of Regional-Investment Development and Cooperation with NGOs and his team from the Ministry, Mr Bojan Bozovic, Minister of Justice and his team, Mr Sinisa Bjekovic, Ombudsman and his team, Mr Nikolla Camaj, Vice President of the Parliament of Montenegro, Mr Marash Dukaj, Minister for Public Administration and his team as well as with delegation from Union of Municipalities of Montenegro.

The delegation of the Conference of INGOs was composed of Gerhard ERMISCHER, President of the Conference of INGOs, Mr Simon MATTHIJSSEN, member of the Standing Committee, Goran MILETIC, Member of the Expert Council on NGO Law and member of the Standing Committee of the Conference of INGOs and Ms Maria DAHLE, Director, Human Rights House Foundation and its representative to CINGO.

By design this report focuses on the working environment for civil society in Montenegro. In explaining the perceived situation, NGO spokespersons shared numerous examples of their experiences of cooperation with the authorities, including a number of concerns and areas of dissatisfaction. The delegation considers that these concerns should be reflected more fully than would be possible through brief references in a broader, more general discussion of cooperation. An appendix therefore provides a concise summary of the issues most frequently raised by civil-society interlocutors. Taken together, these issues point to a significant gap between the formal commitment to European integration, democratic principles and cooperation with civil society, and the experiences described to the delegation by many of those we met.

All meetings with civil society organisations during the visit were conducted under the Chatham House Rule. Participants spoke on the understanding that what they said could be used in this report but that neither their identity nor that of their organisation would be disclosed. The views summarised below are therefore attributed to the organisations the delegation met collectively, without naming any speaker or organisation, except where an organisation has itself stated the same position publicly.

## Legal framework for the functioning of NGOs and its participation in the policy decision-making process

### Legal framework for the functioning of NGOs

An enabling legal environment for non-governmental organisations (NGOs) and citizen participation (participatory democracy) has de facto been incorporated into the political

conditions for the EU accession of the Western Balkan countries, and is regularly assessed in the European Commission (EC) progress reports. The Directorate-General for Neighbourhood and Enlargement Negotiations of the European Commission has developed the Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027, which provide benchmarks and indicators for monitoring the enabling environment for NGOs and citizen participation in candidate countries, and which feed both into the progress reports and into the programming of IPA III funds for civil society.[1] Montenegro is the most advanced EU candidate in the region, and the standard applied to it is correspondingly higher. In its 2025 report, the Commission found that civil society organisations in Montenegro "generally operate in an enabling environment" and that "the overall legal and institutional framework for civil society to operate in the country is in place", while noting instances of public criticism and allegations by high-profile public officials discrediting the work and reputation of human rights defenders.[2]

The Constitution of Montenegro guarantees the freedom of political, trade union and other association and action, without approval, subject to entry in a register kept by the competent authority.[3] It also guarantees the freedom of peaceful assembly without approval, subject to prior notification to the competent authority,[4] and provides that human rights and freedoms may be limited only by law, to the extent necessary to satisfy the purpose for which the limitation is permitted in an open and democratic society.[5]

The legal framework for NGOs is set out in the Law on Non-Governmental Organisations, adopted in 2011 and substantially amended in 2017 and 2024.[6] The term "non-governmental organisation" covers associations (membership-based organisations) and foundations (non-membership organisations), and the Law also governs the establishment and operation of representative offices of foreign NGOs. An association is established by at least three founders, natural or legal persons, of whom at least one must have residence, domicile or seat in Montenegro. Persons aged fourteen and over may establish an association with the consent of their legal representative. A foundation may be established by one or more founders regardless of their residence or seat, and may also be established by testament.[7]

---

[1] DG NEAR, *Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027*, https://enlargement.ec.europa.eu/document/download/07b56d11-c610-44d9-9dc5-c718a1899680_en?filename=EU-Guidelines-for-Support-to-Civil-Society-in-the-Enlargement-region-2021-2027.pdf

[2] European Commission, *Montenegro 2025 Report*, SWD(2025) 754 final, Brussels, 4 November 2025, pp. 24-25, https://enlargement.ec.europa.eu/document/download/9ae69ea7-81d6-4d6a-a204-bd32a379d51d_en?filename=montenegro-report-2025.pdf

[3] *Ustav Crne Gore* (mne.), Article 53, https://www.paragraf.me/propisi-crnegore/ustav-crne-gore.html

[4] Ibid., Article 52.

[5] Ibid., Article 24.

[6] *Zakon o nevladinim organizacijama* (mne.), "Službeni list CG", br. 39/11, 37/17, 84/24 https://www.paragraf.me/propisi-crnegore/zakon-o-nevladinim-organizacijama.html

[7] Ibid.

The ministry responsible for cooperation with NGOs, currently the Ministry of Regional and Investment Development and Cooperation with Non-Governmental Organisations, keeps three registers: the register of associations, the register of foundations, and the register of representative offices of foreign NGOs. Registration is free of charge and the ministry is required to enter the organisation in the register within 20 days of the submission of a complete and proper application.[8] Registration confers legal personality. The registers are publicly searchable through the eNVO platform.[9]

At the beginning of September 2026 the registers recorded 11,695 associations, 463 foundations and 148 representative offices of foreign NGOs entered since their establishment, of which 7,333 associations, 315 foundations and 126 representative offices were active.[10] In 2025 the ministry handled 803 registration cases and resolved 771 of them, including 317 decisions on registration, 298 decisions on the registration of changes to registered data and 38 decisions on deletion from the register, while 112 applications were rejected and 32 cases remained unresolved at the end of the year.[11]

The assets of an NGO may be used only to pursue its statutory aims and may not be distributed to founders, members, members of governing bodies, employees or their related persons. An NGO may carry out economic activity, subject to registration for that purpose, but where income from that activity exceeds 4,000 EUR in the preceding calendar year, or 20 % of total annual income, the surplus is directed to the state budget and the activity must be discontinued for the remainder of the calendar year.[12] The fines prescribed for breaches of the Law range from 30 to 800 euro, which is modest by any comparison and of limited deterrent value.

Two adjacent pieces of legislation weaken the framework. The tax legislation offers some incentives for philanthropy, but its notion of "public interest" is narrower than the one used in the Law on NGOs, which restricts the tax incentives available for supporting civil society. The Law on Volunteer Work remains unconducive to promoting volunteering, as it treats volunteering more as a form of labour than as a civic activity.[13]

## A new Law on Non-Governmental Organisations

The draft new Law on Non -Governmental Organisations has been prepared and was the subject of a 40-day public consultation (held from 25 July to 2 September 2025), accompanied

---

[8] *Kako registrovati NVO u Crnoj Gori* (mne.), Government of Montenegro, https://wapi.gov.me/download/770b6832-6550-4743-a277-292591e89ed3?version=1.0

[9] eNVO registar, Ministry of Regional and Investment Development and Cooperation with Non-Governmental Organisations, https://ngo.gov.me/

[10] Ibid., consulted on 2 September 2026.

[11] Ministarstvo regionalno-investicionog razvoja i saradnje sa nevladinim organizacijama, *Izvještaj o radu za 2025. godinu* (mne.), Podgorica, March 2026, https://wapi.gov.me/download-preview/baf53506-1a2e-4a00-b0fa-d11167dd753a?version=1.0

[12] *Zakon o nevladinim organizacijama* (mne.), Article 25.

[13] European Commission, *Montenegro 2025 Report*, p. 24.

by round tables in Bijelo Polje, Bar and Podgorica, which generated 186 written submissions. The report on the consultation was published on 25 September 2025.[14] The stated objectives of the reform are greater legal certainty, better management of public resources, the digitalisation of procedures including electronic registration and an electronic register of NGOs, the introduction of binding deadlines and clearer criteria for decisions on the allocation of public funds, the extension of co-financing beyond EU-funded projects, the regulation of status changes such as merger, division and acquisition, and strengthened supervision.[15]

The consultation also exposed the contested points. NGOs raised the additional administrative burden and longer processing times that the new registration obligations would create, the proposed restriction on the right of persons convicted of certain criminal offences to establish an organisation, the level of the prescribed fines, and, most significantly, the proposal to abandon the percentage-based allocation of budget funds, which would leave the sector dependent on the discretion of individual ministries.[16] Submissions concentrated on the composition and independence of the evaluation commissions, the objectivity of independent assessors, conflict of interest, limits on the concentration of funding in a small number of organisations, and the pre-financing of EU projects. Most of the detailed proposals on financing procedures were rejected as matters to be regulated by secondary legislation rather than by the Law itself.[17] During the CINGO visit to Montenegro, the majority of organisations mentioned that the process was open, but that not all comments were included in the final draft of the law.

In November 2025, the European Commission recorded that the draft law had completed public consultation but had not been adopted.[18] In its 2025 annual report the responsible ministry stated that inter-ministerial coordination was still under way and that adoption was expected by the end of the second quarter of 2026.[19] A principal concern, shared by the delegation and raised by civil-society interlocutors, is the draft law's balance of power between the executive and the judiciary. The detailed provisions could give the authorities considerable discretion in determining which organisations are permitted to operate, potentially creating scope for arbitrary or selective application. This is particularly evident in the proposed Article 12, which includes an extensive list of criminal offences that could prevent a person from establishing an NGO. Similarly, concerns were raised regarding Article 65, concerning anti-money-laundering requirements under the Moneyval framework, which

---

[14] *Izvještaj sa javne rasprave o Nacrtu zakona o nevladinim organizacijama* (mne.), br. 01-056/25-1234/28, Ministarstvo regionalno-investicionog razvoja i saradnje sa NVO, 25 September 2025, https://wapi.gov.me/download/5ca56c55-7fce-4b7f-afa7-a1ff044948e4?version=1.0

[15] Ibid.

[16] *Konsultativni sastanak o izmjenama Zakona o NVO okupio predstavnike institucija i civilnog sektora* (mne.), Resursni centar / CRNVO, 20 November 2025, https://resursnicentar.me/konsultativni-sastanak-o-izmjenama-zakona-o-nvo-okupio-predstavnike-institucija-i-civilnog-sektora/

[17] *Izvještaj sa javne rasprave o Nacrtu zakona o nevladinim organizacijama* (mne.), op. cit.

[18] European Commission, *Montenegro 2025 Report*, p. 24.

[19] *Izvještaj o radu za 2025. godinu* (mne.), op. cit.

some interlocutors considered too broadly formulated. The delegation consistently encouraged the authorities to submit the draft law to the Venice Commission for an opinion. We encountered differing responses from government representatives. In particular, the Minister for Regional Investment argued that the domestic process had already been sufficiently transparent and extensive, while the Minister for Justice appeared more open to the proposal. The State Secretary questioned the necessity of a Venice Commission opinion and offered his own interpretation of the scope of the proposed legislation. According to the government officials that met the mission, there is a willingness to update these two articles and also to ask the Venice Commission for the opinion on this law.

## Legal framework for civil participation in policy decision-making process

Civil participation in policy development is regulated by the Law on State Administration and its implementing bylaws. The Law requires the ministry preparing a law or a strategy to conduct a public debate in order to consult the interested public, with narrowly defined exceptions relating to defence and security, the annual budget, emergencies and technical amendments of limited scope. If a public debate is omitted, the ministry must give a written explanation.[20] The Law further provides that state administration bodies cooperate with NGOs by enabling their participation in public debates on draft laws and strategies and in working groups and other working bodies established to prepare regulations or to address matters of mutual interest, and it entrusts the Government with determining the criteria and procedure for selecting NGO representatives to such bodies.[21]

The instruments governing the framework for civil participation are the following:

- Constitution of Montenegro (Articles 47, 52 and 53)
- Law on Non-Governmental Organisations
- Law on State Administration
- Decree on the selection of representatives of non-governmental organisations to working bodies of state administration bodies and on the conduct of public debate in the preparation of laws and strategies
- Strategy for cooperation between state administration bodies and non-governmental organisations 2022-2026, with its action plans
- Decree on financing of projects and programmes of non-governmental organisations in areas of public interest
- Decree on the procedure and manner of co-financing of projects and programmes of non-governmental organisations supported by EU funds

[20] *Zakon o državnoj upravi* (mne.), "Službeni list CG", br. 78/18, 70/21 i 52/22, Article 52, https://me.propisi.net/zakon-o-drzavnoj-upravi/

[21] Ibid., Article 79.

The Decree on the selection of NGO representatives to working bodies and the conduct of public debate sets out the procedure for both. For working bodies, the authority publishes a public call and each organisation meeting the prescribed conditions may nominate one candidate within 10 days. The authority then publishes the list of eligible candidates together with the organisations that nominated them, and the head of the authority appoints the candidate who received the most nominations, deciding himself where there is a tie. The Decree provides no means of contesting that selection. For laws and strategies, participation has two stages. Ministries must publish, within fifteen days of adopting their annual work programme, the list of acts on which a public debate will be held. Consultation of the interested public takes place at the initial drafting stage, runs for at least fifteen days and is followed by a published report on the submissions received. The public debate on the draft text lasts between 20 and 40 days and is conducted through round tables and written comments, with the draft, its explanatory statement and the regulatory impact analysis published alongside. Within fifteen days of its close the ministry must publish a report stating the number and structure of participants and the reasons for accepting or rejecting the comments received.

Among other obligations, it requires ministries to publish, within 15 days of the adoption of their annual work programme, the list of laws and strategies for which a public debate will be conducted, on their own websites and on the e-government portal.[22] Consultations of the interested public, public debates and calls for NGO representatives in working bodies are published through the e-participation module of the eUprava portal, which also hosts an e-petitions facility.[23]

The Council for Cooperation between State Administration Bodies and Non-Governmental Organisations is the central institutional mechanism for dialogue with civil society. It was established by a Government decision of 13 February 2025, its members were appointed in September 2025, and it held its constitutive session on 22 December 2025. The Council has 24 members, twelve representing state administration bodies and twelve representing NGOs, the latter selected through a public call across sectors including civil society development, the rule of law, human rights, the environment, education, culture, social welfare, health, sport and youth. It is chaired by the Minister of Regional and Investment Development and Cooperation with NGOs, Ernad Suljević, and Zorana Marković, Executive Director of the Centre for Development of Non-Governmental Organisations, was elected vice-president.[24] Its tasks include providing opinions on draft regulations and strategic documents affecting NGOs, monitoring the implementation of the cooperation strategy, recommending

[22] *Uredba o izboru predstavnika nevladinih organizacija u radna tijela organa državne uprave i sprovođenju javne rasprave u pripremi zakona i strategija* (mne.), "Službeni list CG", br. 41/18, https://www.gov.me/dokumenta/bd8e60de-985b-46b6-8cdf-60550c3a1bd1

[23] e-Participacija module of the eUprava portal, https://euprava.gov.me/e-participacija

[24] *Započeo sa radom Savjet za saradnju organa državne uprave i nevladinih organizacija* (mne.), RTNK, 22 December 2025, https://rtnk.me/drustvo/zapoceo-sa-radom-savjet-za-saradnju-organa-drzavne-uprave-i-nevladinih-organizacija/

improvements to public consultations and public debates, establishing standards for state-budget financing of NGOs, and preparing a new cooperation strategy for the period after 2027.[25] However, during the meetings, many organisations mentioned that many NGO members of the Council are often unknown or connected to some ministers and that the majority of them do not represent civil society properly. In this and other meetings the selection process for NGOs was challenged, as the criteria for selection were solely based on the number of supporting letters from other NGOs. One risk is that such a criterion can easily be manipulated. It was mentioned that some persons found many associations in their own name or names of relatives and friends and these will send support letters when they apply for a place in one of the consultative bodies. Another risk is that such single criterion based on support letters can lead to the inclusion of NGOs with either a conflict of interest or that are not relevant or competent for the cause - either by being partisan, GONGO/not autonomous or lack expertise or experience in the field.

Before December 2025, the Council had not met since October 2021, so that for more than four years the principal formal channel of structured dialogue between the Government and civil society was dormant.[26] The first implementation report on the Strategy for cooperation between state administration bodies and NGOs 2022-2026 attributed the failure to constitute the Council to the fact that NGO representatives had been selected for only three of the six required sectors, and recorded that of the 34 activities planned under the Strategy, three of the six due in 2022 were half implemented and the remainder were not carried out; simplified registration procedures, the register of volunteers and the open data portal were among the measures not delivered.[27] The European Commission has since found that the Strategy is being implemented but that "its practical application continues to remain inadequate for public funding for NGOs and their involvement in public consultations".[28]

Montenegro has been a member of the Open Government Partnership since 2011 and has adopted successive action plans. The Independent Reporting Mechanism published its results report on the 2022-2024 action plan in 2025.[29] The plan is prepared for the period until 2029 with 5 commitments: citizen participation in decision-making processes, fiscal transparency, strengthening integrity and public accountability in the fight against corruption, openness of local self-governments and digital governance.

The framework, taken on its own terms, is largely in line with the Council of Europe standards, and in particular with the Guidelines for civil participation in political decision making adopted

[25] Ibid.

[26] European Commission, *Montenegro 2025 Report*, p. 24. The Commission recorded that the Council "is expected to resume its work for the first time since October 2021".

[27] Ministarstvo javne uprave, *Izvještaj o implementaciji Strategije saradnje organa državne uprave i nevladinih organizacija 2022-2026 za 2022. godinu* (mne.), March 2023, https://wapi.gov.me/download-preview/75c8255b-80b2-4424-a8b7-43feb68d330d?version=1.0

[28] European Commission, *Montenegro 2025 Report*, p. 24.

[29] Open Government Partnership, Montenegro, https://www.opengovpartnership.org/members/montenegro/

by the Committee of Ministers in 2017[30]. The most recent regional monitoring, published in June 2026, ranks Montenegro first in the Western Balkans on policy development and coordination with 41 points out of 100, a result which its authors describe as satisfying only the basics of transparent decision-making. Between November 2024 and November 2025, early public consultation was conducted for 3 of 72 strategic documents and for 7 of 155 laws. Public debates were held for 30,56% of strategic documents and 40.65% of adopted laws, and in the 28th convocation of the Parliament only 47% of government bills were subject to a public debate. Announcements of public debates were published on the eUprava portal in 24% of cases, and no comments were submitted through the portal. Regulatory impact assessment was carried out for 93% of government bills but for only 44% of strategic documents.[31] In the same study, 69% of citizens surveyed felt they had no opportunity to participate in the development of laws and strategies.[32]

The European Commission reaches the same conclusion in different words. Standards for evidence-based policymaking, including regulatory impact assessment and public consultation, are in place, but "these standards are not always implemented", and Montenegro "should strive to ensure that all legislative initiatives follow a transparent and inclusive consultation procedure".[33] The 2025 amendments to the electoral legislation were not consulted in substance with relevant stakeholders, and civil society organisations were not invited to participate in the work on the Reform Agenda under the Growth Plan for the Western Balkans despite their repeated calls for inclusion.[34]

## Transparency of NGO funding

Montenegro is one of the few countries in the region in which the level of public funding for NGOs is guaranteed by law rather than left to annual budget negotiation. Following the 2017 amendments to the Law on Non-Governmental Organisations, at least 0.5 % of the current budget is allocated annually for NGOs, of which at least 0.3 % is for projects and programmes in areas of public interest, at least 0.1 % for programmes in the field of protection of persons with disabilities, and at least 0.1 % for the co-financing of projects supported by EU funds.[35] The allocation is operationalised through the Decree on financing of NGO projects and programmes in areas of public interest, the rulebook governing the content of public calls and application documentation, and the Decree on the procedure and manner of co-financing of NGO projects supported by EU funds. Public calls are conducted by the line ministries, and

[30] *Guidelines for civil participation in political decision making*, CM(2017)83, adopted by the Committee of Ministers on 27 September 2017, https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016807509dd

[31] Institut alternativa, *Crna Gora prva u regionu u razvoju i koordinaciji politika, ali daleko od dobrog rezultata* (mne.), 15 June 2026, presenting the findings of the WeBER 3.0 PAR Monitor, https://institut-alternativa.org/crna-gora-prva-u-regionu-u-razvoju-i-koordinaciji-politika-ali-daleko-od-dobrog-rezultata/

[32] Ibid.

[33] European Commission, *Montenegro 2025 Report*, pp. 25-26.

[34] European Commission, *Montenegro 2025 Report*, pp. 3 and 24-25.

[35] *Finansiranje NVO* (mne.), Government of Montenegro, https://www.gov.me/clanak/finansiranje-nvo

proposals are assessed by commissions with the participation of independent assessors selected through a public call (25 assessors were selected for 2026).[36]

The table below sets out the funds allocated and actually distributed in the most recent years for which data are available, together with the cumulative result since the introduction of the present system of reporting.

Public funding of projects and programmes of non-governmental organisations

| Period and funding line | Allocated (EUR) | Distributed (EUR) | Share distributed | Public calls and projects |
|---|---|---|---|---|
| 2024, all funding lines | 6,982,730 | 6,154,753 | 88.14 % | 23 public calls announced |
| 2025, financing of NGO projects | more than 6,000,000 | not available | not available | |
| 2025, co-financing of projects supported by EU funds | 1,508,000 | 1,278,000 | 84.80 % | 53 projects |
| 2026, planned | 6,453,000 | not applicable | not applicable | 17 priority areas, 11 ministries |
| Cumulative, since 2009 | 37,048,000 | 32,844,000 | 88.65 % | |

*Source: annual report of the responsible ministry for 2025 and the overview of funds allocated and awarded provided to the delegation.*[37]

Data on public calls, on decisions allocating funds and on the registers of the sector are consolidated on the sveonvo.me platform, and data on financed projects since 2009 are published on the portal dedicated to the financing of non-governmental organisations.[38]

The weaknesses lie in compliance and in the quality of the process rather than in the availability of funds. The European Commission found that, despite the obligation prescribed by the Law on NGOs, not all ministries launch calls for proposals to finance NGO projects, and that Montenegro still needs to strengthen the capacity of ministries for strategic planning, monitoring and evaluation of the support provided to civil society organisations.[39] The gap between the funds allocated and the funds actually distributed, which has averaged more than 11 % since 2009, is a symptom of the same problem: calls that are announced late, criteria that are not fit for purpose, and decisions that are taken without the administrative capacity to follow them through.[40] According to several NGOs, a significant share of the

[36] Ibid.

[37] Ministarstvo regionalno-investicionog razvoja i saradnje sa nevladinim organizacijama, *Izvještaj o radu za 2025. godinu* (mne.), Podgorica, March 2026, https://wapi.gov.me/download-preview/baf53506-1a2e-4a00-b0fa-d11167dd753a?version=1.0; and *Overview of Total Funds Allocated and Awarded, 2018-2025*, data provided to the delegation.

[38] See https://sveonvo.me/ and https://www.finansiranjenvo.me/

[39] European Commission, *Montenegro 2025 Report*, p. 24.

[40] *Izvještaj o radu za 2025. godinu* (mne.), op. cit.

available funds is captured by organisations with no record of work, described to the delegation as "ghost" organisations and as government-organised NGOs affiliated to political parties, presented not as isolated irregularities but as a structural feature sustained by nepotism and clientelism. Reports on the competitions, the delegation was told, are not published retrospectively, not systematically accessible and not assessed for quality, and serve to present ministries in a favourable light. Organisations referred the delegation to the adverse opinion of the State Audit Institution in support of that assessment.[41]

The criticism of the scoring criteria was specific. Applicants based in the north receive ten additional points because the region is treated as disadvantaged, and applicants in partnership receive five, although in several specialised fields no other organisation exists in the country with which a partnership could be formed. A newly established organisation cannot accumulate points for experience at all, and is therefore ineligible before it starts. The amounts compound the problem: grants run for six or twelve months and in sums too small to employ professional staff, and the rates paid bear little relation to cost: one organisation can deliver an hour of psychotherapy for 2 EUR, while the ministry pays 0.70 EUR for an hour in a day-care centre. Organisations working on violence against women told the delegation that 250,000 EUR had been calculated as the need for women's shelters and 128,000 secured from the grant.

The mechanics of applying attracted the sharpest criticism. An application is rejected outright where the administration states that an attachment is missing, with no opportunity to correct the omission; submission over a counter against a receipt is not possible; electronic submission is not available; and the list of required documents changes from one competition to the next. An applicant therefore cannot prove what it filed, and organisations now photograph their applications before delivering them. The platform presented as evidence that the system is being digitalised was described by the organisations that would have to use it as a mirage. Proceedings against a refusal were described as lacking transparency, as taking around three years to reach a hearing and as never yet won by a civil society organisation against the State, and as futile in any event because ministries are renamed and then decline responsibility for their predecessors' acts. Organisations consequently do not litigate.

The submissions made during the public consultation on the draft law identified the remaining structural concerns with precision: the composition and independence of the evaluation commissions, the objectivity of the independent assessors, the management of conflicts of interest, the concentration of funding in a limited number of organisations, and the absence of a workable mechanism for pre-financing EU projects, which effectively excludes smaller organisations from EU-funded work. The response of the drafters, which was to refer most of these questions to secondary legislation, addresses the form of the problem rather than its substance. A guaranteed percentage set out in the Law is a genuine safeguard

[41]Državna revizorska institucija, *Izvještaj o reviziji: Kontrola namjenskog trošenja sredstava sa budžetske pozicije 431-4 transferi nevladinim organizacijama u 2022. godini* (mne.), br. 01-035/24-373/24, Podgorica, 17 July 2024.

for the independence of the sector; the same guarantee expressed in a government decree is not.

## Views expressed by NGOs – a critical perspective

The civil society organisations the delegation met did not dispute the description of the legal framework set out above. Their criticism was directed at what happens inside that framework. The formulation the delegation heard in one form or another in almost every meeting was that organisations take part in everything they are invited to and are not satisfied, because the final versions of laws and strategies do not reflect what they recommended.

### Consultation processes and working groups

The procedure for placing civil society representatives on working bodies is set out in detail by decree. A state administration authority forming a working group must publish a public call on its website and on the e-government portal and an eligible organisation may propose one representative within ten days. Within seven days of that deadline, the authority publishes the list of proposed representatives together with the names of the organisations that nominated them, and a separate list of organisations whose proposals were incomplete or which did not meet the conditions. The head of the authority then appoints the candidate for whom the largest number of nominations was received from eligible organisations.[42] Where two or more candidates receive an equal number of nominations, the head of the authority chooses between them.[43]

What the Decree does not contain is any means of contesting the outcome. There is no objection, no appeal and no review of the selection, and no requirement that the choice be reasoned in terms that can be tested. Organisations told the delegation that this, rather than the criteria themselves, is what makes the process feel arbitrary, and that in a number of cases only one or two organisations end up on a working group, so that a single civil society representative sits opposite a body of officials and whatever expertise the sector could contribute depends entirely on that one appointment. The State Audit Institution has separately found the Decree to be internally inconsistent, in that Article 4 makes the absence of an entry in the criminal records register a condition for a nominating organisation while Article 7 does not require any proof of it to be submitted, and has recommended that the two provisions be reconciled.[44]

---

[42] *Uredba o izboru predstavnika nevladinih organizacija u radna tijela organa državne uprave i sprovođenju javne rasprave u pripremi zakona i strategija* (mne.), "Službeni list Crne Gore", br. 041/18 od 28.06.2018 i 086/26 od 19.06.2026, Articles 3 to 9.

[43] Ibid., Article 9.

[44] Državna revizorska institucija, *Izvještaj o reviziji: Kontrola namjenskog trošenja sredstava sa budžetske pozicije 431-4 transferi nevladinim organizacijama u 2022. godini* (mne.), br. 01-035/24-373/24, Podgorica, 17 July 2024, Recommendation P2.

The more serious development is that organisations are ceasing to apply at all. On 29 January 2026 the Ministry of Justice published a public call for the nomination of a civil society representative to the working group drafting amendments to the Law on the Judicial Council and Judges. The call had to be cancelled because no eligible nominations were received.[45] On 4 February 2026, a public call was published for the nomination of a representative to the working body monitoring the implementation of the Strategy for the Protection of Victims' Rights 2025-2029. According to the official notice, no organisation put a candidate forward.[46] The delegation was told that such cases are becoming common, and that they should be read as an indicator in their own right: organisations that no longer believe participation can influence an outcome stop taking up the formal opportunities offered to them. A mechanism that produces no candidates is failing whether or not it complies with its own procedural rules.

This withdrawal was corroborated by numerous interlocutors who described public consultations as an "empty shell", a "farce" or a "PR stunt". They expressed the view that their substantive contributions rarely influence the final legislation. Some NGOs told delegation that they have withdrawn from ministerial working groups because they see little tangible impact from their participation. The figures cited to us show high levels of participation but very limited substantive influence, were intended to illustrate this discrepancy.

Where organisations do sit on working groups, the experience is uneven. One of organisations told the delegation that it was on the whole satisfied with its participation in the working groups on the judiciary. Against that, two laws of direct relevance to human rights were prepared and adopted with no civil society participation at all: the Law on Internal Affairs and the Law on the National Security Agency, adopted by the Parliament in March 2026.[47] The Law on Internal Affairs was not the subject of a public debate, its explanatory statement made no reference to the position of the European Commission, and the Parliament proceeded to a vote although the Commission had stated that it was still reviewing the texts and that changes in this area must be made through a transparent and inclusive consultation process.[48] Before the vote, Human Rights Action warned that sessions were being convened without agendas that citizens could see in advance and that the draft law on the National Security

---

[45] *Javni poziv za predlaganje predstavnika NVO u radnoj grupi za izradu Predloga zakona o izmjenama i dopunama Zakona o Sudskom savjetu i sudijama* (mne.), Ministry of Justice, 29 January 2026, https://www.gov.me/clanak/javni-poziv-za-predlaganje-predstavnika-nvo-u-radnoj-grupi-za-izradu-predloga-zakona-o-izmjenama-i-dopunama-zakona-o-sudskom-savjetu-i-sudijama

[46] *Obavještenje u vezi sa javnim pozivom za predlaganje predstavnika nevladine organizacije u radno tijelo za praćenje sprovođenja Strategije zaštite prava žrtava za period 2025-2029. godine* (mne.), 4 February 2026, https://www.gov.me/clanak/obavjestenje-u-vezi-sa-javnim-pozivom-za-predlaganje-predstavnika-nevladine-organizacije-u-radno-tijelo-za-pracenje-sprovodenja-strategije-zastite-prava-zrtava-za-period-2025-2029-godine

[47] *Skupština usvojila predloge Zakona o unutrašnjim poslovima i ANB-u* (mne.), RTCG, 6 March 2026, https://rtcg.me/vijesti/politika/820409/skupstina-usvojila-predloge-zakona-o-unutrasnjim-poslovima-i-anb-u.html. The Law on the National Security Agency is dated 23 March 2026 in the initiative subsequently filed with the Constitutional Court.

[48] *Vlasti ne čekaju Brisel: Zakon o ANB i o Unutrašnjim poslovima na dnevnom redu bez mišljenja EU* (mne.), Raskrinkavanje.me, https://www.raskrinkavanje.me/politika/vlasti-ne-cekaju-brisel-zakon-o-anb-i-o-unutrasnjim-poslovima-na-dnevnom-redu-bez-misljenja-eu/

Agency had not been communicated to the public and had not been the subject of a public debate.[49]

The concern was not confined to civil society. The Agency for Prevention of Corruption warned publicly that individual solutions in the two laws carried serious corruption and institutional risks, that control over the expanded powers remained predominantly within the executive branch, and that concepts such as grounds for suspicion and threatened national security left significant room for subjective interpretation.[50] Two laws reorganising the security sector were therefore adopted without the participation of civil society, without a public debate, without awaiting the opinion of the European Commission and over the objection of a state body established to prevent corruption.

The second set of complaints concerns consultation that takes place but changes nothing. Organisations described participating in the entire preparation of a law, submitting written comments, attending the round tables, and then finding a final text in which their recommendations do not appear. Several described the exercise as public debates held for the sake of holding public debates, while noting that this is not a matter of low turnout: interest in some consultations is very high and the rooms are full. The obligation the administration is failing is a specific one. The Decree requires that consultation of the interested public last at least fifteen days and be followed by a published report; that the public debate on a draft text last between twenty and forty days; and that within fifteen days of its close the ministry publish a report containing the number and structure of participants and a résumé of the comments, proposals and suggestions received together with the reasons for their acceptance or non-acceptance.[51] It is the reasoning of non-acceptance, rather than the opportunity to comment, that organisations report as absent or formulaic.

The available monitoring bears out the complaint and identifies a further route around the procedure. Between November 2024 and November 2025, early public consultation was conducted for 7 of 155 laws and for 3 of 72 strategic documents, while public debates were held for 40,65 % of adopted laws. In the 28th convocation of the Parliament, only 47 % of the laws proposed by the Government were subject to a public debate. Announcements of public debates were published on the e-government portal in 24 % of cases, and not a single comment was submitted through the portal.[52] In the same research, 69 % of citizens said they have no opportunity to take part in the preparation of laws and strategies.[53] A separate

---

[49] *HRA: Rad Skupštine netransparentan, moguće usvajanje zakona o ANB bez javne rasprave* (mne.), Portal Analitika, https://www.portalanalitika.me/clanak/hra-rad-skupstine-netransparentan-moguce-usvajanje-zakona-o-anb-bez-javne-rasprave

[50] *ASK: Zakoni o ANB-u i policiji otvaraju prostor za zloupotrebe* (mne.), Dan, https://www.dan.co.me/vijesti/drustvo/ask-zakoni-o-anb-u-i-policiji-otvaraju-prostor-za-zloupotrebe/

[51] *Uredba o izboru predstavnika nevladinih organizacija* (mne.), Articles 12, 13, 15 and 18.

[52] Institut alternativa, *Crna Gora prva u razvoju i koordinaciji politika, ali daleko od dobrog rezultata* (mne.), 15 June 2026, presenting the findings of the WeBER 3.0 PAR Monitor, https://institut-alternativa.org/crna-gora-prva-u-regionu-u-razvoju-i-koordinaciji-politika-ali-daleko-od-dobrog-rezultata/

[53] Ibid.

analysis of legislative procedure records that more than half of the draft laws submitted by the Government reached the Parliament without the mandatory public debate, and that members of parliament from the governing majority acknowledge tabling texts drafted inside ministries under their own names, which removes the obligation of public consultation and of inter-ministerial coordination altogether. It also records that the Government rarely delivers its opinion on members' bills within the prescribed fifteen days, and that when it does, the opinion concerns proposals of the governing majority while proposals from the opposition receive no response.[54]

One theme came up again and again, reflecting experiences in other accession states to the EU, that laws which need to be approved by the EU once they have undergone an evaluation process by the EU Commission are "blue flagged" and go through a speedy process with no more consultation, which given the high number of laws that need to be changed in the process reduces the ability of Civil Society to participate meaningfully in the drafting of these laws.

A third complaint concerns presence without standing. One organisation described being formally invited to observe the work of a parliamentary committee and then being treated as though it were not in the room, summarising the experience to the delegation as institutions ignoring the existence of civil society even when they have invited it in. Participation of this kind produces a record of consultation that can be reported to the European Commission without producing any influence on the outcome, which is precisely the risk that the applicable Council of Europe standards are designed to prevent.

## Public funding for NGOs

Criticism of public funding was directed at the conduct of the competitions rather than at the level of funds available. The Law requires each competent ministry to publish its public call by 1 March of the year for which the funds are allocated, and caps the amount any one organisation may receive under a single call at 20% of the total distributed under it.[55] The most concrete complaint put to the delegation concerned the handling of objections. One organisation that contested an allocation received the reasoning for the decision only shortly before the deadline for reacting had expired, which left no realistic opportunity to challenge it. The organisation drew the conclusion that the institutions proceed on the assumption that there will be no reaction to the results of a competition, and that late reasoning is a means of ensuring that outcome.

The documentation of the competitions gives that complaint force. Public calls provide that each project is scored by two independent assessors who must give reasons for the points awarded under each criterion, and that a list of organisations whose applications are incomplete is published within fifteen days of the close of the call, with five days to remedy

[54] Institut alternativa, *How are laws adopted?*, https://institut-alternativa.org/en/how-are-laws-adopted/

[55] *Zakon o nevladinim organizacijama* (mne.), "Službeni list CG", br. 39/11, 37/17 i 84/24, Articles 32v and 32ž.

the defects. They do not set out a procedure for objecting to the result: no deadline is stated, no body is identified as competent to decide an objection, and no standard is given against which a contested score could be reviewed.[56]

One competition made available to the delegation illustrates how the annual cycle actually runs. The Ministry of Diaspora published its public call for the financing of civil society projects in the field of cooperation with the diaspora on 9 April 2026, five weeks after the statutory deadline of 1 March, and corrected it on 12 April 2026. The published call states the deadline for applications as thirty days from publication, "that is, by 9 May 2025", a date almost a year before the call itself appeared, and its preamble records that it is issued by the commission for the allocation of funds "in 2025", established on 2 April 2026. Applications had to be delivered by post alone, in two printed copies accompanied by an identical electronic version on a CD.[57] The allocation decision was taken on 19 June 2026 and distributed 190,999.94 EUR of the 191,000 EUR available to eight projects, from among forty-six applications received.[58] The delegation makes no assessment of the merits of the individual awards. It notes that a procedure conducted in these terms cannot generate confidence in its own outcome, and that digitalisation, one of the stated objectives of the new draft law, has not reached the process by which the sector is financed.

NGOs have raised concerns about the practical difficulties of demonstrating that all required documents have been submitted, particularly as there appears to be no opportunity to correct an application if it is subsequently found to be incomplete. Some organisations have therefore resorted to documenting the submission process, for example by filming the documents being placed in the envelope. Even so, they report that applications have sometimes been rejected on the grounds that they were incomplete, including in cases where the same documents had been submitted successfully in the previous year.

These experiences appear to point to a broader issue concerning the safeguards surrounding the submission process. In particular, applicants do not seem to have the possibility of submitting documents at a counter and obtaining confirmation of receipt. Registered post may provide some additional assurance but apparently does not fully resolve the issue. At the same time, legal remedies before the administrative courts are perceived as difficult to pursue in practice, given the length and cost of proceedings. Taken together, these concerns suggest that there may be scope to strengthen the transparency and procedural safeguards of the application process, in order to give applicants greater certainty that their submissions have been received and properly considered.

---

[56] *Javni konkurs "Crna Gora, tamo gdje su korijeni" za finansiranje projekata/programa nevladinih organizacija u 2026. godini u oblasti saradnje s dijasporom* (mne.), Ministarstvo dijaspore, br. 01-910/26-678/3, published 9 April 2026, with a correction of 12 April 2026. Document provided to the delegation.

[57] Ibid.

[58] *Odluka o raspodjeli sredstava za finansiranje projekata nevladinih organizacija u oblasti saradnja sa dijasporom u 2026. godini* (mne.), Ministarstvo dijaspore, br. 01-910/26-678/73, 19 June 2026. Document provided to the delegation.

In its audit (2024) of the intended use of funds from budget line 431-4, transfers to non-governmental organisations, for 2022, the State Audit Institution gave the Ministry of Health and the Ministry of Labour and Social Welfare a positive opinion with emphasis of matter on their financial statements and an adverse opinion on the compliance of their operations.[59] The Ministry of Labour and Social Welfare had planned 1 EUR on the budget line for transfers to civil society organisations, although the Government decision in force provided 650,000 EUR for priority areas of public interest and 430,000 EUR for the protection of persons with disabilities. Also, 1,080,000 EUR was eventually secured by reallocation from the current budget reserve in late December 2022.[60] The sectoral analyses on which the priority areas depend were delivered in September, October and November 2021 instead of by the statutory deadline of 1 June, and the public calls were published in April and in November 2022 instead of by 1 March.[61]

The audit findings on the allocation machinery itself are more serious. Neither ministry had an internal act setting criteria for the selection of commission members from among their own employees, or for verifying that commission members nominated by civil society organisations were free of conflicts of interest, and no evidence was produced that the nominated members were not so conflicted.[62] Conditions treated as eliminatory in the calls were not prescribed by any legal act. The Ministry of Health took no formal decision appointing the two independent assessors, so that no appealable act existed and the assessors were paid without a contract having been concluded. The commission did not draw up the ranking list of scored projects that the Law requires and a single set of minutes being kept for an entire competition.[63] Contracts with successful organisations were concluded outside the thirty-day deadline, funds were paid in a single instalment rather than in tranches, no on-site monitoring was carried out, reports were not delivered by some recipients without recovery being sought, and neither ministry maintained consolidated records of the organisations and projects financed, of the status of implementation, of claims for recovery or of amounts returned.[64]

The audit also records what happens when the courts intervene. Following the judgments of the Administrative Court in cases U.br. 10523/22 of 21 March 2023 and U.br. 10524/22 of 4 April 2023, the Ministry of Health adopted the acts required of it after the expiry of the thirty-day deadline laid down in the Law on Administrative Dispute.[65] An organisation that succeeds

---

[59]Državna revizorska institucija, *Izvještaj o reviziji: Kontrola namjenskog trošenja sredstava sa budžetske pozicije 431-4 transferi nevladinim organizacijama u 2022. godini* (mne.), br. 01-035/24-373/24, Podgorica, 17 July 2024, opinion adopted on 16 July 2024.

[60]Ibid., Finding and Recommendation F1.

[61]Ibid., Findings and Recommendations P1 and P5.

[62]Ibid., Findings and Recommendations P3 and P4.

[63]Ibid., Findings and Recommendations P6, P8, P9, P10 and P11.

[64]Ibid., Findings and Recommendations P13 to P19.

[65]Ibid., Finding and Recommendation P7. The judgments are U.br. 10523/22 of 21 March 2023 and U.br. 10524/22 of 4 April 2023.

before the Administrative Court against a funding decision therefore recovers, at best, a place in a competition whose year has passed.

The aggregate figures show a system that consistently fails to disburse what it sets aside. Between 2018 and 2024, the amounts allocated rose from 4.43 million EUR to 6.98 million euro, while the amounts actually awarded rose from 4.25 million EUR to 6.15 million euro; in every year of the period a part of the money set aside was never awarded, and the shortfall exceeded 900,000 EUR in 2022 and 800,000 EUR in 2024.[66] The weakest line is consistently the one intended to co-finance projects supported by EU funds, where 372,967 EUR of 910,737 EUR were awarded in 2019 and 556,500 EUR of 1,010,000 EUR in 2022. The distribution across ministries is also concentrated: in 2024 the Ministry of Human and Minority Rights accounted for 2,033,650 EUR of the 3,877,215 EUR awarded in the public-interest line, more than half of the total.[67] For 2026, 6.453 million EUR have been planned across 17 priority areas and 11 ministries.[68]

The final funding complaint concerns institutional discontinuity. Organisations reported that with each change in the composition of the Government the mandates of ministries are redrawn, and that a ministry which inherits a portfolio takes the position that it has nothing to do with the commitments, decisions or unfinished procedures of its predecessor. The Government has been reconstructed three times since it took office, most recently on 23 July 2026, and now numbers 25 ministries and a record 35 members.[69] Responsibility for cooperation with civil society has itself moved between ministries during that period, and the Government's own first implementation report on the cooperation strategy identified staff turnover and changes at the political level among the reasons why planned measures were not delivered.[70]

Beyond the procedural and administrative failures already described, NGOs raised a set of structural concerns about the tendering system itself. A recurring concern was that grants are not always reaching genuine, independent NGOs, with references to so-called "ghost" NGOs and GONGOs, some of which were described as having links to political parties. This was presented to delegation as a structural problem, with parallels drawn with experiences elsewhere in the region and with broader concerns about nepotism and clientelism.

This perception is reinforced by a lack of transparency and accountability. We were told that tender results are not consistently made publicly available or systematically accessible after

---

[66] *Overview of Total Funds Allocated and Awarded, 2018-2025*, data provided to the delegation.

[67] Ibid.

[68] Ministarstvo regionalno-investicionog razvoja i saradnje sa nevladinim organizacijama, *Izvještaj o radu za 2025. godinu* (mne.), Podgorica, March 2026, https://wapi.gov.me/download-preview/baf53506-1a2e-4a00-b0fa-d11167dd753a?version=1.0

[69] *Vlada Crne Gore rekonstruisana treći put; sada ima rekordnih 35 članova* (mne.), 23 July 2026, https://bosnainfo.ba/region/vlada-crne-gore-rekonstruisana-treci-put-sada-ima-rekordnih-35-clanova/

[70] *Strategija saradnje organa državne uprave i nevladinih organizacija 2022-2026* (mne.), and *Izvještaj o implementaciji Strategije*, Ministarstvo javne uprave, March 2023, https://wapi.gov.me/download-preview/75c8255b-80b2-4424-a8b7-43feb68d330d?version=1.0

the process, and that there is insufficient independent quality assessment. Some interlocutors characterised the system as a means of diverting funds or presenting ministries in a favourable light.

Furthermore, civil-society organisations argued that some assessment criteria can disadvantage smaller or genuinely independent organisations. For example, additional points for partnerships in highly specialised fields where potential partners are scarce, or advantages linked to geographical location. New organisations were also said to face particular difficulties because they cannot demonstrate a long track record.

Finally, some interlocutors described past instances of intimidation and administrative obstacles. These included concerns that submitted tenders were allegedly "stolen" and that applications were arbitrarily rejected, including for allegedly missing attachments without an opportunity to correct mistakes. We were told that some NGOs now photograph their submissions in order to have evidence of what they submitted.

Several of the structural concerns about funding are part of a broader pattern. We heard repeated concerns about the exceptionally large public sector and the resulting opportunities for political patronage. The approximate ratio of one civil servant to every 8.6 inhabitants was cited to us as an illustration of the scale of the issue. The promised Public Administration Act, which was presented as one means of addressing clientelism, has reportedly not yet been adopted. Several interlocutors described clientelism as deeply embedded in the social and political system, affecting matters ranging from employment in the public sector to access to grants.

Concerns were also expressed about limited social mobility and the resulting emigration of educated and skilled people. Some interlocutors argued that remittances from the diaspora can mask the underlying loss of human capital. Concerns were also raised about the value and credibility of certain educational qualifications and about the academic backgrounds of some political figures.

## Sustainability and the donor environment

The weaknesses of the domestic funding system would matter less if external funding were stable. It is not. The suspension of United States funding at the beginning of 2025 removed, at short notice, a source that had accounted for between 10 and 30 % of the annual budgets of many organisations. Research covering Montenegro among other countries records organisations cancelling grants in mid-implementation, laying off staff and suspending services altogether, with the effects concentrated in social protection, democracy education and human rights advocacy, and with organisations outside the capital and outside established networks worst affected.[71] The same research notes a wider shift in donor

[71] B. Spasovska and A. Bosilkova-Antovska, *Donor Support, Civic Space, and the Future of Civil Society*, Balkan Civil Society Development Network, October 2025, pp. 16-18.

practice that followed: channelling funds through intermediaries and international implementers, issuing fewer open calls and consolidating contracts, which organisations read as a reduction in transparency, local ownership and accountability.[72]

The withdrawal of USAID support was described to us as having created a substantial funding gap for civil society, with particularly serious consequences for organisations providing services. This has increased the dependence of many CSOs on European funding mechanisms.

The transition from the Instrument for Pre-Accession Assistance to the Global Europe instrument under the 2028-2034 Multiannual Financial Framework carries the same risk in a more permanent form. Without explicit safeguards, replacing the Civil Society Facility could dilute direct support, increase reliance on governments and large intermediaries as primary recipients, and reduce the funding available to watchdog and advocacy organisations, at the very moment when civil society is expected to take on a stronger monitoring role in the accession process.[73] Organisations put the point to the delegation in plain terms: they are being asked to guarantee the credibility of reforms while the two sources that pay for that work, the state budget and pre-accession assistance, are each becoming less predictable at the same time.

## Feedback on NGO initiatives and advocacy

Asked what happens to the initiatives, analyses and legislative proposals they submit on their own motion, organisations returned to a single word. Some receive no answer at all, while others receive an answer that acknowledges receipt without engaging with the substance. The formulation put to the delegation was that the Government is often ignoring civil society. What distinguishes this from the consultation problem is that these are initiatives raised outside any procedure the administration has opened, and no rule requires anyone to respond to them.

The delegation was given a detailed illustration in the field of patients' rights. Under the Law on Patients' Rights, the protector of patients' rights in a health institution is appointed by the director of that institution, and the Law does not exclude the appointment of an employee of the same institution or of the director.[74] A complaint may be submitted to the director or to the protector, must be examined within three days, and a patient who remains dissatisfied is left with recourse to the health inspection.[75] Organisations working in this field pointed out that a patient may therefore end up complaining about conduct to the very person responsible for it, and that a protector appointed and supervised by the head of the institution cannot be regarded as an independent mechanism. The initiative to change this arrangement

[72] Ibid., p. 18.

[73] Balkan Civil Society Development Network, *Civil Society in the EU's Evolving Policy Framework: How Can the EU Ensure Meaningful Civil Society Inclusion in a Credible Enlargement Process?*, Policy Brief, February 2026, p. 5.

[74] *Zakon o pravima pacijenata* (mne.), Article 31, https://www.paragraf.me/propisi-crnegore/zakon-o-pravima-pacijenata.html

[75] Ibid., Articles 32 and 33.

has produced no response. The same organisations described asking the Ministry of Health to regulate who may carry out prevention activities and under what conditions, since the field is at present open to anyone without qualification requirements, standards or supervision. No regulation has followed and no reasoned refusal has been given.

NGOs stated that there was a discrepancy between the public and the private health sector, with practitioners working in both sectors but favouring their private activities, as they earned more in this field. This leads to patients either to be forced into the private sector, which many cannot afford, or to pay bribes to practitioners for better treatment in the public system. The practices described in this particular field were repeated in other sectors and corruption was described as a permanent underlying problem.

Where the law does give organisations a defined role, the difficulty takes a different form. In July 2025, 23 organisations stated publicly that the Administrative Committee of the Parliament has no legal power to decide on candidates nominated by the organisations designated in law for the councils of the public broadcaster and of the electronic media regulator, that a consultative hearing scheduled for that purpose had no basis in media legislation, that earlier public calls had been unlawfully cancelled and that the procedure was being deliberately prolonged.[76] In June 2026, organisations went further and asked the European Union for support in securing the application of the law and access to information in the same appointment process.[77] That civil society should have to seek external assistance in order to have a domestic statutory procedure applied is itself a measure of how the relationship is functioning.

## Access to information

Access to information is the precondition for most of the advocacy described above, and the data made available to the delegation show a system under strain. In 2025, public authorities received 7,481 requests for free access to information, of which 2,180 were decided after the expiry of the 15-day statutory deadline. The Agency for Personal Data Protection and Free Access to Information received 4,769 appeals and decided 4,103 of them, upholding 2,330, that is 57 % of those decided. Of the appeals upheld, 1,209 concerned the failure of an authority to decide at all.[78]

The trend matters more than any single year. Cases pending before the Agency at the end of the reporting period rose from 90 at the end of 2020 to 727 in 2021, 1,137 in 2022, 2,369 in

[76] *Grupa NVO: Zašto Skupština uporno sabotira izbor zakonitih kandidata za savjete RTCG i AVM* (mne.), statement of 23 organisations, 22 July 2025, https://tvpljevlja.me/2025/07/22/grupa-nvo-zasto-skupstina-uporno-sabotira-izbor-zakonitih-kandidata-za-savjete-rtcg-i-avm/

[77] *NVO traže od EU podršku u primjeni zakona i pristupu informacijama u procesu imenovanja članova Savjeta RTCG* (mne.), Akcija za ljudska prava, 26 June 2026, https://www.hraction.org/2026/06/26/nvo-traze-od-eu-podrsku-u-primjeni-zakona-i-pristupu-informacijama-u-procesu-imenovanja-clanova-savjeta-rtcg/

[78] *Agency for Personal Data Protection and Free Access to Information: Performance Indicators in the Area of Free Access to Information, 2020-2025*, data provided to the delegation.

2023, 2,297 in 2024 and 2,768 in 2025. In 2023, half of all first-instance requests were decided outside the deadline. Across the whole period the proportion of decided appeals that were upheld did not fall below 50 %, and administrative silence accounted for between 23 and 42 % of all decided appeals in any given year.[79] The number of lawsuits filed with the Administrative Court in this field reached 8,382 in 2023 and stood at 1,688 in 2025, while the Agency carried out 133 inspections in 2025.[80]

The figures describe a pattern that organisations recognise from practice. In most years, an applicant who appeals is more likely than not to be found to have been wrongly refused, and in a substantial share of cases the authority had not answered at all. A right that is vindicated on appeal in the majority of contested cases is a right that first-instance authorities are systematically failing to respect, and the remedy arrives long after the information would have been of use.

Representatives of NGOs added that staff shortages contribute to significant delays and expressed concern about the financial burden associated with obtaining information, which can have a deterrent effect on citizens and organisations

## Freedom of assembly

On freedom of assembly the picture is different, and in important respects positive. According to the report of the Police Directorate on the application of the Law on Public Assembly and Public Performances for 2025, adopted by the Government on 26 March 2026, 941 public gatherings were held in Montenegro in 2025, against 347 in 2024. Of these, 537 were notified, 399 were held without notification and 5 were spontaneous; the police secured 937 of them, and around 232,989 citizens took part. By subject, 412 were political, 71 socio-economic, 83 religious and 375 of another character.[81]

The increase is largely accounted for by two localities. In Cetinje, citizens held gatherings daily from 6 February to 6 December 2025, 298 in total, mostly in the form of road blockades lasting between one and three hours, in protest at the conduct of the institutions following the killings committed in the town at the beginning of 2025. In Šavnik, citizens held gatherings daily from 27 February to 14 June 2025, 104 in total, over the conduct of the electoral process. Together the two accounted for 43 % of all gatherings held in the country during the year.[82]

The conduct of the authorities in relation to these assemblies was not a source of complaint. In 2025 the police issued no decision prohibiting a public gathering, against three such decisions in 2024, and this despite the fact that two fifths of the gatherings held were not

[79] Ibid.

[80] Ibid.

[81] Uprava policije, *Izvještaj o primjeni Zakona o javnim okupljanjima i javnim priredbama za 2025. godinu* (mne.), Podgorica, March 2026, adopted by the Government on 26 March 2026 and submitted to the Parliament on 16 July 2026 (br. 11-011/26-1091/4).

[82] Ibid., section 2.1.

notified in advance. One breach of public order and peace was recorded at a gathering during the whole year, in Šavnik on 7 June 2025, involving three persons against whom misdemeanour proceedings were initiated, and no criminal offence was committed at any gathering.[83] A year in which the number of assemblies almost trebled, in which two fifths went unnotified and in which not one was prohibited, is evidence of tolerance in practice, and the delegation records it as such.

Two elements nevertheless deserve attention. The report characterises the organisation of assemblies with road blockades as a form of pressure on the state and the Government exercised with the aim of resolving a particular problem, which is an unusual way for a law-enforcement document to describe the exercise of a constitutional right. More concretely, the Government has instructed the Ministry of the Interior to initiate amendments to the Law on Public Assembly and Public Performances, in order to regulate spontaneous assemblies more precisely and to change the definition of the organiser of a public gathering.[84] Both are the very points on which a restrictive amendment would be felt first, since a broadened definition of organiser transfers legal responsibility for an unnotified gathering onto identifiable individuals.

According to NGOs that are working with the LGBTIQ community, cooperation with police around Montenegro Pride is better now than in the past, but improvements could be made. These NGOs provide training to police cadets as well as officers to sensibilise them on LGBTIQ issues, as well as e.g. on needs of young people in vulnerable positions. In the latter case such trainings are also provided for official social workers and health workers. NGOs have to fight with general prejudices in the society which are reflected in the authorities, including prosecutors. Therefore, these trainings are essential, but NGOs are still waiting for them to be accredited and be part of the licensing system for these officials. In general, NGOs in these sectors are very much dependent on foreign funding, which has made their situation much more difficult in recent years.

## Pressure on the media and civil society

The environment for independent scrutiny is also shaped by the media landscape and by the treatment of journalists. We were told of a recent incident involving two young journalists who had published a critical article and were subsequently targeted by security services. According to the account given to us, they were sufficiently concerned about their safety to go into hiding. Civil-society interlocutors also expressed concern about the limited diversity of the media landscape. We were told that four of the five major television channels are Serbian-owned and that the remaining major channel is perceived as strongly pro-government. This was presented as a significant constraint on independent scrutiny of the authorities.

[83] Ibid., sections 2.2 and 2.3.

[84] Ibid., section 5.4, and the Conclusions of the Government of 26 March 2026, point 2.

Independent civil-society organisations described a similarly difficult environment, including smear campaigns, publication of private correspondence and the characterisation of critical organisations as "unreliable discussion partners". Some interlocutors expressed the view that professional opportunities can depend on political conformity. A number of interlocutors contrasted the current situation with 2012, which they remembered as a period of greater openness and enthusiasm for cooperation with civil society. They felt that this openness has subsequently diminished. Some expressed the fear that the proposed NGO Act could become an instrument for placing civil society under greater administrative and political control. When these concerns were raised with government representatives, we sometimes received responses that referred to ministerial competences, administrative procedures or other internal matters rather than addressing the underlying substantive concern directly.

## Sector-specific concerns

Beyond the general framework, organisations working in specific fields shared concerns relevant to their areas of expertise. In the field of environmental protection, interlocutors expressed concern that the constitutional commitment to Montenegro as an “ecological state” is not being adequately respected, citing development in protected areas and along the coast. Concerns were also raised about the independence of inspections and about pressure on inspectors who attempt to enforce environmental or planning rules.

In healthcare, we heard allegations of corruption and conflicts of interest, including concerns about doctors working simultaneously in public and private practice. The absence of effective monitoring of outcomes and an insufficient emphasis on prevention were also raised, as were concerns about the independence of patient-rights mechanisms, as previously noted.

Organisations working with marginalised groups raised particular concerns about inadequate funding and institutional support for those working with former prisoners, SOGIESC communities, sex workers and Roma. We also heard concerns about the limited recognition of harm-reduction approaches to substance use and about continuing difficulties concerning LGBTIQ+ rights and Roma inclusion.

## "The EU factor"

Civil-society interlocutors offered a nuanced assessment of the role of the European Union. Some expressed the concern that the government’s increasingly positive relationship with the European Union may reduce the incentive for meaningful engagement with domestic civil society. While EU pressure has contributed to progress in certain technical areas, including gender-equality policy, interlocutors also argued that the emphasis on technical progress can sometimes allow substantive shortcomings to remain insufficiently addressed. Some felt that the EU is too willing to accept formal compliance where deeper reform is still lacking.

## Rule of law and access to justice

In their assessment of the rule of law, organisations concentrated on the consequences that follow when a court or an independent institution decides against the authorities. A judicial or supervisory decision is of practical value only if it is delivered while the matter it concerns is still live, and only if it is then given effect. The material available to the delegation raises very serious concerns on both counts.

The Administrative Court is the forum in which decisions of the administration are challenged, including decisions on the allocation of public funds, on access to information and on appointments. In 2025 its total caseload was 34,913 cases, of which 13,012 were resolved, leaving 21,899 pending on 31 December 2025. The average caseload per judge was 2,327 cases and the average number resolved per judge 867. Of the 13,012 cases resolved during the year, 11,428, or 88 %, had lasted more than one year, and only 271 were concluded within three months.[85] Pending cases rose from 8,505 at the end of 2020 to 27,587 at the end of 2023 before falling back. The quality of the court's work is not in question: 92 % of its decisions were upheld by the Supreme Court in 2025 and 97 % in 2024.[86] The problem is duration. A judicial remedy that takes more than a year in nearly nine cases out of ten cannot correct an annual funding competition, an appointment procedure or a refusal of information while the matter is still live.

Civil-society representatives expressed serious concerns about the length of judicial proceedings and the limited effectiveness of legal remedies against the state. We were told that NGOs have had little success in challenging the state through the courts, contributing to a perception that litigation is costly and unlikely to produce results. Concerns were also raised about the independence of the administrative courts.

On implementation, the case the organisations returned to most often, and which the delegation considers the clearest illustration, concerns the appointment of the Director General of the public broadcaster RTCG. Boris Raonić was first appointed in 2021 and that appointment was annulled by the courts. The Council of RTCG nevertheless selected him again on 1 June 2023. The Basic Court in Podgorica annulled that decision in April 2024 and the Higher Court in Podgorica upheld the annulment in October 2024, at which point it became final, with an order that the Council make a lawful appointment from among the qualified candidates within eight days.[87] Criminal proceedings followed against the members of the Council who had voted for the unlawful reappointment. The Basic Court in Podgorica convicted members of the Council (Veselin Drljević, Filip Lazović, Naod Zorić and Amina Murić) of abuse of official position in September 2025, and on 15 June 2026 the Higher Court in

[85] *Administrative Court of Montenegro: overview of proceedings, 2020-2025*, data provided to the delegation.

[86] Ibid.

[87] *Nova presuda Višeg suda: Raonić nezakonito reizabran za generalnog direktora RTCG* (mne.), CdM, https://www.cdm.me/hronika/nova-presuda-viseg-suda-raonic-nezakonito-reizabran-za-generalnog-direktora-rtcg/

Podgorica rejected the appeals of both the prosecution and the defence, so that the convictions and the seven-month suspended sentences became final.[88]

In the meantime, the Council appointed Mr Raonić again, in August 2024, for a four-year term running to 2028. On 17 February 2026 the Basic Court in Podgorica annulled that decision as well, for the third time, finding that he did not meet the statutory conditions because he held a public function as a member of the Council of the Agency for Electronic Media, and ordering the Council of RTCG to select a new Director General from among the qualified candidates within eight days of the judgment becoming final.[89] Organisations including the Centre for Civic Education, the Institute for Media of Montenegro, the Centre for Investigative Journalism of Montenegro and the Media Centre called publicly for the judgment to be implemented, for the Parliament to draw the consequences for convicted Council members and for the prosecution to act.[90]

The significance of the case does not lie in the position of any individual. It lies in the fact that three annulments and a final criminal conviction of the members of the appointing body have produced no change in who exercises the function, and no consequence for those convicted of putting him there. Organisations described this to the delegation as the plainest available demonstration that a final judgment is not self-executing where the outcome is politically inconvenient, and that the point of failure in the justice system is not adjudication but execution. The audit findings described earlier, which record a ministry acting on judgments of the Administrative Court only after the statutory deadline had passed, point to the same conclusion in a less prominent setting.

A second sequence, which unfolded during the period of the visit, concerns the National Security Agency. On 13 June 2026 employees of the Agency lodged a complaint with the Special State Prosecutor's Office, the Agency for Personal Data Protection and the parliamentary Committee on Security and Defence, alleging that all staff were subject to constant monitoring through an application installed on official telephones, operating systematically, massively and non-selectively, including outside working hours, and capable of location tracking, screen viewing and camera access.[91] On 18 June 2026 the Director of the Agency filed a criminal complaint against two journalists of the Centre for Investigative Journalism of Montenegro, Andrea Perišić and Đurđe Radulović, over an article examining

---

[88] *Članovi Savjeta RTCG pravosnažno osuđeni zbog zloupotrebe položaja prilikom nezakonitog reizbora Raonića* (mne.), RTNK, 23 June 2026, https://rtnk.me/crna-hronika/clanovi-savjeta-rtcg-pravosnazno-osudjeni-zbog-zloupotrebe-polozaja-prilikom-nezakonitog-reizbora-raonica/

[89] *Presuda Osnovnog suda u Podgorici: Poništeno imenovanje Borisa Raonića za generalnog direktora RTCG* (mne.), CdM, 17 February 2026, https://www.cdm.me/hronika/presuda-osnovnog-suda-u-podgorici-ponisteno-imenovanje-borisa-raonica-za-generalnog-direktora-rtcg/

[90] *Više NVO: Sud je presudio, sada su na potezu RTCG, Skupština i tužilaštvo* (mne.), Aktuelno.me, https://www.aktuelno.me/clanak/vise-nvo-sud-je-presudio-sada-su-na-potezu-rtcg-skupstina-i-tuzilastvo

[91] *Zaposleni u ANB podnijeli krivičnu prijavu SDT zbog sumnji u nezakonit nadzor* (mne.), CIN-CG, 13 June 2026, https://www.cin-cg.me/zaposleni-u-anb-podnijeli-krivicnu-prijavu-sdt-zbog-sumnji-u-nezakonit-nadzor-pazi-snima-se/

hiring practices at the Agency. The journalists were asked to disclose their sources.[92] Organisations called on the Ombudsman and the parliamentary Committee to exercise oversight of the Agency without delay and on the prosecution to state whether it was acting on the complaint against it.[93]

These events are difficult to separate from the legislation described earlier. On 29 May 2026, shortly before the visit, Human Rights Action filed an initiative with the Constitutional Court challenging Articles 13, 18, 20 and 21 of the Law on the National Security Agency, on the ground that they permit access to state records, banks and health institutions without a court decision, secret surveillance and electronic searches in public places without prior judicial approval, and the collection of location data from electronic communications without a court decision, the last of these contrary to a decision of the Constitutional Court of 2014.[94] A law adopted without public debate expands intrusive powers; the body exercising them responds to reporting on its own conduct with a criminal complaint against the journalists; and the remedy available to civil society is a constitutional challenge whose outcome will not be known for a considerable time.

Organisations also described pressures originating outside the country. They pointed to the influence of media broadcasting from Serbia, which they characterised as hostile to human rights work, and to restrictions at the border. Between June and July 2026 the Serbian authorities barred entry to a number of Montenegrin citizens, among them the vice-president of the civic movement URA, Blažo Rađenović, on 3 June, the journalist of Vijesti Petar Komnenić on 30 June, and the Executive Director of BIRN Montenegro, Vuk Maraš, on 6 July, several of the decisions giving no reason beyond the protection of security.[95] International media organisations, including Reporters Without Borders, the European Federation of Journalists and the International Press Institute, called for the bans to be lifted.[96] For the organisations concerned the practical consequence is a restriction on cross-border reporting and on participation in international human rights work.

The media environment in which NGOs work is under sustained strain. The Media Pluralism Monitor assessed Montenegro in 2026 at medium-low overall risk, with its weakest results in fundamental protection and political independence, and recorded that four of the five

---

[92] *SafeJournalists: Krivična prijava direktora ANB protiv novinarki CIN-CG opasan udar na slobodu medija* (mne.), Portal Analitika, 18 June 2026, https://www.portalanalitika.me/clanak/safejournalists-krivicna-prijava-direktora-anb-protiv-novinarki-cin-cg-opasan-udar-na-slobodu-medija

[93] *Support for CIN-CG Journalists: Call for Urgent Oversight of the ANB*, Akcija za ljudska prava, 18 June 2026, https://www.hraction.org/2026/06/18/support-for-cin-cg-journalists-call-for-urgent-oversight-of-the-anb/?lang=en

[94] *Akcija za ljudska prava podnijela inicijativu Ustavnom sudu: Zakon o ANB-u krši pravo na privatnost* (mne.), 29 May 2026, https://www.hraction.org/2026/05/29/akcija-za-ljudska-prava-podnijela-inicijativu-ustavnom-sudu-zakon-o-anb-u-krsi-pravo-na-privatnost/

[95] *Ko su sve Crnogorci kojima je Srbija zabranila ulazak* (mne.), Nova.rs, https://nova.rs/vesti/svet/ko-su-sve-crnogorci-kojima-je-srbija-zabranila-ulazak-od-bivseg-sefa-policije-do-novinara-i-direktora-rtv-podgorica/

[96] *Međunarodne medijske organizacije traže od Srbije povlačenje zabrana ulaska* (mne.), Radio Slobodna Evropa, https://www.slobodnaevropa.org/a/zabrana-ulaska-srbija-crna-gora-novinari/33798756.html

national private television channels are majority-owned by capital from Serbia.[97] Transparency of ownership has improved, and the audiovisual regulator has established the first public digital register of media ownership.[98] Against that, the Media Union of Montenegro recorded 33 attacks on and pressures against media workers in 2025, 40% more than in the preceding year, including eight threats to life and physical safety, 5 of them directed at women, and a further 13 incidents between January and mid-June 2026; the Journalists' Safety Index for Montenegro has declined in every year since 2020, from 3.59 to 3.14.[99] Montenegro has no legislation against strategic lawsuits against public participation (SLAPP) and has not transposed the European Union directive on the subject.[100] The Coalition Against SLAPPs in Europe recorded no documented cases in Montenegro in its 2024 report, but proceedings bearing the characteristics of strategic litigation have been brought: a defamation claim filed against the daily Vijesti in January 2025 by Andrej Vučić remains pending before the court in Podgorica; proceedings against the historian Boban Batrićević, the columnist Brano Mandić and the journalist Vesna Rajković Nenadić were discontinued following public reaction. However, out of 13 incidents recorded in 2026 against journalists, 3 were SLAPP cases brought by Prva Banka against media workers.[101] Defamation claims before the basic courts fell from 31 in 2024 to six in 2025.[102]

Further concerns were raised regarding the Ombudsman's office, which was described as facing constraints in staffing and resources, including dependence on the Ministry of Finance. According to the Ombudsman, approximately 60% of recommendations are followed up, but enforcement of the remainder is weak. At the same time, the office is dealing with serious issues, including alleged police brutality, overcrowded prisons and conditions in mental-health and institutional care. Information concerning the continued employment of police officers under criminal investigation was also presented to the delegation, as well as excessive use of force at public gatherings.

## Conclusion

Montenegro possesses a legal and institutional framework for the functioning of non-governmental organisations and for their participation in decision-making that is broadly in line with the standards of the Council of Europe. Freedom of association is guaranteed by the

[97] Centre for Media Pluralism and Media Freedom, *Media Pluralism Monitor 2026: Montenegro*, European University Institute, https://cmpf.eui.eu/country/montenegro-2026/

[98] Ibid.

[99] Sindikat medija Crne Gore, as reported in *SMCG: U 2026. zabilježio 13 slučajeva napada i pritisaka na medijske radnike, Crna Gora nastavlja da bilježi pad u Indeksu bezbjednosti novinara* (mne.), Portal Analitika, 15 June 2026, https://www.portalanalitika.me/clanak/smcg-u-2026-zabiljezio-13-slucajeva-napada-i-pritisaka-na-medijske-radnike-crna-gora-nastavlja-da-biljezi-pad-u-indeksu-bezbjednosti-novinara

[100] *SLAPP in Montenegro: between hesitant courts and missed reforms*, Osservatorio Balcani e Caucaso Transeuropa, 28 November 2025, https://www.balcanicaucaso.org/en/cp_article/slapp-in-montenegro-between-hesitant-courts-and-missed-reforms/

[101] Ibid.; and Sindikat medija Crne Gore, op. cit.

[102] Sindikat medija Crne Gore, op. cit.

Constitution and exercised without prior approval. The registration process for NGOs is simple, free and open to public inspection; the sector is large and, in the fields the delegation examined, competent and well informed. Public funding of civil society is guaranteed by primary legislation at a fixed minimum share of the annual budget, and the data on its distribution are published. The manner in which organisations are placed on working bodies, and the manner in which laws and strategies are opened to public consultation, are regulated in detail by decree. A strategy for cooperation with civil society is in force, and a Council for Cooperation composed in equal parts of state and civil society representatives exists to oversee it. Taken as a set of instruments, this is a serious framework, and the authorities are entitled to say so.

The central finding of this report is that the framework and the practice have come apart. Almost nothing the delegation was told concerned the absence of rules. What organisations described, consistently and across every field of work, was the experience of taking part in procedures that are correctly conducted and that change nothing: consultations answered without reasons, working groups whose conclusions do not survive into the final text, initiatives that receive no reply at all. Where the practice departs from the rules it does so in the same direction, by narrowing participation rather than widening it, and the instruments most often bypassed are those governing the laws that matter most. The result is a system that can demonstrate compliance while producing very little influence, and organisations have begun to draw the obvious conclusion. The clearest single indicator in this report is not a statistic about consultation but the fact that public calls for civil society representatives on working bodies have started to attract no candidates at all. Withdrawal of that kind is a judgment about whether participation is worth the effort, and it is not corrected by improving procedures.

The institutional dimension of the same problem is discontinuity. The Council for Cooperation, the central channel of structured dialogue, did not meet for more than four years before being reconstituted at the end of 2025 and organisations believed that present NGO members are not representing civil society properly. Ministerial portfolios, including responsibility for civil society itself, have been redrawn repeatedly, and organisations report that commitments do not survive the transfer. Cooperation in Montenegro depends heavily on individuals and on the political moment, and very little on institutional memory.

Public funding illustrates the same divergence between design and operation. The statutory guarantee of a minimum allocation is a genuine protection for the sector, and the publication of funding data over many years is a genuine strength. In operation, however, competitions are launched late, conducted through procedures whose impartiality cannot be verified from the outside, and closed without any means by which an unsuccessful applicant can contest the outcome. The national audit authority has found the administration of these funds to be non-compliant in substance rather than in detail, and a part of the money set aside for civil society goes undistributed every year. This coincides with a marked contraction of external support and with an unsettled transition in European Union funding arrangements. These

operational failures are compounded by the structural concerns raised by civil society regarding the allocation system, including a lack of transparency and perceptions of political influence. The sustainability of independent civil society in Montenegro is therefore an open question, and it is a question the state can influence considerably more than it currently does.

The most serious concern in this report lies in what follows when a court or an independent institution decides against the authorities. This matters more than any individual grievance, because judicial and supervisory review is the mechanism to which everything else defers when consultation, funding and dialogue fail. On the evidence available, that mechanism is not effective in either of the two respects that give it meaning. Proceedings before the court competent to review administrative decisions overwhelmingly last longer than a year, so that a remedy arrives after the competition, the appointment or the decision it concerns has ceased to matter. And where judgments are delivered, they are not reliably executed; the repeated failure to give effect to final judgments concerning the leadership of the public broadcaster, in a sequence that also produced final criminal convictions without consequence, was raised with the delegation more often than any other single matter. The failure to enforce decisions in the field of access to information belongs to the same pattern. A legal order in which final decisions are not implemented does not collapse visibly. It teaches citizens and organisations that seeking a remedy is not worth beginning, and that lesson is difficult to unlearn.

These findings sit alongside developments that point the other way, and the delegation records them without qualification. Freedom of peaceful assembly was exercised extensively and without obstruction during 2025, in a year in which the number of gatherings rose steeply and none was prohibited; the conduct of the authorities in that field was not a subject of complaint in any meeting. The registers of the sector and the published record of its public financing are more accessible than in many states. The Council for Cooperation has resumed its work. A comprehensive reform of the Law on Non-Governmental Organisations has been prepared through a public consultation that was genuinely conducted and that produced a substantial response from the sector, but the law is still not adopted.

What is required is not principally new legislation. It is a change in how the existing framework is used, and that change has to be led politically rather than administratively. Consultation has to be treated as a process capable of altering an outcome; decisions affecting the sector, above all decisions on public money, need to be reasoned, transparent and open to challenge; the mechanisms of institutional dialogue need to function continuously rather than episodically; and the decisions of courts and independent institutions need to be executed as a matter of course. The reform of the Law on Non-Governmental Organisations now under way, and the amendments announced to the legislation on public assembly, are the immediate occasions on which the direction of travel will become apparent, and both should be conducted through the full consultative procedure that recent legislation in the security field bypassed. The recommendations that follow set out in specific terms what the delegation considers necessary. The Conference of INGOs offers its assistance to the

authorities and to the civil society of Montenegro in giving effect to them, and intends to follow their implementation.

## Condensed summary of civil society concerns

*Presented as reported by civil-society interlocutors and not independently verified*

1. Grant allocation and funding

Concerns were raised about transparency in tender processes, publication of results, and independent quality assessment. Some felt that criteria and administrative requirements could disadvantage smaller or newer independent organisations, with limited opportunity to correct procedural errors.

2. Public consultation and civil-society participation

While official data showed significant participation, some CSOs felt their input had limited influence on final legislation. This reportedly led some organisations to reduce their involvement in working groups, and several described a less open climate for critical voices than in earlier years.

3. Draft NGO legislation

Stakeholders raised questions about the balance between executive and judicial oversight and the potential breadth of administrative discretion. The delegation encouraged seeking a Venice Commission opinion; government reactions varied. Certain provisions, including Articles 12 and 65, were seen as broadly formulated.

4. Public administration and social mobility

Concerns were raised about the size of the public sector and perceived scope for patronage, as well as delays in adopting public administration reform. Limited social mobility and emigration of skilled citizens were also mentioned.

5. Media environment

Civil society representatives described limited media diversity and reported an incident in which two young journalists felt unsafe after publishing a critical article. Some expressed concern that the draft NGO law could increase administrative pressure on civil society.

6. Rule of law and oversight institutions

Stakeholders expressed concern about judicial timeliness, the effectiveness of remedies against the state, and the independence of administrative courts. The Ombudsman's office was described as resource-constrained; while many recommendations are followed, enforcement of the remainder was seen as limited. Allegations of selective law enforcement and inadequate protection of vulnerable groups were noted without verification.

7. Sectoral issues

- In *environmental protection*, stakeholders questioned whether ecological-state commitments are consistently reflected in planning and inspection.
- In *healthcare*, concerns included conflicts of interest, monitoring, and prevention.
- Civil society also highlighted *support gaps for marginalised groups*, including Roma, LGBTIQ+ persons, former prisoners, and sex workers.

8. EU-related dynamics

EU engagement was credited with progress in some technical areas, but some interlocutors cautioned that positive relations should not reduce incentives for deeper reform. The withdrawal of USAID support was described as creating a substantial civil-society funding gap.

9. Administrative and digital governance

Stakeholders noted delays in access-to-information requests, partly due to staffing constraints, and said digital grant and registration platforms are not yet fully effective. Montenegro was described as highly centralised, with some local authorities seeking greater responsibility in areas such as spatial planning.

# Recommendations

## For the Public Authorities of Montenegro

- Adopt the new Law on Non-Governmental Organisations without further delay and in line with Venice Commission opinion. Reconsider the proposed restriction on the right to establish an organisation on the basis of previous criminal convictions, and confine any such restriction to what is prescribed by law, pursues a legitimate aim and is proportionate, in accordance with Article 11 of the European Convention on Human Rights and the OSCE/ODIHR-Venice Commission Guidelines on Freedom of Association. Ensure a proper balance between executive and judicial powers in the law's oversight mechanisms
- Complete the digitalisation of registration and of the funding procedure, and abolish the requirement to submit applications for public funds in printed form and on physical media.
- Align the definition of public benefit in the tax legislation with that of the Law on Non-Governmental Organisations, so that the tax incentives for supporting civil society become usable in practice.
- Revise the Law on Volunteer Work so that volunteering is treated as a civic activity rather than as a form of labour, and establish the register of volunteers foreseen by the strategy for cooperation with civil society.
- Introduce a remedy against the selection of civil society representatives to working bodies: a reasoned decision, a right of objection within a short deadline, and a body competent to decide it.
- Harmonise the provisions of the Decree on the selection of representatives of non-governmental organisations concerning the documentation required of nominating organisations, as recommended by the State Audit Institution.
- Ensure that every ministry publishes, within the prescribed deadline, the annual list of laws and strategies on which a public debate will be conducted, and that consultation of the interested public at the initial drafting stage becomes the rule rather than the exception.
- Comply with the obligation to publish, after every public debate, a report stating the number and structure of participants and giving the reasons for the acceptance or non-acceptance of each comment received, and treat the absence of such a report as a defect in the preparation of the draft.
- Discontinue the practice of submitting legislation prepared within ministries to the Parliament through individual members, which removes the obligations of public consultation and of inter-ministerial coordination, and deliver the opinion of the

Government on members' bills within the prescribed deadline and irrespective of the political affiliation of the proposer.

- Ensure that legislation in the field of internal affairs and national security, including any future amendments to the laws adopted in 2026, is prepared through a full public debate, and address the concerns raised by the Agency for Prevention of Corruption regarding oversight of the powers conferred by those laws.
- Prepare the announced amendments to the Law on Public Assembly and Public Performances, in particular those concerning spontaneous assemblies and the definition of the organiser, through the full consultation procedure, and ensure that they do not restrict the exercise of a right that was exercised extensively and without incident during 2025.
- Convene the Council for Cooperation between State Administration Bodies and Non-Governmental Organisations at regular intervals, publish its agendas, minutes and conclusions, respond with reasons to the opinions it adopts, and guarantee the continuity of its work irrespective of changes in the composition of the Government. Ensure NGO representatives on the Council are selected in a transparent manner and are perceived as legitimate by the wider civil society sector.
- Ensure that, where responsibilities are transferred between ministries, the commitments, decisions and ongoing procedures concerning civil society are transferred with them, and that no organisation is required to begin a procedure again because a portfolio has moved.
- Establish an obligation for public authorities to respond, within a defined deadline and with reasons, to initiatives, analyses and legislative proposals submitted to them by civil society organisations.
- Publish all public calls for the financing of civil society projects by the statutory deadline of 1 March, and adopt the sectoral analyses and the decision on priority areas and amounts sufficiently in advance for that deadline to be met.
- Establish a right of objection against decisions on the allocation of public funds, with a short deadline, an identified competent body, and publication of the reasoned scoring on which the decision was based.
- Adopt internal acts governing the selection of members of allocation commissions and the verification of conflicts of interest, appoint independent assessors by formal decision and on the basis of a contract, and ensure that ranking lists are drawn up as the Law requires.
- Ensure that the funds set aside each year are actually distributed, in particular those intended to co-finance projects supported by European Union funds, and introduce a workable pre-financing mechanism so that smaller organisations are not excluded from such projects.

- Strengthen the transparency and accountability of the tendering system by publishing all tender results systematically and ensuring independent quality assessment. Review assessment criteria to ensure they do not inadvertently disadvantage smaller or genuinely independent organisations.
- Ensure the full and prompt execution of final judgments of the courts and of decisions of independent institutions, in particular those concerning the governing bodies of the public broadcaster, and draw the consequences provided by law in respect of office holders convicted by a final judgment.
- Complete the procedures for the appointment of the councils of the public broadcaster and of the electronic media regulator strictly in accordance with the law and on the basis of candidates nominated by the organisations designated for that purpose by legislation.
- Address the duration of proceedings and the accumulated backlog before the Administrative Court, so that judicial review of administrative decisions can be obtained while the matter to which it relates is still capable of being remedied, and comply with the statutory deadline for acting upon its judgments.
- Ensure that public authorities decide requests for access to information within the legal deadline and give effect to the decisions of the Agency for Personal Data Protection and Free Access to Information, and treat the failure to answer a request at all as a disciplinary matter rather than an administrative routine.
- Guarantee that the Ombudsman, the parliamentary Committee on Security and Defence and the Agency for Personal Data Protection are able to exercise effective oversight of the security services, and refrain from responding to journalistic scrutiny of public institutions with criminal complaints against journalists or with demands that they disclose their sources.
- Ensure the Ombudsman's office has adequate resources and functional independence.
- Establish a mechanism for the protection of patients' rights that is independent of the institution whose conduct is complained of, and regulate the conditions under which preventive activities in the field of health may be carried out.
- Refrain from public statements that discredit human rights defenders and the organisations in which they work, and ensure that criticism of the administration is treated as a component of democratic accountability.

## For Civil Society Organisations in Montenegro

- Continue to take up the places reserved for civil society in working bodies and consultative processes, while systematically documenting non-selection, the treatment of submitted comments and the fate of recommendations, so that disengagement does not become the default response of the sector.

- Use the reports on public debates as an instrument of accountability, and challenge, publicly and where appropriate before the courts, the rejection of comments without reasons.
- Make systematic use of the available legal remedies, including against decisions on the allocation of public funds and refusals of access to information, and document the duration and the outcome of those proceedings as evidence of the effectiveness of the remedy.
- Maintain and strengthen joint positions on the reform of the Law on Non-Governmental Organisations, in particular on preserving the statutory guarantee of public funding and on the conditions for establishing an organisation.
- Diversify sources of funding, develop domestic philanthropy, membership and earned income, and cooperate on shared operational and administrative costs, in order to withstand the contraction of external support.
- Invest in organisations and initiatives outside the capital, which are least able to absorb the loss of external funding and least represented in consultative processes.
- Continue cooperation and solidarity with independent media and professional associations of journalists, particularly in relation to oversight of the security services and to restrictions affecting cross-border work.

## For the Conference of INGOs

- Follow closely the adoption of the new Law on Non-Governmental Organisations and the announced amendments to the Law on Public Assembly and Public Performances, and offer the authorities the expertise of the Expert Council on NGO Law at the drafting stage.
- Encourage the Council of Europe and the European Union to keep the enabling environment for civil society, and in particular the freedoms of association, expression and assembly and access to funding, among the criteria against which progress in the accession process is assessed.
- Advocate for dedicated and directly accessible funding for independent civil society within the future European Union financial framework, so that support is not channelled predominantly through governments and large intermediaries.
- Maintain political visibility and public support for organisations under pressure, including in relation to restrictions affecting the cross-border work of journalists and human rights defenders.
- Monitor the execution of judgments and of decisions of independent institutions in the cases identified in this report, and follow up the present report through the General Assembly of the Conference of INGOs and, in due course, through a further visit.

# Key references

## International standards


COUNCIL OF EUROPE, European Convention on Human Rights

COUNCIL OF EUROPE, European Social Charter (revised)

COUNCIL OF EUROPE, Convention on Access to Official Documents (2009)

COUNCIL OF EUROPE, Recommendation CM/Rec(2007)14 of the Committee of Ministers to member States on the legal status of non-governmental organisations in Europe

COUNCIL OF EUROPE, Recommendation CM/Rec(2018)11 of the Committee of Ministers to member States on the need to strengthen the protection and promotion of civil society space in Europe

COUNCIL OF EUROPE, Recommendation Rec(2001)19 of the Committee of Ministers to member States on the participation of citizens in local public life

COUNCIL OF EUROPE, Guidelines for civil participation in political decision making, CM(2017)83, adopted by the Committee of Ministers on 27 September 2017

CONFERENCE OF INGOs OF THE COUNCIL OF EUROPE, Code of Good Practice for Civil Participation in the Decision-Making Process

OSCE/ODIHR - VENICE COMMISSION, Guidelines on Freedom of Association

OSCE/ODIHR - VENICE COMMISSION, Guidelines on Freedom of Peaceful Assembly

OSCE/ODIHR, Guidelines on the Protection of Human Rights Defenders (2014)

UNITED NATIONS, International Covenant on Civil and Political Rights

UNITED NATIONS, Declaration on Human Rights Defenders (1998)

UNITED NATIONS, Human Rights Council Resolution 38/12 (2018) on Civil Society Space


## European Union documents


EUROPEAN COMMISSION, DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027

EUROPEAN COMMISSION, Montenegro 2025 Report, SWD(2025) 754 final, Brussels, 4 November 2025

EUROPEAN COMMISSION, Montenegro 2024 Report, SWD(2024) 694 final, Brussels, 30 October 2024


## Legislation of Montenegro


MONTENEGRO, Constitution of Montenegro

MONTENEGRO, Law on Non-Governmental Organisations ("Službeni list CG", br. 39/11, 37/17 and 84/24)

MONTENEGRO, Law on State Administration ("Službeni list CG", br. 78/18, 70/21 and 52/22)

MONTENEGRO, Law on Public Assembly and Public Performances ("Službeni list CG", br. 52/16)

MONTENEGRO, Law on Free Access to Information

MONTENEGRO, Law on Administrative Dispute

MONTENEGRO, Law on Patients' Rights

MONTENEGRO, Law on Volunteer Work

MONTENEGRO, Law on Internal Affairs (2026)

MONTENEGRO, Law on the National Security Agency (2026)

MONTENEGRO, Decree on the selection of representatives of non-governmental organisations to the working bodies of state administration authorities and on the conduct of public debate in the preparation of laws and strategies ("Službeni list CG", br. 41/18 and 86/26)

MONTENEGRO, Decree on the financing of projects and programmes of non-governmental organisations in areas of public interest ("Službeni list CG", br. 13/18)

MONTENEGRO, Decree on the procedure and manner of co-financing projects and programmes of non-governmental organisations supported by European Union funds

MONTENEGRO, Rulebook on the content of the public call for the allocation of funds for the financing of projects and programmes of non-governmental organisations and on the form and content of the application ("Službeni list CG", br. 14/18)

## Strategic and policy documents of Montenegro

GOVERNMENT OF MONTENEGRO, Strategy for Cooperation between State Administration Authorities and Non-Governmental Organisations 2022-2026, with the accompanying action plans

GOVERNMENT OF MONTENEGRO, Decision establishing the Council for Cooperation between State Administration Bodies and Non-Governmental Organisations (2025)

GOVERNMENT OF MONTENEGRO, Decision determining the priority areas of public interest and the amount of funds for the financing of projects and programmes of non-governmental organisations (annual)

MINISTRY OF PUBLIC ADMINISTRATION, Report on the implementation of the Strategy for Cooperation between State Administration Authorities and Non-Governmental Organisations 2022-2026

MINISTRY OF REGIONAL AND INVESTMENT DEVELOPMENT AND COOPERATION WITH NON-GOVERNMENTAL ORGANISATIONS, Annual Report on Work for 2025 (Podgorica, March 2026)

MINISTRY OF REGIONAL AND INVESTMENT DEVELOPMENT AND COOPERATION WITH NON-GOVERNMENTAL ORGANISATIONS, Report on the public consultation on the Draft Law on Non-Governmental Organisations (25 September 2025)

GOVERNMENT OF MONTENEGRO, Overview of funds allocated and awarded for the financing and co-financing of projects and programmes of non-governmental organisations, 2018-2025

## Reports of oversight and independent institutions

STATE AUDIT INSTITUTION OF MONTENEGRO, Audit Report: Control of the intended use of funds from budget line 431-4, transfers to non-governmental organisations, in 2022 (Podgorica, July 2024)

POLICE DIRECTORATE OF MONTENEGRO, Report on the application of the Law on Public Assembly and Public Performances for 2025 (Podgorica, March 2026)

AGENCY FOR PERSONAL DATA PROTECTION AND FREE ACCESS TO INFORMATION, Performance indicators in the area of free access to information, 2020-2025

ADMINISTRATIVE COURT OF MONTENEGRO, Overview of proceedings, duration of proceedings and quality of decisions, 2020-2025

AGENCY FOR PREVENTION OF CORRUPTION, Assessment of the draft laws on internal affairs and on the National Security Agency (2026)

## Monitoring reports and research

HUMAN RIGHTS ACTION, Initiative to the Constitutional Court of Montenegro concerning the Law on the National Security Agency (29 May 2026)

OPEN GOVERNMENT PARTNERSHIP, Montenegro Results Report 2022-2024

INSTITUTE ALTERNATIVE, PAR Monitor: Policy Development and Coordination in Montenegro (2026)

INSTITUTE ALTERNATIVE, How are laws adopted? (2026)

CENTRE FOR DEMOCRATIC TRANSITION, NGO Index

BALKAN CIVIL SOCIETY DEVELOPMENT NETWORK, Donor Support, Civic Space and the Future of Civil Society (October 2025)

BALKAN CIVIL SOCIETY DEVELOPMENT NETWORK, Civil Society in the EU's Evolving Policy Framework, Policy Brief (February 2026)

## Websites

CENTRE FOR CIVIC EDUCATION (CCE) www.cgo-cce.org

CENTRE FOR DEMOCRATIC TRANSITION (CDT) www.cdtmn.org

PROTECTOR OF HUMAN RIGHTS AND FREEDOMS (OMBUDSMAN) www.ombudsman.co.me

REGISTER OF NON-GOVERNMENTAL ORGANISATIONS OF MONTENEGRO www.ngo.gov.me

ALL ABOUT NGOs (SVE O NVO) www.sveonvo.me

FINANCING OF NGOs (FINANSIRANJE NVO) www.finansiranjenvo.me

GOVERNMENT OF MONTENEGRO www.gov.me

E-GOVERNMENT PORTAL, E-PARTICIPATION MODULE www.euprava.gov.me

AGENCY FOR PERSONAL DATA PROTECTION AND FREE ACCESS TO INFORMATION www.azlp.me

AGENCY FOR PREVENTION OF CORRUPTION www.antikorupcija.me

STATE AUDIT INSTITUTION www.dri.co.me

CENTRE FOR DEVELOPMENT OF NON-GOVERNMENTAL ORGANISATIONS (CRNVO) www.crnvo.me

INSTITUTE ALTERNATIVE www.institut-alternativa.org

HUMAN RIGHTS ACTION (HRA) www.hraction.org

CENTRE FOR INVESTIGATIVE JOURNALISM OF MONTENEGRO (CIN-CG) www.cin-cg.me

NETWORK FOR AFFIRMATION OF THE NGO SECTOR (MANS) www.mans.co.me

WOMEN'S RIGHTS CENTRE www.womensrightscenter.org

RESOURCE CENTRE FOR CIVIL SOCIETY www.resursnicentar.me

# APPENDIX

## Programme of the Visit

Monday, 22 June 2026

| | |
|---|---|
| Afternoon | Arrival of the delegation |
| 15.30 | Briefing at the office of the partner organisation |
| 17.00 | Joint meeting with the Head of the Council of Europe Programme Office in Podgorica |

Tuesday, 23 June 2026

| | |
|---|---|
| 9.00 - 10.00 | Meeting with the Ministry of Interior |
| 10.30 - 12.00 | Meeting with the Ministry of Regional-Investment Development and Cooperation with Non-Governmental Organisations |
| 13.45 - 15.15 | Meeting with a group of rights-based organisations working on the judiciary, human rights, anti-discrimination and free legal aid, on women's rights, support to victims of violence and access to justice for women, and on the rights of LGBTI persons |
| 15.30 - 17.15 | Meeting with a group of organisations promoting social cohesion and equal opportunities: the rights of parents, children and families, the rights of persons with disabilities and in particular of young persons with disabilities, the participation of Roma and Egyptian youth, youth activism, and social inclusion, migration and operational work with vulnerable groups |

Wednesday, 24 June 2026

| | |
|---|---|
| 9.00 - 10.30 | Meeting with the Ministry of Justice |
| 11.00 - 12.30 | Meeting with the Protector of Human Rights and Freedoms of Montenegro (Ombudsman) |
| 13.30 - 15.15 | Meeting with a group of organisations working on good governance, public policy and civic participation: civil society development and participation in policy-making, public administration reform and public finances, transparency, elections and civic engagement, democratic transition and legal reform, and media pluralism and media freedom |
| 15.30 - 17.15 | Meeting with a group of organisations working on environmental protection, public health and institutional accountability: environmental protection and sustainable development, biodiversity and habitat conservation, prevention and support to vulnerable populations in the field of health, and oversight of the management of public resources |

| | |
|---|---|
| 19.00 | Informal discussions at dinner hosted by the Conference of INGOs with representatives of the academic community and organisations working on media standards and freedom of expression, anti-corruption, transparency and accountability, democratisation, the rule of law and European integration |

Thursday, 25 June 2026

| | |
|---|---|
| 9:00 - 10:00 | Meeting with the Union of Municipalities of Montenegro |
| 10:30 - 11:30 | Meeting at the Parliament of Montenegro, with the Vice-President of the Parliament and member of the delegation of Montenegro to the Parliamentary Assembly of the Council of Europe |
| 12:00 - 12:45 | Meeting with the Ministry of Public Administration |
| From 14.00 | Departure of the delegation |