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Annex II

to the Commission Implementing Decision approving the second release of funds to Albania, Montenegro and North Macedonia under the Reform and Growth Facility for the Western Balkans

Assessment of the Conditions for Payments – Montenegro

1. Commission assessment of the preconditions for Union support

Effective democratic and rule of law mechanisms

Montenegro's democratic institutions are functioning in a mostly satisfactory way, and a multi-party parliamentary system is in place, as confirmed by the latest national elections in June 2023. However, the system suffers from recurrent challenges due to the polarised political situation. Despite the persisting fragmentation of the parliamentary landscape, the government, in power since October 2023, operates in a largely stable political environment. Consensus on many EU-accession related reforms was achieved, unblocking the EU accession negotiations. Still, the country and its institutions are vulnerable to political crises and institutional blockages. Montenegro should continue addressing OSCE/ODIHR recommendations and issues concerning electoral legislative reform and align its electoral processes to highest democratic standards, as the ones highlighted in the Commission Recommendation on inclusive and resilient electoral processes¹.

In June 2024, the Commission's report assessed that Montenegro fulfilled the interim benchmarks for the rule of law chapters 23 and 24. Montenegro has a pluralistic media environment and has progressed in the area of freedom of expression. New media-related laws, aligned with the EU *acquis*, were adopted in 2023 and 2024, but need yet to be consistently enforced and fully implemented. This concerns in particular the independence of the public broadcaster RTCG and the Agency for Audiovisual Media Services.

The legal framework ensuring judicial independence, impartiality, and accountability is largely in place. In 2023 and 2024 the country aligned several key pieces of legislation with the EU *acquis* and European standards, based on the European and Venice Commissions' recommendations. However, Montenegro needs to further align its legal framework, including the Constitution, with European standards and needs to focus on its implementation to address the existing challenges. Furthermore, the quality and efficiency of justice need yet to be significantly improved.

The legislation on the prevention and fight against corruption is in place. Montenegro adopted a new Law on prevention of corruption, with the aim to align it with European standards, in June 2024. The implementation of the 2024-2028 strategy for the fight against corruption and its action plan is ongoing, but challenges remain concerning the monitoring of its implementation. The prosecution services and courts must yet substantially improve the

¹ [\(EU\) 2023/2829 of 12 December 2023.](#)

effective enforcement of the criminal legislation. In addition, measures aimed to address corruption in the identified high-risk areas are being rolled out under the Strategy, and Montenegro must ensure targeted risk assessments and specific actions are effectively and systematically enforced.

Respect for all human rights obligations

The legislative and institutional framework on fundamental rights is broadly in place and Montenegro continues to largely meet its international obligations on human rights. More efforts are needed to fully implement the framework and to ensure access to justice and enforcement of rights in administrative and judicial proceedings, in particular for vulnerable groups. Montenegro should also address more comprehensively the recommendations from the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment (CPT).

The preconditions are confirmed as met.

2. Commission assessment of the general conditions for payments

a) Assessment of the macro financial stability

Montenegro's real GDP growth slowed down to 3.2% in 2024 from 6.3% in 2023. Economic expansion was driven by strong increase in private consumption and recovering investment. Growth in private consumption was supported by rising wages and pensions (the latter boosted by a large increase in minimum pensions), while easing monetary conditions and higher public capital spending fostered investment. The main headwind came from contracting exports of goods and weak tourism-related services following an extraordinary performance in 2022-2023. The average annual inflation slowed down to 3.6% in 2024, from 8.7% in 2023 and is expected to hover around this level in 2025. The budget deficit deteriorated to 3.2% of GDP in 2024 from 2023 year's surplus of 0.6% of GDP and is expected to deteriorate further to 3.5-3.7% in 2025² on the back of newly adopted Europe Now 2.0 measures. The general government gross debt-to-GDP ratio increased to 61.3% by end-2024 from 59.3% in 2023 and is projected to decline to 60.2% in 2025. Good economic performance in 2023 and 2024 supported strong growth of budget revenue, but the new policy measures, which entered into force in October 2024, are expected to weaken budget revenue and raise spending, if not accompanied by additional offsetting measures. The current account deficit increased to 17.1% of GDP in 2024 from 11.4% in 2023 due to a broad-based fall in exports and it was financed by net foreign direct investment (FDI) inflows and reserves. New fiscal and debt strategies have been adopted at the end of 2024. The 2025 budget was adopted in February 2025. The labour market situation improved in both 2023 and 2024, bringing the average unemployment rate to a historic low of 11.6% in 2024, but structural problems (the integration into the job market of youth, women, long-term unemployed) and regional disparities persist. The banking sector remains well capitalised and liquid.

In conclusion, the authorities are pursuing a stability-oriented macroeconomic policy, and the general condition is met.

² IMF (2025) [Montenegro: Staff Concluding Statement of the 2025 Article IV Mission](#)

b) Assessment of the soundness of the Public Financial Management system(s)

Public financial management is broadly in place, while the Public Administration Reform strategy 2022-2026 and the Public Finance Reform Programme 2022-2026 aim to address in a comprehensive way long-standing weaknesses in Montenegro's public financial management system, drawing on the lessons and evaluations of the previous programme cycle. While progress has been made in certain areas, additional efforts remain essential—particularly in strengthening the public investment management system to improve efficiency and effectiveness, developing a more robust medium-term budgetary framework, and enhancing the identification and management of fiscal risks.

One of the key reform objectives is to address managerial accountability and increase delegation of authority to middle management. New mid-term fiscal strategy and a new debt strategy and the law on budget inspection were adopted at the end of 2024. The debt strategy aims to establish a stable and sustainable medium-term framework for securing budget financing. It rests on three pillars: (1) reducing financing and refinancing risks by managing market, interest rate, and currency risks while maintaining adequate reserves; (2) broadening the international investor base to ensure steady demand for government bonds even during global turbulence; and (3) diversifying domestic financing sources, including issuing retail bonds to citizens to support the development of Montenegro's capital market. The Law on Budget Inspection represents a key step in revitalising a mechanism that formally existed since 2014 but became functional only in 2024. The law provides a clearer framework for the work of budget inspectors, specifying their competencies and responsibilities in detail. It also introduces stronger reporting requirements and mechanisms to ensure transparency, with the aim of making budget inspection an effective instrument for monitoring compliance, safeguarding public resources, and supporting the broader public financial management reform agenda

The Fiscal Council, legally established in 2024, will become functional once the Parliament selects its members. The government made efforts to improve the management of the capital budget by setting up the Public Investments Council in January 2024, to improve planning and implementation of public infrastructure projects. However, no independent appraisal of large capital investment projects is yet in place. To strengthen the monitoring of fiscal risks in February 2024 the government published an official list of 50 state-owned enterprises at central level, with basic data about their financial performance. Several measures are still necessary to improve the medium-term budgetary framework. These include enhancing the budgetary system, improving the IT system for budget planning and introducing a centralised payroll calculation system to ensure better control and a more efficient management of spending on public wages.

In conclusion, the soundness of the public finance management system (including the relevant reform strategy) is sufficiently confirmed, and the general condition is met.

c) Assessment of the transparency and oversight of the budget

Budget Transparency

Montenegro publishes key fiscal and budgetary documents in a timely manner - including the budget proposal, adopted budget and budget execution reports - ensuring budget transparency. However, the amount of information poses difficulties for timely scrutiny in the Parliament.

The Law on Budget and Fiscal Responsibility regulates the function of budget inspection. A system of internal controls is in place and functioning in a decentralised manner, with significant coverage of the public sector. It is generally assessed as robust and functional but requires further support from senior management of public sector institutions. Concerning financial management control, the Budgetary Inspection is proactively publishing all its findings. Public participation in the budget process and the Parliament's oversight of the budget needs to be improved. In the 2024 budget, Montenegro made progress in introducing the elements of gender-responsive budgeting.

In conclusion, transparency and oversight of the budget are sufficiently credible and the general condition is met.

The general conditions are confirmed as met.

3. Commission review of the achievement of the steps in the Reform Agendas

The Commission has reviewed the information provided by the beneficiary and has no indication that the implementation of the steps contravenes the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement, or the ‘Do No Significant Harm’ principle (DNSH).

1.1.1 Reforming the governance of State-Owned Enterprises (SOEs). Improving the governance, efficiency, and accountability of State-Owned Enterprises (SOEs) to enhance their contribution to the economy.

The step under review	<i>1.1.1.2 Corporate governance and accountability. Amend corporate law or adopt new law/bylaw to introduce new rules and criteria for the nomination and selection of board members of SOEs. The nominations are to be subject to an open, independent and merit-based selection process, while also increasing diversity and number of independent board members. Strengthen the governance, ownership function and oversight of SOEs by establishing the performance-based incentives to assess the efficiency of SOEs based on mandatory annual financial reports, which should be available in the register of SOEs.</i>
Baseline	Not achieved
Deadline of the step	June 2025
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as partially achieved
Commission assessment of results	The Draft Law on the Governance of State-Owned Enterprises, which should introduce new rules and criteria for the nomination and selection of board members of SOEs and performance-based incentives, along with Draft State Ownership Policy are only in the preparatory phase. Based on the above, the Commission considers this step as not achieved.
Checks performed and evidence used in the verification of the step and related findings	In line with the sources of verification, the beneficiary should have submitted the adopted laws, as published in the Official Gazette. The current information has been obtained through regular communication with the Ministry of Finance.
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 30 June 2026.

1.1.2 Revising public procurement processes and State Aid policies. Enhancing transparency, efficiency, and integrity in the public procurement processes and State Aid.

The step under review	<i>1.1.2.3 Anti-corruption framework. Following the adoption of the Law on amendments to the Law on the prevention of corruption, revise the anti-corruption, integrity and conflict of interest framework for public procurements and implement the changes</i>
Baseline	In preparation
Deadline of the step	June 2025
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as partially achieved.
Commission assessment of results	The amendments to the Law on the prevention of corruption have not been adopted by Parliament yet and there were no recorded activities on the requirements to “... <i>revise the anti-corruption, integrity and conflict of interest framework for public procurements and implement the changes</i> ”. Based on the above, the Commission considers this step as not achieved.
Checks performed and evidence used in the verification of the step and related findings	In line with the sources of verification, the beneficiary should have submitted the adopted laws, as published in the Official Gazette. As the laws are not yet adopted, in substitution, the beneficiary provided: <ul style="list-style-type: none"> • A public call for the nomination of representatives from non-governmental organizations (NGOs) for the Working Group for drafting the Proposal for the Law Amending the Law on Prevention of Corruption • A list of NGO candidates for the Working Group for drafting the Proposal for the Law Amending the Law on Prevention of Corruption • Public call for the public consultation on the Draft Law Amending the Law on the Prevention of Corruption • The report on the public consultation process on the Draft Law Amending the Law on the Prevention of Corruption • Opinion of the Ministry of Finance on the Regulatory Impact Assessment (RIA)
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 30 June 2026.

1.1.3 Dismantling regulatory barriers and facilitating the conduct of business.

The step under review	<i>1.1.3.1 Alignment with the Law on Business organisations registration, New Law on business organisation registration will recognise and define the status of active and inactive companies. Company register is updated regularly to remove defunct companies from the registers (in line with the</i>
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	<i>Law on Business organisations registration). Consistency is ensured between debtor register of the Central bank and the company register (current discrepancy 15% of the companies with blocked accounts not shown as debtors in the company registers). Consistency of 100% between the CBCG register and the company register is achieved.</i>
Baseline	2023: The amendments on Law business organisations registration not adopted; Company register does not reflect the real situation properly.
Deadline of the step	June 2025
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as partially achieved.
Commission assessment of results	<p>The starting point for the fulfilment of this step was only achieved after the 30 June 2025 cut-off date. Namely, the Law on Business Organisations (Official Gazette, 90/2025), as well as the Law on the Registration of Business and Other Entities (Official Gazette, 92/2025) were adopted on 31 July 2025.</p> <p>Regarding the update of the Central Register of Business Entities, the improvement of the software which is required in order for the system to recognise and remove defunct companies – the Registration Module – has not been completed. Instead, it is in its final testing phase. All requested additional functionalities such as, status of the company (active or inactive), are expected to be integrated into this module.</p> <p>Regarding interoperability between the Central Register of Business Entities and the Compulsory Collection System of the Central Bank of Montenegro (CBCG), development of the Collection Module, which includes these features, is not completed, either It has been reported that testing of this system is being conducted continuously and in phases across the key modules (Registration, Electronic Applications, Tax Accounting, and Collection), with the expectation for the entire system is expected to go live on 1 January 2026.</p> <p>Based on the above, the Commission considers this step as not achieved.</p>

Checks performed and evidence used in the verification of the step and related findings	<p>In line with the sources of verification, the beneficiary should have submitted, inter alia, the adopted laws, as published in the Official Gazette.</p> <p>In substitution, the beneficiary has submitted:</p> <p>Public call for the public consultation on the draft Law on the registration of business and other entities</p> <ul style="list-style-type: none"> • The report on the public consultation process on the draft Law on the registration of business and other entities • Public call for the public consultation on the draft Law on business organizations • The report on the public consultation process on the draft Law on business organizations <p>Regarding the information system that will enable the assignment of status and the removal of defunct companies, the Commission held regular communication with the ministries regarding the laws, as well as with the relevant institution (the Tax Administration).</p>
Double funding	<p>No contributions from third parties were reported in support of the achievement of this step.</p>
Clear conclusion on the achievement of the step	<p>Not achieved. The ‘grace period’ runs until 30 June 2026.</p>

1.1.4. Improving e-cadastre and spatial planning

The step under review	<p><i>1.1.4.1. Adopting the Spatial Plan of Montenegro (by the Parliament)</i></p>
Baseline	<p>Draft Proposal for the Spatial Plan of Montenegro prepared</p>
Deadline of the step	<p>December 2024</p>
Conclusion of the review of the step by the beneficiary	<p>The beneficiary considers this step as fully achieved.</p>
Commission assessment of results	<p>The Spatial Plan of Montenegro was adopted by the Government on 12 June. The Spatial Plan was adopted in Parliament on 26 June and published in Official Gazette on 1 July (Official Gazette No. 68/2025), Article 10 of the Decision on the adoption of the Spatial Plan of Montenegro stipulates that Decision on the adoption enters into force on the day following its publication in the “Official Gazette of Montenegro.”</p> <p>The Spatial Plan of Montenegro until 2040 serves as a strategic, legally binding framework guiding the organization, use, development, and protection of the country's territory—establishing long-term goals and spatial categories. It seeks balanced regional development, ecological</p>

	<p>resilience, infrastructure expansion (including transport and energy), and mandates that municipal planning align with national objectives to ensure continuity, stability, and sustainable spatial governance over the next two decades.</p> <p>The adoption of the Spatial Plan of Montenegro has been the subject of controversy. However, pending a ruling by the Constitutional Court, the Spatial Plan currently remains in force.</p> <p>Based on the above, the Commission considers this step as achieved.</p> <p>Nevertheless, pursuant to Article 21(2) and (5) of Regulation (EU) 2024/1449, the step is subject to the principle of reversibility. Should the Constitutional Court declare the Spatial Plan invalid, the European Commission will adjust subsequent disbursements by deducting the amount corresponding to this reform step.</p>
Checks performed and evidence used in the verification of the step and related findings	<p>In line with the sources of verification, the following evidence was provided:</p> <ol style="list-style-type: none"> 1. Press release from the 84th Government session with materials, 12 June (https://www.gov.me/en/article/press-release-from-the-84th-cabinet-session). 2. Website publication of the fifth Parliament session of the First Regular (Spring) Sitting in 2025, with status "adopted" and accompanying documentation and media articles (https://www.skupstina.me/en/sittings/parliamentary-sittings; https://en.vijesti.me/news-b/economy-d/764218/The-assembly-adopted-the-spatial-plan.) 3. <u>Publication in Official Gazette on 1 July (Official Gazette No. 68/2025, https://www.sluzbenilist.me/propisi/CFE27B36-84E1-4AD5-BB60-FF188312EB9C).</u> <p>The beneficiary has additionally submitted:</p> <ol style="list-style-type: none"> 4. Initiative for Constitutional Review of the Decision on the Adoption of the Spatial Plan (https://czip.me/wp-content/uploads/2025/08/inicijativa-uscg-prostorni-plan.pdf)
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved.

1.1.5. Reforming inspections services. Increasing integrity, efficiency and performance of inspection services and reducing the informal economy

The step under review	<i>1.1.5.1 Improving integrity in the inspection services. Obligatory annual asset declaration and conflict of interest declaration for the inspectors introduced and subject to checks by the Anti-Corruption Agency</i>
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Baseline	Pursuant to the provisions of Article 6a of the Law on Tax Administration, tax inspectors continuously submit annual reports on assets and income to the Anti-Corruption Agency. According to the Rulebook on Internal Organisation and Systematisation of the Tax Administration and the data obtained from the Department for Planning and Human Resources Management, the total number of systematised tax inspector jobs in the Department for Operations in the field of inspection supervision is 145, of which 92 jobs are filled. In this connection, 92 is taken as the initial value. <i>[text as in the Reform Agenda/Annex I]</i> . The baseline for custom inspectors is 111.
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as partially achieved.
Commission assessment of results	<p>For the reform step to be achieved, Montenegro should fulfil the following activities outlined in the Reform Agenda:</p> <p>a) Extending the obligation to report on assets and income to all categories and ranks of authorised customs officers</p> <p>The following categories of customs officers in the Customs Administration still need to be covered by the asset reporting obligations: Manager of the customs office; Head of department; Head of service; Head of branch; Assistant head of branch.</p> <p>Montenegro informed the Customs Administration is considering updates to the Customs Law, following analysis which is to be done by the end of 2025. In addition, they informed that the Anti-Corruption Agency (ASK) acts as a supervisory authority responsible for verifying submitted reports on assets and income. In the event that the report is not submitted, or contains incomplete or inaccurate data, the Agency initiates appropriate proceedings before the competent court against the responsible tax or customs inspector. Data on the verifications carried out are part of the Agency's quarterly and annual reports. Regarding the reports for 2024 (the deadline for submission was 31 March 2025), the verification process is ongoing. Regarding checks on conflicts of interest, the Agency acts in accordance with the provisions of the Anti-Corruption Law (Art. 9–17), which clearly stipulate that civil servants are not subject to direct control, but only public officials. However, if discrepancies or potential conflicts of interest are identified during the review of asset and income reports, the Agency submits the data to the competent authorities (e.g. the Tax or Customs Administration, as well as the competent ministry), in order to take further measures.</p> <p>b) Implementing the security background checks on the employment of customs officials, in line with the existing, but not implemented provision of the Law on Customs Service</p> <p>Montenegro reported that security background checks for customs officials are part of the employment process, carried out under the Law on Civil Servants and State Employees (Article 34), which requires confirmation of no criminal convictions that would disqualify a candidate. The Human Resource Management Authority is responsible for obtaining certification. Additionally, under the Law on Customs Administration (Article 51), the Director participates in security checks by accessing information through</p>

	<p>the Bureau for Operational Communication, which includes representatives of all security services, ensuring cooperation and information exchange before employment.</p> <p>In summary, not all categories of the customs officers are covered by the asset reporting obligations yet, and the Customs Law has not been updated yet.</p> <p>Based on the above, the Commission considers the step as not achieved.</p>
Checks performed and evidence used in the verification of the step and related findings	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> • Quarterly report on the work of the Agency for the Prevention of Corruption for the first quarter of 2025 • Annual Report on the Work of the Agency for the Prevention of Corruption for 2024
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 31 December 2026.

2.1.1. Full implementation of the electricity integration package

The step under review	<i>2.1.1.1 Complete transposition of the electricity integration package in line with the Energy Community requirements and continue its implementation</i>
Baseline	Partially aligned
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as partially achieved.
Commission assessment of results	<p>While the new Law on Energy was adopted on 17 March 2025, the Law on Cross-Border Exchange of Electricity and Natural Gas remains to be adopted.</p> <p>Based on the above, the Commission considers this step as not achieved.</p>
Checks performed and evidence used in the verification of the step and related findings	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> • Law on Energy published on the “Official gazette No 28/2025” of 19.03.2025: (DG ENER to confirm alignment)
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 31 December 2026.

2.1.2 Gradual tariff adjustments to cost recovery levels accompanied by energy poverty measures.

The step under review	<i>2.1.2.2 Implementation of measures aimed at protecting energy poor and vulnerable customers including developing methodology to define energy poor groups and monitoring tools</i>
Baseline	Not established
Deadline of the step	June 2025
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved
Commission assessment of results	<p>The new Energy Law, adopted in March 2025, implements the provision of Directive (EU) 2019/944 requiring the protection of energy-poor and vulnerable household customers through social policy or other means that do not involve public intervention in setting electricity supply prices.</p> <p>The Energy Law (Article 12) provides a first definition of Energy Poverty and Vulnerable customers and provides the legal basis for the adoption of the 2 following decrees providing more detailed definitions and methodology, in line with the Energy Community requirements.</p> <p>One of the two adopted Decrees provides complementary and detailed criteria for determining energy-poor households which will enable households that qualify as such to be eligible to receive subsidies through energy efficiency programmes.</p> <p>The Decree on the supply of vulnerable electricity customers defines detailed criteria for identifying vulnerable electricity customers, the amount of the subsidy for vulnerable customers who are socially and medically disadvantaged, the monthly electricity consumption threshold eligible for the subsidy, and the method for calculating the subsidy on electricity bills for vulnerable customers.</p> <p>Regarding monitoring tools, the Energy Law (Article 11) establishes the obligation of the competent ministry to report to the Government on the progress regarding the achievement of the national goal of reducing the number of households that are affected by energy poverty and, where applicable, information on policies and measures undertaken to address the issue.</p> <p>Commission services confirm that a) the new Energy Law addresses appropriately the requirements of the step, and b) the methodology is in line with the EU Recommendation (EU) 2020/1563 or Energy Community Recommendations from 2022.</p> <p>Based on the above, the Commission considers this step as achieved.</p>
Checks performed and evidence used in the verification of the step and related findings	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> • Energy Law adopted by the Parliament of Montenegro on 13 March 2025 and published in the “O.G. of Montenegro” No. 28/2025 of 19 March 2025 https://www.sluzbenilist.me/propisi/64F3E28A-1501-407C-91D6-C8E949DE7C5C

	<ul style="list-style-type: none"> • Decree on the supply of vulnerable electricity customers has been adopted by Government of Montenegro and published in “O.G of Montenegro” No. 67/2025 of 26.06.2025 source • Decree on detailed criteria for determining energy-poor households has been adopted by Government of Montenegro and published in “O.G of Montenegro” No. 67/2025 of 26.06.2025 source
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved.

2.2.1 Implementing priority policies and measures from the National Energy and Climate Plan (NECP).

The step under review	<i>2.2.1.1 Governance structures mandated to implement and monitor just transition actions are operational and have adopted a plan for training and job creation for people employed in mining and coal power production</i>
Baseline	Partially established
Deadline of the step	June 2025
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved
Commission assessment of results	<p>The National Council for Just Transition has been established as a government body responsible for monitoring the implementation of this reform. The Decision of its establishment provides also for its composition and tasks, including mandate to monitor the implementation of the Just Transition Plan.</p> <p>The Just Transition Plan is not adopted yet, even though work is ongoing through a study / diagnostic of the socio-economic situation in the coal region. The step also requires the National Council for Just Transition to be operational, but this is not possible until the Just Transition Plan is adopted and under implementation.</p> <p>Based on the above, the Commission considers this step as not achieved.</p>
Checks performed and evidence used in the verification of the step and related findings	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> • Decision on the establishment of the Council for Just Transition was published in the "Official Gazette of Montenegro", No. 59/2025 of 13.6.2025. Link. • Reports from government session and media report on first meeting of Just Transition Council held on 30 June.

	In addition, Montenegrin authorities have clarified that the Action Plan is still under preparation, in line with the NECP (also pending adoption), with the finalisation planned in autumn 2025.
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 30 June 2026.

2.3.1 Developing transparent, competitive procedures for deployment of renewable energy and foreseeing the entry of newcomers.

The step under review	<i>2.3.1.1 Announce 3-year auction plan of at least 400 MW and launch the first auction</i>
Baseline	Not established
Deadline of the step	June 2025
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as partially achieved.
Commission assessment of results	<p>The 3-year auction plan remains in draft form, and according to the government its adoption is planned by the end of 2025.</p> <p>The first auction was published on 11 July 2025, i.e. after the deadline for this step. For this first auction, Montenegro proceeds in two phases, first by launching an auction focusing on 250 MW solar power and then to proceed to a further auction to complete the 400 MW target. Because of such a plan, the launching of the first public auction implied the preparation of subordinate legislation for the implementation of the first auction. They were adopted on 30 June 2025.</p> <p>Based on the above, the Commission considers this step as not achieved.</p>
Checks performed and evidence used in the verification of the step and related findings	The Commission participated in the pre-bid auction conference organised by the Ministry on 3 June 2025.
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 30 June 2026.

2.1.2. Gradual tariff adjustments to cost recovery levels accompanied by energy poverty measures

The step under review	<i>2.1.2.1 Phase out of public intervention in the price-setting for the supply of electricity in line with Article 5 of the Directive 2019/944 on common rules for the internal market for electricity</i>
Baseline	Partially aligned
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.
Commission assessment of results	<p>The step requires alignment of the new Energy Law with the Directive (EU) 2019/944.</p> <p>The Energy Law, adopted on 17 March 2025, addresses requirement of implementation of the concept of market-based pricing, as defined in Article 5 of Directive 2019/944. It provides that electricity prices are freely formed on the market and includes no provisions allowing derogation from this principle. It also provides that prices for the Supplier of Last Resort – responsible for universal service – will be set by the supplier, with no role assigned to the regulator or any public institution in determining these prices. (Articles 49; 184-185;188; 197-198 of the Energy Law)</p> <p>The draft law was submitted to the Energy Community Secretariat who provided its review and recommendations which was taken into account by Montenegro.</p> <p>Commission services confirm that the Energy Law is in line with the “Article 5 of the Directive 2019/944 on common rules for the internal market for electricity”.</p> <p>Based on the above, the Commission considers this step as achieved.</p>
Checks performed and evidence used in the verification of the step and related findings	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> • Law on Energy published on the “Official gazette No 28/2025” of 19.03.2025: (DG ENER to confirm alignment)
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved.

2.3.2. Implementing the Renewable Energy Directive (permitting, guarantees of origin, prosumers)

The step under review	2.3.2.1 <i>Adopt legislation in line with the Renewable Energy Directive (RED II) including a regulatory framework for prosumers and streamlining of permit-granting procedures (e.g. designation of a single contact point)</i>
Baseline	Partially aligned
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.
Commission assessment of results	<p>The Law on the Use of Energy from Renewable Sources was adopted on 23 August 2024. The full alignment of the law with the REDII directive has been confirmed by the Energy Community Secretariat:</p> <ul style="list-style-type: none"> - https://www.energy-community.org/news/Energy-Community-News/2024/08/26.html <p>The step also requires a regulatory framework for prosumers and streamlining of permit-granting procedures, including the designation of a single contact point. Those elements are either prescribed by the adopted law or the guide on permitting procedures for the construction of renewable energy power plants, issued in December 2024.</p> <ul style="list-style-type: none"> - https://cotee.me/pages/vodic <p>While the above-mentioned law is aligned with the REDII Directive and the regulatory framework (for prosumers and for permitting-granting procedures) is in place, the implementing legislation required for full alignment with the REDII Directive is also required (activity 1.2 related to this step). Montenegro has adopted the following implementing legislation:</p> <ul style="list-style-type: none"> • Rulebook on the content of the application for the issuance of an energy permit, the necessary documentation, the content of the application forms and the content of the record of issued energy permits • Rulebook on detailed conditions to be met by a legal entity for assessing and measuring the potential of renewable energy sources • Rulebook on the detailed content and method of keeping records of privileged producers • Rulebook on the content of the request for the transfer of the status of the privileged producer of electricity and the evidence of the fulfilment of the conditions for the transfer of the status of the privileged producer • Rulebook on unit compensation for positive or negative balance deviation of privileged producers in the market premium system • Rulebook on the detailed manner of issuing, using, transferring and terminating the validity of the guarantee of origin for energy produced from renewable sources

	<p>Commission services confirm that the Law on the Use of Energy from Renewable Sources, the Guide on permitting procedures and the implementing legislation are in line with the EU <i>acquis</i>. However, the work on full transposition of articles 25-31 of REDII is still ongoing. The Energy Community Secretariat is currently providing technical assistance to Montenegro to support the full transposition of these RED II articles. This will include establishment of the obligation for fuel suppliers and verification of the sustainability and GHG criteria for biofuels, bioliquids and biomass fuels consumed for transport.</p> <p>Based on the above, the Commission considers this step as not achieved.</p>
<p>Checks performed and evidence used in the verification of the step and related findings</p>	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> • Publication of the Law on the Use of Energy from Renewable sources on the “Official gazette No 82/2024” of 23.08.2024: • Rulebook on the content of the application for the issuance of an energy permit, the necessary documentation, the content of the application forms and the content of the record of issued energy permits (“O.G of Montenegro” No. 66/2025 of 27.06.2025) • Rulebook on detailed conditions to be met by a legal entity for assessing and measuring the potential of renewable energy sources (“O.G of Montenegro” No. 66/2025 of 27.06.2025) • Rulebook on the detailed content and method of keeping records of privileged producers (“O.G of Montenegro” No. 66/2025 of 27.06.2025) • Rulebook on the content of the request for the transfer of the status of the privileged producer of electricity and the evidence of the fulfilment of the conditions for the transfer of the status of the privileged producer (“O.G of Montenegro” No. 66/2025 of 27.06.2025) • Rulebook on unit compensation for positive or negative balance deviation of privileged producers in the market premium system (“O.G of Montenegro” No. 66/2025 of 27.06.2025) • Rulebook on the detailed manner of issuing, using, transferring and terminating the validity of the guarantee of origin for energy produced from renewable sources (“O.G of Montenegro” No. 64/2025 of 26.06.2025). <p>The beneficiary has additionally submitted:</p> <ul style="list-style-type: none"> • Publication of the opinion of the Energy Community secretariat on law alignment: • Publication of the Guide on permitting procedures:
<p>Double funding</p>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>
<p>Clear conclusion on the achievement of the step</p>	<p>Not Achieved. The ‘grace period’ runs until 31 December 2026.</p>

2.3.2 Implementing the Renewable Energy Directive (permitting, guarantees of origin, prosumers).

The step under review	2.3.2.2 <i>Operationalise the system of guarantees of origin.</i>
Baseline	Partially aligned
Deadline of the step	June 2025
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.
Commission assessment of results	<p>An operational national system of guarantees is a prerequisite for full AIB membership (membership to the association and its scheme groups). Once in place, membership in AIB electricity group allows the country's system to connect with other European systems, enabling the cross-border exchange of renewable electricity certificates.</p> <p>Montenegro formally applied for membership of the AIB electricity scheme group and is awaiting AIB's decision based on the procedure which is currently underway and can last from 6 months to 1-2 years.</p> <p>Additionally, Montenegro has established and is using a software solution (G-REX electronic registry) for issuing of guarantees of origin.</p> <p>In relation to the setting up of necessary legal framework, the Government Montenegro adopted <i>Rulebook on the detailed manner of issuing, using, transferring and terminating the validity of the guarantee of origin of energy produced from renewable sources.</i></p> <p>Concerning operationalising of the system, the Montenegrin Electricity Market Operator (COTEE) adopted <i>Rules on guarantees of origin</i> regulating the manner of registering the users of guarantees of origin, the content and form of contracts with users, the register of guarantees of origin, and other matters necessary for the issuing, transfer, use, and cancellation of guarantees of origin. These rules have been approved by the Energy Regulatory agency.</p> <p>Finally, Montenegro has adopted and published in the <u>Official Gazette</u> the <i>Rules on the Method of Calculation, Disclosure, and Publication of the Share of All Types of Energy Sources in Produced or Delivered Electrical Energy and the Method of Calculation Control</i>. These Rules regulate disclosure requirements and the calculation of the residual energy mix. According to Article 4, a residual mix report is published annually and made available on <u>COTEE's website</u>. The same article also establishes the obligation for suppliers to provide reports to final customers.</p> <p>Based on the above, the Commission considers this step as achieved.</p> <p>Nevertheless, pursuant to Article 21(2) and (5) of Regulation (EU) 2024/1449, the step is subject to the principle of reversibility. Should AIB not grant Montenegro membership to its electricity scheme group, the European Commission will adjust subsequent disbursements by deducting the amount corresponding to this reform step.</p>

Checks performed and evidence used in the verification of the step and related findings	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> • Montenegro submitted as evidence the 2024 AIB annual Report confirming its status of member and applicant to the AIB electricity scheme group. • AIB Annual Report up to 08.07.2025.pdf (pages 11 and 56) <p>The beneficiary has additionally submitted:</p> <ul style="list-style-type: none"> • Rulebook on the detailed manner of issuing, using, transferring and terminating the validity of the guarantee of origin for energy produced from renewable sources (“O.G of Montenegro” No. 64/2025 as of 26.06.2025) • Rules on guarantees of origin (“O.G of Montenegro” No. 66/2025 as of 27.06.2025) • Decision 25/923-8 – consent of the Energy Regulatory Agency on the Rules on guarantees of origin (“O.G of Montenegro” No. 66/2025 of 27.06.2025) <p>Website of COTEE offers public reports on issued guaranties of origin using G-REX electronic registry of guarantees of origin</p>
Double funding	<p>No contributions from third parties were reported in support of the achievement of this step.</p>
Clear conclusion on the achievement of the step	<p>Fully achieved.</p>

2.3.4 Implementing energy efficiency and air pollution legislation.

The step under review	<p><i>2.3.4.2 Long-term renovation strategy and action plan adopted and starts to be implemented with retrofitting of existing public buildings ongoing and aligned with the annual 3% renovation target</i></p>
Baseline	<p>Under preparation</p>
Deadline of the step	<p>June 2025</p>
Conclusion of the review of the step by the beneficiary	<p>The beneficiary considers this step as fully achieved</p>
Commission assessment of results	<p>The step required adoption of the Long-term renovation strategy and action plan. Montenegrin authorities instead, following their Law on Efficient Use of Energy, developed a Study on the improvement of energy efficiency in buildings in Montenegro from 1 June 2025.</p> <p>The results of the study have been reflected in the Long-term renovation strategy included in the draft National Energy and Climate Plan (NECP). Consequently, the step can only be considered achieved upon Montenegro’s adoption of the NECP.</p> <p>On this basis, the Commission considers this step as not achieved.</p> <p>In relation to the requirement for “retrofitting existing public buildings and aligned with the annual 3% renovation target”, the Government of Montenegro has adopted a separate 3-year plan for the reconstruction of</p>

	<p>the existing public buildings owned by the central government which covers period 2024-2026, compliant with Article 5 of Directive 2012/27/EU on Energy Efficiency. This 3-year plan provides an overview of the facilities that will be reconstructed in order to achieve the 3% annual renovation target, and its implementation is ongoing.</p> <p>As reported by the beneficiary, financing of the plan’s implementation is provided under ongoing support from KfW bank (loan + Regional Energy Efficiency Programme (REEP) grant) and from the state budget. Renovation of energy efficiency improvement in public buildings beyond 2026 is planned under World Bank support.</p> <p>Based on the above, the Commission considers this step as not achieved.</p>
Checks performed and evidence used in the verification of the step and related findings	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> • Decree on Amendments to the Decree on the Reconstruction of Administrative Buildings (“Official Gazette of Montenegro”, No. 83/2024, as of 29 August 2025). • Plan for the reconstruction of administrative buildings owned by the central government for the period 2024-2026 - adopted at the session of the Government as of 5 September 2024, Conclusion No. 10-302/24-4828/2) • Long-Term Building Renovation Strategy – in the form of a study adopted by the Ministry of Energy and Mining
Double funding	<p>On the basis of the Commission’s assessment, the degree of the reported contributions does not constitute a case of double funding, as the support concerns only one of the three activities foreseen by the step.</p>
Clear conclusion on the achievement of the step	<p>Not achieved. The ‘grace period’ runs until 30 June 2026.</p>

3.1.3 Reforming system of social and child protection for more effective, efficient, and transparent use of public funds.

The step under review	<i>3.1.3.4 Minimum package of guaranteed social services identified and an approach to their sustainable financing is defined in the Strategy for Deinstitutionalization.</i>
Baseline	In the Draft of Deinstitutionalisation Strategy, the Minimum package of guaranteed social services is identified and an approach to their sustainable financing is defined.
Deadline of the step	June 2025
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.

Commission assessment of results	<p>At the 62nd session of the Government of Montenegro, held on 19 December 2024, the Deinstitutionalization Strategy for the period 2025–2028, accompanied by the Action Plan for 2025, was officially adopted.</p> <p>1. <i>As further specified in the reform agenda, defining the minimum package of guaranteed services, as well as defining which services need to be established in different municipalities so that at least 3 services in the field of social and child protection are available in each municipality.</i></p> <p>All defined minimum guaranteed services are listed on page 28 of the strategy onwards. Those are the services Montenegro could potentially provide in the future. The missing services are already defined and are expected to be developed in the future according to the strategy. The law on social and child protection (another step for Dec 2027) is expected to then confirm/give a definition of the "final list" of social services described in the strategy.</p> <p>2. <i>The Strategy as specified in the reform agenda, defines its sustainable financing approach through a clear financial framework and responsibility for establishing and financing these services, as well as the need to adopt the Law on Social and Child Protection to specify the financing.</i></p> <p>A clear financial framework is established for the next five years (page 66 of the report). The total funds required amount to 56,181,600 euro. The necessary funds will be secured from three sources: the regular budget of Montenegro, the budgets of local governments, and donor support funds. The ratio of state budget financing to donor funding is 88% to 12%. Further specification of the approach to sustainable financing for the minimum package of social services is expected to be confirmed in the Law on Social and Child Protection (Q3/2025), action plan and subsequent annual budgeting procedures.</p> <p>Based on the above, the Commission considers this step as achieved.</p>
Checks performed and evidence used in the verification of the step and related findings	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> • Adopted Deinstitutionalisation Strategy • Proposal of the Deinstitutionalisation Strategy in Montenegro
Double funding	<p>No contributions from third parties were reported in support of the achievement of this step.</p>
Clear conclusion on the achievement of the step	<p>Fully achieved.</p>

4.2.1 The judiciary and the prosecution are independent/autonomous, impartial, and accountable and act with integrity and professionalism.

The step under review	<p><i>4.2.1.2 Amended Constitution, in accordance with the acquis of the EU and European standards on the independence, responsibility, integrity,</i></p>
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	<i>impartiality and professionalism of the judiciary and prosecution, including addressing the already existing recommendations of the European Commission, opinions of the Venice Commission and recommendations of the Group of States of the Anti-Corruption Council (GRECO).</i>
Baseline	The Constitution of Montenegro remains to be amended in line with existing recommendations of the European Commission, opinions of the Venice Commission and recommendations of the Group of States of the Anti-Corruption Council (GRECO).
Deadline of the step	June 2025.
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as partially achieved.
Commission assessment of results	On 17 April, the government adopted a proposal to amend the Constitution with a view to enhancing judicial independence. On 30 May, the Government submitted the initiative to amend the Constitution to the Parliament. The Parliament has not yet initiated the procedure to amend the Constitution. Based on the above, the Commission considers this step as not achieved.
Checks performed and evidence used in the verification of the step and related findings	For the verification of this step, continuous monitoring of the Parliament's sessions and political debates related to constitutional amendments is conducted. This includes regular reviews of agendas, minutes, and official records published on the Parliament's website https://www.skupstina.me/ . Additionally, relevant announcements and transcripts of debates are reviewed to confirm whether any formal procedures for constitutional amendments have been initiated.
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The 'grace period' runs until 30 June 2026.

4.4.1. Decrease of the level of gender-based violence in Montenegro

The step under review	<i>4.4.1.1 Supreme state prosecutor has put in place and monitor standard operating procedures for the prosecution as regards the handling of sexual and gender-based violence cases, in line with relevant articles of the Istanbul Convention on preventing and combating violence against women and domestic violence, as well as of the EU Directive of Victim Protection; Standard operating procedures for the sentencing in cases of sexual and gender-based violence are put in place, in line with the new Criminal Code</i>
Baseline	Instruction manual in preparation
Deadline of the step	December 2024

<p>Conclusion of the review of the step by the beneficiary</p>	<p>The beneficiary considers this step as fully achieved. Montenegro considers that the prosecution guidelines cover also sentencing, but there is no reference to sentencing in the guidelines.</p>
<p>Commission assessment of results</p>	<p>The guidelines issued by the Supreme State Prosecutor on 11 October 2024 are in line with the amended Criminal Code of Montenegro, EU Directive on Victim Protection and the Istanbul Convention. However, there is no evidence that the courts have standard operating procedures adopted and they are responsible for sentencing, which is the second part of the step.</p> <p>The Guidelines for State Prosecutors refer only to prosecutors, who qualify the case of gender-based violence, but are not in charge of sentencing. One of the most important issues is how the Supreme State Prosecutor’s guidelines and prosecutor’s qualification of gender-based violence case translate into the court decision in the end. So far, the convictions in cases of gender-based violence have been quite mild, around the legal minimum and with limited deterrent effect.</p> <p>As regards monitoring, the implementation of the Guidelines for State Prosecutors on Processing Domestic and Family Violence Cases was accompanied by a limited degree of oversight. A coordinator in the supreme state prosecution and contact points in basic prosecution offices was designated. Contact points report to the coordinator in the supreme state prosecution and a certain amount of reporting has been established, however not following all aspects of the Guidelines. In addition, the first semi-annual report on the implementation of the Reform Agenda, submitted by the Government in March 2025, does not mention the monitoring of the application of the Guidelines.</p> <p>In June, the Commission was informed by the coordinator in the Supreme State Prosecution that the reporting by basic prosecution offices has been improved, as well as monitoring by the Supreme State Prosecution, based on the Guidelines issued by the Supreme State Prosecutor in October 2024. This is to be evidenced with their next report, which is yet to be submitted. In addition, in a meeting with the Supreme Court advisors also in June, it was confirmed that the Supreme Court can and is willing to produce the guidelines or standard operating procedures for lower courts, since there is practice of issuing guidelines in other cases, such as possession of arms or plea bargain agreements. the Commission offered assistance and the expert support with the Council of Europe Horizontal Facility project, which was accepted. The working group has been formed, and the first meeting will take place on 3 September. They expect to have the first draft of the standard operating procedures ready until 31 October 2025.</p> <p>Based on the above, the Commission considers this step as not achieved.</p>
<p>Checks performed and evidence used in the verification of the step and related findings</p>	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> • First report (from January 2025) from the coordinator to the Ministry of Justice. <p>The beneficiary has additionally submitted:</p> <ul style="list-style-type: none"> • Excel table of background data which indicates that aspects of the guidelines have been considered.
<p>Double funding</p>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>

Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 31 December 2026.
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4.5.1 Improving the results of investigations, confirmed indictments and final rulings in cases of organised crime (including money laundering, cybercrime, smuggling of cigarettes, weapons and drugs, human trafficking, including cases of sexual and labor exploitation.

The step under review	<i>4.5.1.1 Linking and access to the databases of the Revenue and Customs Administration and other state bodies with which the Special Prosecution Office cooperates.</i>
Baseline	The number of databases (9) accessible to the Special State Prosecutor’s Office (SPO)
Deadline of the step	June 2025
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.
Commission assessment of results	<p>In order for this step to considered as achieved, the SPO should be granted access to 13 databases. At the moment of adoption, SPO had access to 9 databases, and by the deadline of 30 June 2025 the SPO was granted access to the databases of the Tax Administration, specifically regarding the income of individuals (from salaries, assets, and capital) in November 2024.</p> <p>However, for the Commission to consider the step achieved, SPO should also be granted access to the additional 3 databases:</p> <p>Revenue Administration – access to an overview of issued and received invoices for legal entities (fiscalisation),</p> <p>Central Bank of Montenegro – access to information on indebtedness with commercial banks, as well as data on account freezes, including the amount and duration of the freeze (legal basis), and transactions available to the Central Bank and</p> <p>Cadastre and State Property Administration – direct access to historical data of cadastre (direct access to the date of acquisition of real estate, as the most important item, as well as documentation and information related to the chronology of changes recorded in the property register).</p> <p>Based on the above, the Commission considers this step as not achieved.</p>
Checks performed and evidence used in the verification of the step and related findings	In line with the sources of verification, the following evidence was provided: Annual report of the Special Prosecutor Office for 2024.
Double funding	No contributions from third parties were reported in support of the achievement of this step.

Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 30 June 2026.
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4.6.1 Alignment of visa policy with the list of EU countries for which a visa is required, especially with regard to countries that pose an irregular migration or security risk to the EU

The step under review	<i>4.6.1.1 Terminating visa-free agreements with countries (at least one per year) which are visa required for the EU.</i>
Baseline	Visa policy not aligned for 11 countries. Terminating visa-free agreements with countries (at least one per year) which are visa required for the EU.
Deadline of the step	December 2024 (extended to February 2025)
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as partially achieved.
Commission assessment of results	<p>No convincing results achieved. Despite the commitment to align with the EU by requiring visas for the 11 countries identified in the baseline, Montenegro has only removed Vanuatu from its list of visa-free agreements following the decision by the EU to suspend its visa exemption in December 2024. This initiative is not sufficient to consider that Montenegro has achieved partial results, especially due to the migratory and security risk carried by some of the third countries on Montenegro’s visa-free list. The Commission also notes that Montenegro has failed to uphold its commitments by granting a permanent exemption to Bahrain in December 2024, upgrading Saudi Arabia’s seasonal exemption to a permanent one, and granting Uzbekistan a seasonal exemption in February 2025.</p> <p>Based on the above, the Commission considers this step as not achieved.</p>
Checks performed and evidence used in the verification of the step and related findings	The government has not issued any decisions to terminate visa-free agreements with countries that require visas for entry into the EU, as agreed in the baseline of 11 countries: Azerbaijan, Belarus, China, Kuwait, Qatar, Russia, Türkiye, Armenia, Egypt, Kazakhstan, Saudi Arabia.
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 31 December 2026.