



Montenegro

Ministry of Finance

Directorate for management of the EU pre-accession funds structures

ANNEX A: REQUEST FOR THE RELEASE OF FUNDS

I declare that, for the implementation of the EU financial assistance to Montenegro under the Facility for the period second half of 2025, based on my own judgement and on the information at my disposal, as well as on the evidence enclosed, the payment conditions set out in the Montenegro Reform Agenda for the following steps have been fulfilled:

REFORM	STEP		FINANCIAL VALUE
1.1.5	1.1.5.1	Improving integrity in inspection services. A mandatory annual declaration of assets and conflict of interest statements is introduced for inspectors- subject to verification by the Agency for Prevention of Corruption.	2,317,185.60
2.1.1	2.1.1.1	The complete transposition of the electricity integration package in accordance with the requirements of the Energy Community and the continuation of its implementation.	2,317,185.60
4.4.1	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	2,317,185.60
4.6.1	4.6.1.3	Abolition of visa-free agreements with countries (at least one country per year) for which the EU requires a visa	4,634,371.20
Total (steps with deadline 28/02/2025)			11,585,928.00
2.2.1	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	579,296.40
2.3.1	2.3.1.1	Announcement of the auction plan for the next three years, within which at least 400 MW will be offered, along with the launch of the first auction.	579,296.40
2.3.4	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	2,317,185.60
Total (steps with deadline 30/06/2025)			3,475,778.40
1.1.3	1.1.3.2	Public consultations and Regulatory Impact Assessments (primary and secondary legislation). 100% of new legislation is subject to public consultation with businesses and civil society organisations and the local self-governments. 100% of new legislation is subject to RIA prior to public consultation	3,475,778.40

REFORM	STEP		FINANCIAL VALUE
1.1.3	1.1.3.5	Feedback on administrative barriers to business. Activities for addressing barriers to business of the administrative nature, registered by the Competitiveness Council Secretariat, including new barriers, are initiated by the public administration within 6 months from their registration in the list. Proposed actions to resolve them, indicative timelines and updates on progress are reported biannually to the Competitiveness Council Secretariat and made available to all Council members	2,317,185.60
1.1.4	1.1.4.2	Updating land registries. Migrating all data from the existing land ownership database to the e-cadastre	579,296.40
1.2.1	1.2.2.1	Number of funded R&I actors (physical persons – researchers and innovators, and legal entities – scientific research institutions, companies, clusters, NGOs) in the National R&I System is increased by 50% and the impact is demonstrated through improved figures in research and innovation statistical reporting,	3,475,778.40
2.2.1	2.2.1.2	Law on protection from the negative impacts of climate change and protection of ozone layer in line with a climate neutrality target for 2050 enters into force.	2,317,185.60
2.3.4	2.3.4.5	Increase annual rate of building renovation and street lighting in accordance with the targets agreed in the Energy Community at least 60.000 sqm renovated	4,634,371.20
2.3.4	2.4.3.2	Deployment of public e-services based on the Plan (1st step)	2,317,185.60
2.4.4	2.4.4.2	Frameworks introduced through NIS2 alignment (Coordinated Vulnerability Disclosure framework, crisis management framework), are in place and in use	1,158,592.80
3.1.1	3.1.1.3	Work based learning in higher education: 20% of total students (of which approx. 50% women) benefit from substantial work-based learning with employers during their respective education	4,634,371.20
3.1.1	3.1.1.4	A new model for career guidance and counselling adopted within the Strategy on career guidance and counselling 2025-2030	579,296.40
3.1.3	3.1.3.1	Activation of beneficiaries of material support: Law on Social and Child Protection and its accompanying bylaws has been amended to enable sequenced transition from receiving material support to labour market activation	2,317,185.60
3.2.1	3.2.1.1	Tendering procedures launched for construction or refurbishment of schools as required to reduce the number of shifts in most overcrowded primary schools from current 5 shifts to 3 by December 2027	1,158,592.80
3.2.2	3.2.2.1	2,000 teachers/participants participated in trainings on digital competences as per the adopted Framework on Teachers' Digital Competences.	3,475,778.40
4.3.1	4.3.1.1	Anti-corruption strategy/action plan implementation):	2,317,185.60

REFORM	STEP		FINANCIAL VALUE
		Integrity tests are created and delivered in the Customs Administration and the Tax Administration – target is reaching at least 30% of staff	
4.3.1	4.3.1.2	Increase of 20% in filling vacant positions – in accordance with the Rules on Internal Organization and Job Systematization – in the relevant courts for the fight against corruption	2,317,185.60
4.4.2	4.4.2.1	Decreased number of complaints before the Ombudsperson and Decreased number of incidents reported by LGBTIQ CSOs	2,317,185.60
4.6.1	4.6.1.4	Terminating visa-free agreements with countries (at least one per year) which are visa required for the EU.	4,634,371.20
Total (steps with deadline 31/12/2025)			44,026,526.40
Total (steps with deadline 28/02/2025; 30/06/2025 and 31/12/2025)			59,088,232.80

On the basis of the above I request that the amount of EUR 59,088,232.80 is made available, EUR 27,476,028.25 disbursed directly to the treasury of Montenegro, and EUR 31,612,204.55 to be made available through the Western Balkans Investment Framework (WBIF), of which EUR 14,653,881.73 in the form of loans and EUR 16,958,322.81 in the form of non-repayable support¹².

I hereby attach an assessment of each step, the required evidence showing the satisfactory fulfilment of the qualitative and quantitative steps set out in the relevant Annex to the Commission implementing decision³ and other information requested as per Article 14 of the Facility Agreement.

I hereby also declare that measures related to the reforms for which satisfactory fulfilment has been declared previously in prior Commission decisions have not been reversed by Montenegro.

Podgorica, 16 -01- 2026



Milica Adžić

**STATE SECRETARY/
DEPUTY COORDINATOR FOR REFORM AGENDA 2024-2027**

- ¹ Subject to rules laid down in Articles 16 and 17, each instalment shall draw from the indicative financial contributions set out in Article 2 paragraph 2, as follows: a) 28.7% from the non-repayable support and 24.8% from the loan support, in sum 53.5%, to be made available through the Western Balkans Investments Framework (WBIF), and b) 46.5% from the loan support to be channelled directly to the treasury.
- ² A condition precedent to the disbursement of the loan to the Treasury, to be channelled to the WBIF, is the submission of the signed contribution arrangement with the WBIF. This signed arrangement must be provided before any loan disbursements are processed.
- ³ CID C(2024) 7375 final, from 23/10/2024