

## **Annex II to the Commission Implementing Decision approving the third release of funds to Montenegro under the Reform and Growth Facility for the Western Balkans**

### **Assessment of the Conditions for Payments – Montenegro**

#### **1. European 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 recurring 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 processes<sup>1</sup>.

In June 2024, the European 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 are not yet consistently enforced and 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 in June 2024, with the aim to align it with European standards. Amendments to the Law on games of chance, and a new Law on prevention of money laundering and financing of terrorism were also adopted. 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 effective enforcement of the criminal legislation. In addition, measures aimed at addressing 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.

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

### ***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. European Commission assessment of the general conditions for payments**

### **a) Assessment of the macro financial stability**

Regarding **real sector**, Montenegro's economy continued to expand at a stable rate of some 3% in 2025 compared to 3.2% in 2024. Economic expansion was driven by strong domestic demand. Growth in private consumption benefited from higher disposable income supported by fiscal measures under the 'Europe Now 2.0' programme, while rapid credit growth and higher public capital spending fostered investment. The main headwind came from contracting exports of goods, mainly reflecting lower electricity exports due to the maintenance-related temporary shutdown of the Pljevlja power plant. Tourism performance was mixed. The services sector dominates economic activity, accounting for 78.8% of gross value added, reflecting a fragmented and undiversified productive base. Inflation increased marginally to 3.8% on average in 2025 due to a combination of external and domestic factors. The fiscal position deteriorated sharply, with the budget deficit widening to 4% of GDP from 3.3% in 2024, driven by underperformance of grants and pension contributions while spending was above the target. Public debt rose to 64.3% of GDP, which is above the country's own 60% fiscal rule threshold. The current account deficit increased from 17.1% to 17.8% of GDP, reflecting weak export performance and representing a significant source of external vulnerability.

Regarding **monetary policy**, Montenegro uses the euro without formal euro area membership, eliminating exchange rate flexibility as an adjustment tool. The banking sector remained well-capitalised and stable, with a capital adequacy ratio at 19.4% in Q3-2025 and a declining non-performing loan ratio of 2.7% in Q3-2025. Credit growth accelerated to around 15.3% year-on-year in 2025, warranting careful monitoring.

**Fiscal policy** is Montenegro's sole macroeconomic instrument, yet recent choices have undermined rather than strengthened the fiscal position. The Europe Now 2 Programme introduced significant minimum wage increases and sharply reduced pension contributions, generating permanent revenue losses only partially offset by a new VAT rate. Debt rollover needs are particularly elevated in 2027, amounting to 8.4% of GDP. In 2025, Montenegro repaid large amounts of maturing debt (EUR 720 million in total or 8.9% of GDP), including a Eurobond (EUR 500 million). Following a record high EUR 850 million Eurobond in March, Montenegro successfully issued retail bonds for the first time in November, raising EUR 50 million. In December, Montenegro concluded a syndicated loan arrangement (EUR 450 million) with several major international financial institutions. The Fiscal Council has still not become operational, but a new call for selecting its members is ongoing.

The wide current account deficit, narrow export base, and heavy dependence on tourism revenues create significant **exposure to external shocks**. FDI inflows are concentrated in real

estate, providing limited productivity spillovers, while the increasing use of debt to finance the current account adds to medium-term vulnerabilities. On the resilience side, efforts are being made to diversify energy sources, with the launch of solar and wind energy projects in 2024-2025, though the economy remains dependent on hydropower and the lignite-fired plant. Investment in digital infrastructure and the launch of a new e-government portal represent steps towards modernisation. Progress on transport infrastructure, particularly the Bar-Boljare highway corridor, is advancing but slowly. While Montenegro's economic fundamentals show resilience – with continued growth, declining unemployment and a stable banking sector – the combination of a widening external deficit, a deteriorating fiscal position and significant debt vulnerabilities poses meaningful risks to medium-term stability. A more prudent fiscal stance, combined with structural reforms to broaden the export base and strengthen institutions, would be necessary to place the economy on a more sustainable trajectory.

Notwithstanding these challenges, several concrete indicators point to a **stability-oriented macroeconomic policy**. The successful repayment of EUR 720 million in maturing debt in 2025, combined with a diversified new issuance strategy encompassing a record Eurobond, first-ever retail bonds, and a syndicated loan, reflects a proactive commitment to debt sustainability and rollover risk reduction.

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

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

Montenegro has a broadly functional public financial management (PFM) system, with an established legal and institutional framework covering budgeting, debt management, and fiscal oversight. On the revenue side, the system benefits from an operational budget inspection mechanism and improving fiscal risk monitoring. The adoption of a new debt strategy and mid-term fiscal strategy reflect growing institutional ambition to anchor public finances within a credible medium-term framework.

However, significant weaknesses persist on both the revenue and expenditure sides. The medium-term budgetary framework remains insufficiently robust, limiting the government's capacity to align annual budgets with longer-term fiscal objectives. Fiscal risk monitoring is currently narrow in scope, essentially limited to state-owned enterprises (SOEs), and broader fiscal risk identification and management capacities remain underdeveloped. The IT infrastructure supporting budget planning is inadequate, and the absence of a centralised payroll calculation system undermines control over one of the largest expenditure categories — public wages. Managerial accountability within spending units also remains insufficiently embedded in practice, despite formal provisions.

Montenegro is implementing a comprehensive PFM reform agenda through two overarching strategic frameworks: the Public Administration Reform Strategy 2022-2026 and the Public Finance Reform Programme 2022-2026. Both documents draw on lessons from the previous programme cycle and aim to address long-standing structural weaknesses in a coordinated manner. The reform programme covers key dimensions of PFM including budget law reform, medium-term fiscal planning, debt management, budget inspection, capital budget management, and fiscal risk oversight. The existence of these complementary strategies signals a genuine commitment to systemic reform, though implementation has been uneven across the various components.

The reforms being pursued are broadly relevant to the weaknesses identified in the system. The ongoing amendment of the organic budget law directly targets the fragility of the annual and medium-term budgeting framework. The new debt strategy, resting on three pillars — reducing

financing and refinancing risks, broadening the international investor base, and diversifying domestic financing sources including through retail bonds — is well-calibrated to Montenegro's specific vulnerabilities, particularly its elevated debt rollover needs in 2025 and 2027. The new Law on Budget Inspection, adopted at the end of 2024 with further amendments in December 2025, revitalises a mechanism that formally existed since 2014 but only became operational in 2024, representing a meaningful step towards stronger expenditure control. The regulation on capital budget management, which entered into force in January 2026, directly supports the work of the Public Investments Council established in 2024 and addresses long-standing weaknesses in the planning and implementation of capital projects. Overall, the reform agenda is credible in its design, though the pace of implementation remains a concern in several areas.

Several concrete advances have been recorded in the recent period. The Fiscal Council was established in 2024 and, once Parliament completes the appointment of its members, will provide an independent institutional anchor for fiscal discipline — a long-absent element of Montenegro's fiscal governance architecture. The Law on Budget Inspection and its subsequent amendments represent the operationalisation of a previously dormant oversight instrument, strengthening the accountability framework for public expenditure. The adoption of the regulation on capital budget management marks progress in improving the quality and oversight of public investment, an area where weaknesses have historically led to cost overruns and implementation delays. The Law on Governance of the State-Owned Enterprises to be adopted by the Parliament will improve fiscal risk monitoring in a sector that has historically posed significant risks to public finances. Finally, in January 2026, Chapter 32 has been provisionally closed and there are still commitments to be implemented until accession.

The structural reforms underway – particularly the strengthening of budget inspection, the improvement of SOE governance and financial control, and efforts to reduce the informal economy – are partly motivated by the need to address systemic governance weaknesses that create conditions conducive to misuse of public funds. The slow progress in tackling undeclared work, weaknesses in State aid transparency, and the limited enforcement capacity of public authorities remain areas of concern that indirectly bear on the integrity of public financial management.

Montenegro's capacity to manage and monitor its PFM reforms remains a work in progress. The institutional architecture is being progressively strengthened, with the Public Investments Council, the forthcoming Fiscal Council, and the revitalised budget inspection function all contributing to a more capable oversight environment. However, gaps persist in technical capacity, particularly in the production of Government Finance Statistics in line with ESA 2010 standards, the development of adequate IT systems for budget planning, and the implementation of a centralised payroll system. The partial implementation of policy guidance from the EU Economic and Financial Dialogue suggests that absorptive and administrative capacity constraints continue to slow the pace of reform delivery. Sustained investment in institutional capacity, combined with stronger interinstitutional coordination, will be essential to ensure that the ambitious reform agenda translates into durable improvements in PFM performance.

In short, Montenegro has the strategic framework and the EU accession incentive to succeed but sustained political will and stronger administrative capacity will be essential to translate its reform ambitions into durable improvements in public financial management.

**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**

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. The Law on Budget and Fiscal Responsibility regulates the function of budget inspection. A system of internal controls is in place and functioning, 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. Citizen’s budget needs still to be adopted and public participation in the budget process and the Parliament’s oversight of the budget needs to be improved. Since the 2024 budget, Montenegro continues to make progress in introducing the elements of gender-responsive budgeting, but implementation should be improved.

**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. European 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.

<b>The step under review</b>	<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>
<b>Baseline</b>	Not achieved
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved
<b>Commission assessment of results</b>	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 the Draft State Ownership Policy are only in the preparatory phase.  <b>Based on the above, the Commission considers this step as not achieved.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	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.
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> 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.**

<b>The step under review</b>	<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>
<b>Baseline</b>	In preparation
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	<p>The amendments to the Law on the prevention of corruption and the Law on public procurement, which should revise the anti-corruption, integrity and conflict of interest framework for public procurements – as requested by the step – have not been adopted and implemented by Parliament yet.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>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:</p> <ul style="list-style-type: none"> <li>• <a href="#">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></li> <li>• <a href="#">A list of NGO candidates for the Working Group for drafting the Proposal for the Law Amending the Law on Prevention of Corruption</a></li> <li>• <a href="#">Public call for the public consultation on the Draft Law Amending the Law on the Prevention of Corruption</a></li> <li>• <a href="#">The report on the public consultation process on the Draft Law Amending the Law on the Prevention of Corruption</a></li> <li>• <a href="#">Opinion of the Ministry of Finance on the Regulatory Impact Assessment (RIA)</a></li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> 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.**

<b>The step under review</b>	<i>1.1.2.5 Adoption by Parliament of the new Law on Protection of Competition and the new Law on the control of State aid, ensuring full financial independence of the Agency for Protection of State Aid and Competition to enforce state aid control and competition rules</i>
<b>Baseline</b>	Legal framework in the field of competition and state aid not changed
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	The Law on State Aid was adopted on 30 July 2025 and with positive opinion from the Commission services.  The Law on the protection of the Competition has not been adopted yet.  <b>Given that only one of the new laws required by the step has been adopted, the Commission considers the step as not achieved.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<ul style="list-style-type: none"> <li>• <b>Law on State Aid Control</b>, Official Gazette 89/2025 <a href="https://www.sluzbenilist.me/propisi/C0663106-0D02-43A9-A042-99AC1263AE51">https://www.sluzbenilist.me/propisi/C0663106-0D02-43A9-A042-99AC1263AE51</a></li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

**1.1.3 Dismantling regulatory barriers and facilitating the conduct of business.**

<b>The step under review</b>	<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 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>
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<b>Baseline</b>	2023: The amendments on Law business organisations registration not adopted; Company register does not reflect the real situation properly.
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	<p>On the first part of the step (<i>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.</i>) the Law on Business Organisations (<a href="#">Official Gazette, 90/2025</a>), as well as the Law on the Registration of Business and Other Entities (<a href="#">Official Gazette, 92/2025</a>) were adopted on 31 July 2025 with the start of implementation on 1 January 2026. Necessary bylaws were adopted, as well. In its Article 10, the Law on Registration of the Business and Other Entities, defines the status of the entity as one of the following: registered (active and inactive, suspended), in bankruptcy, in liquidation and deregistered. Competent authority, i.e. Tax Administration assigns the status active/inactive as follows:</p> <ul style="list-style-type: none"> <li>- <i>Active</i>: In accordance with Article 10 of the Law on Registration of Business and Other Entities, competent authority, i.e. the Tax Administration issues status active once the new entity is registered. For the existing entities, starting from 1 January 2026 and within three months period all companies are obliged to harmonise their internal documents with the laws, including submission of the Statute, Decision and Statement to the Tax Administration for the certification. Once this is completed existing entities will also receive status “active” in the system (Article 630 of the Law on Business Organisations).</li> <li>- <i>Inactive</i>: In line with Article 12 of the Law on Registration of Business and Other Entities, entities that do not submit the requested financial statements withing legal deadlines and entities who do not harmonise their organisation and register changes in the Central Register of Business and Other Entities, will be assigned status “inactive”.</li> </ul> <p>On the second part of the step (<i>Company register is updated regularly to remove defunct companies from the registers (in line with the Law on Business organisations registration).</i>) The Company Law, which provides the legal basis for the removal of defunct companies from the business register, started to apply on 1 January. Under the transitional provisions, business entities were given a three-month period to re-register.</p> <p>In line with Article 622, the law introduced a compulsory liquidation mechanism for companies that fail to submit annual financial statements to the tax authority for two consecutive financial years.</p>

	<p>The Tax administration identifies such companies and notifies the Central Register of Business Entities (CRBE), which then initiates compulsory liquidation proceedings.</p> <p>Article 624 further operationalises this mechanism by allowing the CRBE, after the expiry of the prescribed notification and publication periods, to adopt a decision on deletion and remove defunct companies from the register (the removal process will be carried out through a digital and automated procedure).</p> <p>At this stage, no actions have been initiated in this regard.</p> <p>On the third part of the step (<i>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>), no report has been submitted.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the sources of verification, the beneficiary provided:</p> <ul style="list-style-type: none"> <li>• Law on Registration of Business and Other Entities:  <a href="https://www.sluzbenilist.me/propisi/EBBC443C-5C5F-4948-823C-DB5DE85F77C9">https://www.sluzbenilist.me/propisi/EBBC443C-5C5F-4948-823C-DB5DE85F77C9</a> and  <a href="https://www.sluzbenilist.me/propisi/C7B9EA26-4BE0-4CC1-B4A0-1FA970723CB8">https://www.sluzbenilist.me/propisi/C7B9EA26-4BE0-4CC1-B4A0-1FA970723CB8</a></li> <li>• Rulebook on the registration of application form, instructions on filling out the registration application form and documentation to be submitted with the registration application form:  <a href="https://www.sluzbenilist.me/propisi/1A87BE19-387E-4EE1-B0BC-8C90DB04F0FF?page=1">https://www.sluzbenilist.me/propisi/1A87BE19-387E-4EE1-B0BC-8C90DB04F0FF?page=1</a></li> <li>• Decision on the amount of compensation in the Central Register of Business and Other Entities:  <a href="https://www.sluzbenilist.me/propisi/5129F49D-8A03-46B4-A88F-B1FA6A52E6D2">https://www.sluzbenilist.me/propisi/5129F49D-8A03-46B4-A88F-B1FA6A52E6D2</a></li> <li>• Rulebook on the detailed content of the registration number for business and other entities and the bankruptcy estate and the European unique identifier for business entities:  <a href="https://www.sluzbenilist.me/propisi/044D0874-14E5-48CD-9762-F9BB9D13A56F">https://www.sluzbenilist.me/propisi/044D0874-14E5-48CD-9762-F9BB9D13A56F</a></li> <li>• Rulebook on the detailed content and manner of keeping the Register of Business Entities, the Register of Other Entities and the Register of Bankruptcies:  <a href="https://www.sluzbenilist.me/propisi/4DB71145-1F2C-4FA1-A2DE-3985DE1D716F">https://www.sluzbenilist.me/propisi/4DB71145-1F2C-4FA1-A2DE-3985DE1D716F</a></li> <li>• Law on Business Companies:  <a href="https://www.sluzbenilist.me/propisi/946F287F-06EF-422F-BD26-5E4D680A3F66">https://www.sluzbenilist.me/propisi/946F287F-06EF-422F-BD26-5E4D680A3F66</a> and</li> </ul>

	<p><a href="https://www.sluzbenilist.me/propisi/8AD783E6-786E-45A3-819C-44554687E95F">https://www.sluzbenilist.me/propisi/8AD783E6-786E-45A3-819C-44554687E95F</a></p> <ul style="list-style-type: none"> <li>The internet page of the Central Register of Business and Other Entities: <a href="https://irms.tax.gov.me/public/search-register/business-entities">https://irms.tax.gov.me/public/search-register/business-entities</a></li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 30 June 2026.

### 1.1.3 Dismantling regulatory barriers and facilitating the conduct of business.

<b>The step under review</b>	<i>1.1.3.2 Public consultations and Regulatory Impact Assessments (primary). 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</i>
<b>Baseline</b>	Partially implemented
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p><i>100% of new legislation is subject to public consultation with businesses and civil society organisations and the local self-governments</i></p> <p>Based on the Official Gazette of Montenegro, Montenegro adopted 200 new laws in 2025. Out of this, only 113 were proposed by the Government in the RA implementation period without documented exception of the obligation of public debate in line with the Article 52 of the State Administration Law. Out of this number, for 80 a public hearing took place and is documented (invitation to the public hearings, report from the public hearings or it is reported in the RIA) and for 48 there was a documented working group who took part in preparation of the draft law which included at least one member from "<i>businesses and civil society organisations and the local self-governments</i>" (report by the Competitiveness Council, reported in RIA, reported in the documentation the Government provided to the Parliament when sending the draft for adoption). <b>In total, 85 laws (75%) were adopted in the procedure which included documented forms of public consultation</b> as referred to in the Regulation on the</p>

	<p>selection of NGO representatives to working groups of state administration bodies and the implementation of public consultations in the preparation of laws and strategies (Article 10). It should be noted that in case the laws ratifying international agreements are not observed, <b>the share of relevant laws with organised public hearings will increase to 95%.</b></p> <p><i>100% of new legislation is subject to RIA prior to public consultation</i></p> <p>Regarding RIA, out of 80 laws proposed by the Government and adopted by the Parliament, for which public hearing took place, 79 laws documented RIA (99%). Number of laws that were adopted in the Parliament, proposed by the Government which has documented public hearing and when RIA was published with the public call for public hearing, is 33 (in line with article 15 of Regulation), which accounts for 41% of laws.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<ul style="list-style-type: none"> <li>• In line with the sources of verification, the beneficiary provided: Laws adopted in 2025 and published on the Official Gazette: <a href="https://www.sluzbenilist.me">https://www.sluzbenilist.me</a></li> <li>• Laws adopted by the Parliament of Montenegro and published on: <a href="https://www.skupstina.me/me/sjednice/zakoni-i-druga-akta">https://www.skupstina.me/me/sjednice/zakoni-i-druga-akta</a></li> <li>• Opinion of the Ministry of finance on RIA forms: <a href="https://www.gov.me/mif/analiza-efekata-propisa-ria">https://www.gov.me/mif/analiza-efekata-propisa-ria</a></li> <li>• Report on the implementation of the Regulation on the selection of NGO representatives to working groups of state administration bodies and the implementation of public consultations in the preparation of laws and strategies for 2024: <a href="https://wapi.gov.me/download-preview/3aa5a8afb91d-455e-95ca-17365eb7592b?version=1.0">https://wapi.gov.me/download-preview/3aa5a8afb91d-455e-95ca-17365eb7592b?version=1.0</a></li> <li>• Annual report on the involvement of the private sector in the process of drafting the law for 2025: <a href="https://scc.org.me/web/index.php/ukljucenost-privatnog-sektora-u-proces-izrade-zakona">https://scc.org.me/web/index.php/ukljucenost-privatnog-sektora-u-proces-izrade-zakona</a></li> <li>• Law on public administration (Official Gazette of Montenegro 78/18, 70/21 and 52/22)</li> <li>• Regulation on the selection of representatives of non-governmental organizations in the working bodies of state administration authorities and the conduct of public debates in the preparation of laws and strategies: <a href="https://www.sluzbenilist.me/propisi/9F8ED982-BDCD-4642-A31F-0D1B592D6469">https://www.sluzbenilist.me/propisi/9F8ED982-BDCD-4642-A31F-0D1B592D6469</a></li> </ul>
<p><b>Double funding</b></p>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>

<b>Clear conclusion on the achievement of the step</b>	Not achieved. The ‘grace period’ runs until 31 December 2026.
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### 1.1.3 Dismantling regulatory barriers and facilitating the conduct of business.

<b>The step under review</b>	<i>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</i>
<b>Baseline</b>	11 key barriers have been identified as specific tasks to be addressed through 37 individual activities in the future period
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved
<b>Commission assessment of results</b>	<p>- <i>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.</i></p> <p>By the end of 2025, progress on implementation was recorded across all eleven identified barriers. More specifically, one barrier can be considered removed, on four there is a progress in the range of 51–75%, while removing remaining barriers continue to progress below 50%.</p> <p>Key developments include the adoption of business legislation and implementing by-laws enabling electronic company registration as of January 2026, improvements in VAT refund procedures through expanded risk-based analysis, Montenegro’s operational inclusion in the SEPA payment area reducing transaction costs for businesses, strengthened enforcement measures in the accommodation sector, and enhanced inspection capacities through training programmes.</p> <p>Out of the total 37 activities:</p> <p>Nine activities have been completed; 1 activity is at an advanced stage of implementation; a significant number of activities show moderate progress; several activities remain at an early stage or have not yet started. Some specific activities have not started due to clearly identified institutional, legal and coordination constraints.</p>

	<p><i>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</i></p> <p>Under this step, an Action Plan coordinated by the Secretariat of the Competitiveness Council, serves as the main framework for identifying and addressing administrative barriers affecting the business community. The Action plan was adopted in March 2024 and updated in March 2025.</p> <p>The activities are monitored on a quarterly basis by the Secretariat of the Competitiveness Council (to date there are seven quarterly reports), with progress updates shared with all Council members.</p> <p>In summary, the purpose of the step is to establish and ensure the functioning of a systemic mechanism for identifying administrative barriers to doing business, providing feedback from the competent institutions, and regularly reporting to the Competitiveness Council on activities undertaken and progress achieved. Considering this, along with the requirements of the steps for the activities addressing barriers to be initiated, it is considered that this constitutive element of the step is achieved. The fact that most activities are still in progress does not change the overall assessment on the completeness of this reform step.</p> <p><b>Based on the above, the Commission considers this step as fully achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>In line with the sources of verification, the beneficiary provided:</p> <p>Quarterly reports of the Secretariat of the Competitiveness Council on the implementation of the Action Plan for removing barriers identified by the business community, covering the period from September 2024 to December 2025.</p>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

#### 1.1.4 Improving e-cadastre and spatial planning

<b>The step under review</b>	<i>1.1.4.2 Updating land registries. Migrating all data from the existing land ownership database to the e-cadastre</i>
<b>Baseline</b>	Data on the ownership structure available through the e-cadastre web application. Depending on the type of records (real estate cadastre 85%, land cadastre 3% and census cadastre 12%), the content/detail of the data is different.
<b>Deadline of the step</b>	December 2025

<p><b>Conclusion of the review of the step by the beneficiary</b></p>	<p>The beneficiary considers this step as fully achieved</p>
<p><b>Commission assessment of results</b></p>	<p><i>Updating land registries</i></p> <p>During the reporting period, the cadastre was updated on a large scale, following defined working procedures and supported by quantitative results, indicating that updating has become a regular administrative activity.</p> <p>According to the report, recorded changes are automatically reflected in the digital e-Kat system, enabling continuous updating of cadastral data.</p> <p>Updates include both changes arising from legal bases (such as sales, inheritance and property division) and the correction of incorrectly entered data.</p> <p>To improve data accuracy in a structured manner, dedicated commissions were established to address the quality of graphical and alphanumeric data. Procedures for data quality checks and harmonisation of cadastral records were adopted, alongside specific methodologies for improving ownership data, supported by data analysis at both central and local levels. These measures have formalised updating as a standard administrative process.</p> <p>Public outreach activities were also conducted to encourage verification of cadastral data and reporting of inaccuracies. Information was provided through direct contact with the Administration, telephone and email communication, service counters in Podgorica, and online access to documentation in regional offices. These efforts contributed to additional corrections and improvements in data reliability.</p> <p>Overall, the reported activities and numerical indicators demonstrate that land cadastre updating is being carried out, supported by digital tools, quality control procedures and regular data flows between land registers and the real estate cadastre.</p> <p><i>Migrating all data from the existing land ownership database to the e-cadastre</i></p> <p>During the reporting period, cadastral register data originating from the census cadastre, land cadastre and property cadastre have been consolidated within a unified electronic database (e-Katastar). An electronic register of property rights holders covering the entire territory of Montenegro is now operational and publicly accessible.</p> <p>Ownership data are available online and reflected in real time, with changes entered at the level of regional units automatically synchronised within the central system. This indicates that cadastral data are managed within a single digital environment.</p> <p>In addition, digital cadastral plans are available for all cadastral municipalities covered by the property and land cadastre registers</p>

	<p>through the national Geoportal. Graphical cadastral data are maintained in vector format and subject to regular updates.</p> <p><b>Based on the above, the Commission considers this step as achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>In line with the sources of verification, the beneficiary provided:</p> <ul style="list-style-type: none"> <li>• Report from database of cadastral records on the number of changes</li> <li>• Geoportal of Cadastre and State Property Administration (<a href="https://geoportal.co.me/">https://geoportal.co.me/</a>)</li> <li>• Procedures (<a href="https://cejn.gov.me/tenders">https://cejn.gov.me/tenders</a>)</li> <li>• Interview of the Director of Cadastre (<a href="https://www.gov.me/clanak/intervju-direktora-uprave-za-nekretnine-mr-marka-bulatovica-za-bankar">https://www.gov.me/clanak/intervju-direktora-uprave-za-nekretnine-mr-marka-bulatovica-za-bankar</a>)</li> <li>• Report of number of changes</li> <li>• Report of number of changes 2025</li> <li>• Report of number of database changes 2023</li> <li>• Report of number of database changes 2025</li> <li>• Confirmation of database</li> <li>• Information from CEJN portal</li> <li>• Correction of database 2023</li> <li>• Correction of database 2025</li> <li>• Overview of cadastre 10 December 2025</li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

#### 1.1.4 Improving e-cadastre and spatial planning

<b>The step under review</b>	<i>1.1.4.3 Providing functionality to the e-cadastre. Implementing new online services for distributing cadastral data and documents, amending legal provisions to allow for electronic request submission, fully implementing the web application for electronic requests submission</i>
<b>Baseline</b>	Services not established/The regulation not fully prescribed
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.

<p><b>Commission assessment of results</b></p>	<p>During the reporting period, preparatory legal and technical activities were undertaken to support the digitalisation of cadastre services and electronic submission of requests.</p> <p>However, based on available information, the key elements required for full implementation are not yet in place.</p> <p>The Plan for the Development of the Information System of the Real Estate Administration has been prepared, but it has not yet been formally adopted nor published.</p> <p>The necessary bylaws regulating the functioning of the e-counter, electronic submission procedures and operational workflows have not yet been adopted, either.</p> <p>On the technical side, a test version of the web application for electronic submission of requests by notaries has been developed. The application has not yet been harmonised with the Ministry of Justice, has not been launched in operational use, and is currently available only on a test platform. A pilot phase with two notary offices is still in the planning stage.</p> <p>Overall, the legal framework enabling electronic services has been partially established and preparatory IT work has begun, but the system is not yet operational. Key prerequisites – including adoption of secondary legislation, institutional harmonisation and deployment of the web application – remain outstanding.</p> <p>Accordingly, the step cannot be considered achieved at this stage and requires completion of the remaining legal, technical and operational actions.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the sources of verification, the beneficiary reported on:</p> <ul style="list-style-type: none"> <li>• Adopted Amendments of the Law on State Survey and Real Estate Survey, official website of the Parliament (<a href="https://zakoni.skupstina.me/zakoni/web/app.php/akt/3908">https://zakoni.skupstina.me/zakoni/web/app.php/akt/3908</a>);</li> <li>• Adopted Amendments of the Law on State Survey and Real Estate Survey, website of the Official Gazette (<a href="https://www.sluzbenilist.me/propisi/2C6B0F72-0A7A-4B7A-9A26-C5F1F9DAF868">https://www.sluzbenilist.me/propisi/2C6B0F72-0A7A-4B7A-9A26-C5F1F9DAF868</a>)</li> </ul>
<p><b>Double funding</b></p>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>

<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.
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### 1.1.5. Reforming inspections services. Increasing integrity, efficiency and performance of inspection services and reducing the informal economy

<b>The step under review</b>	<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>
<b>Baseline</b>	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 Organization and Systematization of the Tax Administration and the data obtained from the Department for Planning and Human Resources Management, the total number of systematized 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.
<b>Deadline of the step</b>	December 2024
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.
<b>Commission assessment of results</b>	<p>To achieve the step, Montenegro fulfilled the following activities outlined in the Reform Agenda:</p> <ul style="list-style-type: none"> <li>- Extending the obligation to report on assets and income to all categories and ranks of authorised customs officers</li> </ul> <p>On 27 December 2025, the Montenegrin Parliament adopted amendments to the Customs Service Law, whereby all the staff categories (Article 62) are encompassed within the status of authorised customs officers and therefore have the obligation to report on their assets and income, as well as the assets and income of their partners and children (Article 55). These declarations are subject to checks of the Anti-Corruption Agency (see below).</p> <p>Regarding the conflict of interest declaration for the inspectors, customs officers have already had an obligation to declare if a person related to them, performs customs activities upon taking up employment and upon request of the director, or immediate superior (Article 77: Duty to notify on the conflict of interest of the Customs Service Law). Therefore no further actions were needed.</p>

	<p>Additionally, it should be noted that with the purpose of improving integrity in the inspection services, 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 the Bureau for Operational Communication, which includes representatives of all security services, ensuring cooperation and information exchange before employment.</p> <p><i>... Subject to checks by the Anti-Corruption Agency</i></p> <p>The Anti-Corruption Agency, in the line with the Anti-Corruption Law monitors submitted asset and income declarations. In the first quarter report of 2025 of the Anti-Corruption Agency, the Agency included a plan to perform checks on asset and income declarations for officials of the Customs Administration over the course of 2025 (page 7). When it comes to conflict of interest declarations, the role of the Agency is defined in Article 10 of the Anti-Corruption Law.</p> <p><b>Based on the above, the Commission considers the step as achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> <li>• <a href="#">Quarterly report on the work of the Agency for the Prevention of Corruption for the first quarter of 2025</a></li> <li>• <a href="#">Annual Report on the Work of the Agency for the Prevention of Corruption for 2024</a></li> <li>• Text of the amended law, public consultation report, decision on the adoption by the Government of 15/12/2025, decision on the adoption by the Parliament of 27/12/2025 and its promulgation by the President of 29/12/2025: <a href="https://www.sluzbenilist.me/propisi/EADD05F6-5976-48D8-AF11-CF1CE7FF5879?page=1">https://www.sluzbenilist.me/propisi/EADD05F6-5976-48D8-AF11-CF1CE7FF5879?page=1</a></li> <li>• Anti-Corruption Law, OG 54/2024: <a href="https://www.sluzbenilist.me/propisi/B3986529-BDE1-4F7A-9BFB-2E32849A37C2">https://www.sluzbenilist.me/propisi/B3986529-BDE1-4F7A-9BFB-2E32849A37C2</a></li> </ul>
<p><b>Double funding</b></p>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p><b>Fully achieved.</b></p>

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

<b>The step under review</b>	<i>1.1.5.2 Improving legal framework and focusing on informal economy. Adopt and implement changes to the Law on Misdemeanours, the Law on Inspection Supervision, the Law on Prevention of Illegal Business, as well as the Criminal Code of Montenegro, to increase the supervisory oversight of inspectors (including right of entry to residential premises where suspected unregistered activities are carried out), introduce appeal procedures, lift their territorial assignments, remove the possibility of discretionary decisions and to ensure the prerequisites are met for a systematic fight against the informal economy</i>
<b>Baseline</b>	Legal framework is not improved
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	<p>Montenegro initiated legislative changes aimed at strengthening enforcement against unregistered economic activity and improving the legal framework for tackling the informal economy.</p> <p>The reform consists of amendments to three key laws: the Law on Misdemeanours, the Law on Inspection Supervision, and the Law on Prevention of Illegal Business.</p> <p>Amendments to the Law on Prevention of Illegal Business were adopted by Parliament and entered into force, introducing a clearer definition of illegal business activities, strengthened enforcement measures by the Tax Administration, and additional tools to improve tax discipline, including account blocking mechanisms, restrictions on establishing new companies by non-compliant taxpayers, and updated payment provisions.</p> <p>Amendments to the Law on Inspection Supervision, aimed at enabling inspectors - upon court order - to enter residential and other private premises where there is a reasonable suspicion of unregistered activity, were submitted to Parliament in December 2025 and are pending adoption.</p> <p>Amendments to the Law on Misdemeanours, which establish the legal basis for court-authorized inspections of residential premises in cases related to tax violations and informal economic activity, were adopted by the Government in December 2025, but have not yet been adopted by Parliament. The final legal text and its entry into force therefore remain pending.</p> <p>Given that the amendments to the Law on Inspection Supervision, and to the Law on Misdemeanours constitute a central legal prerequisite for the effective enforcement of inspection powers, and</p>

	<p>that the legislative process is still ongoing, the full legal framework required for implementation has not yet been completed.</p> <p>On this basis, <b>the Commission considers the step as not achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<ul style="list-style-type: none"> <li>• Amendments to the Law on Prevention of Illegal Business: <a href="https://www.sluzbenilist.me/propisi/B6437440-6C63-455C-A4D2-8CE332B96EF9">https://www.sluzbenilist.me/propisi/B6437440-6C63-455C-A4D2-8CE332B96EF9</a></li> <li>• Draft amendments to the Law on Misdemeanours (Government adoption and conclusions): <a href="https://www.gov.me/dokumenta/edd55bdd-5653-47fd-8224-e86dea58bdb3">https://www.gov.me/dokumenta/edd55bdd-5653-47fd-8224-e86dea58bdb3</a> and <a href="https://www.gov.me/dokumenta/b4fc4071-e90d-419c-aed0-7b9d19fdc4f8">https://www.gov.me/dokumenta/b4fc4071-e90d-419c-aed0-7b9d19fdc4f8</a></li> <li>• Draft amendments to the Law on Inspection Supervision: <a href="https://zakoni.skupstina.me/zakoni/web/dokumenta/zakoni-i-drugi-akti/815/3981-23110-01-1-25-1.pdf">https://zakoni.skupstina.me/zakoni/web/dokumenta/zakoni-i-drugi-akti/815/3981-23110-01-1-25-1.pdf</a></li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 1.2.1 Deployment of e-freight and Intelligent Transport Systems

<b>The step under review</b>	<i>1.2.1.1 Align with Regulation (EU) 2020/1056 on electronic freight transport information (eFTI)</i>
<b>Baseline</b>	Partially aligned
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	<p>The new draft Law on the Electronic Freight Transport Information, which should establish a legal framework for the electronic communication of regulatory information between the economic operators concerned and competent authorities in relation to the transport of goods, is in the preparatory phase and it was submitted to public consultation on 26 December 2025, which is due on 23 January 2026. The draft Law is yet to be submitted to the Commission for compliance assessment with the Regulation (EU) 2020/1056.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>

<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<ul style="list-style-type: none"> <li>• Draft Law on the Electronic Freight Transport Information, as published under the call for public discussion, which is available here: <a href="https://wapi.gov.me/download/57f22938-5c5c-4f04-b05d-caea01c9975c?version=1.0">https://wapi.gov.me/download/57f22938-5c5c-4f04-b05d-caea01c9975c?version=1.0</a></li> </ul> <p>Furthermore, the beneficiary submitted the text of the call, the nomination of the working group, and its minutes of meetings which shows the previous work done and a major shift to new approach which is now reflected in drafting of a separate law that should ensure full alignment with the eFTI basic regulation.</p>
<p><b>Double funding</b></p>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p><b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.</p>

### 1.2.2 Further development of the Research and Innovation (R&I) ecosystem for knowledge-based economy (in accordance with the Smart Specialization Strategy)

<p><b>The step under review</b></p>	<p><i>1.2.2.1 Number of funded R&amp;I actors (physical persons - researchers and innovators, and legal entities - scientific research institutions, companies, clusters, NGOs) in the National R&amp;I System is increased by 50% and the impact is demonstrated through improved figures in research and innovation statistical reporting</i></p>
<p><b>Baseline</b></p>	<p>2023: 294 actors in the national R&amp;I system (148 private persons and 146 physical persons)</p>
<p><b>Deadline of the step</b></p>	<p>December 2025</p>
<p><b>Conclusion of the review of the step by the beneficiary</b></p>	<p>The beneficiary considers this step as achieved.</p>
<p><b>Commission assessment of results</b></p>	<p><i>Number of funded R&amp;I actors in the National R&amp;I System is increased by 50%</i></p> <p>Montenegro published 19 calls in 2025, through which support was awarded to <b>490</b> actors in the research and innovation ecosystem, out of which 382 actors were supported by the Ministry of Education, Science and Innovation and 108 actors by the Innovation Fund. The decisions for granting funds and contracts with the beneficiaries are considered eligible if they are made/signed in the period from 1 January 2025 to 31 December 2025. Consequently, the total number of R&amp;I actors funded in the implementation period increased from 294 to 490, i.e. by 67%.</p> <p>For the purpose of this assessment, the following calls for grants (understood as all forms of <b>non-repayable funds</b>) have been taken into consideration:</p>

- **13 calls** published by the Ministry of Education, Science and Innovation in 2025 (Total contribution to the value of the indicator: 382 actors funded, out of which 184 natural persons and 198 legal persons):
  1. **MESI25\_1**: Call for projects of cooperation with the scientific diaspora 2025 resulted in 10 actors funded (all legal persons) with EUR 1,080,075.45.
  2. **MESI25\_2**: Call for postdoctoral research 2025 resulted in 7 actors funded (all legal persons) with EUR 697,033.04.
  3. **MESI25\_3**: Call for support for participation in the Horizon Europe programme 2025 resulted in 52 actors funded (45 natural persons and 7 legal persons) with EUR 96,586.13.
  4. **MESI25\_4**: Public call “Science at Hand” for financing NGO projects and programmes in the field of science resulted in 6 actors funded (all legal persons) with EUR 99,998.20.
  5. **MESI25\_5**: Call for support for science promotion projects and innovative programmes within the “Days of Science and Innovation 2025” festival resulted in 15 funded actors (all legal persons) with EUR 30,700.
  6. **MESI25\_6**: Call for support of scientific research activities 2025 resulted in 207 funding actors (139 natural persons and 68 legal persons) with EUR 172,945.11
  7. **MESI25\_7**: Call for co-financing scientific and technological cooperation between Montenegro and the Republic of Slovenia for the period 2025–2026 resulted in the 20 actors (all legal persons) funded with EUR 40,000.
  8. **MESI25\_8**: Call for co-financing scientific and technological cooperation between Montenegro and the People’s Republic of China for the period 2025–2026 resulted in 15 funded actors (all legal persons) with EUR 210,000.
  9. **MESI25\_9**: Call for co-financing scientific and technological cooperation between the Ministry of Education, Science and Innovation of the Government of Montenegro and the Italian Council for National Research (CNR) for the period 2026–2027 resulted on 8 actors (all legal persons) funded with EUR 78,000.
  10. **MESI25\_10**: Call for co-financing scientific and technological cooperation between Montenegro and the Republic of Slovakia resulted in 10 actors (all legal persons) funded with EUR 160,000.
  11. **MESI25\_11**: Call for joint projects for multilateral scientific and technological cooperation in the Danube region for the period 2025–2027 resulted in 3 actors (all legal persons) funded with EUR 23,600.

	<p>12. <b>MESI25_12</b>: Call for excellence scholarships for doctoral research in Montenegro 2025 resulted in 25 actors (all legal persons) with EUR 999,714.98.</p> <p>13. <b>MESI25_13</b>: Public call for financing NGO projects and programmes in the field of social innovation resulted in 4 actors (all legal persons) with EUR 60,618.</p> <ul style="list-style-type: none"> <li>• <b>Six calls of the Innovation Fund in 2025</b>: (Total contribution to the value of the indicator: <u>108 actors funded, out of which 0 natural persons and 108 legal persons</u>):</li> </ul> <p>14. <b>IF25_1</b>: Call for grants to strengthen the innovativeness of micro, small and medium-sized enterprises 2025 resulted in 14 actors (all legal persons) funded with EUR 2,435,454.15.</p> <p>15. <b>IF25_2</b>: Early-Stage Start-up Development Support Programme 2025 resulted in 12 actors (all legal persons) funded with EUR 390,789.40.</p> <p>16. <b>IF25_3</b>: Proof of Innovative Concept Programme 2025 resulted in 19 actors (all legal persons) funded with EUR 691,103.79.</p> <p>17. <b>IF25_4</b>: Innovation Vouchers Programme 2025 resulted in 14 actors (all legal persons) funded with EUR 123,442.58.</p> <p>18. <b>IF25_5</b>: Programme for the implementation of educational programmes in the areas of Montenegro's smart specialisation 2025 resulted in 28 actors (all legal persons) funded with EUR 269,658.96.</p> <p>19. <b>IF25_6</b>: Call for fostering innovation culture 2025 resulted in 21 actors (all legal persons) funded with EUR 165,523.04.</p> <p><i>...the impact is demonstrated through improved figures in research and innovation statistical reporting</i></p> <p>While the real effect of these projects launched in 2025 is to be measured in the years to come, the most imminent impact can be observed on the reported R&amp;D budgetary statistics showing consistent growth from EUR 5,012,422.27 in 2021, over EUR 7,717,132.78 in 2022, EUR 12,562,547.49 in 2023, EUR 14,997,925.29 in 2024, until EUR 15,352,543.66 (projected in 2025), with an additional increase of EUR 6 million from the special economic citizenship programme to support the development of innovation.</p> <p><b>Based on the above, the Commission considers the step as achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<ul style="list-style-type: none"> <li>• <u>Information on the implementation of Step 1.2.2.1 – Number of funded actors in research and innovation (individuals – researchers and innovators, and legal entities – research institutions, business companies, clusters, and NGOs) in the National Research and Innovation System increased by 50%, with the impact of funding visible through improved positions</u></li> </ul>

in statistical reporting for science and innovation –published on the website of the Ministry of Education, Science and Innovation on 13 January 2026, available at the link below:

<https://www.gov.me/clanak/reformska-agenda-crne-gore-2024-2027-za-instrument-eu-za-reforme-i-rast-korak-1221>

- Table overview of the implementation of calls/programmes of the Ministry of Education, Science and Innovation and the Innovation Fund of Montenegro, for which decisions were made and/or contracts signed in the period from 1 September 2024 to 31 December 2025 (includes: call/programme code, name of call/programme, reference to the reform step, name of implementing institution, year of call/programme publication, call/programme status, beneficiary name, type of beneficiary, strategic sector/industry/project field, region/location, tax identification number, gender of main applicant, contact person, project title, project start and end date, amount of allocated funds, beneficiary co-financing, total project value, type of support, application submission date, approval date, number of contract/decision, and status of payment implementation).
- **MESI25\_1:** <https://www.gov.me/clanak/konkurs-za-sufinansiranje-projekata-saradnje-sa-naucnom-dijasporom>
- **MESI25\_2:** <https://www.gov.me/clanak/konkurs-za-finansiranje-postdoktorskih-istrazivanja-za-izvrstnost>
- **MESI25\_3:** <https://www.gov.me/clanak/konkurs-za-podsticanje-ucesca-u-programu-za-istrazivanje-i-inovacije-horizont-evropa>
- **MESI25\_4:** [https://www.gov.me/dokumenta/8202ef8f-4e74-4c69-a7fd-c372a94c4587?utm\\_source](https://www.gov.me/dokumenta/8202ef8f-4e74-4c69-a7fd-c372a94c4587?utm_source)
- **MESI25\_5:** <https://www.gov.me/clanak/otvoren-konkurs-za-sufinansiranje-projekata-promocije-nauke-i-inovacija-u-okviru-festivala-nauke-i-inovacija-2025>
- **MESI25\_6:** <https://www.gov.me/clanak/konkurs-za-sufinansiranje-naucnoistrazivacke-djelatnosti-u-2025-godini>
- **MESI25\_7:** <https://www.gov.me/clanak/konkurs-za-sufinansiranje-naucne-i-tehnoloske-saradnje-crna-gora-slovenija-2025-26godine>
- **MESI25\_8:** <https://www.gov.me/clanak/konkurs-za-sufinansiranje-naucne-i-tehnoloske-saradnje-izmedu-crne-gore-i-nr-kine>
- **MESI25\_9:** <https://www.gov.me/clanak/konkurs-za-sufinansiranje-naucne-i-tehnoloske-saradnje-izmedu-mpni-i-cnr>
- **MESI25\_10:** <https://www.gov.me/clanak/konkurs-za-sufinansiranje-naucne-i-tehnoloske-saradnje-izmedu-cg-i-republike-slovske>

	<ul style="list-style-type: none"> <li>• <b>MESI25_11:</b> <a href="https://www.gov.me/clanak/cetvrti-poziv-za-podnosenje-zajednickih-prijedloga-projekata-saradnje-u-dunavskom-regionu">https://www.gov.me/clanak/cetvrti-poziv-za-podnosenje-zajednickih-prijedloga-projekata-saradnje-u-dunavskom-regionu</a></li> <li>• <b>MESI25_12:</b> <a href="https://www.gov.me/dokumenta/e8b034b4-af73-4b47-bb35-5b1b26f4a7d4">https://www.gov.me/dokumenta/e8b034b4-af73-4b47-bb35-5b1b26f4a7d4</a></li> <li>• <b>MESI25_13:</b> <a href="https://www.gov.me/clanak/odluka-o-raspodjeli-sredstava-za-finansiranje-projekata-nvo-u-oblasti-drustvenih-inovacija">https://www.gov.me/clanak/odluka-o-raspodjeli-sredstava-za-finansiranje-projekata-nvo-u-oblasti-drustvenih-inovacija</a></li> <li>• <b>IF25_1:</b> <a href="https://fondzainovacije.me/wp-content/uploads/2025/12/Rezultati-Programa-za-jacanje-inovativnosti-MMSP-2025-1.pdf">https://fondzainovacije.me/wp-content/uploads/2025/12/Rezultati-Programa-za-jacanje-inovativnosti-MMSP-2025-1.pdf</a></li> <li>• <b>IF25_2:</b> <a href="https://fondzainovacije.me/wp-content/uploads/2025/10/Rezultati-Programa-za-ranu-fazu-razvoja-startapova-2025-1.pdf">https://fondzainovacije.me/wp-content/uploads/2025/10/Rezultati-Programa-za-ranu-fazu-razvoja-startapova-2025-1.pdf</a></li> <li>• <b>IF25_3:</b> <a href="https://fondzainovacije.me/programi/provjera-inovativnog-koncepta/#1711235584647-7f7df15b-e9e8">https://fondzainovacije.me/programi/provjera-inovativnog-koncepta/#1711235584647-7f7df15b-e9e8</a></li> <li>• <b>IF25_4:</b> <a href="https://fondzainovacije.me/wp-content/uploads/2025/12/Rezultati-Programa-za-dodjelu-inovacionih-vaucera-2025.pdf">https://fondzainovacije.me/wp-content/uploads/2025/12/Rezultati-Programa-za-dodjelu-inovacionih-vaucera-2025.pdf</a></li> <li>• <b>IF25_5:</b> <a href="https://fondzainovacije.me/wp-content/uploads/2025/10/Rezultati-Programa-za-organizaciju-edukacija-u-oblastima-pametne-specijalizacije-Crne-Gore-2025-2.pdf">https://fondzainovacije.me/wp-content/uploads/2025/10/Rezultati-Programa-za-organizaciju-edukacija-u-oblastima-pametne-specijalizacije-Crne-Gore-2025-2.pdf</a></li> <li>• <b>IF25_6:</b> <a href="https://fondzainovacije.me/wp-content/uploads/2025/10/Rezultati-Programa-za-podsticanje-inovacione-kulture-2025-1.pdf">https://fondzainovacije.me/wp-content/uploads/2025/10/Rezultati-Programa-za-podsticanje-inovacione-kulture-2025-1.pdf</a></li> </ul>
<b>Double funding</b>	The Commission takes note that some reported grant schemes assessed in the framework of this step are complementary to the funding schemes provided by the third parties (e.g. Horizon Europe, bilateral support) and concludes that this does not constitute double funding.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

### 2.1.1. Full implementation of the electricity integration package

<b>The step under review</b>	<i>2.1.1.1 Complete transposition of the electricity integration package in line with the Energy Community requirements and continue its implementation</i>
<b>Baseline</b>	Partially aligned
<b>Deadline of the step</b>	December 2024
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.

<b>Commission assessment of results</b>	<p>The new Law on Energy was adopted on 17 March 2025 and the new Law on Cross-Border Exchange of Electricity and Natural Gas on 31 December 2025. As concerns the latter, the alignment with the EU <i>acquis</i> remains to be verified by the Commission.</p> <p>Two secondary legislative acts deriving from the adopted legal framework have been prepared but are pending Government adoption. They concern the methodology for the implementation of the Italy –Montenegro Capacity Calculation Region (IT–ME CCR), prepared by the Montenegrin electric power transmission system operator (CGES).</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> <li>• Law on Energy published on the “Official gazette No 28/2025” of 19.03.2025: <a href="https://www.sluzbenilist.me/propisi/64F3E28A-1501-407C-91D6-C8E949DE7C5C">https://www.sluzbenilist.me/propisi/64F3E28A-1501-407C-91D6-C8E949DE7C5C</a></li> <li>• The Law on Cross-Border Exchange of Electricity and Natural Gas was adopted on 31December 2025, <a href="https://www.sluzbenilist.me/propisi/62A8D833-6C71-4CF9-80F3-5B2284299B28">https://www.sluzbenilist.me/propisi/62A8D833-6C71-4CF9-80F3-5B2284299B28</a> <a href="https://zakoni.skupstina.me/zakoni/web/app.php/akt/3906">https://zakoni.skupstina.me/zakoni/web/app.php/akt/3906</a></li> <li>• Finalised technical documentation, including the methodology for the implementation of the IT–ME Capacity Calculation Region (IT–ME CCR), prepared by the CGES and awaiting formal adoption.<a href="https://consultations.entsoe.eu/markets/itme-ccm/">https://consultations.entsoe.eu/markets/itme-ccm/</a></li> </ul>
<b>Double funding</b>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>
<b>Clear conclusion on the achievement of the step</b>	<p><b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.</p>

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

<b>The step under review</b>	<p><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></p>
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<b>Baseline</b>	Partially established
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.
<b>Commission assessment of results</b>	<p><i>Governance structures mandated to implement and monitor just transition actions are operational</i></p> <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><i>...have adopted a plan for training and job creation for people employed in mining and coal power production</i></p> <p>The Plan for Workforce Retraining in the Context of Just Transition in the Pljevlja Coal Region (Just Transition Plan) was adopted on 22 December 2025 by the Council for Just Transition. The Plan identifies seven objectives: improve employability of the local population, enable just transition of coal mine workers, empower women, youth and vulnerable groups, diversify the local economy of Pljevlja, establish a Green Jobs Training Centre, connect educational institutions, businesses and public services and ensure sustainability. Furthermore, it identifies key target groups: coal mine and energy sector employees, unemployed local population, women, young and vulnerable and marginalised population. It also recognised key priority sectors: renewable energy and energy efficiency, construction and green infrastructure, agri-business, information technologies, waste management, tourism, services and industrial technologies. Finally, chapter 9 of the Plan identifies 19 measures and associated training activities (with hours of training and number of participants), indicators, responsible institutions and estimation of needed resources. The plan is valid until end 2027.</p> <p>The National Energy and Climate Plan (NECP) was adopted by the Government on 10 December 2025. It explicitly recognises just transition as a national priority, which demonstrates policy coherence.</p> <p><b>Based on the above, the Commission considers this step as achieved.</b></p>
<b>Checks performed and evidence used in the verification of the</b>	In line with the sources of verification, the following evidence was provided:

<b>step and related findings</b>	<ul style="list-style-type: none"> <li>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. <a href="https://www.sluzbenilist.me/registri/B3720DB7-2672-48DA-8B1A-8DF1D362AA3A?page=5">https://www.sluzbenilist.me/registri/B3720DB7-2672-48DA-8B1A-8DF1D362AA3A?page=5</a></li> <li>Plan for Workforce Retraining in the Context of Just Transition in the Pljevlja Coal Region (Just Transition Plan), adopted by the Council for Just Transition</li> <li>Government decision on the adoption of the National Energy and Climate Plan (NECP), 10 December 2025. <a href="https://www.gov.me/dokumenta/1d7f53cc-ebf4-4355-8b6f-295a2879249d">https://www.gov.me/dokumenta/1d7f53cc-ebf4-4355-8b6f-295a2879249d</a></li> </ul>
<b>Double funding</b>	Montenegro reported that technical assistance funded by the third party was used in the preparation of the above referred documents but given that all of them were adopted by the competent institutions, no double funding was identified in line with the Guidelines.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

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

<b>The step under review</b>	<i>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</i>
<b>Baseline</b>	partially aligned
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved.
<b>Commission assessment of results</b>	<p>Law on Climate Change was adopted and published on in the Official Gazette of Montenegro (No. 149/25) 17.12.2025 and entered into force on 31.12.2025, in line with the Reform Agenda deadline.</p> <p>Article 3 of this law provides that Montenegro's long term climate goal is to achieve climate neutrality by 2050, and that greenhouse gas (GHG) emissions and removals in Montenegro must be balanced no later than 2050, to reduce emissions to net zero and thereafter with aim to achieve negative emissions. It also provides for Montenegro to undertake the necessary measures to enable the</p>

	<p>achievement of the climate neutrality goal. Therefore, we assess it as aligned with Article 2 of the European Climate Law; Regulation (EU) 2021/1119.</p> <p>The Commission’s review discovered a point of inconsistency in the Montenegrin Law on Climate Change relating to definition of the GHG emissions. While the definition of “climate neutrality” in Article 6 point 20 of the law considers it to be economy-wide balance of GHG emissions and removals, the definition of “GHG emissions” in Article 6 point 15 seems to only cover GHG emissions released by the regulated entities under the EU Emissions Trading System. It is important that Montenegro considers GHG emissions from all sectors of the economy for its climate neutrality target, in the same manner as the European Climate Law does it for the EU. Nevertheless, Commission did not find this ambiguity as preventing the positive assessment of the step above and advised Montenegro to consider economy-wide emissions for its strategic documents and any further climate policies aiming to facilitate achieving the climate neutrality target as well as to address this inconsistency in future revisions of the law on Climate Change.</p> <p>The Commission would like to clarify to Montenegrin authorities, that the provisions of this Law were only evaluated considering the requirements of this reform agenda step and the Commission Implementing Decision for the release of the funds under the Reform and Growth Facility. Evaluation of the other aspects of the Montenegrin Law on Climate Change pertaining to alignment with other EU legislation will continue and its outcome will be communicated at a later stage i.e. when evaluating the Reform Agenda step 2.2.2.1 (Full implementation of Monitoring, Reporting, Verification, and Accreditation (MRVA)) and for assessing whether the Closing Benchmark 7 of Chapter 27 Environment and climate change has been met.</p> <p><b>Based on the above, the Commission considers this step as fully achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the sources of verification, the following evidence was used: the Law on Climate Change was published on 17 December 2025 in the Official Gazette of Montenegro (No. 149/25): <a href="https://www.sluzbenilist.me/propisi/81F1BD94-06BA-4694-A049-0DC19D2EE1FE">https://www.sluzbenilist.me/propisi/81F1BD94-06BA-4694-A049-0DC19D2EE1FE</a></p>
<p><b>Double funding</b></p>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p><b>Fully achieved.</b></p>

## 2.2.2 Improvement of the National Emissions Trading System (ETS) in accordance with the EU ETS system

<b>The step under review</b>	<i>2.2.2.1 Full implementation of Monitoring, Reporting, Verification, and Accreditation (MRVA)</i>
<b>Baseline</b>	not established
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	<p>The Commission notes that the Law on Climate Change setting the legal basis MRVA was adopted in December 2025 and work is ongoing on completing the alignment via secondary legislation related to the establishment of the MRVA processes and their implementation. To support the achievement of this step and development of the secondary legislation, in June 2025, the Commission mobilised TAIEX assistance carried by the Croatian national authorities to explain how MRVA is implemented in the EU and provide guidance on drafting secondary legislation. The TAIEX was meant to conclude by November 2025, however due to significant delays on the Montenegrin side it concluded only in January 2026.</p> <p>The Commission also reiterates that legislative alignment in itself will not constitute fulfilment of the step considering that the step requires “full implementation”. In particular, each identified regulated entity (operator) must apply for Greenhouse gas (GHG) permit and submit a draft monitoring plan to the competent Montenegrin authorities, that should in turn conduct the necessary checks, approve the monitoring plans and, on this basis, issue a GHG permit to the related operator. Note that this process can take place only after the adoption of the secondary legislation and that the Commission provided Montenegro with detailed guidance on the specific implementation steps required for fulfilment of his step in June 2025.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	Drafting of secondary legislation was completed late by Montenegrin authorities. The Commission has officially received the legislation pertaining to assessment of this step only in March 2026. The assessment is currently ongoing. Further, no evidence was presented on progress on the implementation steps that need to take place after the adoption of the legislation.
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.

<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.
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### 2.3.1 Developing transparent, competitive procedures for deployment of renewable energy and foreseeing the entry of newcomers.

<b>The step under review</b>	<i>2.3.1.1 Announce 3-year auction plan of at least 400 MW and launch the first auction</i>
<b>Baseline</b>	Not established
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved.
<b>Commission assessment of results</b>	<p>The first auction was <a href="#">published</a> on 11 July 2025. 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>Following the completion of the first auction and the assessment of its results, the Ministry of Energy and Mining, with support from the EBRD, prepared and adopted a three-year renewable energy auction plan, adopted by the Government on 25 December 2025. The Plan includes two auctions to be launched, one for solar power plan (capacity 250MW) and one wind power plan (200MW). Total capacity eligible for the relevant subsidies in next three years is therefore 450MW.</p> <p><b>Based on the above, the Commission considers this step as achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>In line with the sources of verification, the beneficiary submitted:</p> <ul style="list-style-type: none"> <li>Public call for the first renewable energy auction, officially published on the website of the Government of Montenegro, confirming the launch of the first market-based auction in line with the Law on the Use of Energy from Renewable Sources. <a href="https://www.gov.me/clanak/objavljivanje-javnog-poziva-za-ucesce-u-aukciji-za-dodjelu-prava-na-trzisnu-premiju-za-neodredene-lokacije-za-solarne-elektrane">https://www.gov.me/clanak/objavljivanje-javnog-poziva-za-ucesce-u-aukciji-za-dodjelu-prava-na-trzisnu-premiju-za-neodredene-lokacije-za-solarne-elektrane</a></li> <li>Decision on the three-year plan of system of incentives (auction plan) for the period 2026-2028: <a href="https://www.gov.me/dokumenta/0562040a-250a-4c77-b449-a78b742007ae">https://www.gov.me/dokumenta/0562040a-250a-4c77-b449-a78b742007ae</a></li> </ul>

	<ul style="list-style-type: none"> <li>An additional set of secondary legislation, necessary for auction, was also adopted: The Rulebook on unit compensation for positive or negative balance deviation of privileged producers in the market premium system; the Decree on the methodology for determining the ceiling price; the Decree on rules for filling the auction quota; the Decision on the quota for the first auction; and the Decision on the ceiling price for the first auction.</li> </ul>
<b>Double funding</b>	Montenegro reported that support from EBRD was utilised in the preparation of the three-year renewable energy auction plan. However, given this document is adopted by the Government, the Commission considers that such support does not constitute double funding.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

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

<b>The step under review</b>	<i>2.3.2.1 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>
<b>Baseline</b>	Partially aligned
<b>Deadline of the step</b>	December 2024
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	<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"> <li>- <a href="https://www.energy-community.org/news/Energy-Community-News/2024/08/26.html">https://www.energy-community.org/news/Energy-Community-News/2024/08/26.html</a></li> </ul> <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"> <li>- <a href="https://cotee.me/pages/vodic">https://cotee.me/pages/vodic</a></li> </ul>

	<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"> <li>• 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</li> <li>• Rulebook on detailed conditions to be met by a legal entity for assessing and measuring the potential of renewable energy sources</li> <li>• Rulebook on the detailed content and method of keeping records of privileged producers</li> <li>• 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</li> <li>• Rulebook on unit compensation for positive or negative balance deviation of privileged producers in the market premium system</li> <li>• Rulebook on the detailed manner of issuing, using, transferring and terminating the validity of the guarantee of origin for energy produced from renewable sources</li> </ul> <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 aligning with the EU <i>acquis</i>.</p> <p>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><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> <li>• <a href="#">Publication of the Law on the Use of Energy from Renewable sources on the “Official gazette No 82/2024” of 23.08.2024:</a></li> <li>• 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)</li> </ul>

	<ul style="list-style-type: none"> <li>• <a href="#">Rulebook on detailed conditions to be met by a legal entity for assessing and measuring the potential of renewable energy sources</a> (“O.G of Montenegro” No. 66/2025 of 27.06.2025)</li> <li>• <a href="#">Rulebook on the detailed content and method of keeping records of privileged producers</a> (“O.G of Montenegro” No. 66/2025 of 27.06.2025)</li> <li>• <a href="#">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</a> (“O.G of Montenegro” No. 66/2025 of 27.06.2025)</li> <li>• <a href="#">Rulebook on unit compensation for positive or negative balance deviation of privileged producers in the market premium system</a> (“O.G of Montenegro” No. 66/2025 of 27.06.2025)</li> <li>• <a href="#">Rulebook on the detailed manner of issuing, using, transferring and terminating the validity of the guarantee of origin for energy produced from renewable sources</a> (“O.G of Montenegro” No. 64/2025 of 26.06.2025).</li> </ul> <p>The beneficiary has additionally submitted:</p> <ul style="list-style-type: none"> <li>• <a href="#">Publication of the opinion of the Energy Community secretariat on law alignment:</a></li> <li>• <a href="#">Publication of the Guide on permitting procedures:</a></li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not Achieved.</b> The ‘grace period’ runs until 31 December 2026.

#### 2.3.4 Implementing energy efficiency and air pollution legislation.

<b>The step under review</b>	<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>
<b>Baseline</b>	Under preparation
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved

<p><b>Commission assessment of results</b></p>	<p><i>Long-term renovation strategy and action plan</i></p> <p>The step required adoption of the Long-term renovation strategy and action plan. Montenegrin authorities, 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 key results and recommendations of the study have been reflected in the Long-term renovation strategy included in the National Energy and Climate Plan (NECP), adopted by the Government on 10 December 2025.</p> <p><i>... and starts to be implemented with retrofitting of existing public buildings ongoing and aligned with the annual 3% renovation target</i></p> <p>The Government of Montenegro has adopted a separate 3-year plan for the reconstruction of 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 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><b>Based on the above, the Commission considers this step as fully achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> <li>• <a href="#">Decree on Amendments to the Decree on the Reconstruction of Administrative Buildings</a> (“Official Gazette of Montenegro”, No. 83/2024, as of 29 August 2025).</li> <li>• <a href="#">Plan for the reconstruction of administrative buildings owned by the central government for the period 2024-2026</a> - adopted at the session of the Government as of 5 September 2024, Conclusion No. 10-302/24-4828/2)</li> <li>• <a href="#">Long-Term Building Renovation Strategy</a> – in the form of a study adopted by the Ministry of Energy and Mining</li> <li>• National Energy and Climate Plan (NECP), adopted by the Government of Montenegro on 10 December 2025, incorporating the key results and recommendations of the Study in accordance with Article 7a of the Law on Efficient Use of Energy. <a href="https://www.gov.me/dokumenta/1d7f53cc-ebf4-4355-8b6f-295a2879249d">https://www.gov.me/dokumenta/1d7f53cc-ebf4-4355-8b6f-295a2879249d</a></li> </ul>

<b>Double funding</b>	On the basis of the Commission’s assessment, the degree of the reported contributions does not constitute a case of double funding, as the complementary funding concerns only the implementation of the plan and it is combined with funds from Montenegro’s state budget.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

#### 2.3.4 Implementing energy efficiency and air pollution legislation.

<b>The step under review</b>	<i>2.3.4.3 Adoption of the Strategy on Air Quality Management Strategy 2024-2029, including the development/update of air quality plans for zones where the National Emission Ceilings (NEC) Directive limit values are exceeded.</i>
<b>Baseline</b>	Under preparation
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved
<b>Commission assessment of results</b>	<p>The Commission takes note of the report that work on the Air Quality Management Strategy has commenced. A public consultation is launched on 11 February 2026. Expected date for the adoption is April 2026.</p> <p>The draft form has not yet been shared with Commission for feedback/assessment.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	Montenegro submitted no documents in support for the activities under this step.
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 2.3.4 Implementing energy efficiency and air pollution legislation.

<b>The step under review</b>	<i>2.3.4.5a 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</i>
<b>Baseline</b>	Current annual renovation rate 20.000 sqm
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.
<b>Commission assessment of results</b>	<p>The total surface area of buildings renovated in 2024/2025 and eligible for reporting amounts to 122,509.20 m<sup>2</sup>, significantly exceeding the target of 60,000 m<sup>2</sup>. The energy efficiency measures were primarily related to façade and roof thermal insulation, replacement of external windows and doors, and the installation of high-efficiency heating.</p> <p>Provided information for street lightning confirms substantial work on energy efficient street lighting in 8 municipalities.</p> <p><b>Based on the above, the Commission considers this step as achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>Evidence provided includes the following:</p> <ul style="list-style-type: none"> <li>• Excerpts from project documentation related to implemented energy efficiency projects, including signed contracts, implementation records, and handover and acceptance certificates, demonstrating that works on the reported buildings have been fully completed;</li> <li>• An official Information adopted by the Government of Montenegro, covering all ongoing and implemented energy projects, which provides an overarching confirmation of the implementation status and demonstrates the fulfilment of this step. This Information also includes a dedicated overview of financial allocations and funding sources, ensuring full transparency and explicitly addressing the avoidance of double funding across national, EU, and other international funding instruments;</li> <li>• Verified information from municipalities about the replacement and adaptation of street lighting.</li> </ul> <p>Provided information/report on status of projects, adopted by government clearly shows that target is met and exceeded.</p>
<b>Double funding</b>	Contributions from third parties were reported in support of the achievement of this step. Clear distinction between state funds and third party funding is presented. The reported renovated buildings are funded from two projects: The Montenegro <b>Second Energy</b>

	<p><b>Efficiency Project</b> (MEEP 2) and Improvement of energy efficiency in public buildings. Regarding the former total budget of the project is EUR9.9 million and it consists of EUR6 million loan from IBRD and EUR3.9 million of state funding. In relation to latter, total value of the project includes EUR45 million of the loan provided by KfW, 10 million euro of state funding and EUR4.7 million of grant from the European union through WBIF – REEP Plus. In light of small share of the grant in the overall value of the project, the Commission considers this does not constitute double funding.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p><b>Fully achieved.</b></p>

#### 2.4.1. Secure broadband infrastructure deployment, including 5G networks

<p><b>The step under review</b></p>	<p><i>2.4.1.2 Compliance with the Gigabit Infrastructure Act: legislation in place (primary and secondary) to set-up a secure information system</i></p>
<p><b>Baseline</b></p>	<p>In progress</p>
<p><b>Deadline of the step</b></p>	<p>December 2025</p>
<p><b>Conclusion of the review of the step by the beneficiary</b></p>	<p>The beneficiary considers this step as partially achieved.</p>
<p><b>Commission assessment of results</b></p>	<p>This step foresees the alignment of the Law on the Use of Physical Infrastructure for the Deployment of High-Speed Electronic Communications Networks with Regulation (EU) 2024/1309 (Gigabit Infrastructure Act), adopted in April by the European Parliament and the Council and entered into force in May 2024. Provisions became applicable on 12 November 2024.</p> <p>Montenegro reported that a working group was established in the third quarter of 2025, and the first draft of the Law was completed in November. The public debate was announced on 20 November 2025, with the deadline for submitting comments set for 10 December 2025. Based on the received comments and recommendations, the Ministry of Economic Development prepared a final report on the public debate, which was adopted on 25 December 2025.</p> <p>While the process for the adoption of the Law is advancing, legislation compliant with the Gigabit Infrastructure Act has not yet been adopted and submitted to the Commission.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>

<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>The following evidence regarding the state of the legislative process was provided:</p> <ul style="list-style-type: none"> <li>Public call for public debate on the text of the Draft Law on the Use of Physical Infrastructure for the Deployment of Very High Capacity Electronic Communications Networks: <a href="https://www.gov.me/clanak/javni-poziv-za-sprovođenje-javne-rasprave-o-tekstu-nacrta-zakona-o-korisćenju-fizicke-infrastrukture-za-postavljanje-elektronskih-komunikacionih-mreza-veoma-velikog-kapaciteta">https://www.gov.me/clanak/javni-poziv-za-sprovođenje-javne-rasprave-o-tekstu-nacrta-zakona-o-korisćenju-fizicke-infrastrukture-za-postavljanje-elektronskih-komunikacionih-mreza-veoma-velikog-kapaciteta</a></li> <li>Report on the public hearing on the law on the use of physical infrastructure: <a href="https://www.gov.me/dokumenta/23d0f22e-82e2-4495-b4f8-21c1e0e78819">https://www.gov.me/dokumenta/23d0f22e-82e2-4495-b4f8-21c1e0e78819</a></li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

#### 2.4.2. E-signature and deployment of digital identity wallet

<b>The step under review</b>	<i>2.4.2.1 Compliance with the EU digital ID resolution</i>
<b>Baseline</b>	Not aligned yet
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved
<b>Commission assessment of results</b>	<p>According to this step, Montenegro is supposed to incorporate to its internal regulatory framework the provisions of the EU Digital Identity framework (Regulation 910/2014 as amended by Regulation 2024/1183 - eIDAS 2). The step does not entail the adoption of any secondary legislation.</p> <p>For this purpose, Montenegro is currently working on the drafting of a new law. The old law submitted was published in 2019 and does not contain the necessary amendments.</p> <p>The draft of the new law is published for public consultation, in order to ensure transparency of the process and enable the participation of all relevant stakeholders in its final formulation.</p> <p>The adoption of the law is expected in Q2 of 2026.</p>

	<b>Based on the above, the Commission considers this step as not achieved.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<ol style="list-style-type: none"> <li>1. Public call for consultation of the interested public for the preparation of the Draft Law on Electronic Identification and Electronic Trust Services: <a href="https://www.gov.me/clanak/javni-poziv-za-konsultovanje-zainteresovane-javnosti-za-pripremu-nacrta-zakona-o-elektronskoj-identifikaciji-i-elektronskim-uslugama-povjerenja">https://www.gov.me/clanak/javni-poziv-za-konsultovanje-zainteresovane-javnosti-za-pripremu-nacrta-zakona-o-elektronskoj-identifikaciji-i-elektronskim-uslugama-povjerenja</a></li> <li>2. Report on the conducted public consultation in the initial phase of the preparation of the Draft Law on Electronic Identification and Electronic Trust Services: <a href="https://www.gov.me/dokumenta/5c7ad0b3-37c9-4f2f-aaa2-ab144a938606">https://www.gov.me/dokumenta/5c7ad0b3-37c9-4f2f-aaa2-ab144a938606</a></li> </ol>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 2.4.3 User friendly digital public service delivery

<b>The step under review</b>	2.4.3.2 <i>Deployment of public e-services based on the Plan (Step 1)</i>
<b>Baseline</b>	Not available yet
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved
<b>Commission assessment of results</b>	<p>This step entails the development and implementation of the services defined by the Plan for full deployment of transactional national and local level public electronic services 2025-2027 adopted by the Government at the 69<sup>th</sup> session of the Government held on 20 February 2025.</p> <p>According to the plan, 22 institutions have proposed the digitalization of a total of 171 public services, 57 of which are scheduled for implementation in 2025.</p>

	<p>The Ministry of Public Administration, in cooperation with the Operational Team responsible for implementing the Plan, prepared a Revised Service Plan, which was adopted by the Government of Montenegro at 107<sup>th</sup> session from 10 December 2025. The revision was intended to update the priorities and dynamics of implementation, to respect the needs of institutions and users, and to ensure greater compliance with strategic documents. The revised plan does not materially revise the 2025 service package.</p> <p>As verified by the Commission and its expert, 57 of the planned 57 e-services foreseen in the revised plan have been fully implemented and are functioning in terms of usability.</p> <p><b>Based on the above, the Commission considers this step as achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>The fulfilment of all steps was validated through the following verification sources:</p> <ol style="list-style-type: none"> <li>1. Plan for the Full Implementation of Transactional Public e-Services at the National and Local Levels (2025-2027) Adopted by the Government; <a href="#">Link to Plan</a></li> <li>2. Report on the Development of the Plan for the Full Implementation of Transactional Public e-Services at the National and Local Levels for the Period 2025-2027, with the Government’s Conclusion; <a href="#">Link to Conclusion</a></li> <li>3. Revised Plan for the Full Implementation of Transactional Public e-Services at the National and Local Levels for the Period 2025-2027, with status of implementation <a href="#">Link to Revised Plan</a></li> <li>4. Report of the revised Plan for the Full Implementation of Transactional Public e-Services at the National and Local Levels for the Period 2025-2027, with status of implementation; <a href="#">Link to Conclusion</a></li> </ol>
<p><b>Double funding</b></p>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p><b>Fully achieved.</b></p>

**2.4.4. Cybersecurity - Setting up a comprehensive framework for cyber resilience (introducing requirements of NIS2 Directive and strengthening relevant institutions)**

<b>The step under review</b>	2.4.4.2 <i>Frameworks introduced through NIS2 alignment (Coordinated Vulnerability Disclosure framework, crisis management framework), are in place and in use</i>
<b>Baseline</b>	Not applicable yet
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved
<b>Commission assessment of results</b>	<p>This step entails the establishment and use of a comprehensive framework to ensure the full implementation of the Law on Information Security adopted on 19 November 2024, aligned with Directive (EU) 2022/2555 (NIS2).</p> <p>This framework encompasses the legal, institutional, and operational arrangements necessary for the effective application of NIS2 requirements in practice. It provides clearly defined roles and responsibilities for competent authorities and regulated entities, establishes mechanisms for coordinated vulnerability management and incident reporting, and ensures structured crisis management and interinstitutional cooperation in the event of major cyber incidents or cyber crises.</p> <p><i>Crisis management framework</i> In this regard, Montenegro adopted the National Plan for Response to Cyber Threats, Serious Cyber Threats, Cyber Incidents and Cyber Crises, the Disaster Recovery Plan for Ministry of Public Administration, which is in charge of all governments IIS, and the List of Critical and Important Entities, in line with NIS2 requirements. Both documents constitute the <i>crisis management framework</i> in line with the Law on Information Security.</p> <p>The National Plan for Response to Cyber Threats, Serious Cyber Threats, Incidents, and Cyber Crisis has to be considered as an important and comprehensive framework within the crisis management system, as it clearly defines the modalities of action, operational capabilities, obligations, and roles of the competent actors before and during a cyber crisis. In particular, the Plan specifies when, in the event of an incident, international partners such as the EU and NATO have to be informed.</p> <p><i>Coordinated Vulnerability Disclosure framework</i> Montenegro also adopted a Standard Operating Procedure for Vulnerability Management. This specific document should also</p>

	<p>be considered an integral part of the crisis management framework. In particular, the Disaster Recovery Plan of the Ministry of Public Administration, which is responsible for all Government Information and Information Systems (IIS), represents a key document defining the organizational and operational arrangements for disaster recovery.</p> <p>The Plan establishes dedicated teams responsible for managing the disaster recovery process, including technical recovery teams, communication and coordination teams, as well as other supporting teams, with clearly defined roles and responsibilities</p> <p>Montenegro also submitted the Rulebook on the Internal Organization and Systematization of the Ministry of Public Administration, This document is relevant for assessing the crisis management and vulnerability framework, as it shows the efforts to strengthen human resources capacities in this area, which is crucial and highly relevant for the effective functioning of the system.</p> <p>The new Rulebook introduces organizational solutions that enable the further development and strengthening of the Government CIRT, including the establishment of a dedicated department responsible for malware analysis. This creates the conditions for recruiting and engaging specialized staff, which directly contributes to improved capabilities for identifying, analysing, and assessing cyber threats and vulnerabilities, as well as for providing timely technical support in incident response and crisis situations. By reinforcing human resources capacities and specialized functions within the Government CIRT, the Rulebook supports a more robust and systematic approach to vulnerability assessment and overall cyber crisis management.</p> <p><b>Based on the above, the Commission considers this step as achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>The completion of this step was verified through the following sources:</p> <ol style="list-style-type: none"> <li>1. Decree on the Proclamation of the Law on Information Security, Published in the Official Gazette of Montenegro No. 113/24 of 27 November 2024; <a href="#">Link</a></li> <li>2. Proposal of the National Plan for Response to Cyber Threats, Serious Cyber Threats; <a href="#">Link</a></li> <li>3. National Plan for Response to Cyber Threats, Serious Cyber Threats Operational plan, INT 01-19/25 of 18 December 2025;</li> <li>4. Disaster Recovery Plan, INT 01-21/25 of 18 December 2025;</li> <li>5. List of Critical and Important Entities; INT 01-20/25 of 18 December 2025</li> <li>6. Standard Operation Procedures for Vulnerability Management, INT 01-18/25 of 2 December 2025</li> </ol>

	<p>7. Rulebook on the Internal Organization and Systematization of the Ministry of Public Administration, <a href="#">Link</a></p> <p>8. On the spot checks of the documents marked as “INT” from representatives of the Delegation of the European Union to Montenegro, following prior submission of a signed Confidentiality Statement.</p> <p>9. Clarifications provided by Montenegro on 28 January 2026.</p> <p>10. Official readouts and proof of adoption of the documents marked as “INT” provided by Montenegro on 09 February 2026.</p>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

#### 2.4.4. Cybersecurity - Setting up a comprehensive framework for cyber resilience (introducing requirements of NIS2 Directive and strengthening relevant institutions)

<b>The step under review</b>	<i>2.4.4.3 Establishment of a competent authority and list of entities. The Cybersecurity Agency (acting as competent authority as defined in the NIS2) is operational: sufficiently staffed, equipped with supervisory powers, performing supervisory checks. List of entities in scope of the national law corresponding to the NIS2 Directive is finalized</i>
<b>Baseline</b>	In progress
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	<p>Based on the Law on Information Security, the Government of Montenegro, at session held on December 19, 2024, adopted the Decision on the Establishment of the Cybersecurity Agency, which was published in the Official Gazette of Montenegro, No. 125/2024 of December 26, 2024, and entered into force on December 27, 2024.</p> <p>At the proposal of the Ministry of Public Administration, the Government of Montenegro appointed the management of the Cyber Security Agency. At the session of 8 December 2025. the Acting Director of the Cyber Agency was appointed, while the decision on the appointment of the Agency Council was made at the session of 10 December, 2025.</p> <p>The next step will be the adoption of the Regulation on the Internal Organization and Systematization of the Agency, which will define</p>

	<p>the internal structure, key responsibilities and operational mechanisms of the newly established institution. After the adoption of the Regulation, the transfer of employees from the National CIRT will follow, in accordance with the Law on Information Security. This will ensure continuity of expertise and integration of existing capacities within the new Agency, which is crucial for its smooth start of work and further development.</p> <p>Until the adoption of the Regulation, we cannot consider that the Cybersecurity Agency is sufficiently staffed, equipped with supervisory powers, performing supervisory checks.</p> <p>Also, in accordance with the obligations arising from the Law on Information Security, the Government of Montenegro has adopted the List of Key and Important Entities.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>The completion of this step is verified through the following sources:</p> <ul style="list-style-type: none"> <li>- Proposal of Decision on the Establishment of the Cybersecurity Agency; <a href="#">Link</a></li> <li>- Proposal for the appointment of the Acting Director of the Agency for Cyber Security; <a href="#">Link</a></li> <li>- Proposal for the appointment of the president and three members of the Cyber Security Agency Council, <a href="#">Link</a></li> </ul> <p>List of Critical and Important Entities, INT. No 01-20/25 of December 2025</p>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

#### 2.4.4. Cybersecurity - Setting up a comprehensive framework for cyber resilience (introducing requirements of NIS2 Directive and strengthening relevant institutions)

<b>The step under review</b>	<i>2.4.4.4 National and governmental CIRT are operational in line with NIS2 requirements and reach at least ‘accredited’ status on TF CSIRT Trusted Introducer</i>
<b>Baseline</b>	Not established yet
<b>Deadline of the step</b>	December 2025

<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	<p>One of the key reform steps in this policy area is the establishment of the National and Government CIRTs (Computer Incident Response Team), which operate in accordance with the requirements of the NIS2 Directive.</p> <p>As per the accreditation procedure, government CIRT has already achieved agreements on support and sponsorship with partner CIRTs from Slovenia and Latvia. The procedure for obtaining the “Listed” status on the TF-CSIRT Trusted Introducer platform – which is a precondition to obtain the accredited status - is currently ongoing</p> <p>In parallel, the National CIRT will be formally transferred under the remit of the Cyber Security Agency and the National CIRT will become an integral part of its organisational structure.</p> <p>The overarching objective is that both the Government CIRT and the Agency for Cybersecurity achieve the “Accredited” status on the TF-CSIRT Trusted Introducer platform by mid-next year, thereby confirming full operational maturity and compliance with the highest international standards.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<ul style="list-style-type: none"> <li>TF-CSIRT Trusted Introducer platform: <a href="https://tf-csirt.org/trusted-introducer/directory/teams/cirtme-me/">https://tf-csirt.org/trusted-introducer/directory/teams/cirtme-me/</a></li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 3.1.1. Addressing labour market mismatches through lifelong learning and increasing the employability of graduates with practical work-based learning, including jobs in green and digital economy

<b>The step under review</b>	<i>3.1.1.3 Work-based learning in higher education: 20% of the total number of students (of which about 50% are women) benefit from substantial work-based learning with employers during their respective education.</i>
<b>Baseline</b>	[5% of total student population]

<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved.
<b>Commission assessment of results</b>	<p>The submission did not contain sufficient information required for the assessment, i.e. calculation of the percentage: Total number of students, i.e. a clear overview of the student population where work-based learning is applicable.</p> <p>Furthermore, the submission did not contain following required evidence:</p> <ul style="list-style-type: none"> <li>• Evidence related to the relevant student population,</li> <li>• Evidence that related to the reported work-based learning took place (e.g. certificates of participation or equivalent document) providing, inter alia, information on the length of the of the programme and gender of the students.</li> </ul> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>The beneficiary submitted the following evidence:</p> <ul style="list-style-type: none"> <li>• A total of 63 contracts were signed between faculty units and employers (both private and public).</li> </ul> <p>While the contracts with employers constitute necessary condition for work-based learning, they do not include all necessary data to prove achievement of the step.</p>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 3.1.1. Addressing labour market mismatches through lifelong learning and increasing the employability of graduates with practical work-based learning, including jobs in green and digital economy

<b>The step under review</b>	<i>3.1.1.4 Career Guidance and Counselling: A new model of career guidance and counselling adopted within the Strategy on Career Guidance and Counselling 2025-2030</i>
<b>Baseline</b>	Not established
<b>Deadline of the step</b>	December 2025

<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.
<b>Commission assessment of results</b>	<p>A detailed model of career guidance and counselling based on the Strategy on Career Guidance and Counselling 2025-2030 (adopted in July 2025) was developed (December 2025). The model describes how career guidance will be organised throughout the education system, including roles and responsibilities as well as clearly defined activities.</p> <p>In addition, changes in the internal organisation and job systematisation of the Ministry for Education, Science and Innovation were adopted in December 2025 to establish the Directorate for Career Guidance and Counselling within the Directorate for Career Guidance and Counselling and Strategic Planning and Management, which will be in charge to develop and implement career guidance policies and to coordinate activities between the education system, the Employment Agency and the business sector.</p> <p>Furthermore, in December 2025, the National Council for Education adopted the Framework for Career Management Skills, including the Competence Profile for Career Guidance Practitioners and the Code of Ethics for Career Guidance Practitioners. This document represents the basis for preparing training programs for career advisors, as well as for their legal and professional integration into the education system.</p> <p><b>Based on the above, the Commission considers this step as achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>The completion of this step was verified through the following sources:</p> <ul style="list-style-type: none"> <li>• Strategy for Career Guidance and Counselling 2025-2030</li> <li>• Framework for Career Management Skills</li> <li>• Model for Career Guidance and Counselling in Primary, Secondary (General and Vocational) and Higher Education in Montenegro</li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

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

<b>The step under review</b>	<i>3.1.3.1 Activation of material support beneficiaries: The Law on Social and Child Protection and accompanying by-laws amended</i>
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	<i>to enable the sequenced transition from receiving material support to labour market activation</i>
<b>Baseline</b>	The current law does not provide any incentives for beneficiaries of material support who enter the labour market
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.
<b>Commission assessment of results</b>	<p>The Law on Social and Child Protection was amended to ensure that income earned through active labour market programmes or employment (Article 31a) shall not be counted as income when determining eligibility for material support.</p> <p>Article 4 of the amendments referring to Article 31a of the Law states that "...material support shall not cease for a beneficiary during the period of participation of the individual or a family member in active labour market policy programmes, including programmes involving the establishment of an employment relationship, implemented through the Employment Service, for a duration of up to 12 months."</p> <p>The final version of the amendments to the Law deviates from the submitted version insofar as the amount of material support to which the individual or family is entitled in the submitted version is 100% of the amount of the material support which they received in the months preceding the conclusion of the employment contract (Article last paragraph) and not 50% as in the submitted version.</p> <p>These amendments eliminate an identified gap in the legal framework and represent a concrete activation incentive for working-aged beneficiaries of material support.</p> <p>Provisions in line with the amendments to the Law are introduced in the rulebooks through two bylaws, namely:</p> <ol style="list-style-type: none"> <li>1) Rulebook on detailed requirements for exercising basic material support in social and child protection OG 0/5/2026/157.</li> <li>2) Rulebook on the content and form of the individual activation plan and the manner of implementing social inclusion measures for able-bodied users of material support OG 0/5/2026/156.</li> </ol> <p>The amendments to the Law were adopted on 22 December 2025 and published in the OG 160/2026.</p> <p>The bylaws were adopted before the deadline by the Ministry on 31 December 2025 and published in the OG 5/20256.</p> <p><b>Based on the above, the Commission considers this step as achieved.</b></p>

<b>Checks performed and evidence used in the verification of the step and related findings</b>	The achievement of the step was verified in the following documents: <ul style="list-style-type: none"> <li>• Amendments to the Law on Social and Child Protection, <a href="#">OG 160/2025</a></li> <li>• Rulebook on detailed requirements for exercising basic material support in social and child protection <a href="#">OG 0/5/2026/157</a></li> <li>• Rulebook on the content and form of the individual activation plan and the manner of implementing social inclusion measures for able-bodied users of material support <a href="#">OG 0/5/2026/156</a>.</li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

### 3.2.1 Investing in all levels of education

<b>The step under review</b>	<i>3.2.1.1 Tendering procedures launched for construction or refurbishment of schools to reduce the number of shifts in most overcrowded primary schools from the current 5 to 3 shifts</i>
<b>Baseline</b>	13 out of 48 tendering procedures launched
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved
<b>Commission assessment of results</b>	Based on the information provided, there are ten reported projects directly relevant for the reduction from 4 or 5 shifts to 3 shifts in schools. Out of this, three projects are reported as completed (Štampar Makarije, Radojica Perović and Vladimir Nazor), one project has works in progress (Oktoih). For three projects (City kvart, Karabuško polje settlement, Vlado Milić) the tenders have been launched. The remaining three tenders have not been launched yet. It should be noted that for one of the tenders (Zabjelo) land ownership and legal matters have not yet been resolved. <b>Based on the above, the Commission considers this step as not achieved.</b>
<b>Checks performed and evidence used in</b>	Montenegro submitted link to the following tenders: <ul style="list-style-type: none"> <li>– Activity 1 - Design Contract school City kvart <a href="#">CeJN</a></li> </ul>

<b>the verification of the step and related findings</b>	<ul style="list-style-type: none"> <li>– Activity 2 – Desing and Works Contact for pavilion Elementary School Oktoih <a href="#">CeJN</a></li> <li>– Activity 3 – Tender publication Elementary School Karabuško polje <a href="#">378381-2025 - Competition - TED</a></li> <li>– Activity 4 – Tender Dossier for Elementary School Vlado Milić <a href="#">CeJN</a></li> <li>– Activity 5 - Works Contract Elementary School Štampar Makarije <a href="#">CeJN</a></li> </ul> <p>The Commission has also reviewed the provided <i>Supporting table for step 3.2.1.1</i> and respective narrative explanation.</p>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

**3.2.2 Digital Education: Building on the concept and curricula of the Digital Academy beyond public administration and implementing to the society at large in an organized and socially inclusive way; Implementing Education System Digitalization Strategy (2022-2027) and its related action plans**

<b>The step under review</b>	<i>3.2.2.1 2,000 teachers/participants attended training on digital competencies as per the adopted Framework on Teachers’ Digital Competences.</i>
<b>Baseline</b>	0
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.
<b>Commission assessment of results</b>	<p>As indicated in the attendance list of the trainings and the clarifications provided on 6 February 2026 (see evidence below) a total of <b>2,423 teachers</b> has completed training to strengthen digital competencies in teaching, thereby achieving the planned target of 2,000 trained teachers.</p> <p>The trainings provided are consistent with the Framework on Teachers’ Digital Competences adopted on 13 June 2025. The adopted framework is aligned with the European Framework for the Digital Competence of Educators (DigCompEdu) and covers six areas: professional engagement, use of digital resources, learning and teaching, monitoring and evaluation, empowering students and developing their digital competence. The framework also recognises the importance of artificial intelligence in education, including competencies that involve the ethical, critical</p>

	<p>and purposeful use of AI tools. The development of this document is foreseen by the Strategy for Digitization of the Education and Training System of Montenegro, as a measure from the Action Plan for 2024 and 2025, and represents the basis for planning training, improving pedagogical practice and building a digitally competent educational staff.</p> <p>The trainings covered areas such as media literacy, the use of Office 365, application of digital tools in teaching, film as a teaching resource, data protection, cybersecurity, active teaching with digital tools, teaching programming through MakeCode, as well as 3D modelling.</p> <p>During 2025, trainings were also conducted for the use of the <b>SELFIE tool</b>, through about 40 groups with approximately 530 employees, with the first round including members of SELFIE teams in schools. SELFIE (Self-reflection on Effective Learning by Fostering the use of Innovative Educational Technologies) is a free, multilingual, online tool from the European Commission designed to help schools in Europe and beyond assess how they use digital technology for teaching and learning. Within these trainings, the tool <b>SELFIE for Teachers</b> was also presented. Additionally, in cooperation with the European Training Foundation (ETF), for 2026 it is planned to conduct a survey of teachers' needs in the area of strengthening digital competencies, through group SELFIE for Teachers self-evaluation, on a sample of at least 15% of teachers in primary and secondary schools.</p> <p>Based on the evidence provided, out of the 2,423 trainings reported, 1594 are indicated as being financed by the budget. The remaining number is financed from other projects. A more detailed analysis of the double funding risk can be found below.</p> <p><b>Based on the above, the Commission considers this step as fully achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<ul style="list-style-type: none"> <li>• The Framework of Teachers' Digital Competence was adopted in June 2025 and is available on the official portal of the Government of Montenegro:</li> <li>• Attendance lists for trainings – A <a href="#">link</a> with all scanned lists as well as an Excel file containing a list of all trainings with the most important information and the names of the attendance file records</li> <li>• Clarification provided from Montenegro on 6 February 2026.</li> </ul>
<p><b>Double funding</b></p>	<p>Montenegro reported that certain costs related to some trainings (in particular the cost of trainers and refreshments) were supported by third party funding. However, in line with the Commission's interpretation presented in the double funding guidance, complementary support aimed capacity development, i.e. study</p>

	visits as well as EU or other donor paying the fees and /or travel costs of the experts/trainers providing the training is acceptable. Therefore, reported third party support does not constitute double funding.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

**4.1.1 A new, comprehensive and harmonized legal framework for conducting elections adopted by the Parliament, in accordance with European standards and existing recommendations of the Organization for Security and Cooperation in Europe (OSCE)/Office for Democratic Institutions and Human Rights (ODIHR), as well as the Council of Europe.**

<b>The step under review</b>	<i>4.1.1.1 A comprehensive review of the electoral legal framework, implementing ODIHR recommendations (2023) is adopted</i>
<b>Baseline</b>	The electoral legislation remains to be aligned following the work of the Committee on Comprehensive Electoral Reform, established by the 28th Parliament on December 28, 2023, with the aim to draft the following laws: Law on Election of Councillors and Members of Parliament; Law on Voter Register; Law on Financing of Political Entities and Election Campaigns, and Law on Registers of Permanent and Temporary Residence
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved
<b>Commission assessment of results</b>	<p>In July 2025, the Parliament adopted amendments to the Law on Election of Councillors and Members of Parliament, the Law on Financing of Political Entities and Election Campaigns, and the Law on Local Self Government, partially addressing existing OSCE/ODIHR recommendations, including oversight of campaign finance and media, improving the integrity of election administration, increasing gender quota on electoral lists and introducing an election day for local elections. With this, Montenegro fulfilled the first part of its electoral reform.</p> <p>However, to fully achieve this step, further changes are necessary to fully align Montenegro's legal framework with the EU <i>acquis</i> and European standards on inclusive, transparent and resilient electoral processes. Notably, as part of chapter 23 closing benchmarks, the Law on Financing of Political Entities and Electoral Campaigns should be further revised through a transparent and inclusive consultation process including relevant stakeholders to bring it fully in line with OSCE/ODIHR and</p>

	<p>European standards, to substantially increase transparency and control of political parties' spending. In August, Montenegro sent the three adopted laws to the Commission. In September 2025, the Commission asked for tables of concordance to assess their alignment with the <i>acquis</i>. This, however, has not happened until now.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>Montenegro provided the following evidence:</p> <ul style="list-style-type: none"> <li>• Decision on the establishment of the Committee for Comprehensive Electoral Reform</li> <li>• Decision on the election of co-presidents and members of the Committee for Comprehensive Electoral Reform</li> <li>• Decision on amendments to the Decision on the establishment of the Committee for Comprehensive Electoral Reform</li> <li>• <a href="#">Law on Financing of Political Entities and Election Campaigns (Official Gazette 81/2025)</a></li> <li>• <a href="#">Law on Election of Councillors and Members of Parliament (Official Gazette 81/2025)</a></li> <li>• <a href="#">Law on Local Self Government (Official Gazette 81/2025)</a></li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The 'grace period' runs until 31 December 2026.

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

<b>The step under review</b>	<i>4.2.1.2 Amended Constitution, in accordance with the acquis of the EU and European standards on the independence, responsibility, integrity, 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>
<b>Baseline</b>	The Constitution of Montenegro remains to be amended in line with existing recommendations of the European Commission, opinions of the Venice Commission (VC) and recommendations of the Group of States of the Anti-Corruption Council (GRECO).
<b>Deadline of the step</b>	June 2025.

<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	On 17 April 2025, the government adopted a proposal to amend the Constitution with a view to enhancing judicial independence. On 30 May 2025, the Government submitted the initiative to amend the Constitution to the Parliament. The Parliament has not yet initiated the procedure to amend the Constitution. <b>Based on the above, the Commission considers this step as not achieved.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	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 <a href="https://www.skupstina.me/">https://www.skupstina.me/</a> . Additionally, relevant announcements and transcripts of debates are reviewed to confirm whether any formal procedures for constitutional amendments have been initiated.
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 30 June 2026.

**4.3.1. Effective enforcement of legislation to combat corruption, including high-level corruption, including financial investigations and seizure and confiscation of assets, in line with the EU acquis, European and international standards, including the recommendations of the 2022 review mission, as well as recommendations of GRECO and OSCE**

<b>The step under review</b>	<i>4.3.1.1 Anti-corruption strategy/action plan implementation: Integrity tests are created and delivered in the Customs Administration and the Tax Administration – target is reaching at least 30% of staff</i>
<b>Baseline</b>	The Government of Montenegro adopted the Strategy for the fight against corruption
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.

<p><b>Commission assessment of results</b></p>	<p>In December 2025, <b>the Customs Administration</b> reached 36% of integrity-tested officers, thereby <b>achieving and exceeding the target</b>. In the period 2014-2020 Customs Administration conducted integrity tests for a total of 131 officials, which represented about 25% of the number of employees and in November 2025 the testing of additional 41 employees took place. By the end of the year 2025, out of 481 customs officers in service, a total of 172 officers, (or 35.8%) were tested.</p> <p>In December 2025, the <b>Tax Administration</b> started its Integrity testing of tax officials of the Central, Coastal and Northern regions. The total number of tested employees was 161 out of a total of 497 employees in the Tax Administration, which is 32%, or 2% more than the 30% required for this step.</p> <p><b>Based on the above, the Commission considers this step as fully achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<ul style="list-style-type: none"> <li>• Strategy for the fight against corruption 2024-2028, with Action Plan 2024-2025;</li> <li>• Government Decision No. 04-078/24-6081 from 29/10/2024 to establish the Operational team for monitoring the implementation of the Strategy for the fight against corruption 2024-2028;</li> <li>• Custom administration Decision No. 03/01-9367/2-25 from 21/07/2025 to establish the Working group for integrity tests</li> <li>• Integrity Plan of the Customs Administration for 2025-2026, which contains the Risk map of workplaces and the Risk map of organizational units and the Decision on the adoption of the Integrity Plan</li> <li>• Internal procedure for carrying out integrity tests for officials and employees of the Customs Administration (number I/1 - 14325/1 from 30/10/2025). Note: Report on the implementation of integrity tests with a detailed description of the results and proposed measures (No. 07-9367/3-25) is an internal document and not submitted as such.</li> <li>• Tax administration Decision No. br. I/1-11470/1-25, from 09/06/2025, for the establishment of Working group for integrity tests.</li> <li>• Information on the status of implementation of the activities according to the Reform Agenda for Montenegro 2024-2027, No. 05/074/25-5868 from 29 December 2025 by the National Council for the fight against corruption.</li> </ul>
<p><b>Double funding</b></p>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>

<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>
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**4.3.1. Effective enforcement of legislation to combat corruption, including high-level corruption, including financial investigations and seizure and confiscation of assets, in line with the EU acquis, European and international standards, including the recommendations of the 2022 review mission, as well as recommendations of GRECO and OSCE**

<b>The step under review</b>	<i>4.3.1.2 increase by 20% of filling in vacant positions - in accordance with the Rulebook on the internal organization and systematization of positions - in competent courts for the fight against corruption</i>
<b>Baseline</b>	60 civil servants employed in Courts
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.
<b>Commission assessment of results</b>	<p>The Report of the Judicial Council (<i>see below evidence submitted</i>) states that in the courts competent for combating the fight against corruption, namely the High Court in Podgorica - Special Department for Combating Organized Crime, Corruption, War Crimes and Terrorism (13 advisors and 19 clerks) and Bijelo Polje (3 clerks), the Court of Appeal of Montenegro - Criminal Department (4 advisors and 6 clerks), and the Supreme Court of Montenegro - Criminal Department (3 advisors and 5 clerks), a total of 53 civil servants and employees are employed, assisting judges in their work on criminal cases.</p> <p>According to the gathered data from the presidents of basic courts across the country, the number of advisors was 21 and clerks 30. Therefore, <b>a total of 51 civil servants and employees are employed in positions to assist judges in their work on criminal cases and therefore in cases with elements of corruption within the jurisdiction of these courts.</b></p> <p>Total number of advisors and clerks in all courts (including Basic Courts) is 104, which is an <b>increase of around 73% in comparison with the baseline.</b></p> <p>The number of employees in courts is determined in accordance with the accordance with the <i>Rulebook on framework workload criteria for determining the required number of judges and civil servants and state employees in courts</i> (Official Gazette of Montenegro, Nos. 017/15 of 17 April 2015, 015/18 of 9 March 2018, 037/23 of 31 March 2023, and 039/23 of 7 April 2023)</p>

	<p>The filling of civil service positions in courts falls within the competence of each individual court, on the basis of the rulebook on internal organisation and job classification and in accordance with the procedure prescribed by law. (Source: information paper Ref. No.: 01-9227/25)</p> <p><b>Based on the evidence submitted, the Commission considers this step as fully achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	Judicial Council Report No. 01-9227/25 from 12 December 2025 on filled judicial positions, based on the data provided by court presidents on the number of relevant staff positions.
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

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

<b>The step under review</b>	<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>
<b>Baseline</b>	Instruction manual in preparation
<b>Deadline of the step</b>	December 2024
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.

<p><b>Commission assessment of results</b></p>	<p><i>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 case in line with relevant articles of the Istanbul Convention on preventing and combating violence against women and domestic violence.</i></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.</p> <p>The Guidelines issued by the Supreme State prosecutor on 11 October 2024, already yield some positive results with significant increase of qualification of the reported gender-based violence cases as criminal rather than misdemeanour acts (70% compared to 30%), which was not the case before, more efficient processing of reported cases as majority of victims have hearing within 48 hours after reporting the case, presence of children as witnesses is also taken into account. There is also an increase in reported cases of gender-based violence, which could also mean the increase in trust in prosecution, from 421 cases in the first quarter, then 441, to 519 cases reported in the third quarter, since the adoption of the Guidelines. Monitoring reports submitted by the coordinator in the Supreme State Prosecutor office show more thorough monitoring and reporting on reported and processed cases of gender-based violence, combined in quarterly reports based on the data submitted by all basic prosecutorial offices.</p> <p><i>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></p> <p>In December 2025, the Supreme Court of Montenegro adopted Standard operating procedures for the sentencing in cases of sexual and gender-based violence, in line with the new Criminal Code. Standard operating procedures for sentencing or Guidelines, make relevant reference to international standards and conventions, EU directives and national law, as well as the case law of the European Court of Human Rights. It also outlines aggravating and mitigating circumstances which should be taken into account when sentencing in cases of sexual and gender-based violence.</p> <p><b>Based on the above, the Commission considers this step as fully achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the sources of verification, the following evidence was provided:</p> <ul style="list-style-type: none"> <li>• First report (from January 2025) from the coordinator to the Ministry of Justice.</li> <li>• Excel table of background data which indicates that aspects of the guidelines have been considered.</li> </ul>

	<ul style="list-style-type: none"> <li>• Second and third monitoring reports of the prosecution, covering the period from 1 April to 30 June 2025 and 1 July until 30 September 2025 respectively</li> <li>• Standard operating procedures (Guidelines) for the sentencing in cases of sexual and gender-based violence adopted by the Supreme Court of Montenegro</li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

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

<b>The step under review</b>	<i>4.4.1.2 The Unique Database on Domestic Violence includes at least 95% domestic violence cases reported to the police or to the social welfare offices; Montenegro delivers on the GREVIO/Istanbul convention recommendations to put in place three Crisis Centers for victims of sexual violence in line with the standards outlined in the convention (i.e. integrated health, legal and psychological services for victims)</i>
<b>Baseline</b>	75% of domestic violence cases reported and 0 Crisis Centers
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	<p><i>The Unique Database on Domestic Violence includes at least 95% domestic violence cases reported to the police or to the social welfare offices</i></p> <p>Beneficiary reports improvement in the technical set-up of the unique database on domestic violence, however, previous problems refer to limited data entered by the police, that is gender-based violence cases reported to them. Update on how many reported gender-based violence cases are entered in the database by the police and social welfare centres is needed.</p> <p><i>Montenegro delivers on the GREVIO/Istanbul convention recommendations to put in place three Crisis Centers for victims of sexual violence in line with the standards outlined in the convention (i.e. integrated health, legal and psychological services for victims)</i></p> <p>Moreover, there are no developments regarding the second part of the step, that is, establishment of three crisis centres for the victims of sexual violence</p>

	<b>Based on the above, the Commission considers this step as not achieved.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	The beneficiary has provided the following evidence: <ul style="list-style-type: none"> <li>– Screenshot proving the existence and functionality of the Unified Database on Domestic Violence;</li> <li>– Letter of the minister confirming the relevance of the data.</li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

#### 4.4.2 Effective implementation of the Law on Protection of Equality and Prohibition of Discrimination

<b>The step under review</b>	<i>4.4.2.1 Decreased number of complaints before the Ombudsperson and Decreased number of incidents reported by LGBTIQ CSOs (December 2025)</i>	
<b>Baseline</b>	243 complaints in year 2023. 124 incidents in year 2023	
<b>Deadline of the step</b>	December 2025	
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.	
<b>Commission assessment of results</b>	Based on the Report of the Ombudsman Office for 2024, one can observe a <b>downward trend</b> in 2024 and during the first months of 2025 compared to 2023 in the number of complaints submitted to the Protector of Human Rights and Freedoms.	
	<b>2023</b>	<b>2024</b>
	243 complaints	211 complaints
	124 incidents	102 incidents
	In 2024, the number of complaints was 211, <b>13.17% less compared to 2023</b> , when the number was 243. In 2023, the Ombudsman reported on cases before the Misdemeanor Courts prosecuted under the Law on Public Order and Peace where the basis was sexual orientation/LGBTIQ: 69 in Podgorica, 30 in Budva, and 25 in Bijelo Polje (together: 124 cases). In 2024, the Ombudsman’s report states 71 cases before the court in Podgorica, 17 in Budva, and 14 in Bijelo Polje (under	

	<p>the Law on Public Order and Peace where the basis was sexual orientation/LGBTIQ) (total: 102 cases).</p> <p>Additionally, the Ombudsman also reports 13 cases under the Anti-Discrimination Law on the basis of sexual orientation/LGBTIQ in 2023, and 7 cases in 2024.</p> <p>In 2024, the number of incidents/cases reported was 102, <b>17.7% less compared to 2023</b>. With cases based on the Discrimination Law the total number of incident/cases dropped from 135 to 109 (by 19.3%)</p> <p>As the new Anti-Discrimination law was adopted only in late December 2025, the decrease in 2026 is expected to be even higher.</p> <p><b>Based on the evidence submitted, the Commission considers this step as fully achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p><a href="#">Report of the Ombudsman Office for 2024</a></p> <p><a href="#">Report of the Ombudsman Office for 2023</a></p>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>

#### 4.4.3. Effective implementation of the recommendations of the European Committee for the Prevention of Torture and inhuman or degrading treatment or punishment (CPT)

<b>The step under review</b>	<i>4.4.3.1 Action by authorities on alleged cases of ill-treatment of detained persons through police forces and on complaints by prisoners (December 2025)</i>
<b>Baseline</b>	<p>2023:</p> <ul style="list-style-type: none"> <li>- 117 internal controls;</li> <li>- 9 disciplinary proceedings against 10 officers of the Administration for the Execution of Criminal Sanctions (AECS);</li> <li>- 3 cases of illegal treatment of police officers in official premises;</li> <li>- 8 suspended police officers;</li> <li>- 11 complaints related to the prohibition of torture and cruel and inhuman or degrading treatment or punishment.</li> <li>- 0 number of convictions</li> </ul>
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.

<p><b>Commission assessment of results</b></p>	<p><u>Internal controls</u>: the Commission assessed the data from the <i>Annual Report on the work of the Ministry of Internal Affairs and the Police Administration 2024</i>. In 2024, MoI carried out 32 internal controls (page 4), a <b>drastic decrease compared to 2023</b> (117).</p> <p><u>Disciplinary proceedings against AECS officers</u>: the Commission assessed the data from the <i>Annual Report on Work and Conditions in Administrative Areas of the Administration for the Execution of Criminal Sanctions for 2024</i>. In 2024, AECS initiated 14 proceedings against 14 AECS officers, a <b>decrease compared to 2023</b> (9 disciplinary proceedings against 10 AECS officers).</p> <p><u>Cases of illegal treatment of police officers in official premises</u>: the Commission assessed the data from the <i>Annual Report on the Work of the Ministry of Internal Affairs and the Police Administration 2024</i> and no sufficient evidence was provided.</p> <p><u>Suspension of police officers</u>: the Commission assessed the data from the <i>Annual Report on the work of the Ministry of Internal Affairs and the Police Administration 2024</i> as well as no sufficient evidence was provided.</p> <p><u>Complaints related to the prohibition of torture and cruel and inhuman or degrading treatment or punishment</u>: the Commission assessed the data from the <i>Annual Report on the Work of the National Preventive Mechanism 2024</i> and no sufficient evidence was provided.</p> <p><u>Number of convictions</u>: The necessary evidence is missing, i.e. the quoted data from the Judicial Council of Montenegro on judicial proceedings were not submitted as evidence.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>The Beneficiary has submitted the following evidence:</p> <ul style="list-style-type: none"> <li>- Annual Report on the Work of the Ministry of Internal Affairs and the Police Administration 2024;</li> <li>- Annual Report on Work and Conditions in Administrative Areas of the Administration for the Execution of Criminal Sanctions for 2024;</li> <li>- Annual Report on the Work of the National Preventive Mechanism 2024;</li> </ul>
<p><b>Double funding</b></p>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p><b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.</p>

#### 4.4.3. Effective implementation of the recommendations of the European Committee for the Prevention of Torture and inhuman or degrading treatment or punishment (CPT)

<b>The step under review</b>	<i>4.4.3.2 All remand prisoners enjoy a comprehensive regime of out-of-cell structured activities (work, vocation, education, recreation and sport) (December 2025)</i>
<b>Baseline</b>	an average of 300 persons (convicted or detained) were employed every month during 2023;
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	The Commission assessed the data from the <i>Annual Report on Work and Conditions in Administrative Areas of the Administration for the Execution of Criminal Sanctions for 2024</i> . On page 17, it is stated that in 2024, on an average monthly basis 16 detainees in Podgorica and 14 in Bijelo Polje were employed, a <b>decrease compared to 2023</b> (average of 300 convicted or detained persons employed every month).  <b>Based on the above, the Commission considers this step as not achieved.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	The Beneficiary submitted the following evidence: Annual Report for 2024 of the Administration for the Execution of Criminal Sanctions
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

#### 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.

<b>The step under review</b>	<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>
<b>Baseline</b>	The number of databases (9) accessible to the Special State Prosecutor’s Office (SPO)

<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	<p>In order for this step to be considered as achieved, the SPO should be granted access to 13 databases. At the moment of adoption of the Reform Agenda, SPO had access to nine databases. 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), and to the requested database of the Revenue Administration, including an overview of issued and received invoices for legal entities - fiscalisation (in June 2025).</p> <p>However, for the Commission to consider the step achieved, SPO should also be granted access to the following additional two databases:</p> <p><b>Central Bank of Montenegro</b> – 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><b>Cadastre and State Property Administration</b> – 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><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	In line with the sources of verification, the following evidence was provided: Annual report of the Special Prosecutor Office for 2024.
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 30 June 2026.

#### 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

<b>The step under review</b>	<i>4.6.1.1 Montenegro reaches interoperability between its systems and databases used in the current visa approval system</i>
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<b>Baseline</b>	Interoperability between the system is not established.
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as partially achieved.
<b>Commission assessment of results</b>	While Montenegro reports progress in achieving interoperability between the IT systems used in the current visa issuance system, the interoperability between databases has not been achieved. <b>Based on the above, this step cannot be considered as achieved.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was submitted.
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

#### 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

<b>The step under review</b>	<i>4.6.1.3 a)3a Terminating visa-free agreements with countries (at least one per year) which are visa required for the EU.</i>
<b>Baseline</b>	Visa policy not aligned for 11 countries.
<b>Deadline of the step</b>	December 2024
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.
<b>Commission assessment of results</b>	The baseline for the assessment of this step was 11 countries visa-required for the EU that were visa-free for Montenegro. Subsequently, Montenegro added Bahrain (December 2024) and Uzbekistan (February 2025) to the list of visa-free countries while the EU added visa requirements for Vanuatu (May 2024). In order to achieve this Reform Agenda step, Montenegro therefore had to remove three countries (one as per the formulation of the step – at least one per year - and two that were added later on), bringing the number of countries to 10.  By the end of 2025, Montenegro removed five countries, i.e. Armenia, Egypt, Kuwait, Uzbekistan and Vanuatu from its visa-free list, resulting in exempting nationals from eight third countries from

	<p>short-term visa requirements – eight permanently (Azerbaijan, Bahrain, Belarus, China, Qatar, Russia, Saudi Arabia and Türkiye) and one (Kazakhstan) on a seasonal basis.</p> <p>Montenegro reported adopting the government decision on the termination of the visa exemption for Azerbaijan in December 2025; however, as the entry into force of this measure was in January 2026, this country cannot be considered eligible in the context of this assessment.</p> <p>In conclusion, Montenegro’s alignment gap decreased from 11 countries to 9 countries.</p> <p><b>Based on the above, the Commission considers this step as achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<ul style="list-style-type: none"> <li>• <b>Official Gazette of Montenegro, No. 13/2025</b></li> <li>• Decision on temporary exemption from obtaining a visa for citizens of the Republic of Kazakhstan – ended on 1.11.2025.</li> <li>• <a href="https://www.sluzbenilist.me/propisi/D617E182-3EB8-4121-A8CF-EBE2DBC0D39B">https://www.sluzbenilist.me/propisi/D617E182-3EB8-4121-A8CF-EBE2DBC0D39B</a></li> <li>• <b>Official Gazette of Montenegro, No. 119/2025</b></li> <li>• Decision on amending the Decision on temporary exemption from obtaining a visa for citizens of the Republic of Armenia – ended on 29.10.2025.</li> <li>• <a href="https://www.sluzbenilist.me/propisi/F9659B3D-684B-404F-B52F-92C32D2BD8A1">https://www.sluzbenilist.me/propisi/F9659B3D-684B-404F-B52F-92C32D2BD8A1</a></li> <li>• Decision on amending the Decision on temporary exemption from obtaining a visa for citizens of the Republic of Uzbekistan – ended on 29.10.2025.</li> <li>• <a href="https://www.sluzbenilist.me/propisi/33BF28AC-B92A-4A4B-B5C6-B99797CA72D6">https://www.sluzbenilist.me/propisi/33BF28AC-B92A-4A4B-B5C6-B99797CA72D6</a></li> <li>• Decision on amending the Decision on temporary exemption from obtaining a visa for citizens of the Arab Republic of Egypt – ended on 29.10.2025.</li> <li>• <a href="https://www.sluzbenilist.me/propisi/9E5E5C8B-5848-4B2B-9CDD-11A1231E6984">https://www.sluzbenilist.me/propisi/9E5E5C8B-5848-4B2B-9CDD-11A1231E6984</a></li> <li>• Regulation amending the Visa Regulation – Kuwait and Nauru</li> <li>• <a href="https://www.sluzbenilist.me/propisi/065A7B0F-ADD7-41B8-8EB9-EEC1102B38FC">https://www.sluzbenilist.me/propisi/065A7B0F-ADD7-41B8-8EB9-EEC1102B38FC</a></li> <li>• <b>Official Gazette of Montenegro, No. 154/2025</b></li> <li>• Regulation amending the Visa Regulation – Azerbaijan</li> <li>• <a href="https://www.sluzbenilist.me/propisi/77BFA506-7AFF-4135-94AE-2FB437654718">https://www.sluzbenilist.me/propisi/77BFA506-7AFF-4135-94AE-2FB437654718</a></li> </ul>
<p><b>Double funding</b></p>	<p>No contributions from third parties were reported in support of the achievement of this step.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p><b>Fully achieved.</b></p>

**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**

<b>The step under review</b>	<i>4.6.1.3 b) 3b Terminating visa-free agreements with countries (at least one per year) which are visa required for the EU.</i>
<b>Baseline</b>	Visa policy not aligned for 11 countries.
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as fully achieved.
<b>Commission assessment of results</b>	<p>The baseline for the assessment of this step was 11 countries visa-required for the EU that were visa-free for Montenegro. Subsequently, Montenegro added Bahrain (December 2024) and Uzbekistan (February 2025) to the list of visa-free countries while the EU added visa requirements for Vanuatu (May 2024). In order to achieve this Reform Agenda step, Montenegro therefore had to remove four countries (one as per the formulation of this step, one as per formulation of the step due by 2024 and two that were added later on), bringing the number of countries to 9.</p> <p>By the end of 2025, Montenegro removed five countries, i.e. Armenia, Egypt, Kuwait, Uzbekistan and Vanuatu from its visa-free list, resulting in exempting nationals from eight third countries from short-term visa requirements – eight permanently (Azerbaijan, Bahrain, Belarus, China, Qatar, Russia, Saudi Arabia and Türkiye) and one (Kazakhstan) on a seasonal basis.</p> <p>Montenegro reported adopting the government decision on the termination of the visa exemption for Azerbaijan in December 2025, however, as the entry into force of this measure was in January 2026, this country cannot be considered eligible in the context of this assessment.</p> <p>In conclusion, Montenegro’s alignment gap decreased from 11 countries to 9 countries.</p> <p><b>Based on the above, the Commission considers this step as achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<ul style="list-style-type: none"> <li>• <b>Official Gazette of Montenegro, No. 13/2025</b></li> <li>• Decision on temporary exemption from obtaining a visa for citizens of the Republic of Kazakhstan – ended on 1.11.2025.</li> <li>• <a href="https://www.sluzbenilist.me/propisi/D617E182-3EB8-4121-A8CF-EBE2DBC0D39B">https://www.sluzbenilist.me/propisi/D617E182-3EB8-4121-A8CF-EBE2DBC0D39B</a></li> <li>• <b>Official Gazette of Montenegro, No. 119/2025</b></li> <li>• Decision on amending the Decision on temporary exemption from obtaining a visa for citizens of the Republic of Armenia – ended on 29.10.2025.</li> <li>• <a href="https://www.sluzbenilist.me/propisi/F9659B3D-684B-404F-B52F-92C32D2BD8A1">https://www.sluzbenilist.me/propisi/F9659B3D-684B-404F-B52F-92C32D2BD8A1</a></li> </ul>

	<ul style="list-style-type: none"> <li>• Decision on amending the Decision on temporary exemption from obtaining a visa for citizens of the Republic of Uzbekistan – ended on 29.10.2025.</li> <li>• <a href="https://www.sluzbenilist.me/propisi/33BF28AC-B92A-4A4B-B5C6-B99797CA72D6">https://www.sluzbenilist.me/propisi/33BF28AC-B92A-4A4B-B5C6-B99797CA72D6</a></li> <li>• Decision on amending the Decision on temporary exemption from obtaining a visa for citizens of the Arab Republic of Egypt – ended on 29.10.2025.</li> <li>• <a href="https://www.sluzbenilist.me/propisi/9E5E5C8B-5848-4B2B-9CDD-11A1231E6984">https://www.sluzbenilist.me/propisi/9E5E5C8B-5848-4B2B-9CDD-11A1231E6984</a></li> <li>• Regulation amending the Visa Regulation – Kuwait and Nauru</li> <li>• <a href="https://www.sluzbenilist.me/propisi/065A7B0F-ADD7-41B8-8EB9-EEC1102B38FC">https://www.sluzbenilist.me/propisi/065A7B0F-ADD7-41B8-8EB9-EEC1102B38FC</a></li> <li>• <b>Official Gazette of Montenegro, No. 154/2025</b></li> <li>• Regulation amending the Visa Regulation – Azerbaijan</li> <li>• <a href="https://www.sluzbenilist.me/propisi/77BFA506-7AFF-4135-94AE-2FB437654718">https://www.sluzbenilist.me/propisi/77BFA506-7AFF-4135-94AE-2FB437654718</a></li> </ul>
<b>Double funding</b>	No contributions from third parties were reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved.</b>