

ANNEX

to the Commission Implementing Decision approving the first release of funds to Montenegro under the Reform and Growth Facility for the Western Balkans

Assessment of the Conditions for Payments – Montenegro

1. EC 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. 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 address 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 Recommendation¹.

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 need yet to be consistently enforced and fully implemented. This concerns in particular the independence of the public broadcaster RTCG and the Agency for Audiovisual Media Services.

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

The legislation on the prevention and fight against corruption is in place. Montenegro adopted a new Law on prevention of corruption, with the aim to align it with European standards, in June 2024. 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 prosecution services and courts must yet substantially improve the effective enforcement of the criminal legislation.

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

Respect for all human rights obligations

The legislative and institutional framework on fundamental rights is largely 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. EC assessment of the general conditions for payments

a) Assessment of the macro financial stability

Montenegro's real GDP growth slowed down to 3% in 2024 from 6.3% in 2023. Economic expansion was driven by strong increase in private consumption and recovering investment. Growth in private consumption was supported by rising wages and pensions (the latter boosted by a large increase in minimum pensions), while easing monetary conditions and higher public capital spending fostered investment. The main headwind came from contracting exports of goods and weak tourism-related services following an extraordinary performance in 2022-2023. The average annual inflation slowed down to 3.3% in 2024, down from 8.6% in 2023 and is expected to hover around this level in 2025. The budget deficit deteriorated to 3.2% of GDP in 2024 from 2023 year's surplus of 0.6% of GDP and is expected to widen again to 3.9% in 2025 on the back of newly adopted Europe Now 2.0 measures. The general government gross debt-to-GDP ratio increased to 61.3% by end-2024 from 59.3% in 2023 and is projected to decline to 60.2% in 2025. Good economic performance in 2023 and 2024 supported strong growth of budget revenue, but the new policy measures, which entered into force in October 2024, are expected to weaken budget revenue and raise spending, if not accompanied by additional offsetting measures. The current account deficit increased to 17.3% of GDP in 2024 from 11.4% in 2023 due to a broad-based fall in exports and it was financed by net foreign direct investment (FDI) inflows and reserves. New fiscal and debt strategies have been adopted at the end of 2024. The 2025 budget was adopted in February 2025. The labour market situation improved in both 2023 and 2024, bringing the average unemployment rate to a historic low of 11.6% in 2024, but structural problems (the integration into the job market of youth, women, long-term unemployed) and regional disparities persist. The banking sector remains well capitalised and liquid.

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

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

Public financial management is broadly in place, while the Public Administration Reform strategy 2022-2026 and the Public Finance Reform Programme 2022-2026 aim to address the identified weaknesses in a comprehensive and structured way, with progress registered during 2024 as highlighted in the PFM monitoring report. One of the key reform objectives is to address managerial accountability and increase delegation of authority to middle management. New mid-term fiscal strategy and a new debt strategy and the law on budget inspection were adopted at the end of 2024. The Fiscal Council, established in 2024, will become functional once the Parliament selects its members. The government made efforts to improve the management of the capital budget by setting up the Public Investments Council in January 2024, to improve planning and implementation of public infrastructure projects. However, no independent appraisal of large capital investment projects is yet in place. In February 2024 the government published an official list of 50 state-owned enterprises at central level, with basic data about their financial performance. Several measures are still necessary to improve the medium-term budgetary framework. These include enhancing the budgetary system, improving the IT system for budget planning and introducing a centralised payroll calculation system to ensure better control and a more efficient management of spending on public wages.

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

c) Assessment of the transparency and oversight of the budget

Budget Transparency

Montenegro publishes key fiscal and budgetary documents in a timely manner - including the budget proposal, adopted budget and budget execution reports - ensuring budget transparency. However, the amount of information poses difficulties for timely scrutiny in the Parliament. The Law on Budget and Fiscal Responsibility regulates the function of budget inspection. A system of internal controls is in place and functioning in a decentralised manner, with significant coverage of the public sector. It is generally assessed as robust and functional but requires further support from senior management of public sector institutions. Concerning financial management control, the Budgetary Inspection is proactively publishing all its findings. Public participation in the budget process and the Parliament's oversight of the budget needs to be improved. In the 2024 budget, Montenegro made progress in introducing the elements of gender-responsive budgeting.

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

The general conditions are confirmed as met.

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

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

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

The step under review	<i>1.1.1.1 Keeping a publicly available and up to date register of SOEs and companies with State’s participation, including municipal companies. The register should be regularly updated with all relevant data on the financial performance of SOEs [liquidity, profitability, solvency], as well as the data on results of external audits.</i>
Baseline	Not established (i.e.: register not established)
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.
Commission assessment of results	The Ministry of Finance posted on its webpage updated versions of two registers in February 2025, containing information on 50 SOEs supervised centrally (at the government level) and on 124 local (municipal) level SOEs. The registers are in the form of Excel documents. The Excel file on the government-level SOEs contains data on enterprises’ financial performance with key indicators on liquidity, profitability and solvency, and information on external audits, where data were available. The register of municipal companies contains cumulative list of enterprises per municipality with key data on their financial performance (total assets, liabilities, capital, revenues, EBIT and net results for 2021, 2022 and 2023) and number of employees.
Checks performed and evidence used in the verification of the step and related findings	Registers can be accessed at the official web page of the Ministry of Finance: <ul style="list-style-type: none"> - https://www.gov.me/clanak/registar-javnih-preduzeca-i-privrednih-drustava-u-vecinskom-vlasnistvu-drzave-2 - https://www.gov.me/clanak/registar-privrednih-drustava-na-lokalnom-nivou
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

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

<p>The step under review</p>	<p><i>1.1.2.1 Inter-governmental agreements and third-country contracts. The level of transparency regarding all projects [completed, ongoing and future contracts] contracted under intergovernmental agreements is increased by introducing and making publicly available project-specific information in the e-procurement system. The following elements should be available:</i></p> <ul style="list-style-type: none"> • <i>Name of the project</i> • <i>Procurement contract value</i> • <i>Basic procurement contract information</i> • <i>Contracting authority</i> • <i>Main contractor</i> • <i>Procurement procedure followed</i> • <i>State of play of the project according to an established project management methodology.</i> • <i>Studies and public consultations made, including impact on environment and other technical surveys, cost-benefit and feasibility studies.</i> • <i>Information on how EU standards have been respected, including the principles of transparency and equal treatment in public procurement</i>
<p>Baseline</p>	<p>Not accomplished [text as in the Reform Agenda/Annex I]</p>
<p>Deadline of the step</p>	<p>December 2024</p>
<p>Conclusion of the review of the step by the beneficiary</p>	<p>The beneficiary considers this step as fully achieved.</p>
<p>Commission assessment of results</p>	<p>The reform step has been achieved and most of the required information and documents on the past and ongoing intergovernmental projects (in practice, Bar-Boljare Highway) are publicly available at the web page of the e-procurement system:</p> <ul style="list-style-type: none"> - https://cejn.gov.me/AttachedReports <p>A part of the remaining information concerning the previously concluded agreement on the first section of Bar-Boljare Highway is available at the webpage of the Ministry of Transport and the Maritime Affairs:</p> <ul style="list-style-type: none"> - https://www.gov.me/mpo/auto-put-bar-boljare <p>To facilitate access to information on future government to government agreements and projects, the e-procurement system software has been upgraded and allows for the direct publication of the contract information and supporting documentation directly in the system.</p> <p>Note: The nature of the step is such that it requires continuous monitoring since new G2G contracts may be concluded and it is necessary that those are subjected to the same rules of transparency.</p>

Checks performed and evidence used in the verification of the step and related findings	<p>The web page providing required information is publicly available and has been reviewed under this link:</p> <ul style="list-style-type: none"> - https://cejn.gov.me/AttachedReports <p>Additional verification will be possible with the Annual Report on Public Procurement for 2024, which is expected to be adopted by 31 May 2025.</p> <p>Other documents under competence of a different ministry (Ministry of Transport and Maritime Affairs) have been reviewed at this link:</p> <ul style="list-style-type: none"> - https://www.gov.me/mpo/auto-put-bar-boljare
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

1.1.4. Improving e-cadastre and spatial planning

The step under review	<i>1.1.4.1. Adopting the Spatial Plan of Montenegro (by the Parliament)</i>
Baseline	Draft Proposal for the Spatial Plan of Montenegro prepared
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as not achieved.
Commission assessment of results	<p>The adoption of the Spatial Plan of Montenegro is conditional upon the adoption of two key pieces of legislation – the Law on Spatial Planning and the Law on Construction of Buildings. Both laws were adopted by the Government on 19 December 2024 (https://www.gov.me/en/article/press-release-from-the-62nd-cabinet-session) and subsequently by the Parliament on 28 February 2025 (https://www.skupstina.me/en/articles/sitting-of-third-extraordinary-session-in-2025-ends). The preparation of the plan already began in 2018, with all horizontal procedures completed, including a 90-day public consultation, publication of the consultation report, and the issuance of a positive opinion by the Advisory Board, with the requirement to consider additional comments. In line with the legal procedure, the proposal of the Spatial Plan was submitted to state institutions and municipalities for comments on 30 December 2024, with a subsequent deadline extension until 14 February 2025. The adoption of the Spatial Plan of Montenegro by the Parliament is expected in the second quarter of 2025.</p>

Checks performed and evidence used in the verification of the step and related findings	A desk review was conducted to monitor the key process steps. However, the Spatial Plan has not yet been adopted, hence has not yet been published in the Official Gazette.
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 31 December 2026.

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

The step under review	<i>1.1.5.1 Improving integrity in the inspection services. Obligatory annual asset declaration and conflict of interest declaration for the inspectors introduced and subject to checks by the Anti-Corruption Agency</i>
Baseline	Pursuant to the provisions of Article 6a of the Law on Tax Administration, tax inspectors continuously submit annual reports on assets and income to the Anti-Corruption Agency. According to the Rulebook on Internal 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. [text as in the Reform Agenda/Annex I]. The baseline for custom inspectors is 111.
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.
Commission assessment of results	<p>According to Montenegro, no reform activities or legal changes were initiated for this reform step between the initial date of submission of the Reform Agenda (13 May 2024) and the reporting cut-off date (28 February 2025).</p> <p>Montenegro reported, however, that it has fulfilled this reform step on the basis of legal provisions and reporting rules that were already in force and applied to tax and customs inspectors <i>before</i> the Reform Agenda of Montenegro was negotiated and adopted.</p> <p>For the reform step to be achieved, Montenegro should fulfil the following activities outlined in the Reform Agenda:</p> <ol style="list-style-type: none"> a) Extending the obligation to report on assets and income to all categories and ranks of authorised customs officers - Montenegro confirmed that this is not implemented;

	<p>The following categories of customs officers in the Customs Administration still need to be covered by the asset reporting obligations: Manager of the customs office; Head of department; Head of service; Head of branch; Assistant head of branch.</p> <p>b) Implementing the security background checks on the employment of customs officials, in line with the existing, but not implemented provision of the Law on Customs Service - Montenegro did not provide any information on this commitment.</p> <p>As per Montenegro's reporting on conflict-of-interest declarations, Montenegro refers primarily to the ethical code of conduct for civil servants and state employees, which, however, appears not to be a legally binding instrument enforced by the civil and penal law, but just an administrative document. It is also unclear if the conflict-of-interest declarations are subject to any checks by the Anti-Corruption Agency, as requested by the reform step.</p>
Checks performed and evidence used in the verification of the step and related findings	<p>Montenegro's report self-assessing the achievement of the steps has been thoroughly reviewed. Moreover, additional clarifications were requested from the beneficiary, who provided answers to most of the Commission's points.</p> <p>The analysed documents confirm that no reform activities took place within the inspection services.</p>
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The 'grace period' runs until 31 December 2026.

2.1.1. Full implementation of the electricity integration package

The step under review	<i>2.1.1.1 Complete transposition of the electricity integration package in line with the Energy Community requirements and continue its implementation</i>
Baseline	Partially aligned
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step partially achieved.
Commission assessment of results	The step is in progress but not completed. The transposition of the Energy Community Electricity Package in Montenegro is set to be achieved through the adoption of the new Law on Energy and the Law on Cross Border Exchange of Electricity and Natural Gas. The new Law on Energy was adopted by the Parliament on 17 March 2025, while the Law on Cross Border Exchange of Electricity and Natural Gas is undergoing public consultation and remains to be adopted.

Checks performed and evidence used in the verification of the step and related findings	<p>Law on Energy published on the “Official gazette No 28/2025” of 19.03.2025:</p> <ul style="list-style-type: none"> - http://sluzbenilist.me/pregled-dokumenta-2/?id={64F3E28A-1501-407C-91D6-C8E949DE7C5C} <p>The status of the Law on Cross Border Exchange of Electricity and Natural Gas is covered by Montenegro’s official reporting for the Reform Agenda (the first semi-annual implementation report), written contribution for the Transport, environment, energy and regional development (TEER) sub-committee meeting and regular policy dialogue with the Ministry of Energy.</p>
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 31 December 2026.

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

The step under review	<i>2.1.2.1 Phase out of public intervention in the price-setting for the supply of electricity in line with Article 5 of the Directive 2019/944 on common rules for the internal market for electricity</i>
Baseline	Partially aligned
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as partially achieved.
Commission assessment of results	<p>The step is set to be introduced and regulated as part of the new Law on Energy, transposing Directive (EU) 2019/944.</p> <p>While this Law has been adopted by the Parliament in the meantime, this was done only on 17 March 2025, thus after the deadline set for the step.</p>
Checks performed and evidence used in the verification of the step and related findings	<p>Publication of the Law on Energy on the “Official gazette No 28/2025” of 19.03.2025:</p> <ul style="list-style-type: none"> - http://sluzbenilist.me/pregled-dokumenta-2/?id={64F3E28A-1501-407C-91D6-C8E949DE7C5C}
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 31 December 2026.

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

The step under review	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)
Baseline	Partially aligned
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.
Commission assessment of results	<p>The Law on the Use of Energy from Renewable Sources was adopted by the Parliament on 23 August 2024. The full alignment of the law with the REDII directive has been confirmed by the Energy Community Secretariat:</p> <ul style="list-style-type: none"> - https://www.energy-community.org/news/Energy-Community-News/2024/08/26.html <p>The step also requires a regulatory framework for prosumers and streamlining of permit-granting procedures, including the designation of a single contact point. Those elements are either prescribed by the adopted law or the guide on permitting procedures for the construction of renewable energy power plants, issued in December 2024.</p> <ul style="list-style-type: none"> - https://cotee.me/pages/vodic <p>While the above-mentioned law is aligned with the REDII Directive and the regulatory framework (for prosumers and for permitting-granting procedures) is in place, the implementing legislation required for full alignment with the REDII Directive has not been adopted (activity 1.2 related to this step). Such implementing legislation is also required from EU Member States to achieve full compliance with the directive. This is also a requirement under the second closing benchmark under Chapter 15 in Montenegro’s accession negotiations. To note that activities 1.3 and 1.4 related to this step are inconsistent with requirements which are foreseen in subsequent steps (2.3.2.2 and 2.3.2.3, planned for June 2025 and June 2026 respectively). These activities have not been completed.</p>
Checks performed and evidence used in the verification of the step and related findings	<p>Publication of the Law on the Use of Energy from Renewable sources on the “Official gazette No 82/2024” of 23.08.2024:</p> <ul style="list-style-type: none"> - https://me.propisi.net/zakon-o-korisecnju-energije-iz-obnovljivih-izvora/ <p>Publication of the opinion of the Energy Community secretariat on law alignment:</p> <ul style="list-style-type: none"> - https://www.energy-community.org/news/Energy-Community-News/2024/08/26.html <p>Publication of the Guide on permitting procedures:</p> <ul style="list-style-type: none"> - https://cotee.me/pages/vodic <p>Policy dialogue with the Ministry of Energy.</p>

Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 31 December 2026.

2.3.4. Implementing energy efficiency and air pollution legislation

The step under review	<i>2.3.4.1 Ensure the issuing of Energy Performance Certificates (in line with the EPBD) and amend relevant legislation to enable effective decision-making on energy efficiency investments for homeowners</i>
Baseline	Partially aligned
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.
Commission assessment of results	The step is completed through a new regulatory framework (rulebook on energy performance certification of buildings) in place since August 2024. This step also requires enforcement and implementation of regulations which have been achieved through the establishment of a registry of energy certificates (from December 2024) and reinforcement of monitoring capacities for energy audits and energy certification of buildings (trainings completed in 2024, with a new call open in January 2025).
Checks performed and evidence used in the verification of the step and related findings	<p>Evidence of publicly available rulebooks and systems, as per the beneficiary’s submission: the Law on efficient use of energy (O.G. of Montenegro no. 57/14, 29/10 and 140/22), Rulebook on minimum energy efficiency requirements for buildings (O.G. of Montenegro no. 47/24) and Rulebook on energy performance certification of buildings (O.G. of Montenegro no. 47/24)</p> <p>Policy dialogue with the Ministry of Energy and regular updates obtained on the progress.</p> <p>The evidence of Montenegro’s improved cost-optimality calculations and introduction of a new national software for energy performance calculations and certification of buildings is also confirmed by the Annual Implementation Report 2024 of the Energy Community Secretariat.</p> <p>The registry of issued energy certificates enables effective monitoring of the building energy certification process in Montenegro and ensures quality control in compliance with EPBD Directive requirements. The access to the registry is provided through the MEEC – Montenegrin Energy Efficiency Certification.</p> <p>Evidence that Montenegro regularly organises trainings for energy audits and energy certification of buildings.</p>
Double funding	No contributions from third parties were reported in support of the achievement of this step.

Clear conclusion on the achievement of the step	Fully achieved
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2.4.1. Secure broadband infrastructure deployment, including 5G networks

The step under review	<i>2.4.1.1 Adoption of the National Plan for deployment of Broadband infrastructure by the government</i>
Baseline	In progress
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.
Commission assessment of results	The final version of the National Plan for deployment of Broadband infrastructure was approved by the Ministry of Economic Development in September 2024. On 26 December 2024, the Government of Montenegro formally adopted it. The plan aligns with the goal to increase broadband access, including in rural areas.
Checks performed and evidence used in the verification of the step and related findings	Publication of the Plan following Government adoption as per the decision No. 10-350/25-7214/2-24: <ul style="list-style-type: none"> - https://wapi.gov.me/download-preview/674a72d5-7f7e-4ec4-b66b-e311e2ddd7c2?version=1.0
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

2.4.3. User friendly digital public service delivery

The step under review	<i>2.4.3.1 Plan for full deployment of transactional national and local level public electronic services 2025-2027 adopted by the Government (additional to services piloted in 2024); e-government platform and inter-operability of registers functional</i>
Baseline	In progress
Deadline of the step	December 2024

<p>Conclusion of the review of the step by the beneficiary</p>	<p>The beneficiary considers this step as fully achieved.</p>
<p>Commission assessment of results</p>	<p>Plan for full deployment of transactional national and local level public electronic services 2025-2027 adopted by the Government at the 69th session of the Government held on 20 February 2025.</p> <p>This step also requires that the e-Government platform and the inter-operability are made functional. Based on the report on the Establishment of the New Unified e-Government Portal, with the Government’s Conclusion No. 10-049/24-7379/2 of 16 January 2025 a new e-Government portal is accessible at https://euprava.gov.me, designed as a central online hub. Its functionality is ensured by: (1) a Service Registry that ensures transparent information about government procedures, enabling users to search for services, understand the requirements, and in some cases, initiate processes online without visiting physical offices. This includes applications for permits, licenses, and certificates, reducing administrative burdens and improving transparency. (2) My e-Government, enables registered users to manage personal data, track service requests, and make real-time payments; it allows users to track the status of their submitted requests. This section is integrated with eDMS (Electronic Document Management System), i.e. with personal identification number citizens can view real-time status of their requests. (3) search functionality is fully operational; (4) for most listed services, the portal provides informational content rather than full online service execution and this feature is an ongoing process of digitalisation; (5) the portal is also connected to the centralised authentication system (idp.gov.me), which requires citizens to register using their electronic ID cards. The Ministry of Interior has set a deadline until September 2025 for citizens to obtain their new electronic ID cards.</p> <p>Also, inter-operability of registers is made functional with (1) access to the Unified System for Electronic Data Exchange (JSERP) platform, currently available to 21 institutions, while 44 registers are registered in the meta-register; (2) active electronic data exchange between 18 pairs of registers through which data is exchanged via a specific web service; (3) government having invested in system cyber-security with further ‘upgrading’ ongoing, including use of X-Road open-source platform, which is already in use in EU Member States. All in all, the interoperability of registers (that are functional) is being enhanced.</p>
<p>Checks performed and evidence used in the verification of the step and related findings</p>	<p>Desk review of the national evidence received. Experts in the field of digitalisation from on-going (‘EU4Public Administration – technical assistance to Montenegro in support of public services and human resources management’ – implemented by KPMG) or past (E-services and digital infrastructure as Covid-19 response measure’ implemented by UNDP) EU-funded projects as well as from SIGMA were consulted.</p> <p>Additionally, the government sent (1) Plan for the Full Implementation of Transactional Public e-Services at the National and Local Levels (2025-2027) adopted by the Government; (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; (3) Report on the Establishment of the New Unified e-Government Portal, with the Government’s Conclusion No. 10-049/24-7379/2 of January 16, 2025; (4) Report on the Establishment of an Information System for the Automation/Digitalization of Business Processes with a Data Integration Module, with the Government’s Conclusion.</p>

Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

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

The step under review	<i>2.4.4.1 Adoption of the Law on Information Security by the Parliament in full alignment with the NIS2 directive</i>
Baseline	In Parliament procedure
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.
Commission assessment of results	<p>The Draft Law on Information Security was developed with assistance from the UK Embassy and adopted by the Government in May 2024. In parallel, the Government consulted the European Commission on its alignment with the NIS2 Directive. The Ministry of Public Administration played a central role in drafting the new law.</p> <p>On 19 November 2024, the Parliament of Montenegro adopted the Law on Information Security during its autumn session.</p> <p>However, when it comes to compliance with the NIS2 Directive, it is notable that article 53 (on the exclusion of state administration bodies from the supervisor’s powers), and articles 68–70 (on administrative fines), are not included in the law adopted by Montenegro. The country provided satisfactory explanations on these aspects. CNECT took note that certain elements of the NIS2 Directive are still to be brought into Montenegrin legislation via other instruments.</p> <p>Ultimately, DG CNECT and DG ENEST decided to acknowledge Montenegro’s progress, concluding that, for the purposes of the Reform Agenda indicator, Montenegro has reached sufficient alignment with the NIS2 Directive.</p>
Checks performed and evidence used in the verification of the step and related findings	The Law on Information Security, published in Official Gazette of Montenegro was analysed in coordination with DG CNECT, which is the relevant service to assess if the Law on Information Security is aligned with the NIS2 directive.
Double funding	No contributions from third parties were reported in support of the achievement of this step.

Clear conclusion on the achievement of the step	Fully achieved
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4.2.1. The judiciary and the prosecution are independent/autonomous, impartial, and accountable and act with integrity and professionalism

The step under review	<i>4.2.1.1 Appointment of the Supreme Court president.</i>
Baseline	President of the Supreme Court of Montenegro not appointed.
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The beneficiary considers this step as fully achieved.
Commission assessment of results	New President of the Supreme Court appointed on 27 November 2024 by the Judicial Council. The newly appointed President of the Supreme Court of Montenegro, Valentina Pavlicic, has taken the oath before the Judicial Council of Montenegro on 2 December 2024.
Checks performed and evidence used in the verification of the step and related findings	The completion of this step has been verified through official information available on the website of the Judicial Council of Montenegro (https://sudovi.me/sdsv/sadrzaj/9jzw) and the Supreme Court of Montenegro (https://sudovi.me/vrhs/sadrzaj/goEQ).
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved

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

<p>The step under review</p>	<p>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</p>
<p>Baseline</p>	<p>Instruction manual in preparation</p>
<p>Deadline of the step</p>	<p>December 2024</p>
<p>Conclusion of the review of the step by the beneficiary</p>	<p>The beneficiary considers this step as fully achieved. Montenegro considers that the prosecution guidelines cover also sentencing, but there is no reference to sentencing in the guidelines.</p>
<p>Commission assessment of results</p>	<p>The guidelines issued by the Supreme State Prosecutor on 11 October 2024 are in line with the amended Criminal Code of Montenegro, EU Directive on Victim Protection and the Istanbul Convention. However, there is no evidence that the courts have standard operating procedures adopted and they are responsible for sentencing, which is the second part of the step.</p> <p>The Guidelines for State Prosecutors refer only to prosecutors, who qualify the case of gender-based violence, but are not in charge of sentencing. One of the most important issues is how the Supreme State Prosecutor’s guidelines and prosecutor’s qualification of gender-based violence case translate into the court decision in the end. So far, the convictions in cases of gender-based violence have been quite mild, around the legal minimum and with limited deterrent effect.</p> <p>As regards monitoring, the implementation of the Guidelines for State Prosecutors on Processing Domestic and Family Violence Cases was accompanied by a limited degree of oversight. A coordinator in the supreme state prosecution and contact points in basic prosecution offices were designated. Contact points report to the coordinator in the supreme state prosecution and a certain amount of reporting has been established, however not following all aspects of the Guidelines. In addition, the first semi-annual report on the implementation of the Reform Agenda, submitted by the Government in March 2025, does not mention the monitoring of the application of the Guidelines.</p>
<p>Checks performed and evidence used in the verification of the step and related findings</p>	<p>The evidence was obtained in direct communication and email exchanges with the Supreme State Prosecution and other partners dealing with gender equality in Montenegro. The EUD has reviewed the first report (from January 2025) from the coordinator to the Ministry of Justice, along with an Excel table of background data which indicates that aspects of the guidelines have been considered.</p> <p>The prosecution will have more detailed reports on monitoring and the next report is due on 15 April 2025. The latest report by the authorities rightly states that the jurisdiction of the State Prosecutor’s Office does not include punishing perpetrators. The State Prosecutor’s Office can potentially influence the court’s sentencing policy through activities such as proposing the type and severity of penalties, as well as filing appeals against court decisions.</p>

	Therefore, the second part of the step has not been achieved: “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”. The Supreme Court should issue unified guidelines or instructions for the lower courts, which are responsible for the fulfilment of this part of the step.
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 31 December 2026.

4.6.1 Alignment of visa policy with the list of EU countries for which a visa is required, especially with regard to countries that pose an irregular migration or security risk to the EU

The step under review	<i>4.6.1.1 Terminating visa-free agreements with countries (at least one per year) which are visa required for the EU.</i>
Baseline	Visa policy not aligned for 11 countries.
Deadline of the step	December 2024
Conclusion of the review of the step by the beneficiary	The Ministry of Foreign Affairs does not consider this step as achieved.
Commission assessment of results	No results achieved. Montenegro has not removed any country from its list of visa-free agreements, despite the commitment to align with the EU by requiring visas for the 11 countries identified in the baseline.
Checks performed and evidence used in the verification of the step and related findings	The government has not issued any decisions to terminate visa-free agreements with countries that require visas for entry into the EU, as agreed in the baseline of 11 countries: Azerbaijan, Belarus, China, Kuwait, Qatar, Russia, Türkiye, Armenia, Egypt, Kazakhstan, Saudi Arabia. On the contrary, the government issued decisions (published in the Official Gazette) in December 2024 and February 2025 to add two more countries on the list of countries for which the EU requires visa: Bahrain and Uzbekistan.
Double funding	No contributions from third parties were reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Not achieved. The ‘grace period’ runs until 31 December 2026.