

DG NEAR Guidelines For EU Support to Civil Society
in the Enlargement Region
2021-2027

2025 Assessment

REPORT FOR MONTENEGRO





This study was carried out by a team of experts under the supervision of the Hajde4EU project.

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Skopje, North Macedonia, July 2026

This publication was funded by the European Union. Its contents are the sole responsibility of authors and do not necessarily reflect the views of the European Union.

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List of Abbreviations

AML/CFT	Anti-Money Laundering and Countering the Financing of Terrorism
AMU	Agency for Audiovisual Media Services
BCSDN	Balkan Civil Society Development Network
CAF	Charities Aid Foundation
CCE	Centre for Civic Education
CDT	Center for Democratic Transition
CEDEM	Centre for Democracy and Human Rights
CoE	Council of Europe
CRNVO	Centre for Development of Non-governmental Organisations
CSO	Civil society organisation
DG ENEST	Directorate-General for Enlargement and Eastern Neighbourhood
DG NEAR	Directorate-General for Neighbourhood and Enlargement Negotiations
ECF	European Civic Forum
ECHR	European Convention on Human Rights
EU	European Union
EUD	EU Delegation
FATF	The Financial Action Task Force (recommendations)
FIU	Financial Intelligence Unit (within government)
FRA	European Union Agency for Fundamental Rights
FSTP	Financial Support to Third Parties
GDPR	General Data Protection Regulation
HRBA	Human Rights Based Approach
ICCPR	International Covenant on Civil and Political Rights
IPA	Instrument for Pre-accession Assistance
KII	Key Informant Interview
LGBTIQ+	Lesbian, gay, bisexual, transgender, intersex and queer
LLC	Limited Liability Company
MANS	Montenegro Network for Affirmation of NGO Sector
MONEYVAL	The Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism



* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence

MPs	Members of Parliament
NGO	Non-governmental organisation
NPOs	Non-profit organisations
NRC	National Resource Centre for CSOs
RSF	Reporters Without Borders
RTCG	Radio and Television of Montenegro (public broadcaster)
SLAPP	Strategic Lawsuits Against Public Participation
SO	Specific Objective
TACSO	Technical Assistance for Civil Society Organisations
TF	Terrorist Financing
TUMM	Trade Union of Media of Montenegro
UN	United Nations

Methodology

Common methodology (Western Balkans and Türkiye)

This assessment applies the common methodology used across the seven targeted countries to assess the DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027, Hajde4EU's principal recurring analytical product, delivered annually as seven national reports and one regional report. It is an upstream advisory exercise for DG ENEST B1 and the EU Delegations and EU Office in Kosovo*, in which CSOs and independent media are subjects of analysis and dialogue partners, not direct beneficiaries.

The 2025 cycle applies the official, slightly revised methodology, retained to preserve comparability with the 2021 baseline and the 2023 and 2024 TACSO assessments. Assessment is organised around three Specific Objectives, scored through approximately 55-59 indicators, each combining an indicator-based grade with a qualitative narrative:

SO	Dimension assessed	What it measures
SO1	Legal and financial enabling environment	Registration, operation, freedoms of association/assembly/expression; state funding, fiscal framework, financial viability.
SO2	Public authority - civil society cooperation	Consultation and cooperation mechanisms, their mandate and effectiveness, inclusiveness (incl. HRBA-inclusive composition).
SO3	CSO capacity, sustainability and effectiveness	Organisational capacity, accountability, networking, and effectiveness in influence and service delivery.

Prior-year scores (2021-2024), particularly under SO3, are reference points only, not comparison baselines, due to inter-year methodological changes that widened the assessment's scope. For 2025, regional summary reports from the FRA Civic Space Update, ECF Civic Space Watch and the BCSDN Monitoring Matrix are appended where available for comparability, but not merged into the scoring.

IPA beneficiary Coordinators (and dedicated enabling-environment experts where needed) gather country-level evidence through a mixed-methods design: legal and desk review; structured online questionnaires targeting three groups (general CSOs, expert CSOs competent in the enabling environment, and public administration); key informant interviews; and focus groups. Evidence is processed through indicator-based scoring and qualitative narratives, verified through national validation meetings in June 2026 and internal Key Expert review, with working-draft consultation where agreed with EUDs. Internal or restricted Commission documents may inform data collection but are not cited.

Montenegro - country-specific approach to the methodology

The 2025 assessment for Montenegro is based on extensive desk review, survey data, specialised CSO input, key informant interviews and validation feedback. These sources are read together rather than in isolation. The General CSO Survey provides quantitative CSO percentages, the Specialised CSO Survey provides qualitative expert input used to confirm, nuance or challenge wider survey and desk-review

findings, and the Public Institutions Survey provides an institutional perspective and a means of triangulation, not a substitute for CSO experience.

Evidence base at a glance

Instrument	Responses	Notes
Desk review	80+	National legislation, draft laws, strategies, official reports and statistics, parliamentary and independent institution documents, international and CSO reports
General CSO Survey	93	93 in final export; 93 Montenegro-coded in the raw file, used for respondent-level aggregation; denominators vary by question
Specialised CSO Survey	11	Circulated to 41 expert organisations; 11 substantive responses
Public Institutions Survey	3	Circulated to 22 central institutions and 2 local intermediary organisations; 3 responses, all central
Key informant interviews	3	Qualitative triangulation; not statistically representative
Validation focus group	1	Online, 17 June 2026; 7 participants

Desk review

More than 80 documents were reviewed to collect, verify and analyse secondary data relevant to the assessment. The desk review covered national legislation and draft laws, government strategies and action plans, official reports and statistics, parliamentary documents, reports of independent institutions, European Commission documents, reports of international organisations and civil society organisations, and relevant media sources where appropriate.

Survey data

The General CSO Survey, which was publicly available and open to all CSOs, was distributed from 20 May to 5 June 2026 via the Hajde4EU email database (104 active organisations from Montenegro) and platforms (LinkedIn¹, Facebook²), the Civil Society Resource Centre (CRNVO platform³ and mailing lists with over 1,300 recipients), the EU Delegation to Montenegro and national CSO networks, such as the Network of Youth Organisations (22 CSOs), with targeted outreach to grassroots and local organisations. It was further disseminated to grassroots and local organisations through direct invitations and one-to-one follow-up by the Coordinator for Montenegro. The questionnaire was anonymous and consisted for the most part of closed questions. As not every respondent answered every question, the number of valid answers typically decreases as the questionnaire progresses. Unless stated otherwise, the per-centages in this report are calculated against the valid responses to each question rather than the full sample. In total 93 valid responses from general CSOs in Montenegro were recorded and used where respondent-level aggregation was required.

¹ Hajde4EU, LinkedIn: <https://www.linkedin.com/company/hajde4eu/>

² Hajde4EU, facebook: <https://www.facebook.com/Hajde4EU>

³ CRNVO: <https://crnvo.me/>

The Specialised CSO Survey was addressed to 41 expert organisations working on human rights (including women's, youth, children's, LGBTIQ+, disability, labour and minority rights, and the freedoms of assembly, expression and association), watchdog and think-tank organisations, media, social innovation and the social economy, environmental organisations, and civil society development (the National Resource Centre for CSOs). Its purpose was qualitative: to let expert voices confirm, qualify or push back against what the General CSO Survey and the desk review suggested. The 11 responses received were used for triangulation and validation of the General CSO survey findings and desk-review analysis.

The Public Institutions Survey, in turn, went to 22 central government institutions and two intermediary organisations at local level, with one-to-one follow-up by the Coordinator for Montenegro. The three re-sponses received (all from central-level ministries) offer the institutional side of the picture and a point of triangulation, but it is not a stand-in for the experience of civil society itself. The low institutional response rate constrains the weight that can be placed on this instrument and limits triangulation by level of administration.

Respondent profile and reach

By region, 70 CSO respondents were based in the central region, 16 in the north and seven in the south. Respondents were heavily concentrated in the capital, Podgorica (60 organisations), but also included organisations from Bijelo Polje, Nikšić, Pljevlja, Ulcinj, Kotor, Andrijevica, Budva, Cetinje, Danilovgrad, Mojkovac, Petnjica, Petrovac, Rožaje, Tivat and Tuzi. Around 63% of identifiable CSO respondents were women and 37% men. Outreach to local administrations was pursued through two intermediary organisations, but produced no responses; the aggregate survey export did not allow systematic cross-tabulation by level of administration for all indicators.

Other relevant respondent information: *(Percentages as reported; totals may not sum to 100 due to rounding or multiple response options.)*

Montenegro	
Type of CSO	69% registered association; 5% not-for-profit company; 4% not-for-profit cooperative; 3% vocational/professional organisation or union; 2% registered foundation, 2% unregistered platform/network; 1% registered platform/network; 1% unregistered initiative; 12% other
Scope of work	47% national level; 23% regional/sub-national/entity level; 15% local level; 15% international level
Position in the CSO	36% Executive director; 25% President; 20% Manager; 6% Project staff; 1% Expert/consultant; 12% other
Thematic fields: top 5	46% youth and youth rights; 46% human rights; 28% social inclusion; 26% education, research and innovation; 26% environment and climate action
Thematic fields: bottom 5	3% digital technologies and e-government; 2% rights of older people; 1% amateur sports; 1% animal rights; 0% consumer protection
Age	28% between 18-35; 71% between 36-65; 1% 66+

Key informant interviews

Three key informant interviews were integrated into the report. They were used as qualitative triangulation and are not treated as statistically representative evidence. The interviews provided contextual information, explored issues that the surveys could not adequately capture, and helped explain trends, challenges and developments identified through the desk review and quantitative data.

The first interview was held on 5 June 2026 with the Executive Director of CRNVO, who leads the National Resource Centre and co-chairs the National Council on Cooperation with NGOs. The second was held on 8 June 2026 with a Policy Assistant of the EU Delegation to Montenegro, covering EU policies and project management for health, education and civil society. The third was held on 15 June 2026 with the Head of the Division for Cooperation with NGOs at the Ministry of Investment, Regional Development and Cooperation with NGOs.

Validation

An online validation focus group was held on 17 June 2026. Eleven representatives were invited and seven participated: six from civil society organisations and one from the EU Delegation. Participating organisations worked on human rights, media, justice, the social economy, FSTP support and community-based initiatives. Participants reviewed the preliminary findings, the supporting evidence and the proposed indicator scores. The discussion clarified the interpretation of legislative developments affecting civic space, including the draft legislation on the National Security Agency and on internal affairs; highlighted an increase in attacks against journalists and civil society actors; identified gender-specific patterns in attacks on women journalists; and provided additional evidence on SLAPP lawsuits and anti-union discrimination. On the basis of this feedback, selected indicator scores were reconsidered and the narrative refined where appropriate.

Interpretation and context

Survey results are interpreted as indicative findings and triangulated with the desk review, key informant interviews, the Specialised CSO Survey and validation focus group feedback. The year 2025 was not marked by major political disruptions affecting civic space. It was, however, characterised by an intensive legislative agenda driven by Montenegro's EU accession process and the implementation of the Reform Agenda, placing significant demands on public institutions and potentially influencing institutional responsiveness and the quality of policy consultation. The period also included public debate over several legislative initiatives and strategic investments, such as Ulcinj Long Beach, which contributed to increased civic mobilisation and public scrutiny. It should further be noted that the majority of survey respondents were local civil society organisations, whose experiences may differ from those of advocacy, watchdog and human rights organisations that engage more directly with public authorities and are generally exposed to higher levels of pressure and public attack.



Executive Summary

This report presents the findings of the 2025 assessment of Montenegro's civil society environment against the DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027. Compared with previous years, the overall environment for civil society remained relatively enabling, as no major negative changes affecting core freedoms were recorded. At the same time the reporting period was characterised by an intensive legislative agenda including debates on the draft Law on NGOs, draft amendments to the Law on Public Gatherings and Public Events, amendments to the Law on the Agency for National Security and Internal Affairs, and a new Law on Free Access to Information. Alongside the increased number of attacks against journalists and CSO activists, these developments posed forward-looking risks to civic space.

In most cases, sustained civil society advocacy, backed by the legal freedoms that enable such engagement, helped prevent more significant restrictions, so that the core freedoms score was unchanged. Against this backdrop, the assessment finds a broadly stable formal environment accompanied by selective pressures on implementation - on effective remedies, protection from attacks, the proportionality of financial-control measures and the quality of public consultation - and a persistent perception gap between the generally positive self-assessments of public institutions and the more critical experience reported by advocacy and watchdog organisations.

Specific Objective 1 - Conducive Environment for Civil Society:

Specific Objective 1 examines whether the legal, institutional and financial environment enables civil society organisations to operate freely, independently and sustainably. It assesses the protection of the fundamental freedoms of association, peaceful assembly and expression, safeguards against undue interference, the proportionality of regulatory requirements, access to domestic and foreign funding, public financial and non-financial support, taxation, philanthropy and volunteering, as well as the overall enabling environment for both registered organisations and informal civic initiatives.

Montenegro's legal framework continued to formally guarantee freedom of association, peaceful assembly and expression in 2025, with no changes to the constitutional provisions or to the core Law on Non-Governmental Organisations, and **the core-freedoms score remained unchanged**. The most consequential developments were legislative initiatives whose direction was not yet settled. A draft Law on NGOs introduced by the responsible Ministry drew concern over a provision barring persons convicted of serious offences from establishing organisations, which CSOs argued could be achieved through more proportionate safeguards. Draft amendments to the Law on Public Gatherings, initiated by MPs of the ruling majority and seeking to prohibit gatherings on roads and at border crossings, drew warnings from the Council of Europe Commissioner for Human Rights and the UN of incompatibility with Article 11 ECHR and Article 21 ICCPR; the vote was postponed but the amendments were not withdrawn, leaving the future scope of assembly protection uncertain. **Police data nonetheless recorded a marked increase in public gatherings, involving some 232,989 participants, all of which were approved and held**. On expression, the new Law on Free Access to Information introduced improvements to proactive transparency but drew a constitutional challenge from MANS, and more than 100 CSOs opposed proposed media-law amendments seen as undermining the independence of the public broadcaster (RTCG) and the audiovisual regulator (AMU).

Access to effective remedies and protection from attacks weakened, and both indicators were downgraded. The continued reduced capacity of the Constitutional Court, in crisis since late 2024,

contributed to delays in access to justice, while the requirement that requesters bear court costs when challenging administrative silence under the access-to-information law may deter judicial recourse. In 2025, 27% of surveyed CSOs reported that government decisions had negatively affected the exercise of their rights, primarily through implementation failures: funding and decision-making delays, inconsistent administrative practice and prolonged administrative silence. Some 31% **reported that their organisation or members had been subjected to threats, physical attacks, unlawful searches, property damage or interference with communications, up from 17% in both 2024 and 2023**, with watchdog and human-rights organisations the most exposed. Journalist safety deteriorated, with the Trade Union of Media of Montenegro recording **33 attacks against 24** in 2024 and a pronounced gender dimension, as 18 of the attacks targeted women journalists, most in the online space; countervailing steps included a Protocol on the Protection of Journalists and a parliamentary inquiry into historic cases.

The AML/CFT framework was assessed as broadly proportionate. The MONEYVAL follow-up assessment upgraded Montenegro's technical compliance with FATF Recommendation 8 and found the sector at low terrorist-financing risk, with **no criminal investigations, prosecutions or foreign-FIU exchanges involving non-profit organisations**, providing evidence that AML/CFT measures had not been used to target civil society. The reduction reflected concerns that non-profit organisations remain subject to the same sanctions regime as other legal entities without adequate assessment of proportionality, that a EUR 10,000 cash-transaction limit applies without evaluation of its operational impact on the sector, and that bank-compliance requirements create an administrative burden, with trade unions particularly affected. Reported discriminatory restrictions rose to 18% of CSOs, from around 5-6% in prior years.

Small and unregistered organisations continued to operate lawfully without registration, and the draft Law on NGOs was not expected to alter this permissive approach, though it did not address longstanding concerns regarding their legal recognition. Structural inequalities in participation persisted: unregistered initiatives retain access to only a limited number of formal mechanisms, and organisational size shaped inclusion, with CSOs having three or more paid staff participating in consultations at 79% against 51% for smaller organisations, and holding working-group membership at 62% against 29% - **a gap that led to a one-point reduction for this indicator**.

The legal framework for CSO funding remained relatively liberal, with no restrictions based on donor type or origin and no foreign-agent regime, and 92% of CSOs reported facing no restrictive administrative practices. Public funding is guaranteed at no less than 0.5% of the state budget, and in 2025 EUR 5.7 million was disbursed against EUR 6.0 million allocated, an absorption rate of **94.4%**, though the Ministries of Internal Affairs and Energy disbursed none of their allocated funds. Persistent delays in the annual funding cycle continued, with **27 of 28 public calls published after the statutory 31 March deadline**, and **74%** of CSOs assessed the transparency and fairness of public funding negatively, against a more positive institutional self-assessment; the draft Law on NGOs proposed raising the minimum allocation to 0.6% but envisaged regulating funding largely through secondary legislation, which CSOs viewed as a forward-looking risk. Tax incentives for individual and corporate giving improved following amendments to the income-tax laws, raising that indicator, and the adoption in December 2025 of a Strategy for the Development of the Social Economy 2025-2029, with a dedicated budget, raised the CSO-taxation indicator by one point.

Volunteering remained inadequately supported at the legislative level but saw significant strategic movement. The Law on Volunteer Work remained unchanged, and its longstanding treatment of volunteering as a form of labour relation under Article 12a continued to be criticised, with only 196 registered volunteer contracts against survey evidence of over 1,000 long-term volunteers, indicating **a wide gap between the formal framework and practice**. The adoption in December 2025 of a Strategy for the Development of Volunteering 2025-2029, following a decade-long strategic gap, **raised the**

relevant indicator, though its Action Plan retained targets tied to the existing administrative model. No respondent organisation reported benefiting from state volunteering programmes, and 20% reported benefiting from state employment programmes, broadly stable but below the 2021 level.

Specific Objective 2 - Cooperation and Partnership between CSOs and Public Institutions:

Specific Objective 2 assesses whether civil society organisations are meaningfully involved in public decision-making processes and whether institutional mechanisms enable regular, transparent and inclusive dialogue between civil society and public authorities. The assessment covers the legal framework governing public consultations, the quality of consultation processes, participation in policy development and EU accession processes, as well as the effectiveness of institutional structures established to support government-civil society cooperation.

Montenegro's normative framework for public consultation remained formally in place, though the quality of consultation deteriorated in practice. Ministries processed 186 acts during the year, of which 134 were subject to consultation requirements, yet early-stage consultations were conducted for only 25% of eligible acts and the obligation to publish annual consultation plans was met by only four ministries. A methodological refinement of the 2025 survey, separating access to drafts from the minimum comment period, revealed a striking gap between participation and quality: **while 70% of CSOs reported involvement in at least one consultation, only 8% experienced a process meeting both effectiveness criteria simultaneously.** Validation participants also noted a growing practice of advancing significant legislative initiatives - including on public gatherings and national security - through groups of MPs rather than the Government, thereby bypassing the public-debate obligations applicable to executive proposals, and **smaller and community-level organisations remained under-represented in working groups**, with 42 of 74 public calls for working-group membership receiving no CSO applications.

Montenegro retained a formally adopted and currently valid civil society cooperation strategy throughout 2025, the Strategy for Cooperation between State Administration Bodies and Non-Governmental Organisations 2022-2026, accompanied by a budgeted action plan, but implementation remained limited. In 2025 reported expenditure amounted to **approximately 11% of the total planned budget for the budgetary period 2024-2026**, with several planned measures postponed pending adoption of the new Laws on NGOs and Volunteering, and the European Commission observed that progress in implementing the strategy remained limited. **Only 1% of CSOs considered the strategy both relevant and effective in 2025**, a sharp fall from 14% in 2024, and the responsible Ministry continued to coordinate the strategy with only two dedicated staff. A notable institutional step was the **first fully public financing of the Network of Resource Centres**, with EUR 488,154 allocated to the national and three regional centres.

The Council for Cooperation between the Government and NGOs was **re-established in December 2025 after five years of inactivity**, comprising twelve CSO and twelve institutional representatives, and the **relevant indicator was upgraded**. As the Council was only recently reactivated, there is not yet sufficient information to assess the follow-up to its recommendations or its practical influence on policy-making, which remains to be demonstrated in the coming period.

Specific Objective 3 - CSOs' Capacities and Resilience:

Specific Objective 3 assesses the organisational capacity, sustainability and resilience of civil society organisations. It examines internal governance, strategic and financial management, accountability, organisational learning, communication, evidence-based work, stakeholder engagement and financial

sustainability, recognising that resilient civil society organisations require not only an enabling legal environment but also sound governance systems, professional management, diversified resources and the capacity to adapt to changing political, economic and social circumstances.

Internal governance indicators showed apparent improvement in 2025, partly reflecting revised survey methodology: 93% of CSOs reported having a governing body and 95% a governance document, with the governing-body figure rising from a narrowly interpreted 27% in 2024, a change that prompted a **cautious upgrade to a score of four rather than five**. Regular conflict-of-interest screening also improved under a broadened question formulation, with 65% of CSOs conducting periodic checks, although 23% did so only on entry into the role. **Transparency in sharing governance information improved but remained a relative weakness**, with 43% of CSOs publishing their governance document, board structure and membership together on their website, while an organisational strategy was reported by 59% and an internal gender-equality policy by 40%, the latter unchanged and concentrated among larger organisations.

Communication and evidence-based practice remained strong. Online communication was near-universal, led by Facebook and Instagram (both 86%) and organisational websites (66%), and media cooperation rose to 36% through partnerships, with a further 59% cooperating through consultation. Some 79% of CSOs undertook at least one form of research to inform their work, predominantly surveys and focus groups, and 94% engaged stakeholders through consultation or partnership. Network membership remained high at 84%, with international affiliation the most common form, and cross-sectoral partnerships with academia, social partners and the private sector rose to 57%, from 41% in 2024, although engagement with social partners and the private sector remained the weakest links.

Funding diversification and human-resource sustainability presented the most significant concerns. **Only 48%** of CSOs reported that no single donor accounted for more than half their budget, down from 60% in 2024, and the sector remained heavily dependent on EU and international funding, with the EU cited as a donor by 60% of organisations. Alternative and domestically generated income remained underdeveloped, with income from own economic activity reported by just 14% of CSOs and from assets or crowdfunding by 6% and 4% respectively, though 59% raised at least some non-donor income. Some 77% of CSOs reported employing paid staff, broadly stable, but staffing was markedly uneven, with local organisations far more volunteer-heavy and less likely to employ staff, and comprehensive human-resource policies remained almost entirely absent, **no organisation reporting the full set of nine listed policies** and 31% reporting none.



IPA beneficiary Assessment

Specific Objective 1: A conducive environment for civil society to carry out its activities is in place.

SO 1.1 | All individuals and legal entities in the Enlargement Region can establish, join and participate in non-formal and/or registered organisations, can assemble peacefully and can express themselves freely.

Indicator 1.1.a – Extent to which relevant domestic legislation provides that:

- ➔ Associations can be established or registered without discrimination on any grounds.
- ➔ No unlawful restrictions are placed on the scope of their activities or pursuit of their objectives.
- ➔ Their termination may only occur following a decision by an independent and impartial court.
- ➔ No unlawful restrictions are placed on freedom of peaceful assembly.
- ➔ Freedom of expression is exercised by all, and no unlawful restrictions are imposed.

Year	Compliance
2025	4 – meets most standards
2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

According to official data, Montenegro has 11,588 registered civil society organisations, 455 foundations, and 148 branches of foreign CSOs. Among them, 7,231 civil society organisations, 309 foundations, and 126 branches of foreign organisations are currently active.⁴ The legislative framework governing the establishment and registration of civil society organizations (CSOs) in Montenegro is generally enabling and non-discriminatory. The Law on Non-Governmental Organisations provides clear procedures for registering CSOs and does not contain provisions that discriminate against specific groups or categories of organisations. Furthermore, according to publicly available data, in 2025, the authorities of Montenegro did not terminate the work of associations through procedures not prescribed by law.⁵

In 2025, there were no changes to the constitutional provisions guaranteeing freedom of association, as set out in Articles 53 and 79 (lines 3 and 6) of the Constitution of Montenegro, nor to the main legislative framework regulating civil society organisations, namely the Law on Non-Governmental Organisations.⁶ Nonetheless, the Ministry of Investment, Regional Development and Cooperation with

⁴ Public e-registry of NGOs and political parties <https://ngo.gov.me/>

⁵ Database of the Administrative Court Decisions <https://sudovi.me/uscg/odluke>

⁶ Law on NGOs, Official Gazette of Montenegro”, No. 39/11 and 37/17

NGOs in 2025 introduced a Draft Law on NGOs.⁷ The public consultations recorded concerns about the new provision (Article 11, paragraphs 9 and 10), which prohibits persons finally convicted of terrorist financing, money laundering, a criminal offence in another state, or child abuse from establishing an organisation. The rationale for introducing this provision appears to be aligning the legal framework with anti-money laundering standards and preventing individuals convicted of serious criminal offences from accessing public funding through organisations they establish. CSOs argued that the provision may have implications for the freedom of association and argued that the underlying policy objectives could be achieved through more proportionate safeguards that do not restrict the right to establish an association. The relevant Ministry stated that the restriction is not permanent, applying only for the duration of the legal consequences of the conviction, and framed it as necessary to align with the Anti-Money Laundering Law while avoiding negative practices under previous arrangements.⁸

Another major development in 2025 concerning freedom of peaceful assembly and freedom of expression was the introduction of amendments to the Law on Public Gatherings and Public Events, initiated by a group of MPs from the ruling majority. The proposed amendments aimed to prohibit public gatherings on highways, main roads, regional and local roads, as well as border crossings, “where such gatherings could obstruct traffic flow, endanger traffic safety, or restrict the movement of citizens”, with the stated aim of establishing a balance between the right to peaceful assembly and other constitutionally protected rights, including public safety, freedom of movement, and the uninterrupted functioning of daily life.⁹

CSOs and international actors, including the CoE Commissioner for Human Rights and the UN mission, warned of disproportionate impact and incompatibility with Article 11 ECHR and Article 21 ICCPR. The vote was postponed but the amendments were not formally withdrawn, leaving the future scope of assembly protection uncertain.¹⁰

Available data from the Police Department report indicates a substantial increase in the overall number of public gatherings in 2025 compared with the previous year, with approximately 232,989 participants, suggesting a high level of civic engagement.¹¹ It should be noted that around 43% of this increase was related to two major protests in Cetinje following the authorities’ response to two mass killings over a three-year period, and in Šavnik related to the implementation of the local electoral process.

The aforementioned police report notes that all notified/registered public gatherings in 2025 were approved and held, some with rather minor disturbances. No criminal offences were recorded in connection with public gatherings during the reporting period.

The constitutional provisions regarding freedom of expression (Articles 47, 49 and 50) remained unchanged in 2025. Montenegro continues to formally guarantee the freedom of expression, including the prohibition of censorship and the decriminalisation of defamation. The EU progress report published in 2025 assessed Montenegro as “moderately prepared”¹² in the area of freedom of expression.

The new Law on Free Access to Information was promulgated in December 2025, with its implementation expected to begin on 8 July 2026. The new legislation introduced several improvements, particularly regarding proactive transparency and open data provisions, although CSOs raised concerns about



⁷ Ministry of Investment, Regional Development and Cooperation with NGOs. “Draft Law on NGOs.” Government of Montenegro. Published 25 July 2025. Available at: <https://tinyurl.com/4r6cx2sd>

⁸ Interview findings

⁹ Hadžić, Seid. Statement on proposed amendments to the Law on Public Gatherings. Quoted in: Pobjeda, 17.07.2025

¹⁰ IA, HRA, WRC, Proposed Amendments to the Law on Public Assemblies Represent a Serious Violation of Human Rights and a Bypass of Democratic Procedures, 2 July 2025.

¹¹ Government of Montenegro. Report on the Implementation of the Law on Public Gatherings in 2025. Podgorica: Ministry of Internal Affairs, 26.03.2026.

¹² European Commission. Montenegro 2025 Report. Commission Staff Working Document SWD (2025), 7. Brussels: European Commission, November 4, 2025.

its practical effectiveness and potential chilling effects on access to information. The Network for the Affirmation of the NGO Sector (MANS) has challenged Article 49(3) before the Constitutional Court, arguing that it is inconsistent with the constitutional framework and established Constitutional Court case law on the matter.¹³

Montenegro does not have legislation specifically addressing Strategic Lawsuits Against Public Participation (SLAPP). The EU SLAPP Directive (EU 2024/1069) has not yet been included in Montenegro's Chapter 23 Action Plan, but it is expected to be transposed as part of the country's EU accession process, in line with the obligation to align national legislation with the EU acquis..¹⁴

Despite the adoption of the media law package in 2024, more than 100 civil society organisations in 2025 publicly opposed proposed amendments that would have increased the influence of the Parliament's Administrative Committee over appointments to the Councils of RTCG (public broadcaster) and the Agency for Audiovisual Media Services (AMU), warning that they would undermine the independence of these institutions. In addition, CSOs raised concerns about repeated delays and the rejection of appointment procedures for civil society representatives to the AMU¹⁵ Council, resulting in the regulator operating with an incomplete composition for a prolonged period in 2025. The EU Delegation to Montenegro publicly stressed that any amendments to media legislation should not undermine the political independence of RTCG and AMU. At the same time, the European Commission highlighted the need for urgent, transparent, and merit-based appointments to "ensure the full functionality and independence of media regulatory bodies."^{16,17}

Overall, developments in 2025 challenged several standards under SO 1.1. However, civil society advocacy and engagement, backed by the legal freedoms enabling their actions and resistance helped prevent more significant restrictions on the freedoms of association, assembly, and expression. Consequently, the score remains unchanged compared with the previous reporting period.



¹³ MANS Submitted an Initiative to the Constitutional Court: Repeal the Provision of the Law on Free Access to Information that Encourages Concealment of Information," Vijesti, January 20, 2026, available at:

¹⁴ Centre for Development of Non-Governmental Organisations (CRNVO). Transposition of the SLAPP Directive in Montenegro legislation: responsibilities on the road to the EU. P. 7, Podgorica: CRNVO, November 2025.

¹⁵ AMU – Agency for Audiovisual Media Services

¹⁶ "Non-paper EC: Appoint Council Members of AMU, Resolve Case of RTCG Director in Court." Vijesti, June 4, 2025, available at: <https://goo.su/RzEx1y0>

¹⁷ Centre for Civic Education (CCE). Initiative of NGOs Against Amendments to Media Laws in the Part Related to the Appointment of NGO Representatives to the Councils of RTCG and AAVMU. Podgorica, March 31, 2025. Available at <https://tinyurl.com/y82ajsbv>

SO 1.2 | Public authorities protect CSOs from interference and attacks and respect their right to privacy.

Indicator 1.2.a – Extent to which CSOs have access to an effective remedy to challenge or seek review of decisions affecting the exercise of their rights.

Year	Compliance
2025	3 – moderately meets standards
2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

There were no significant legislative changes in 2025 regarding CSO access to effective remedies in Montenegro. Article 20 of the Constitution guarantees the right to a legal remedy against decisions affecting individual rights or legally based interests, and CSOs in Montenegro generally enjoy equal access to justice as other legal entities.

In addition to the regular court proceedings available to all legal entities, the administrative dispute proceedings before the Administrative Court remain available for cases such as the rejection of registration, withdrawal of licenses, administrative silence regarding requests for access to public information, and similar matters. According to Article 18a of the Law on NGOs, an organization's registration may be denied if its objectives, as specified in its Statute, are contrary to the Constitution or existing legislation. In such cases, applicants have the right to appeal the registration decision before the Administrative Court, ensuring judicial review and legal protection against arbitrary decisions. CSOs may also submit constitutional appeals before the Constitutional Court once all other available legal remedies have been exhausted. The Constitutional Court remains competent to review alleged violations of constitutional rights, including freedom of association, peaceful assembly, and freedom of expression. In addition, Article 56 of the Constitution guarantees the right to seek protection before international human rights institutions. Accordingly, appeals to the European Court of Human Rights remain available to CSOs and other legal entities once all domestic remedies have been exhausted. In general, CSOs have access to a broad range of remedies available to other legal entities. However, the efficiency of these mechanisms remains affected by the overall challenges the judiciary sector faces in ensuring timely judicial responses.

A major development in 2025 relates to the Constitutional Court crisis that began in late 2024 and continued throughout 2025, raising concerns about legal certainty, judicial independence, and the functioning of judicial protection mechanisms. Following an EU-mediated agreement, a Venice Commission opinion was sought on the disputed termination of one of the judge's mandate; despite one new appointment, expiring mandates and delayed vacancy-filling left the Court below full composition, though it continued to issue decisions.

The publicly consulted draft Law on NGOs introduced in July 2025 addresses one of the structural shortcomings identified in previous assessments by proposing to transfer the authority to prohibit the operation of an NGO from the Administrative Court to the Constitutional Court. Under Article 20 of the draft Law this procedure applies where the Ministry suspects that the objectives of an organisation

are directed towards unconstitutional or criminal aims.¹⁸ This proposed amendment better reflects the constitutional nature of such decisions and would more closely align the framework with international standards on freedom of association. However, it remains to be seen whether this provision will be retained in the final version of the law adopted by the Parliament of Montenegro.

In 2025, 27% of surveyed organisations reported that government decisions had negatively affected their ability to exercise their rights. Reported concerns primarily related to the implementation of the existing legal framework rather than formal legal restrictions, including delays in funding and decision-making, inconsistent administrative practices, limited institutional responsiveness, prolonged administrative silence, and insufficient consultation in legislative processes. Respondents also raised concerns about the implementation of the Law on Free Access to Information, the predictability of public funding mechanisms for CSOs, and the proposed Accounting Law for Non-profit Organisations.

The organisations reporting negative impacts were predominantly active in human rights, particularly women's rights, disability rights, youth rights, and HR watchdog activities. Given that these organisations are often exposed to public pressure and attacks, ensuring diversified, sustainable funding remains essential to safeguarding their independence and operational capacity.

According to the 2025 CSO Survey, 9% of responding organisations made official complaints against initiatives that adversely affected their rights. This was higher when complaints made by members were also included (13%). Of the 11 organisations that lodged official complaints, two won their case, while for 73% of the complaints the process was still ongoing.

The score has been downgraded due to the continued reduced operational capacity of the Constitutional Court, which contributes to delays in access to justice. In addition, under the Law on Free Access to Information, requesters are required to bear the costs of court proceedings even when challenging instances of administrative silence by public authorities. This may discourage individuals and CSOs from seeking judicial protection and, consequently, limit the effective exercise of the right to an effective remedy.

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¹⁸ Ministry of Investment, Regional Development and Cooperation with NGOs. "Draft Law on NGOs." Government of Montenegro. Published 25 July 2025.

Indicator 1.2.b – Extent to which CSOs are protected by law from threats, attacks, judicial harassment and discriminatory treatment, in particular:

- ➔ threats including intimidation, harassment, defamation, as well as hate speech online and off-line
- ➔ attacks including acts of violence, physical abuse, searches and damage to property
- ➔ judicial harassment including arbitrary arrest and detention, unlawful interference with communications, and abuse of criminal, civil and administrative proceedings, or threats thereof
- ➔ discriminatory treatment, including disproportionate reporting requirements for CSOs.

Year	Compliance
2025	3 – moderately meets standards
2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

A draft Law on Foreign Agents, initiated by the coalition “For the Future of Montenegro” and put on the political agenda in 2024, was neither advanced through parliamentary procedure nor revived in 2025. Pressure on the sector has not diminished since then, and has taken new forms. Direct attacks on activists and human rights defenders, alongside sustained attempts to discredit CSO work and delegitimise civil society advocacy, have been documented by civil society throughout 2025. Various articles and reports suggest that targeting activists and their families on a personal basis creates an atmosphere of intimidation that discourages open expression of opinion and undermines the watchdog function that CSOs perform in a democratic society.^{19,20,21,22,23,24} During the validation focus group, participants expressed concern about a change in the public officials’ rhetoric directly contributing to the stigmatisation of CSOs. Participants noted that particularly watchdog and human rights-focused CSOs appear to be highly exposed to threats, public discreditation, and other forms of pressure compared with other organisations. This suggests that organisations performing a public watchdog function may face increased challenges linked to the nature of their activities and their role in promoting transparency, accountability, and human rights.²⁵

Amendments to the Law on the Agency for National Security and Internal Affairs were also part of the policy agenda in 2025. Institute Alternative and Human Rights Action urged the authorities together with 21 CSOs to suspend the adoption of the draft law, citing concerns about its implications for privacy rights, the operating environment for CSOs, and other aspects of the protection of fundamental

¹⁹ BIRN. “Campaigns Against NGOs: From ‘Mice’ to Foreign Agents.” BIRN Montenegro, December 20, 2025.

²⁰ Hate Graffiti on a Building in Podgorica Where Civic Activists Live, Urgent Reaction from Authorities Requested.” Vijesti, April 8, 2025.

²¹ “Murić: Part of the Government and Media Supporting It Are Attacking Civic Activists Who Criticise Their Work.” Vijesti, 1 October 2025.

²² The Price of Criticism Paid by NGOs and Media: SLAPP Lawsuits, Discreditation and Political Pressure.” Center for Democratic Transition (CDT), July 22, 2025.

²³ The Kvinna till Kvinna Foundation (2025). Women’s Rights in Western Balkans (2025). pp 58 Stockholm: The Kvinna till Kvinna Foundation. Published 22 December 2025.

²⁴ CEDEM. Political Public Opinion – October 2025. Podgorica: Centre for Democracy and Human Rights (CEDEM), October 2025, p9.

²⁵ Centre for Democratic Transition (CDT). Od nedosljednosti do satanizma: Za šta sve provladini portali krive NVO. Published May 20, 2025.

rights.²⁶ Following public and political debate, the President of Montenegro did not sign the law and returned it to the Parliament for reconsideration. The Delegation of the European Union to Montenegro noted that parts of the proposed framework were not fully aligned with the EU acquis, including standards related to personal data protection and GDPR requirements. It indicated that further alignment would be necessary in the context of the accession process.²⁷

Furthermore, according to monitoring data published by the Trade Union of Media of Montenegro (TUMM), 33 attacks²⁸ against journalists were recorded in 2025, compared with 24 in 2024, indicating a continued deterioration of the safety environment for media professionals, in line with global trends in this area.²⁹ The statistics indicate a significant gender dimension of the reported attacks, which was further highlighted and confirmed during the validation meeting. 27 ³⁰The analysis also reported an increase in the efficiency of police and prosecutors' work in cases of attacks on journalists, but highlighted slower progress in investigating older cases.

In 2025, Montenegro improved its overall global score in the Reporters Without Borders (RSF) index³¹ by three places, mainly due to new developments in the legal framework and better results regarding society's tolerance towards diverse media content. However, the significant decreases in political and security indicators warrant particular attention from organisations that serve as watchdogs in media freedom and journalist safety.

In March 2025, a Parliamentary Inquiry Committee was established for the purpose of collecting information and facts regarding the actions of state authorities and other entities in cases of politically motivated murders that occurred from the introduction of the multi-party system (since 1990) to the present day."³² The initiative aimed at addressing long-standing unresolved cases, while its practical impact on access to justice and accountability remains to be demonstrated.

In February 2025, amendments to the Criminal Code were submitted by TUMM and were partly adopted by the Ministry of Justice to further strengthen criminal law protections for journalists.³³ However, the amendments to the Criminal Code were not promulgated in 2025. In 2025, TUMM signed a Protocol on the Protection of Journalists together with relevant government representatives, the Supreme State Prosecutor's Office, public broadcasters, and media outlets.³⁴ The Protocol represented an important political commitment to the protection of journalists, and its operationalisation advanced with the adoption of the Decision establishing the Intersectoral Working Group mandated to develop a safety mechanism for journalists.³⁵

The Trade Union of Employees of the Public Broadcaster RTCG reported cases of anti-union discrimination in 2025 related to its opposition to proposed provisions of the collective agreement and its advocacy for fairer labour conditions within the public broadcaster. 33 ³⁶

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²⁶ Human Rights Action (HRA), "21 CSOs: Use the Opportunity to Reform the National Security Agency," Human Rights Action, published July 30, 2025.

²⁷ Delegation of the EU: Provisions of the Laws on the National Security Agency and Internal Affairs Can Be Harmonised Subsequently. RTCG, 4 March 2026.

²⁸ The most prevalent form of attacks reported are "threats and harassment, predominantly in the digital sphere, including death threats, insults, sexist comments, doxxing, and various forms of public discrediting."

²⁹ TUUM, "33 Attacks on Media Workers Recorded in 2025," January 22, 2026,

³⁰ Safety of Women Journalists and Media Workers in Montenegro: Brief Overview 2025." Trade Union of Media in Montenegro, 2026

³¹ RSF - Reporters without Borders Index <https://rsf.org/en/index?year=2025>

³² Parliament of Montenegro, "Inquiry Committee on the actions of state authorities in cases of political assassinations and attacks on journalists and intellectuals, including the activities of the 'Black Threes'," accessed 21 June 2026,

³³ Ministry of Justice Accepts Three out of Four Proposed Amendments to the Criminal Code." Vijesti, March 25, 2025.

³⁴ Protocol on the Protection of Journalists Signed: A Step Towards Establishing a Mechanism for the Safety of Media Workers." Trade Union of Media in Montenegro, October 10, 2025.

³⁵ Trade Union of Media of Montenegro (2025). We welcome the adoption of the Decision establishing the Intersectoral Working Group for the creation of a journalist safety mechanism. 26 December 2025.

³⁶ RTCG Employees' Trade Union: Instead of Negotiations – Blackmail and Pressure." Trade Union of Media in Montenegro, June 6, 2025.

Indicator 1.2.c – Proportion of CSOs that operate effectively without threats, attacks, or judicial harassment in terms of:

- ➔ number of complaints concerning the lack of protection of CSOs;
- ➔ number of attacks on CSOs and their members;
- ➔ number of instances of damage to property;
- ➔ number of instances of discriminatory treatment in reporting;
- ➔ number of instances when CSO offices were unlawfully searched, or subjected to inspections;
- ➔ number of instances of interference with the communications of CSOs.

The 2025 survey findings indicate a deterioration in the perceived operating environment for civil society organisations compared with previous years. Overall, 31% of surveyed CSOs reported that their organisation or its members had been subjected to verbal threats, physical attacks, unlawful searches, property damage or interference with communications, compared with 17% in both 2024 and 2023 and 12% in 2021. Consequently, the share of organisations (69%) reporting that they operate without such forms of interference appears to have declined compared with previous assessment rounds (78% in 2024, 76% in 2023, 82% in 2021).

Beyond threats and physical attacks (25%), respondents reported a range of additional forms of pressure and interference. Smear campaigns (16%), interference with communications by the authorities (9%), incidents of property damage (9% - significantly higher than the 3% reported in previous assessment rounds), SLAPPs (7%), unlawful or excessive searches or inspections (7%), arbitrary audits or inspections (4%), requirements to register as a foreign agent (3%), unlawful detainment during peaceful assemblies (2%), unlawful termination of their organisation (1%), and unlawful or forced appointment of trustees (1%).

The data confirm the findings of the expert survey and validation meeting, indicating that civil society organisations engaged in human rights advocacy and watchdog activities related to public policies and the work of public officials and institutions experienced the highest incidence of attacks.

Survey Results

	% CSOs saying that their organisation or its members were subject to threats, physical attacks, property damage, unlawful searches or interference with communications	% CSOs that submitted an official complaint	% CSOs saying that the authorities interfered with the communications of their CSO
2025	31%	9%	9%
2024	17%	1%	2%
2023	17%	4%	3%
2021	12%	4%	1%

While direct comparisons with previous years should be treated with caution due to some structural changes in 2025 survey scales and especially the introduction of additional response categories (e.g. smear campaigns, SLAPPs), the overall findings indicate that CSOs are experiencing a wider range of pressures than those reflected in previous assessments. In particular, the increase in reported

communication interference and property damage, together with the high prevalence of perceived discrimination in access to public funding and smear campaigns, points to growing concerns regarding the enabling environment for civil society organisations in Montenegro.

SO 1.3 | Measures used to fight extremism, terrorism, money laundering or corruption are targeted and proportionate in line with the risk-based approach, and respect human rights standards on freedom of association, assembly and expression.

Indicator 1.3.a – Extent to which laws to combat extremism, terrorism, money-laundering and corruption do not unduly restrict legitimate activities of CSOs.

Year	Compliance
2025	4 – meets most standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The findings of the MONEYVAL First Enhanced Follow-up Report and Technical Compliance Re-Rating from December 2025 for Montenegro noted an upgrade of the status from non-compliant (2023) to partially compliant with FATF Recommendation 8 regarding non-profit organisations and terrorist financing risks.³⁷

The risk assessment concluded that the civil society sector in Montenegro remains exposed to a low level of terrorist financing (TF) risk. Out of 11,841 registered non-profit organisations, 3,253 were identified as falling under the FATF definition, of which 118 were assessed as vulnerable to TF risks, including 26 categorised as highly vulnerable. The report also noted that 22 religious communities fell within the FATF definition, while highlighting limitations in the availability and quality of the relevant data necessary for a more comprehensive risk analysis.

MONEYVAL further noted in its report that non-profit organisations are subject to the same sanctions regime as other legal entities, without sufficient regard for the sector's specific nature, particularly the proportionality and deterrent effect of sanctions. For example, Article 65 of the AML/CFT Law bars all legal entities, including NPOs, from making or receiving cash payments, but the implications for NPOs' operational sustainability were not assessed. No evidence was identified, however, that AML/CFT measures have restricted CSO operations in practice, and the expert survey suggests they generally do not significantly affect CSOs' work. Validation meeting participants did note, however, that bank compliance requirements (additional questionnaires and information requests) do create an administrative burden, with trade unions particularly affected, as financial institutions do not always understand the nature of their work.

Due to the aforementioned data gaps, the MONEYVAL report noted that it remains difficult to establish direct correlations between specific types of non-profit organisations and potential TF abuse risks.

The rationale accompanying the draft Law on NGOs introduced in 2025 emphasised the intention to further align the legislative framework with MONEYVAL and FATF recommendations. However, it was not explicitly clarified which specific provisions of the draft law are intended to directly address the

³⁷ MONEYVAL. Montenegro: First Enhanced Follow-up Report and Technical Compliance Re-Rating. Strasbourg: Council of Europe, December 2025, p13–15.

shortcomings identified in the national risk assessment and related compliance reports. At the same time, the draft law maintains the voluntary nature of CSO registration, as well as the obligation for organisations to report changes to their status and operational data officially. Moreover, articles 46 and 47 of the draft law could help create a more accurate and up-to-date dataset on non-profit organisations, potentially facilitating more comprehensive and evidence-based risk assessments in the future.

Furthermore, during 2025, several activities aimed at raising awareness among CSOs regarding terrorist financing risks and compliance obligations were conducted by relevant institutions and stakeholders (ibid.). However, the MONEYVAL report also highlighted limited available data on whether outreach and awareness-raising activities were adequately targeted towards the most vulnerable parts of the non-profit sector.

Indicator 1.3.b – Proportion of CSOs whose ability to undertake legitimate activities is not restricted by the implementation of laws to combat extremism, terrorism, money-laundering and corruption, and in particular by:

- ➔ Being judicially harassed for their alleged connections with extremism, terrorism, money-laundering, and corruption
- ➔ Discriminatory restrictions placed on funding
- ➔ Authorities or banks preventing them from opening bank accounts, sending or receiving money

The findings of the MONEYVAL First Enhanced Follow-up Report and Technical Compliance Re-Rating from December 2025 noted that “no criminal investigations, prosecutions, or exchanges of information with foreign FIUs involving NPOs were initiated. This finding provides evidence that AML/CFT measures have not been used to target or judicially harass civil society organizations.

No publicly available evidence was identified indicating that authorities or financial institutions have prevented NPOs from opening bank accounts, sending and receiving funds, or any other forms of discriminatory restrictions on funding imposed through the implementation of AML/CFT legislation. At the same time, concerns remain regarding the proportionality of certain measures and the limited assessment of their potential impact on the functioning of non-profit organizations, particularly considering the overall low level of vulnerability identified within the sector.

The 2025 survey findings indicate that discriminatory restrictions remain the most frequently reported challenge affecting CSOs’ ability to undertake legitimate activities. Specifically, 15% of respondents reported discriminatory restrictions as a consequence of receiving funding from a particular source, 2% reported being unable to open a bank account, and 4% reported judicial harassment for alleged connections with extremism, terrorism, money laundering or corruption.

In 2025, 18% of CSOs reported restrictions, suggesting a less favourable picture than in earlier years, when 5% of organisations in both 2024 and 2023 (and 6% in 2021) reported experiencing judicial harassment, discriminatory funding restrictions or barriers to financial access.

Survey Results

	% CSOs saying their members were subject to judicial harassment	% CSOs saying their organisation had been subjected to discriminatory restrictions	% CSOs saying they could not open a bank account or face restrictions sending/receiving money
2025	4%	15%	2%

SO 1.4 | Public authorities treat all CSOs equally with regard to their operations, and equitably with other entities (such as businesses).

Indicator 1.4.a – Extent to which laws:

- ➔ Do not require CSOs to submit more reports and information than businesses.
- ➔ Do not subject CSOs to more inspections and sanctions than business entities, all else being equal.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

Compared to the previous assessment period, no significant legislative changes were introduced under this indicator that would formally result in discriminatory treatment of CSOs or unequal treatment in relation to other legal entities. During the validation meeting, participants reported a case in the innovation field where a CSO was initially asked for additional documentation when applying to a public call, despite already meeting the primary eligibility criterion (registration to operate in innovation, which applied equally to all applicants regardless of legal form). The institution, however, withdrew the extra requirements after the organisation intervened. While this appears to have been an isolated case, it suggests that implementation-level challenges may arise from an insufficient understanding of the legal status and operational characteristics of CSOs in certain sectors.

Under the current legal framework, civil society organisations are not subject to any specific or enhanced reporting or inspection requirements beyond those generally applicable to other legal entities. Against this background, two draft legislative initiatives entered the broader public debate during 2025.

The draft Law on NGOs introduced additional oversight provisions regarding the financial and operational functioning of organisations, set out in Articles 47–50. These provisions have raised concerns among several CSOs as some of them could create space for inconsistent or potentially selective implementation, particularly regarding the powers granted to institutions to assess whether organisations operate in line with the objectives for which they were established (Article 48, line 1). Concerns were also raised that such provisions could affect the nature of non-profit work and, if broadly interpreted,

indirectly impact freedom of association.³⁸ In response, the Ministry responsible for the draft law stated that these provisions were intended to prevent the misuse of the legal framework for conducting primarily commercial or economic activities unrelated to the statutory objectives of organisations, such as operating businesses under the formal status of a non-profit organisation (e.g., hairdressers, language schools, etc.).

In parallel, the drafting of the new Law on Accounting and Financial Operations of Non-Profit Organisations was initiated in 2025.³⁹ In this context, the Centre for the Development of Non-Governmental Organisations (CRNVO) organised consultative meetings with CSOs and relevant public institutions. In the same year, the Ministry of Finance published a public call for CSO representatives to participate in the working group drafting the law that was established and had one meeting within the reporting period.

Despite their importance in shaping the CSO sector, the mentioned draft laws, due to their status, have not been taken into account in the present assessment and have therefore not affected the score.

SO 1.5 | Central and/or local public authorities have enabling policies and rules for small community organizations and civic initiatives (grassroots organisations)

Indicator 1.5.a – Small community/local organisations and civic initiatives are allowed to operate by law without registering.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

No significant developments were recorded in 2025 regarding this indicator. The existing legal framework governing CSOs does not specifically regulate unregistered civic initiatives, yet it does not prescribe punitive measures against such forms of informal organising. In line with the legal principle that everything not explicitly prohibited by law is permitted, current practice reflects a relatively permissive approach towards informal civic engagement and citizen-led initiatives outside the framework of formally registered organisations. The draft Law on NGOs introduced in 2025 is not expected to substantially change this approach as it does not introduce specific provisions regulating unregistered initiatives. Even though several CSOs raised concerns about the legal status and recognition of informal civic initiatives and diverse forms of organising, the legislator responded that unregistered initiatives and diverse forms of organisation fall outside the scope of the draft law and therefore were not addressed through the proposed draft Law.⁴⁰

Given the unchanged situation in 2025, the score remains the same.

³⁸ Government of Montenegro. "Report from the Public Consultation on the Draft Law on Non-Governmental Organizations." September 25, 2025.

³⁹ "Drafting of the Law on Accounting and Financial Operations of Non-Profit Organisations Begins." CDM, 25 June 2025.

⁴⁰ Government of Montenegro. "Report from the Public Consultation on the Draft Law on Non-Governmental Organizations." September 25, 2025.

Indicator 1.5.b – In law, unregistered small community/local organisations and civic initiatives enjoy the same right to participation in decision-making processes as registered CSOs.

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

Unregistered civic initiatives faced the same challenges as in the previous reporting period, including unequal treatment in decision-making compared with registered organisations. Regular public discussions are generally open to any citizen or policy stakeholder, regardless of registration status. However, participation in working groups that contribute to policy-making remains inaccessible to unregistered organisations and is exclusively available only for registered CSOs. The participation is defined by the Regulation on the Election of Representatives of Non-Governmental Organisations to Working Bodies of State Administration Authorities and the Conduct of Public Consultations in the Preparation of Laws and Strategies.⁴¹

The draft Law on NGOs introduced in 2025 did not address this shortcoming through any specific provision, as the issue was not considered within the law's scope.

In practice, the 2025 CSO Survey findings show that organisational size affects inclusion in consultation processes. While CSOs with three or more paid staff show an average participation rate of 79% in consultation processes, this falls to 51% for CSOs with fewer or no paid staff. A similar pattern is seen when comparing CSOs with larger and smaller incomes (71% compared with 46%). When it comes to inclusion in working groups, the gap widens further: 62% of larger organisations hold membership, compared with only 29% of smaller ones.

⁴¹ Regulation on the Election of Representatives of Non-Governmental Organisations to Working Bodies of State Administration Authorities and the Conduct of Public Consultations in the Preparation of Laws and Strategies, Official Gazette of Montenegro No. 41/18

SO 1.6 | All CSOs are free to solicit and receive funding.

Indicator 1.6.a – Extent to which relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions as regards

- ➔ cash and in-kind donations from all sources
- ➔ funding from domestic public bodies
- ➔ funding from institutional, corporate, or individual donors
- ➔ funding from foreign governments or multilateral agencies

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

No significant developments were recorded under this indicator in 2025. In general, the legal framework in Montenegro remains relatively liberal regarding access to funding from diverse sources, with no restrictions based on donor type or origin. However, access to public funds remains subject to specific eligibility criteria. CSOs may apply only for funding opportunities that are aligned with their organization's statutory objectives and activities for which it was established.

Recent AML/CFT amendments introduced a EUR 10,000 limit on cash transactions for all legal entities, including CSOs. This reflects standard anti-money-laundering practice, consistent with EU and FATF approaches, and applies equally regardless of legal form. The MONEYVAL 2025 assessment noted, however, that the specific implications of such measures for NPOs' operations have not yet been adequately assessed.

Indicator 1.6.b – Proportion of CSOs that can access a broad range of funding without undue government interference.

Under Montenegro's Law on NGOs (Official Gazette 39/2011, 37/2017), CSOs can legally access a broad range of funding - domestic and foreign grants, donations, membership dues, corporate and individual giving, income from assets and from economic activity - with no restriction based on donor type or origin, no foreign-agent regime, and no special authorisation for foreign or multilateral funding (Arts 2-3, 10, 28). The state thus has minimal lawful basis to interfere with funding access; residual friction (e.g. banking due diligence, AML compliance burden) is administrative rather than legally mandated.

The findings from the 2025 CSO survey indicate that there has been an increase in the use of restrictive administrative practices (i.e. arbitrary audits, freezing bank accounts, requiring foreign agent registration). 7% of responding CSOs reported that they faced at least one of these restrictions at least once. This was 1% in 2024, 2% in 2023, and 0% in 2021. Most of these cases were arbitrary audits (4%), with 3% requiring registration as a foreign agent and 1% freezing of assets.

Conversely, the proportion of CSOs that confirmed they had not faced such restrictions has improved since the baseline year. In 2025, this was 92%, compared with 90% in 2024, 93% in 2023 and 82% in 2021.

SO 1.7 | Public financial and non-financial support to CSOs is available in IPA beneficiaries, and provided in a transparent, accountable, fair, and non-discriminatory manner.

Indicator 1.7.a – The level of public funding available for CSOs and associations is clearly articulated in laws and regulations, and the rights and duties of the state body invested with the ability to set and revise the level of public funding available is clearly defined in law.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

No significant developments were recorded under this indicator in 2025. The existing Law on NGOs, through Article 32, guarantees public funding for CSOs in an amount not lower than 0.3% of the on-going annual state budget. In addition, 0.1% of the budget is dedicated to programmes and projects targeting persons with disabilities, and a further 0.1% is allocated for the co-financing of EU-funded projects implemented by CSOs.

The draft Law on NGOs, introduced in 2025, proposes increasing the minimum allocation for CSO funding to 0.4% of the current annual state budget. Civil society organisations generally perceived this proposal as a positive step towards strengthening the sustainability of public funding for the sector. Nevertheless, challenges related to the timely and consistent disbursement of funds allocated to CSOs continued to be reported in practice. According to the Law on NGOs (Articles 32a and 32v), by 31 July of the current year, the Government will adopt a decision on priority areas for financing the next year, while it is expected that Ministries will publish the call by 1 March of the following year. In practice, these provisions do not appear to be consistently respected. By consulting publicly available information on the respective ministries' websites, the majority of public calls are published in the second half of the year.

According to Article 116 of the Law on Self-Governance, all 25 municipalities in Montenegro adopted a Decision on the Criteria, Method, and Procedure for the Allocation of Funds to NGO Projects, the content of which differs across municipalities. The local legal framework does not prescribe a minimum percentage or threshold for allocating funds to CSOs, but some municipalities (e.g., Kotor) have regulated it by decision. At the same time, there is no comprehensive, publicly available overview of the total funds planned for CSOs at the local level in 2025, which limits analysis and overall assessment of the support for the sector. In addition to financial support, municipalities may provide CSOs with office space at no cost or at reduced rates, depending on local policies and available resources.

Indicator 1.7.b – Percentage of public budget actually disbursed to CSOs in a year.

In 2025, a total of EUR 6,032,285 was allocated to the financing of civil society organisations, including projects and programmes in areas of public interest and those supporting the protection of persons with disabilities. Of this amount, EUR 5,696,340 was actually disbursed, corresponding to an implementation rate of 94.4%. The disbursed amount included EUR 4,323,789 for projects and programmes

in areas of public interest and EUR 1,372,551 for projects and programmes supporting persons with disabilities.

Overall, EUR 292,965 remained undistributed at the end of the reporting period. The largest amounts of undistributed funding were recorded by the Ministry of Health (EUR 132,243), the Ministry of Internal Affairs (EUR 64,696), and the Ministry of Culture and Media (EUR 59,771). Notably, the Ministry of Internal Affairs and the Ministry of Energy did not disburse any of the funds allocated for CSO funding, EUR 64,696 and EUR 42,980, respectively.⁴²

Despite these gaps, the overall absorption rate remained high. This suggests a strong level of implementation of the public funding framework for civil society organisations and an overall effective translation of budget allocations into financial support for CSO activities.

Additionally, municipalities are also allocating public funding to CSOs. However, no publicly available and consolidated data exists on the percentage or level of funds actually disbursed in practice. According to its Work Plan, the Council for Cooperation with NGOs will be responsible for following the budget allocation for CSOs from the public funds.

Indicator 1.7.c – Extent to which legal provisions regulating the award of public funding to CSOs ensure that:

- ➔ funding criteria are clearly defined, objective, and publicly announced
- ➔ evaluation of proposals is clear and impartial
- ➔ conflict of interest is clearly regulated
- ➔ reporting requirements are clear and proportionate

Year	Compliance
2025	3 – moderately meets standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

Besides the Law on NGOs, public financing of CSOs is also regulated by: 1) The Regulation on the Criteria, Method, and Procedure for the Allocation of Funds to Non-Governmental Organisations, 2) The Rulebook on the Content of Public Calls and Application Forms, and 3) The Regulation on the Procedure and Method for the Co-financing of Projects and Programmes of Non-Governmental Organisations Supported by European Union Funds. The selection criteria and objectives of the call are clearly defined and publicly announced. Overall, the legislative framework governing public funding for CSOs in Montenegro remained largely unchanged in 2025. While the legal framework includes procedural safeguards for public funding, CSOs and line ministries remain concerned about timeliness, monitoring of the projects and regarding conflicts of interest within selection committees as well as the limited availability of independent experts.

The analysis of the 2025 public calls for CSO funding identified 28 distinct funding calls. Under the Law on NGOs, public calls for financing CSO projects and programmes have to be published no later than 31 March of the current year. However, only one call was published before the statutory deadline, while

⁴² Data provided by the Ministry of Investment, Regional Development and Cooperation with NGOs during the interview.

the remaining 27 calls were launched after 31 March throughout the year, with the latest calls launched in late November 2025.⁴³

These findings indicate persistent delays in implementing the annual CSO funding cycle. While priorities and funding allocations for public-interest projects and programmes are determined during the preceding budget year, the late publication of public calls delays the implementation of planned activities well into the following year. As a result, the implementation of activities addressing identified public interest priorities may be deferred beyond the period in which the needs were initially identified, potentially affecting their relevance, responsiveness, and overall effectiveness. Delays in the funding cycle may also undermine the predictability of public funding and limit CSOs' ability to respond promptly to emerging societal needs and policy priorities.

The interview with the representative of the line ministry for CSOs further emphasised the need to strengthen field monitoring of project implementation. The interviewee also noted that the statutory provision introducing external evaluators has not proven effective in practice and would benefit from reconsideration in future revisions of the funding framework. The draft law on NGOs, introduced in July 2025, indicated a change of approach with regard to public financing. The majority of comments submitted during the public consultation on the draft law focused on the regulation of public funding, indicating that this remains a significant concern for stakeholders and an area requiring further improvements in implementation. The draft framework envisages a shift towards regulating funding mechanisms primarily through secondary legislation, with the law setting out only the overarching principles and legal basis for financing, which CSOs perceive as a forward-looking risk. The concerns expressed by CSOs in this regard are that this approach could lead to legal insecurity, a more flexible regulatory framework for financing, and greater discretion for the legislator, potentially leading to political influence. Some organisations also argue that regulating these issues through bylaws further reduces the sector's ability to participate in shaping the framework, as such documents are not legally required to undergo public consultations. In this regard, CSOs expect institutions to proactively ensure meaningful participation of the sector in the drafting and adoption of these acts.⁴⁴

Taking into consideration that the new Law on NGOs was not promulgated in 2025, the scoring for the respective indicator remains the same.

Indicator 1.7.d – Central governments make the information on awards publicly available and sufficiently detailed to identify individual awards.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

No changes to the regulatory framework regarding the public announcement of awarded projects were recorded in 2025, and the existing practice remained aligned with the current Law on NGOs, specifically the Regulation on the Financing of Projects and Programmes of Non-Governmental Organisations in Areas of Public Interest. In general, competent institutions continued to follow the prescribed procedures for publishing funding decisions and awarded projects.

⁴³ Interview finding and data shared by line Ministry

⁴⁴ Government of Montenegro. "Report from the Public Consultation on the Draft Law on Non-Governmental Organizations." September 25, 2025.

Indicator 1.7.e – Proportion of CSOs indicating that the provision of domestic public funds is transparent, fair, and non-discriminatory.

Year	Compliance
2025	2 – minimally meets standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

According to the 2025 CSO survey, 85% of respondents applied for public funding. This is considerably higher than previous years: 76% in 2024, 72% in 2023, 74% in 2021.

15% of respondents indicated that they did not apply for public funding. Among respondents that applied, 57% were successful in securing public funding, while 43% were rejected. The proportion of unsuccessful CSOs is considerably lower than in previous assessment rounds: 79% in 2024, 68% in 2023 and 77% in 2021. Application and success rates in 2025 indicate a much better picture regarding accessibility of public funding.

Among organisations that did not secure public funding, 35% cited the perception that authorities fund preferred organisations as the main reason. In addition, 47% selected “other” reasons, suggesting that concerns regarding access to public funding extend beyond the predefined response categories. These findings suggest that public funding remains an important source of support for a significant proportion of CSOs.

According to the 2025 CSO survey, perceptions of the transparency and fairness of public funding for civil society organisations remain predominantly negative. Only 26% of respondents considered the allocation of public funds to be either sufficiently or very transparent and fair, while 74% assessed it as either insufficiently transparent and fair (55%) or not transparent and fair at all (20%). Although the percentage of responding CSOs that find public funds transparent and fair is higher than in previous years (10% in 2024, 8% in 2023 and 18% in 2021), the findings are largely consistent with the views expressed by experts. In contrast to the views of CSOs, representatives of public institutions generally considered public funding to be transparent, fair, and based on established procedures and criteria.

These findings indicate that concerns regarding the transparency and fairness of public funding persist within the civil society sector. The results suggest that a substantial majority of CSOs continue to perceive shortcomings in the allocation of public resources, underscoring the need for further efforts to strengthen transparency, accountability, and trust in public funding mechanisms.

Indicator 1.7.f – Public funding does not exclude CSOs on the basis of constituency representation

There are no legal provisions or formal decisions that explicitly exclude particular CSOs from access to public funding.

A small percentage (3%) of responding CSOs whose public funding application was rejected reported in the 2025 CSO Survey that this was due to the fact that the authorities were unwilling to fund work related to the communities they serve and represent. This was 7% in 2024. Survey responses show no obvious exclusion based on thematic field, however CSOs working on anti-corruption (36%) and humanitarian aid (30%) reported lower levels of acceptance than some others.

SO 1.8 | Individuals and corporations enjoy tax benefits for their donations to CSOs.

Indicator 1.8.a – Tax legislation allows for tax relief as regards:

- ➔ Individual giving
- ➔ Corporate giving

Year	Compliance
2025	4 – meets most standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

Amendments to the Law on Corporate Income Tax⁴⁵ provided additional clarification of Article 24, explicitly defining the public-benefit purposes for which corporate donations may be recognised as deductible expenses. These include health, social, educational, scientific, religious, cultural, sports, and humanitarian activities, environmental protection, the development of civil society and volunteering, as well as support to institutions and providers of social and child protection services and CSOs. Under the law, such donations are recognised as tax-deductible expenses up to 3.5% of a company's total annual revenue. However, the absence of publicly available data on companies' awareness of these incentives and their uptake in practice limits the assessment of the effectiveness of the proposed measures in promoting corporate philanthropy and supporting CSOs.

The Personal Income Tax Law provides for tax relief for donations made to a broad range of public-benefit purposes, including health, humanitarian, social, educational, scientific, cultural, environmental, and civil society development. Donations made in cash, goods, rights, or services to eligible entities, including non-governmental organisations, may be recognised as deductible expenses of up to 3% of total income, provided that they are used exclusively for the prescribed public-benefit purposes.⁴⁶ However, no publicly available information was identified on the extent to which these tax relief provisions are utilised in practice, making it difficult to assess their effectiveness in promoting donations to civil society organisations.

Due to the changes in the income tax legislation, the score is raised to 4.

Indicator 1.8.b: Proportion of private individuals who have given money to a CSO

While previous editions of this assessment made use of data from the Charities Aid Foundation World Giving Index on the proportion of private individuals who donated money in Montenegro in general, beyond CSOs, this index has no data for Montenegro for the year 2025.

⁴⁵ Law on Amendments to the Law on Corporate Income Tax – Official Gazette of Montenegro, No. 088/24, published on 13 September 2024. The Law entered into force on 1 January 2025.

⁴⁶ Personal Income Tax Law, Official Gazette 88/2024, implementation from 1 January 2025. <https://wapi.gov.me/download-preview/d93f2f4f-b97b-44fc-9409-7bf26be031c1?version=1.0>

SO 1.9 | Tax benefits are available to CSOs.

Indicator 1.9.a – Extent to which applicable tax laws provide for the following:

- ➔ CSO income generated from grants, donations, and membership dues, income from economic activities, investment income, real property, gifts and inheritance is not subject to taxation;
- ➔ Any excess revenue or profit generated through economic activity and used for mission-related purposes by CSOs is not subject to corporate income/profit tax.

Year	Compliance
2025	4 – meets most standards
2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

No significant changes were recorded in 2025 regarding the legal and fiscal framework governing CSOs' economic activities. The Law on NGOs allows CSOs to engage in economic activities, provided that the income generated does not exceed EUR 4,000 per year or 20% of the organization's total budget from the previous year, and that such activities comply with the relevant legislation governing economic activities. Additionally, CSOs are not obligated to pay corporate income tax if they are operating under the special regulation governing non-profit activities (the law on NGOs).

CSOs that have sought to diversify their funding base and strengthen their financial sustainability by establishing limited liability companies (LLCs) report several practical and regulatory challenges under the current legal and fiscal framework. In particular, profits generated by LLCs remain subject to standard corporate taxation. At the same time, subsequent transfers or reinvestments into activities of public benefit performed by CSOs are not recognised through specific fiscal incentives. Furthermore, stakeholders note that the related-parties rule also limits LLCs' ability to provide services to their founding CSOs, thereby reducing the potential of this model to generate sustainable income for civil society organisations.

Montenegro still lacks a dedicated legislative framework for the social economy, thereby hindering the creation of an enabling environment for CSOs' economic activities and the sustainability of their programmes through diversified funding. Nevertheless, an important development in 2025 was the establishment of a working group to prepare the Strategy for the Development of the Social Economy 2025-⁴⁷, with the action plan 2026-2027, which was subsequently adopted in late December 2025. The Strategy aims to strengthen the social economy ecosystem through measures related to the regulatory and institutional framework, financial instruments, human capital, support infrastructure, social impact, and improved recognition and market access for social economy actors. The Strategy also foresees the establishment of a Council for Social Economy as an intersectoral body responsible for supporting the implementation of the Strategy, providing policy recommendations, monitoring developments in the sector, and contributing to the preparation of future strategic documents. In parallel, a working group was established to prepare the Law on Social Economy, with its adoption envisaged for 2026. The forthcoming legislation is expected to provide a more coherent framework for the

⁴⁷ Government of Montenegro. 2025. Draft Strategy for the Development of the Social and Solidarity Economy 2025–2029, with the Draft Action Plan 2026–2027. Podgorica: Government of Montenegro. Published December 25, 2025. Accessed May 25, 2026.

development of social economy initiatives. It may create additional opportunities for CSOs to diversify their funding sources and strengthen their financial sustainability.

While examples of banks providing loans to CSOs for property and infrastructure acquisition exist in practice, no comprehensive research or publicly available data are available to evaluate those practices systematically.

The score for this indicator increased in 2025 following the adoption of the Strategy for the Development of the Social Economy, which is accompanied by a dedicated budget and aims to create a more enabling environment for the sector while supporting the diversification of CSO funding sources. Given that the Strategy was adopted only in December 2025 and that no implementation measures were introduced during the reporting period, the score is raised by only one point.

SO 1.10 | The policies and legal environment provide incentives and facilitate volunteering for and employment in CSOs.

Indicator 1.10.a – Laws regulating volunteering are adopted.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

The legislative framework governing volunteering remained unchanged in 2025, although a working group for preparing a new Law on Volunteering was established. While the Law on Volunteer Work does not formally restrict citizens' participation in community initiatives, it continues to create significant practical barriers to civic engagement and the development of volunteering.

The key longstanding concern remains Article 12a, which regulates volunteering as a specific form of labour relation for the purpose of acquiring work experience and meeting eligibility requirements for the state professional examination. This approach has long been criticised by CSOs and has also been highlighted in successive European Commission reports as one of the main shortcomings of the current legal framework, underscoring the need to align the legislation more closely with international standards and contemporary understandings of volunteering.

One CSO participating in the working group on Drafting the Law on Volunteering reported that their role was largely limited to commenting on draft texts rather than shaping policy design and raised concerns that Article 12a may, in practice, be applied beyond its original purpose. Available data further underline the limited effectiveness of the current framework. While the Strategy reports only 196 registered volunteer contracts and 28 registered organizers of volunteering in 2025, findings from the CSO survey conducted for this report indicate substantially higher levels of volunteer engagement in practice (more than 1,000 long-term volunteers as a part of organised volunteering), suggesting a significant gap between the formal legal framework and on-the-ground realities.

Several structural shortcomings of the current framework also remain unresolved, including the lack of differentiation between different forms of volunteering, disproportionate administrative requirements for short-term and ad hoc engagement, limited institutional support mechanisms, and the continued

prohibition on volunteering by children under 15. Together, these limitations continue to constrain the broader development of volunteering as a form of civic participation.

In 2025, the process of preparing a new Law on Volunteering was reinitiated, with adoption expected in 2026. Given the longstanding concerns raised by civil society, the reform presents an opportunity to better align the legislative framework with contemporary understandings of volunteering and reduce unnecessary administrative barriers to civic engagement.

No state volunteer programmes supporting volunteer engagement in the civil sector were identified during the reporting period.

As no significant developments were recorded under this indicator in 2025, the score remains unchanged.

Indicator 1.10.b – Government volunteering strategies and programmes support volunteering for CSOs and have sufficient resources allocated for implementation.

Year	Compliance
2025	3 – moderately meets standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

Following the establishment of the Directorate for Social Entrepreneurship, Volunteering and Civil Society Cooperation in 2024, the most significant development in the field of volunteering in 2025 was the adoption of the Strategy for the Development of Volunteering 2025–2029.⁴⁸ Although the preparation of such a document is mandated under Article 24 of the Law on Volunteer Work, the previous strategy already expired in 2015, leaving a decade-long gap in strategic planning and policy development in this area. Against this backdrop, the adoption of a new strategic framework represents an important step towards returning volunteering to the public policy agenda.

The Strategy, informed by a comprehensive mapping analysis, was adopted in December 2025. The Strategy aims to support the development and promotion of volunteering through a more strategic and coordinated approach, recognising volunteering as an important component of social life and a valuable contribution to community development and active citizenship.⁴⁹ It is structured around two strategic objectives: strengthening the volunteering system and infrastructure, and enhancing the recognition and promotion of the social value of volunteering.

Importantly, the Strategy acknowledges the need to replace the current Law on Volunteer Work with a new Law on Volunteering, signalling a potential shift away from the existing approach that perceives volunteering primarily through the lens of labour relations. This could pave the way towards a legislative framework that is more conducive to civic engagement and community participation, addressing concerns that CSOs have raised for years regarding the limitations of the current regulation.

Yet, while the accompanying analysis repeatedly highlights the shortcomings of the existing legal framework and the need for a different regulatory approach, the Action Plan still sets as one of its key targets

⁴⁸ Government of Montenegro, Proposal for the Volunteering Development Strategy 2025–2029 with the Draft Action Plan 2026–2027, Government of Montenegro, published December 25, 2025.

⁴⁹ Government of Montenegro, Proposal for the Volunteering Development Strategy 2025–2029 with the Draft Action Plan 2026–2027, Government of Montenegro, published December 25, 2025. Pp 5

an increase of approximately 75% (from 196 to 350) in the number of registered volunteer contracts by 2029. This raises the question whether this target reflects a transitional measure under the current legal framework or an indication that the future reform will continue to rely on the same administrative model. Therefore, it is not possible at this stage to assess the extent to which the planned legislative changes will address the structural issues identified throughout the Strategy and mapping exercise.

The total budget envisaged for the implementation of the Strategy amounts to EUR 1,114,594 for a four-year period.

The Strategy also foresees financial and institutional support for CSOs active in volunteering, including support for resource organisations through the establishment of a Network of Volunteer Resource Centres. According to the Action Plan, these structures are expected to play a key role in promoting volunteering, strengthening coordination, and providing support services to volunteers and volunteer-involving organisations.

Indicator 1.10.c – Proportion of CSOs that benefit from state employment strategies and programs.

According to the 2025 CSO Survey, 20% of civil society organisations reported benefiting from government employment programmes, while 77% reported not benefiting from them. A further 4% of respondents stated that no such programmes existed. The findings are broadly consistent with previous years, when 21% of CSOs reported benefiting from government employment programmes in 2024 and 19% in 2023. While the proportion of beneficiary organisations has remained relatively stable in recent years, it remains below the 2021 level (31%).

	% CSOs saying they benefit from state employment strategies and programmes
2025	20%
2024	21%
2023	19%
2021	31%

CSOs continued to benefit from several state employment support measures, most notably the Professional Training Programme for Higher Education Graduates, Public Works schemes, and employment subsidies for persons with disabilities, as also stated in the survey responses. These programmes remain among the few publicly funded mechanisms through which CSOs can strengthen their human resources capacity while contributing to youth employment and the labour market inclusion of persons with disabilities.

In 2025, proposed amendments to the Law on Professional Rehabilitation and Employment of Persons with Disabilities generated significant concerns among organisations of persons with disabilities and CSOs, which argued that the changes could weaken existing employment support measures. Following advocacy efforts and consultations with representative organisations, the Government withdrew the draft amendments and established a new working group, including organisations of persons with disabilities, to prepare a revised proposal. The amended Law was adopted in October 2025.

Indicator 1.10.d – Proportion of CSOs that benefit from state volunteering strategies and programmes.

According to the 2025 CSO Survey, none of the respondent organisations reported benefiting from state volunteering strategies or programmes. Some 76% of respondents stated that they had not benefited from such programmes, and 24% indicated that no such programmes existed.

On the other hand, the line ministry responsible for volunteering policy in 2025 published a call to promote volunteering. The fact that nearly one quarter of surveyed CSOs stated that no such programmes existed may therefore indicate limited awareness of available volunteering support measures within the civil society sector. The findings are broadly consistent with previous years. In 2024, only 1% of surveyed CSOs reported benefiting from state volunteering strategies and programmes, while no respondents reported such benefits in 2025. Taken together, the results indicate that government-supported volunteering programmes continue to have very limited reach and impact within the civil society sector.

Indicator 1.10.e – Proportion of employees in CSOs in relation to the total workforce.

There is no official data on the number of employees in CSOs in 2025.

Indicator 1.10.f – Percentage of people who have volunteered to give their time to an organization.

This indicator was assessed through the CAF World Giving Index in previous years; however, the methodology of that index changed in 2025 and no relevant data are available for Montenegro for 2025. In 2024, 9% of people in Montenegro reported volunteering their time for an organisation, consistent with the 9% recorded in 2023 and below the 11% of 2021.

Specific Objective 2: Strengthened cooperation and partnership between CSOs and public institutions.

SO 2.1 | Public authorities and institutions include CSOs in decision and policy-making processes.

Indicator 2.1.a – Laws, by-laws, strategies, other acts of public interest, and policy reforms are effectively consulted with CSOs in that:

- ➔ CSOs have access to the draft document from the beginning of the drafting process to the end of the adoption procedure;
- ➔ At least 15 days are allowed for commenting before the draft document enters the adoption procedure;
- ➔ The use of extraordinary/expedited procedures to adopt legislation without allowing for consultation is an exception and duly justified;
- ➔ Reports on results of public consultations, including reasons for rejection of comments, are published in a timely fashion;
- ➔ Working groups members from CSOs are selected based on a public call, clear criteria and in line with equal treatment;
- ➔ Working group members from CSOs include representatives of society as a whole, including women's groups, LGBTIQ+ groups, migrant groups, minorities, disability groups, and others as appropriate, in line with the Human Rights Based Approach.

Year	Compliance
2025	3 – moderately meets standards
2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

In 2025, no significant changes were recorded in the framework governing CSO participation in public consultations and the EU accession process. Civil society participation continues to be regulated by the Regulation on the Selection of Representatives of Non-Governmental Organisations to Working Bodies of State Administration Authorities and the Conduct of Public Consultations in the Preparation of Laws and Strategies.⁵⁰ Also, procedures governing the selection of CSO representatives to working groups continued to be applied, with representatives selected based on their expertise and the support provided by civil society organisations endorsing their candidacy.

According to the 2025 Report on the Implementation of the Regulation on the Selection of NGO Representatives to Working Bodies and the Conduct of Public Consultations, prepared by the Ministry

⁵⁰ Regulation on the Election of Representatives of Non-Governmental Organisations to Working Bodies of State Administration Authorities and the Conduct of Public Consultations in the Preparation of Laws and Strategies, Official Gazette of Montenegro, No. 41/18, 28 June 2018

of Public Administration⁵¹, ministries reported the processing of a total of 186 acts during the year, composed of 153 laws and 24 strategic documents. Of these, 134 acts were subject to the consultation and public debate requirements set out in the Regulation. However, provisions aimed at improving the transparency and predictability of public consultations remain inconsistently implemented. In particular, the requirement for ministries to publish annual consultation plans within 15 days of adopting their Annual Work Programmes remained largely ineffective. Only four ministries complied with this obligation in 2025.⁵²

The findings indicate that early-stage public consultations were conducted for only 25% of eligible acts. This suggests that the practice of involving stakeholders at the initial stage of policy development remains limited despite being envisaged by the regulatory framework. This also overlaps with the validation focus group and expert survey findings.

Compliance was higher in formal public debates. Public debates were held for 84% of laws and 56% of strategic documents subject to this obligation. This leaves a significant proportion of strategic documents and a smaller share of laws without the required public debate process. According to the Ministry of Public Administration's report, a total of 153 laws were under preparation in 2025, of which 111 were subject to the consultation and public participation requirements under the Regulation. However, it is not possible to conclude that the remaining 42 laws were all adopted under an expedited procedure through the MPs amendments since the Regulation does not apply to certain categories of legislation, such as laws ratifying international agreements, budget-related legislation, and other acts exempt under the applicable legal framework. Therefore, it is not possible to determine the exact number of laws adopted under an expedited procedure based on this particular report. On the other hand, participants in the validation focus group pointed to the growing use of legislative initiatives being submitted by groups of Members of Parliament rather than through the Government. As parliamentary proposals are not subject to the Regulation's public debate requirements, this approach may limit opportunities for public participation in the legislative process. According to validation focus group participants, several important legislative initiatives, including the Laws on Public Gatherings, the Agency for National Security, and the Internal Affairs Law, were advanced through this route without undergoing public consultation.⁵³

Transparency of consultation processes remains mixed. Public calls for participation in public debates were published on the e-Government portal for roughly half of the laws and strategic documents that underwent public debate. In addition, while ministries reported publishing public debate reports for 96 acts on their websites, only 13 laws and one strategic document could be verified as having corresponding reports published through the e-Government portal. All consultations, however, respected the prescribed timeframe of a minimum of 20 and a maximum of 40 days.

Regarding the participation of civil society organizations, more than half of all public calls for establishing working groups on draft laws and strategic documents (42 out of 74) received no applications from CSOs, indicating strategic challenges in ensuring meaningful, broad-based participation by CSOs in public policy development processes. The feedback collected through the expert survey, interviews and validation focus group suggests that the low level of interest in participation may be linked to several factors, including perceptions that the involvement of CSO representatives in working groups is often seen as formal rather than substantive, the absence of remuneration for participation in most

⁵¹ Ministry of Public Administration. (2026). Report on the Implementation of the Decree on the Selection of NGO Representatives to Working Bodies of State Administration Authorities and the Conduct of Public Consultations in the Preparation of Laws and Strategies for 2025. Podgorica: Ministry of Public Administration. Published on 4 June 2026 Available at: <https://www.gov.me/dokumenta/115ed0bb-caba-4651-9f82-b47c3bea53d6>

⁵² Ministry of Justice and Ministry of Education, Science and Innovations, Ministry of Public Administration, and Ministry of Human and Minority Rights

⁵³ Vijesti, Laws testing the seams of the government: what the frictions between constituents of the ruling majority represent", Vijesti, August 20, 2025,

working bodies, and uncertainties regarding the status of CSO representatives in certain bodies, which may create disincentives for engagement.

The 2025 CSO Survey results also support this finding. While 49% of responding CSOs are not represented in working groups, 39% had a member in government-level working groups, 20% in municipal-level working groups and only 3% at parliamentary level. With regard to thematic representation of CSOs in working groups, the findings suggest that organisations working on minority rights and non-discrimination (61%), gender equality and LGBTIQ+ (57%), and disability rights (52%) are reasonably represented in formal working structures. However, organisations focused on social inclusion (46%), youth and youth rights (42%) and rural development (40%) fall noticeably below average, with the most notable gap being with CSOs working on community development (32%). Although there is no official data about thematic representation, CSO Survey findings suggest that while CSOs representing specific marginalised identity groups have relatively good access to working groups, organisations working at the broader community level, which often serve the most diverse and vulnerable populations, are significantly underrepresented, indicating that working group composition does not fully reflect society as a whole.

The question in the CSO Survey that assesses CSOs' involvement in effective consultation processes was revised this year to provide a more nuanced and detailed picture. In previous years, CSOs were asked whether they had been included in an effective consultation process, with "effective" defined as having access to draft documents from the beginning of the process and having at least 15 days to provide feedback. This year, the two criteria were split into separate questions, asking respondents independently whether they had access to drafts and whether they had at least 15 days to respond and whether both conditions were met within the same consultation process.

This methodological change reveals a striking gap between participation and quality: while 70% of responding CSOs reported being involved in at least one consultation process, this figure drops sharply to just 8% when the consultation process met both criteria simultaneously; indicating that meaningful, effective consultation remains the exception rather than the rule. This confirms that, while consultation opportunities exist, fully effective consultation remains rare in practice.

Survey Results

	% CSOs saying they were effectively consulted by authorities
2025	70% (only 8% when both effectiveness criteria are met)
2024	21%
2023	31%
2021	34%

This is consistent with the views expressed in the interviews, the expert survey and the validation meeting, where participants highlighted persistent shortcomings in the quality and effectiveness of public consultations. A closer look at the 2025 CSO Survey responses shows that 61% of responding CSOs took part in some form of government-level consultation, but only 8% of these met both criteria for effective consultation. Municipal-level consultations came second, with 44% of CSOs stating that they took part, but again only 3% of responding CSOs experienced both criteria. For the other types, 33% of CSOs reported involvement in parliamentary-level consultations, with none meeting both criteria; 38% attended consultations related to the civil society cooperation strategy, with none effective;

and 18% of responding CSOs stated that they were involved in consultations on EU accession programming, of which 7% had both access to drafts and at least 15 days to respond.

Indicator 2.1.b – CSOs are effectively included in oversight mechanisms.

This indicator was not assessed.

Indicator 2.1.c – Proportion of CSOs that have participated in consultations during preparation of state reports under international human rights and other legal obligations, and the implementation of treaty body recommendations.

This indicator was not assessed.

SO 2.2 | Public authorities and institutions acknowledge the importance of civil society in societal policy debate and EU integration processes.

Indicator 2.2.a – Extent to which CSOs assess the attitude of public officials towards civil society as supportive.

Year	Compliance
2025	3 – moderately meets standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

According to the 2025 CSO Survey, 31% of respondents assessed public institutions' attitude towards civil society as generally supportive, while 34% described it as neutral. At the same time, 35% perceived public institutions as generally negative or hostile towards civil society organizations.

The survey findings suggest a considerably more positive perception than in previous assessment rounds. However, comparisons with previous years should be interpreted carefully, as the indicator measured attitudes of public institutions towards CSOs in 2025, whereas earlier assessments focused on public officials' attitudes. In addition, in previous years the 'neutral' option was not offered to respondents, and its addition in the 2025 survey appears to have affected CSOs' responses.

At the same time, the 2025 key informant interviews, as well as the expert survey, present a considerably less favourable picture, with all respondents assessing public institutions as insufficiently supportive or not supportive at all. This discrepancy may reflect differences in the profile of respondents. While the general CSO survey included a broad range of mid and grassroots organisations, the expert survey was dominated by advocacy, watchdog, and human rights organisations, which tend to have more demanding and critical interactions with public authorities.

The findings suggest that perceptions of institutional support vary across segments of civil society, with advocacy-oriented organisations reporting a less favourable environment than community-based organisations, as noted by the validation group participants as well.

Survey Results

	% CSOs that assess the attitude of public institutions as supportive	% CSOs that assess the attitude of public institutions as not supportive
2025	31%	35% (+34% neutral)
2024	16%	74%
2023	18%	69%
2021	13%	79%

SO 2.3 | Public authorities contribute to civil society strengthening by cooperating with civil society through strategic policy frameworks and relevant institutional mechanisms.

Indicator 2.3.a – Proportion of CSOs that were effectively consulted in the preparation of civil society cooperation strategies.

The Strategy for Cooperation between State Administration Bodies and Non-Governmental Organisations 2022–2026 remained in force throughout 2025. During the reporting period, no consultations or review processes related to its content were conducted.

Indicator 2.3.b – IPA beneficiaries have adopted currently valid civil society cooperation strategies.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	1 – does not meet standards

In 2025, there were no changes to the Strategy for Cooperation between State Administration Bodies and Non-Governmental Organizations, as it was scheduled to expire by the end of 2026.

Indicator 2.3.c – Civil society cooperation strategies are accompanied by adopted budgeted action plans.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	1 – does not meet standards

The Government allocated EUR 1,281,000 to implement the Strategy for Cooperation between State Administration Bodies and Non-Governmental Organisations 2022–2026. Budget execution in 2025 remained below the level originally planned under the 2024–2026 Action Plan. Of the total budget of EUR 1,162,455 for the period 2024–2026, reported expenditure in 2025 amounted to EUR 107,503 from the state budget, complemented by EUR 21,000 from the previous EU-funded Technical Assistance project for activities launched in 2025, representing approximately 11% of the planned budget. However, this should be considered a minimum estimate, as several institutions did not report financial data for implemented activities. In addition, according to information from the line ministry, the implementation of several planned activities and related budget allocations was postponed pending the adoption of the new Law on NGOs and the Law on Volunteering.

The European Commission observed that progress in implementing the Strategy remains limited. According to the line Ministry, several measures under the Strategy remain pending, as their implementation is contingent upon the adoption of the new Law on NGOs and the new Law on Volunteering.⁵⁴

Indicator 2.3.d – Proportion of CSOs that rate civil society cooperation strategies as relevant and effective.

According to the 2025 CSO Survey, perceptions of the Strategy for Cooperation with Civil Society's relevance and effectiveness remain predominantly negative. Only 1% of survey respondents assessed the Strategy as both relevant and effective. 16% CSOs assessed it as relevant, with 49% not relevant; 9% assessed it as effective, while 55% as not effective.

Overall, both surveys indicate that, despite the existence of a strategic framework for cooperation with civil society, CSOs continue to express concerns regarding its implementation and practical impact.

In 2024, 14% of respondents rated the Strategy as both relevant and effective (same as in 2023 and 45% in 2021). Compared with 1% recorded in 2025, the sharp drop signals an even more negative perception of CSOs towards the Strategy.

	% CSOs saying the civil society cooperation strategy is relevant and effective
2025	1%
2024	14%
2023	14%
2021	10%

⁵⁴ Interview with the line Ministry

Indicator 2.3.e – Public structures responsible for the implementation of civil society cooperation strategies are appropriately resourced.

No changes in the institutional framework governing cooperation with civil society were recorded in 2025. The Ministry of Investment, Regional Development and Cooperation with NGOs retained its mandate to oversee the implementation of the Strategy for Cooperation between State Administration Bodies and Non-Governmental Organisations 2022–2026 and to coordinate activities envisaged under its Action Plan. According to information provided by the Ministry, institutional capacity for coordinating and implementing the civil society cooperation strategy remains limited, with only two staff members responsible for this portfolio.

At the beginning of 2025, the Ministry of Investment, Regional Development and Cooperation with NGOs launched a two-year programme supporting the Network of Resource Centres, funded by the state budget as it was planned in the Strategy Action Plan. The programme includes CRNVO as the national resource centre, alongside three regional resource centres: the Democratic Centre of Bijelo Polje (North), Active Zone (Central), and New Horizons (South). With a total allocation of EUR 488,154, this marks the first time the resource centre network has been fully financed by public funds. The mandate of the resource centres is to support the civil society sector through “capacity building, strengthening its innovation potential, and improving and expanding the services provided to citizens.”⁵⁵

Indicator 2.3.f – Mechanisms for dialogue between civil society cooperation councils and central governments meaningfully include CSOs in that:

- ➔ they have an agreed programme of work
- ➔ they have agreed rules of procedure
- ➔ they meet regularly
- ➔ rules allow CSOs to call the meetings and contribute to agenda setting
- ➔ there is adequate follow-up to conclusions and recommendations

Year	Compliance
2025	3 – moderately meets standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	3 – moderately meets standards

A notable development in 2025 was the re-establishment of the Council for Cooperation between the Government and NGOs after a five-year period of inactivity. It held its first meeting in December 2025 and comprises 12 representatives from civil society organisations and 12 from state institutions.

At its first session, the Council adopted its Rules of Procedure, and the 2026 Work Plan, reaffirming its role as the central institutional mechanism for dialogue and cooperation between public authorities and civil society. Under the Rules of Procedure, CSO members of the Council have the right to propose agenda topics and initiate discussions on matters within the Council’s mandate. The Council’s mandate includes monitoring and analysing public policies and legislation that affect the enabling environment

⁵⁵ Government of Montenegro, Allocated EUR 488,154 for the Financing of the National and Three Regional Resource Centers, 30 December 2024

for civil society, including ongoing reforms to the Law on Non-Governmental Organisations and the Law on Volunteer Work. Additionally, it is also tasked with monitoring the implementation of the Strategy for Cooperation between State Administration Bodies and Non-Governmental Organisations 2022-2026, as well as reviewing the quality of public consultation processes and the participation of CSO representatives in various working groups and institutional bodies. In addition, the Council is expected to monitor the allocation and use of public funding for CSOs and to serve as a platform for structured dialogue between state institutions and the broader civil society sector on issues of common concern. The reactivation of the Council represents an important step towards restoring an institutional mechanism for cooperation and oversight. The extent to which it will contribute to more effective cooperation between public institutions and civil society, and influence policy-making processes in practice, remains to be seen in the upcoming period.

As the Council has only recently been established, there is not yet sufficient information to assess the follow-up to its recommendations or the extent to which proposals put forward by CSO representatives are reflected in its work or acted upon by the competent authorities.

Specific Objective 3: CSOs' capacities and resilience to carry out their activities are reinforced.

SO 3.1 | CSOs' internal governance structures follow the principles of good governance.

Indicator 3.1.a – Proportion of CSOs that have an independent and effective governing body, with clear terms of reference to oversee the organisation's strategic goals, impact, management, legal compliance, and accountability.

Year	Compliance
2025	4 – meets most standards
2024	2 – minimally meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

This indicator was assessed differently in 2025. In previous years, the relevant question in the CSO surveys required that the effective governing body is appointed by the assembly, which is a rather narrow and limited interpretation of an effective governing body, not only because it leaves out unregistered or small organisations but also because organisations may have different means and methods of their own to select/appoint/decide their governing bodies. In 2025, the question was formulated differently and inquired about the existence of a governing body (e.g. assembly, board or council responsible for oversight, legal compliance and accountability).

It should also be noted that, under the Montenegrin Law on NGOs, associations are obligated to have an assembly as the decision-making body, while boards and other oversight mechanisms are optional and regulated by statute. In contrast, foundations are legally required to establish a governing board. When the question is interpreted in this manner, the percentage of CSOs that have a governing body rises to 93% in 2025 (90% when combined with the existence of a governing document), from 27% in 2024 under the narrower interpretation (46% in 2023 and 2021).

The 2025 CSO Survey shows that 93% of responding organisations reported having a governing body, including an assembly, governing board, or council responsible for oversight, legal compliance, and accountability, while 7% indicated that they did not have such a body. In addition, 95% of respondents have a governance document.

Survey Results

	% CSOs saying they have an independent and effective governing body
2025	93%
2024	27%
2023	46%
2021	46%

Although the finding would justify a score of 5, given the recent methodological change the score is, with due caution, raised to 4 (meets most standards) rather than 5 (fully meets standards). This will be monitored in the upcoming cycles.

Indicator 3.1.b – Proportion of CSOs that regularly check potential conflicts of interest with regard to the political, economic and personal relationships of their governing body.

Year	Compliance
2025	3 – moderately meets standards
2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

This indicator was assessed differently in 2025. In previous years, the relevant question in the CSO surveys asked how often governing body members were signing a conflict-of-interest declaration, which is a rather narrow interpretation of the indicator standard, not only because it would leave out unregistered CSOs, but also because organisations may have different ways and means for assessing conflict of interest. Therefore, in 2025, the survey question asked how often organisations check for potential conflicts of interest in general.

In the 2025 survey, among responding CSOs, 58% of responding organisations reported checking potential conflicts of interest related to the political, economic, and personal relationships of members of their governing bodies on an annual basis, and a further 7% reported conducting such checks every two years. This means that 65% of participating CSOs conduct periodic conflicts of interest checks. However, while 23% of responding CSOs only do this check upon entry into the role, 4% indicated that they never perform them, and 9% reported following other internal procedures.

The findings are not directly comparable with previous survey rounds, as earlier questionnaires focused on the frequency of signing conflict-of-interest declarations rather than a broader approach to conflict-of-interest checks. With this narrower interpretation, the 2024 survey results showed that only 18% of CSOs required annual conflict of interest declarations, 36% required them upon appointment, while more than one-third of organisations reported never requiring such declarations from members of their governing bodies.

With due attention to the comparability with previous years, but based on the respective change in interpreting the applicability of this indicator, the compliance score is now raised to 3, as the result

indicates a considerable increase, but does not yet show that regular conflict-of-interest checks are standard practice across the sector, and a substantial share of CSOs still do not carry them out on a recurring basis.

Indicator 3.1.c – Proportion of CSOs that share relevant information on their organisation, using the means and channels that are accessible to all stakeholders in terms of publishing.

Year	Compliance
2025	3 – moderately meets standards
2024	2 – minimally meets standards
2023	1 – does not meet standards
2021	2 – minimally meets standards

In 2025, 43% of responding CSOs published all three key governance elements — their governing document, the structure of their governing body and the names of governing body members on their website. This is an increase compared with 2024, when the figure was 23%. In 2023, the figure was 16%, and in 2021, 33%.

Despite a minor change in the formatting of the question, the results indicate that many CSOs are using their websites for broader transparency and accountability.

Looking only at websites, 53% of CSOs published their governing document, 43% published the structure of their governing body, and 49% published the names of governing body members. When website and social media are both taken into account, these figures are higher: 76% published their governing document, 56% published the structure of their governing body, and 39% published the names of governing body members by either social media or website. The 2025 result still indicates an increase compared with the previous reporting period, with due attention to minor change in the question format.

Indicator 3.1.d – Proportion of CSOs that have an organisational gender equality policy.

Year	Compliance
2025	2 – minimally meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

According to the 2025 CSO Survey, 40% of responding organisations reported having an internal gender equality policy. This is the most frequently reported policy among the surveyed internal governance and human resource management policies. This is the same percentage as last year, and slightly higher than 2023 (37%) and 2021 (39%).

The findings suggest that gender equality continues to receive relatively high attention within the civil society sector compared with other areas of internal governance but remains insufficiently embedded.

Indicator 3.1.e – Proportion of CSOs that have an organisational strategy, including vision, mission and goals.

Year	Compliance
2025	3 – moderately meets standards
2024	4 – meets most standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

According to the 2025 CSO Survey, 59% of responding organisations reported having an organisational strategy, strategic plan, or similar strategic document in place, while 41% indicated that they did not. Qualitative responses indicate that the absence of strategic documents is concentrated primarily among smaller, grassroots, and locally operating organisations. The most frequently cited reasons include limited organisational and financial capacity, the organisation’s recent establishment, ongoing preparation of strategic documents, and competing operational priorities. Several respondents also pointed to structural barriers, including limited accessibility and inadequate support for disability organisations, while others noted that their organisational models or informal status do not rely on formal strategic planning documents. Those results may indicate more limited organisational capacities and resources available for formal strategic planning and organisational development for smaller organisations.

The results are broadly consistent with previous survey rounds. In 2024, 61% of surveyed CSOs reported having a defined strategy, strategic plan, mission, vision, or organisational goals, compared with 59% in both 2021 and 2023. Overall, the findings suggest that strategic planning remains an established practice among most CSOs, although a substantial share of organisations continues to operate without a formal strategic framework.

SO 3.2 | CSOs are able to communicate the results of their activities to the public.

Indicator 3.2.a – Proportion of CSOs that have at least one online channel of communication.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

According to the 2025 CSO Survey, the use of online communication channels among surveyed organisations remains widespread. Facebook and Instagram are the most commonly used platforms, with 86% of respondents reporting regular use of each, followed by organisational websites (66%), YouTube (46%), and messaging applications such as WhatsApp, Signal, Viber, and Telegram (34%). LinkedIn (25%) and X (formerly Twitter) (20%) are used by a smaller share of organisations, while newer platforms such as Threads, Reddit, Discord, and Spotify remain negligible.

The findings are broadly consistent with previous survey rounds and point to a sustained reliance on digital communication channels by CSOs in Montenegro. Facebook remains the dominant communication platform, although its reported use has decreased slightly from 90% in 2024 (while remaining above the 75% recorded in 2023). By contrast, Instagram use has continued to grow, increasing from 69% in 2024 and 57% in 2023 to 86% in 2025, making it equally as prominent as Facebook among surveyed organizations.

The use of organisational websites has also increased, reaching 66% in 2025, up from 55% in 2024 and 39% in 2023, and slightly exceeding the 62% recorded in 2021. In contrast, the use of messaging applications has remained relatively stable at 34%, broadly comparable to 35% in 2024, although below the 40% reported in 2021. Overall, the findings suggest that while social media continues to play a central role in CSO communication, organisations are also maintaining or strengthening their own digital communication channels.

Indicator 3.2.b – Proportion of CSOs that have specialised communication staff.

This indicator was not assessed.

Indicator 3.2.c – Proportion of CSOs that cooperate with the media.

The 2025 survey findings suggest a stronger level of cooperation between CSOs and the media than in previous assessment rounds.

In previous years, the question related to this indicator asked only about partnerships with the media. This year, however, in addition to partnership, CSOs were also asked if they consulted with the media or not. Overall, 36% of respondents reported cooperating with the media through partnerships, which is considerably higher than previous years: 16% in 2024, 29% in 2023 and 26% in 2021. In addition, 59% indicated cooperation through consultations. 16% reported engaging with the media through both partnerships and consultations.

Survey Results

	% CSOs saying they cooperate with the media
2025	36%
2024	16%
2023	29%
2021	26%

With due consideration to the limitations of the survey, 2025 findings indicate an increase in CSOs' engagement with the media in Montenegro; although outside of the scope of this assessment, this may be based on growing use of digital communication channels and social media.

SO 3.3 | CSOs are transparent about their programme activities and sources of funding.

Indicator 3.3.a – Proportion of CSOs that publish their annual reports and financial statements.

Year	Compliance
2025	4 – meets most standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	3 – moderately meets standards

According to the 2025 CSO Survey, 64% of responding CSOs stated that they publish both documents either on their website or in hard copy.

The percentage of CSOs saying they published both reports (64%) is higher than previous years (35% in 2024, 28% in 2023 and 42% in 2021). With due attention to the limitations of the survey, this shows an increase in transparency and accountability practices. Nevertheless, a considerable proportion of organisations did not publish their annual or financial reports.

Given that Montenegrin legislation does not require CSOs to publicly disclose their financial reports, the finding that almost two-thirds of surveyed organisations publish financial information may be viewed as a positive indication of voluntary transparency practices within the sector. At the same time, the lower prevalence of annual narrative reporting suggests that communicating organisational achievements, results, and lessons learned to the wider public is not yet a standard practice across all CSOs.

Indicator 3.3.b – Proportion of CSOs that publish information on their sources of funding and amounts received in the previous year.

Year	Compliance
2025	3 – moderately meets standards
2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

According to the 2025 CSO Survey, 59% stated that they publish both their sources of funding and the amounts received either on their website or in hard copy.

The results are considerably higher than in previous survey rounds (28% in 2024, 27% in 2023 and 36% in 2021). Overall, the findings indicate that transparency regarding funding sources and financial inflows is increasingly practised, but a considerable share of CSOs still do not publish financial information.

Indicator 3.3.c – Degree of public trust in CSOs.

The Balkan Barometer has not yet been officially published, and data for 2025 are still unavailable. In 2024, 37% of the public in Montenegro expressed trust in civil society.

SO 3.4 | CSOs monitor and evaluate the results and impact of their work.**Indicator 3.4.a** – Proportion of CSOs that have carried out an evaluation of their work in the last year.

Year	Compliance
2025	4 – meets most standards
2024	5 – fully meets standards
2023	4 – meets most standards
2021	4 – meets most standards

In 2025 80% of responding CSOs reported conducting evaluations of their organisation, projects, or internal processes, showing a decrease from last year, which was 86%, but is higher than 2023 (78%) and 2021 (77%).

Project-level evaluations remain the most common evaluation practice among civil society organisations, with 66% of respondents reporting conducting them during the year. In addition, 29% conducted evaluations of internal processes, 13% evaluated their organisational strategy, and 18% reported not conducting any evaluation activities.

As in previous years, project-level evaluations appear to remain the predominant form of evaluation among surveyed organizations, suggesting that evaluation practices continue to be closely linked to project implementation and donor requirements.

SO 3.5 | CSOs use research and evidence to underpin their work.**Indicator 3.5.a** – Proportion of CSOs whose work is based on evidence generated through research.

Year	Compliance
2025	4 – meets most standards
2024	4 – meets most standards
2023	5 – fully meets standards
2021	4 – meets most standards

According to the 2025 CSO survey, 79% of CSOs in Montenegro reported that their work was informed by research and evidence, implementing at least one type of research. This reflects an unchanged situation when compared with 2024 (80%), 2023 (81%) and 2021 (80%).

The 2025 survey shows that the most commonly used research methods to inform the work of civil society organisations were surveys with specific target groups (54%), and focus group discussions (47%), followed by desk research (43%), public opinion surveys (29%), and field research (24%). Randomised

controlled studies remained rare (3%). Overall, 21% of respondents reported not conducting any research activities in 2025. The findings suggest that research-informed approaches remain an important feature of CSO work in Montenegro, with organisations predominantly relying on relatively accessible, practice-oriented research methods. The prominence of surveys and focus groups also indicates a strong emphasis on stakeholder engagement and direct consultation with target groups.

The findings point to a continued emphasis on direct engagement with target groups. This suggests that participatory approaches and the collection of first-hand evidence continue to play an important role in informing the work of surveyed CSOs.

Indicator 3.5.b – Proportion of CSOs whose work is informed through consultation with people who have a stake in their current or future work.

Year	Compliance
2025	5 – fully meets standards
2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

This year, the relevant question for this indicator was designed differently from previous years, with a view to obtaining a more detailed understanding of CSOs' engagement practices. In the 2025 survey, the question asked about engagement in two separate forms, consultation and partnership, whereas previous years covered consultation only.

The 2025 general CSO survey confirms that CSOs continue to inform their work through consultation and engagement with relevant stakeholders. The comparable value for this indicator is 83%, meaning that respondents consulted at least one of the following stakeholders: the organisation's members, local communities and constituencies, national government, local government, public institutions, the private sector or academic institutions. This is lower than in previous assessments (91% in 2024 and 2023, and 88% in 2021). When the additional 11% of CSOs that reported engaging with these stakeholders through partnerships only is included, the combined total rises to 94%.

The most frequently consulted groups were local communities (66%), their members (64%), followed by public institutions (52%), local authorities (44%), and academic institutions (44%). The private sector is last on the consultation list with 31%, however with a considerable increase from 19% in 2024. 2025 results show a rise in consultation practices with local communities (from 52% to 66%), national authorities (from 29% to 50%) and academic institutions (from 24% to 44%).

SO 3.6 | CSOs work in fair and respectful partnership to achieve shared goals.

Indicator 3.6.a – Proportion of CSOs taking part in local, central and international CSO networks.

According to the 2025 CSO Survey, participation in civil society networks remains widespread among surveyed organisations. In 2025, 84% of CSOs reported being part of a network, whether local, national, or international. International networks were the most frequently reported form of affiliation (59%), followed by national (54%) and local (26%) networks. Some 16% of respondents reported not being a member of any network.

The findings suggest that national and local networking patterns have remained broadly stable over time, while participation in international networks appears to have become more prominent compared

with previous years (44% in 2024 and 38% in 2021). The share of organisations reporting no network affiliation (16%) is slightly higher than in 2024 (14%).

Survey Results

	% CSOs taking part in local, central and international networks.
2025	84%
2024	80%
2023	71%
2021	61%

Indicator 3.6.b – Proportion of CSOs engaged in cross-sectoral partnerships with academia, social partners and private sector.

The 2025 survey findings indicate a mixed level of cross-sector cooperation with academic institutions, social partners and the private sector. 39% of surveyed CSOs reported partnership with academic institutions, 29% reported partnerships with the private sector, and 16% stated that they had partnerships with social partners. These figures are slightly higher than in previous years: 21% reporting partnership with the private sector in 2024 (26% in 2023), 25% with academic institutions in 2024 and 2023, and 12% partnering with social partners in 2024 (13% in 2023). Overall, 57% of participating CSOs report at least one partnership with the private sector, academic institutions or social partners.

In addition, this year's survey included a further question on CSOs' consultation practices with these three stakeholder groups. 59% of responding CSOs stated that they consulted at least once with one of these cross-sector stakeholders. The highest percentage of consultation is found to be with the academic institutions (44%), followed by social partners (40%) and lastly the private sector (31%). While 23% of CSOs reported that they only consulted with these stakeholders with no partnership involved, 36% stated that their relationship involved both consultation and partnership.

The 2025 data suggest that cooperation with academic institutions remains relatively well established, whereas engagement with the private sector and specifically with social partners appears to be more limited. This year's findings with 57% of respondents are higher than 2024 (41%), and 2023 (43%), but lower than the baseline year 2021 (65%).

Survey Results

	% CSOs engaged in cross-sectoral partnerships
2025	57%
2024	41%
2023	43%
2021	65%

SO 3.7 | CSOs have a diversified funding base.

Indicator 3.7.a – Proportion of CSOs whose sources of donor income are diversified.

Year		Compliance	
2025	➤	3 – moderately meets standards	48%
2024	➤	3 – moderately meets standards	60%
2023	➤	4 – meets most standards	64%
2021	➤	2 – minimally meets standards	37%

The 2025 survey findings indicate a relatively diversified funding landscape among surveyed CSOs. Overall, 70% of respondents reported receiving funding from more than one donor source, while 48% indicated that no single donor source accounted for more than half of their overall budget. This is considerably lower than 2024 (60%) and 2023 (64%), while higher than 2021 (37%). In addition, 13% of participating CSOs stated that they raise no funds at all, from donors or other sources, while 17% did not receive any donor support.

The most frequently cited donor is the EU with 60%, followed by the national government and international CSOs (both 44%), local governments (33%), foreign private foundations (31%), bilateral government donors (27%), the UN (21%), and domestic private foundations (20%).

Indicator 3.7.b – Proportion of CSOs raising funds from sources other than donors (e.g. membership fees, corporate/individual giving and income generating activities)

Year		Compliance	
2025	➤	3 – moderately meets standards	59%
2024	➤	3 – moderately meets standards	52%
2023	➤	3 – moderately meets standards	51%
2021	➤	3 – moderately meets standards	57%

Alternative and domestically generated sources of funding continue to play a limited but increasing role in CSOs' financial sustainability. Regarding CSOs raising funds from other sources besides donors (membership fees, corporate/individual giving, and income generated from economic activities) 59% of CSOs stated that in 2025 they had at least one other source of income, compared with 52% in 2024, 51% in 2023 and 57% in 2021, according to the CSO survey responses, showing a gradual increase. Meanwhile, 13% of responding CSOs do not raise funding at all: not from donors or other sources.

Among the surveyed organizations, private companies were reported as a funding source by 17% of respondents, while 33% received individual donations. Membership fees were a source of income for 26% of respondents, although only a small proportion reported that they accounted for a substantial share of their annual budget.

Income generated through CSOs' own economic or social enterprise activities remains particularly limited, with only 14% of organisations reporting such revenues. Similarly, income from assets and

crowdfunding were among the least utilised funding sources, reported by only 6% and 4% of organisations, respectively.

Overall, the findings suggest that domestically generated and alternative funding sources remain underdeveloped and contribute only marginally to the budgets of most CSOs. This indicates that the sector continues to rely primarily on public and international funding, while opportunities for strengthening financial sustainability through philanthropy, membership-based financing, social enterprise activities, and other self-generated income streams remain largely untapped.

SO 3.8 | CSOs have effective, empowered and developed human resources.

Indicator 3.8.a – Proportion of CSOs that employ staff.

According to the 2025 CSO Survey, 77% of responding organisations reported having paid staff, while 23% indicated that they operated without employees. Among the CSOs employing paid staff, 72% have between one and five employees, 18% between six and ten, and 10% more than ten. The findings are broadly consistent with previous assessment rounds and suggest that the majority of CSOs in Montenegro continue to maintain at least some level of paid staffing capacity. The proportion of organisations employing staff remains relatively stable over time, standing at 77% in 2025, compared with 79% in 2024, 74% in 2023, and 70% in 2021.

With regard to paid staff, location is a strong determinant: local organisations are much more volunteer-heavy (93%) but less likely to have staff (57%), while CSOs working at regional, national, and international levels are more likely to employ staff. Organisational age is also relevant: the oldest organisations are the most institutionalised, with 82% staff and 82% volunteers, while newer organisations, especially those founded after 2015, have fewer paid staff but still high volunteer engagement. Thematically, CSOs working on gender equality and LGBTIQ+ are strong both in staff and volunteer capacity. CSOs working on conducive environment, anti-corruption, fight against poverty, minority rights, and transparency are also strong in staffing. Volunteers are especially strong in CSOs working on public participation, health, human rights, youth rights, and community building.

Survey Results

	% CSOs that employ staff
2025	77%
2024	79%
2023	74%
2021	70%

Indicator 3.8.b – Proportion of CSOs that have organisational human resources policies.

Year		Compliance
2025		1 – does not meet standards
2024		1 – does not meet standards
2023		1 – does not meet standards
2021		1 – does not meet standards

This question in the CSO survey asks if the following organisational human resources policies are in place in the organisation: recruitment policy, diversity, equality and inclusion policy, gender equality policy, disciplinary policy, complaints policy, performance appraisal policy, redundancy policy, bullying and harassment policy, and safeguarding of children and vulnerable adults policy.

In 2025, no responding CSO to the survey reported having all nine organisational human resource policies in place, compared with 1% in 2024, 0% in 2023 and 1% in 2021. At the same time, 31% of surveyed CSOs in 2025 reported not having any of these policies, a result lower than previous years: 44% in 2024, 52% in 2023 and 64% in 2021. This shows a steady increase in the share of CSOs developing and adopting policies for their human resources.

When examining individual policies, diversity, equality and inclusion policies are more commonly reported, present in 36% of organisations (39% in 2024). This was followed by safeguarding of children and vulnerable adults policy with 31% (33% in 2024), bullying and harassment policies with 21% (24% in 2024), performance appraisal policies with 14% (15% in 2024), grievance and complaints procedures with 13% (15% in 2024), recruitment policies with 11% (24% in 2024), and disciplinary policies with 9% (10% in 2024). No CSO reported having a redundancy policy in place, while this was 2% in 2024.

Indicator 3.8.c – Proportion of CSOs that have advertised publicly their staff and volunteering vacancies in the last year.

This indicator was not assessed.

Indicator 3.8.d – Proportion of CSOs that have organisational policies encouraging recruitment of a diverse workforce.

This indicator was not assessed.

Indicator 3.8.e – Proportion of CSOs whose staff and volunteers have attended a training course in the past year.

This indicator was not assessed.



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Comparative Scores Table per Indicator 2021-2025

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
		SO1 - Enabling Environment for CSOs																											
1.1.a	Extent to which relevant domestic legislation provides for freedoms of association, assembly and expression	3	3	4	4	4	2	1	3	3	4	4	4	2	1	3	3	4	4	4	2	1	3	4	4	4	4	3	1
1.2.a	Extent to which CSOs have access to an effective remedy to challenge or seek review of decisions affecting exercise of their rights	3	4	4	3	4	2	2	3	4	4	4	4	3	2	3	4	4	4	4	3	2	3	4	3	4	4	3	2
1.2.b	Extent to which CSOs are protected by law from threats, attacks, judicial harassment and discriminatory treatment	3	2	4	3	4	2	1	4	2	4	4	4	3	1	5	2	4	4	4	3	1	5	3	4	4	4	3	1
1.3.a	Extent to which laws to combat extremism, terrorism, money laundering and corruption do not unduly restrict legitimate activities of CSOs	4	3	4	4	4	3	1	4	3	4	5	4	3	1	4	2	4	5	4	3	1	4	2	4	5	4	3	1

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.4.a	Extent to which laws (1) do not require CSOs to submit more reports and information, and (2) do not submit CSOs to more inspections and sanctions, than business entities	5	5	5	5	5	3	1	5	4	5	5	5	4	1	5	4	5	5	5	4	1	5	5	5	5	5	4	1
1.5.a	Small community/local organisations and civic initiatives are allowed to operate by law without registering	5	4	5	5	5	5	2	5	4	5	5	5	5	2	5	4	5	5	5	5	2	5	4	5	5	5	5	2
1.5.b	In law, unregistered small community/local organisations and civic initiatives enjoy the same right to participation in decision making processes as registered CSOs	4	4	4	3	4	4	2	4	4	4	3	4	4	2	4	4	4	3	4	5	2	4	4	4	3	4	5	2
1.6.a	Extent to which relevant laws allow CSOs to seek a broad range of funding, including from abroad, without undue restrictions	5	3	5	5	5	4	2	5	3	5	5	5	5	2	5	3	5	5	4	5	2	5	4	5	5	4	5	2

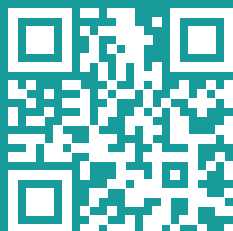
		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.7.a	The level of public funding available for CSOs and associations is clearly articulated in laws and regulations, and the rights and duties of the state body invested with the ability to set and revise the level of public funding available is clearly defined in law	1	2	4	5	2	2	1	1	1	4	5	2	2	1	1	1	4	5	2	2	1	1	1	4	5	1	2	1
1.7.c	Extent to which legal provisions regulating the award of public funding to CSOs ensure that it is clear, impartial and well regulated	4	2	4	3	2	2	1	4	3	4	3	2	2	1	4	3	4	3	2	2	1	3	3	4	3	2	2	1
1.7.d	Central governments make the information on awards publicly available and sufficiently detailed to identify individual awards	2	2	4	5	2	2	2	2	2	4	5	2	3	2	1	2	4	5	2	2	2	1	2	4	5	2	2	2
1.7.e	Proportion of CSOs indicating that the provision of domestic public funds is transparent, fair, and non-discriminatory	2	1	3	2	2	1	1	1	2	2	1	1	1	1	1	1	2	1	1	1	1	2	1	1	1	1	1	1
1.8.a	Tax legislation allows for tax relief as regards individual and corporate giving	2	3	5	5	3	3	2	2	3	5	3	3	3	2	2	3	5	4	3	3	2	2	3	5	4	3	3	2

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
1.9.a	Extent to which applicable tax laws provide for appropriate tax benefits for CSOs	3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
1.10.a	Laws regulating volunteering are adopted	3	4	1	2	3	2	1	2	4	1	2	3	2	1	2	4	1	2	3	2	1	2	4	1	2	3	2	1
1.10.b	G o v e r n m e n t volunteering strategies and programmes support volunteering for CSOs and have sufficient resources allocated for implementation	1	1	2	3	3	3	1	1	1	2	1	3	3	1	1	3	2	1	3	3	1	1	3	2	1	3	2	1
SO 2 - Cooperation Between Government and CSOs																													
2.1.a	Laws, bylaws, strategies, other acts of public interest and policy reforms are effectively consulted with CSOs	3	2	3	3	2	2	1	3	2	3	4	2	2	1	3	2	3	4	2	1	1	3	2	3	4	2	2	1
2.2.a	Extent to which CSOs assess the attitude of public officials towards civil society as supportive	1	1	2	3	1	1	1	3	1	2	1	1	1	2	2	2	2	1	2	1	2	2	1	2	1	1	1	1
2.3.b	Currently valid civil society cooperation strategies are adopted	1	2	1	5	5	5	1	1	1	1	5	5	5	1	5	1	5	5	5	5	1	5	1	5	1	1	1	1
2.3.c	Civil society cooperation strategies are accompanied by adopted budgeted action plans	1	2	1	5	4	4	1	1	1	1	5	3	1	1	1	1	5	5	3	5	1	1	1	5	1	1	1	1

		2025							2024							2023							2021							
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	
2.3.f	Mechanisms for dialogue between civil society cooperation councils and central governments meaningfully include CSOs:	2	1	1	3	5	2	1	3	4	1	1	1	3	1	4	4	3	1	1	4	2	4	4	3	3	5	1	2	
SO 3 - Capacity and Accountability of CSOs																														
3.1.a	Proportion of CSOs that have an independent and effective governing body with clear terms of reference	3	4	4	4	4	4	4	3	3	3	2	3	3	2	4	3	3	3	3	3	3	3	3	3	3	3	2	3	2
3.1.b	Proportion of CSOs that regularly check potential conflicts of interest with regard to the political, economic and personal relationships of their governing body	3	2	3	3	2	2	3	2	1	2	1	1	1	1	2	1	2	1	1	1	1	1	1	1	2	1	2	1	1
3.1.c	Proportion of CSOs that share relevant information on their organisation using means and channels that are accessible to all stakeholders	2	1	2	3	2	1	3	1	2	1	2	2	1	3	1	1	1	1	3	1	3	2	2	2	2	2	2	1	3
3.1.d	Proportion of CSOs that have an organisational gender equality policy	3	3	3	2	3	3	3	3	2	3	2	2	3	3	3	2	3	2	2	2	3	3	2	3	2	2	3	3	

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
3.1.e	Proportion of CSOs that have an organisational strategy, including vision, mission, and goals	4	4	4	3	5	4	4	4	4	4	4	4	4	3	4	4	4	3	4	3	4	4	3	4	3	5	4	3
3.2.a	Proportion of CSOs that have at least one on-line channel of communication	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
3.3.a	Proportion of CSOs that publish their annual reports and financial statements	3	3	2	4	4	3	3	2	2	1	2	3	2	2	2	3	2	2	3	2	2	3	3	3	3	4	3	3
3.3.b	Proportion of CSOs that publish information on their sources of funding and amounts received in the previous year	3	3	2	3	3	2	2	2	2	2	2	2	2	1	2	2	1	2	2	1	2	2	2	2	2	2	2	2
3.4.a	Proportion of CSOs that have carried out an evaluation of their work in the last year	5	5	4	4	5	5	5	5	5	4	5	4	4	4	5	5	4	4	5	4	5	5	4	4	4	4	5	5
3.5.a	Proportion of CSOs whose work is based on evidence generated through research	4	5	4	4	4	4	5	5	4	5	4	4	4	4	5	5	4	5	4	4	5	5	4	5	4	4	5	5
3.5.b	Proportion of CSOs whose work is informed through consultation with people who have a stake in their current or future work	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5

		2025							2024							2023							2021						
		AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR	AL	BA	XK	ME	MK	RS	TR
3.7.a	Proportion of CSOs whose sources of donor income are diversified	4	4	3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	4	3	4	4	4	4	3	3	3	3	4
3.7.b	Proportion of CSOs raising funds from sources other than donors	3	5	3	3	4	4	5	3	4	3	3	4	4	4	4	4	3	3	4	4	5	4	4	4	3	5	4	5
3.8.b	Proportion of CSOs that have organisational human resources policies	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1



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