



EU TECHNICAL ASSISTANCE
TO CIVIL SOCIETY ORGANISATIONS
IN THE WESTERN BALKANS AND TÜRKIYE

DG ENEST Guidelines for
EU Support to Civil Society
in the Enlargement Region
2021–2027

2024 Assessment

Country Report for
MONTENEGRO



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This study was carried out by a team of researchers under the supervision of the EU TACSO 3 project..

Lead Expert and main author: Snježana Bokulić

Data analyst and survey expert: Dr. Blerina Metanj Subashi

Country Analysis Authors:

Natasha Mazari – Albania

Kanita Kulić – Bosnia and Herzegovina

Sara Salihu – Kosovo and Montenegro

Marija Armenski – North Macedonia and Montenegro

Jelena Pajović van Reenen – Serbia and Montenegro

Dr. Özge Konuralp – Türkiye

EU TACSO 3 Team Leader: Richard Allen

Legal Advisors

Prof. assoc. Dr. Ersida Teliti – Albania

Selim Kulić – Bosnia and Herzegovina

Alban Krasniqi – Kosovo

Miljan Vlaović MSc – Montenegro

Goce Kocevski – North Macedonia

Prof. Dejan Vučetić – Serbia

Assoc. Prof. Dr. Ulaş Karan – Türkiye

Proofreading: prof. Jonathan Boulting M.A. (Eng. Lit. Trinity, Cantab)

Graphic Design: Bojan Ivanović, Brigada Design

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Abbreviations and Acronyms

Acronym/Abbreviation	Explanation
AML	Anti-Money-Laundering
BTI	Bertelsmann Transformation Index
CAF	Charities Aid Foundation
CSO	Civil Society Organisation
CSOs	Civil Society Organisations
DG ENEST	European Commission Directorate-General for Enlargement and Eastern Neighbourhood
EC	European Commission
EPI	European Policy Institute Skopje
EU	European Union
EUR	Currency code for the euro (€)
FATF	Financial Action Task Force
ILGA	International Lesbian, Gay, Bisexual, Trans and Intersex Association
IPA	Instrument for Pre-accession Assistance
LGBTQ+	Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, and other diverse sexual and gender identities.
MONEYVAL	The Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism. It is a permanent monitoring body of the Council of Europe, tasked with assessing compliance with international standards to counter money laundering and terrorist financing.
NGO	Non-governmental Organisation
RSF	Reporters Without Borders
RTCG	Radio and Television of Montenegro - the national public service broadcaster of Montenegro
SEPA	Single Euro Payments Area
SIGMA	SIGMA Monitoring Reports analyse the performance of public administrations through a set of standard indicators based on the Principles of Public Administration.
UBO	Ultimate Beneficial Owner
UN	United Nations
VAT	Value Added Tax

Introduction to Annex

This country analysis is an Annex to the DG ENEST Guidelines for EU Support to Civil Society 2021–2027: Assessment Report 2024.

This assessment for Montenegro provides evidence for the situation against the Guidelines' indicators for 2024, and a comparison with the previous year, 2023, and the baseline year, 2021.

This annex provides a summary of the evidence for assessment of the situation in Montenegro against the 59 indicators in the Guidelines. This annex should be read in conjunction with the main report, which is available on the tacso.eu website.

Methodology

The analysis is based on data collected from primary and secondary sources. Primary research included surveys with CSOs and public officials and a legal analysis of relevant laws. Secondary sources, such as reports produced by CSOs, national human rights institutions, the government, and others, were reviewed to provide relevant information and data.

The public officials' survey was conducted from 10 February to 3 March 2025. The aim was to collect the perspectives on specific relevant indicators from selected public officials who, in their work, engage most closely with CSOs. The survey consisted of closed questions and was anonymous. For Montenegro, 5 responses were received from public institutions. In 2024, most public officials were from local self-government units, unlike in 2021 and 2023, when the majority were from the central government.

The CSO capacity and resilience assessment was based on a survey of CSOs conducted between 19 January and 10 February 2025. The survey was open to any CSOs willing to participate. It was disseminated through various channels with the support of CSOs, CSO networks, the National Resource Centre, UN agencies, international organisations and public institutions, to make sure that the outreach covered a broad variety of CSOs. The validation of responses was ensured at the data-checking stage. Respondents who indicated that they did not belong to the target group were filtered out. Based on the number of valid responses received, the margin of error is 9%. This margin of error has been statistically calculated using the number of CSOs in Montenegro in 2024 to determine the population size.

In total, 130 valid responses were received for Montenegro. This represents an increase of 7% compared to 2023 (122 valid responses) and 23% compared to 2021 (106 valid responses).

Regarding the demographic characteristics (age group, gender, role within the organisations, self-identification as a minority, organisation size, sector of work, turnover, and number of employees) of the civil society organisations that responded to the survey, the sample structure remained the same.

In terms of the geographical distribution, the proportion is similar to that in 2023, with around half of the respondents from the capital city and the other half from the rest of the country.

Location	2023	2024
Podgorica	53%	51%
Rest	47%	49%

When it comes to regional distribution, the sample remained similar to that in 2023.

		2023	2024
In which region of Montenegro is your organisation based?	Coastal region (Ulcinj, Bar, Budva, Tivat, Kotor, Herceg Novi)	16%	11%
	Podgorica	53%	51%
	Central region (Cetinje, Danilovgrad, Nikšić)	16%	15%
	Northern region (Plužine, Šavnik, Žabljak, Pljevlja, Bijelo Polje, Berane, Rožaje, Andrijevica, Plav, Mojkovac, Kola	16%	22%
	None		1%
Total (n)		122	130

In terms of gender distribution, 38% of the respondents are men, 59% are women, 1% identify as non-binary, and 2% prefer not to disclose their gender. The gender composition of the sample has remained consistent since 2021.

The age composition of respondents in 2024 remained largely consistent with that of previous years. The largest group were those aged over 51, comprising 36% of the sample, followed by 25% aged 31–40 and another 25% aged 41–50. Respondents aged 21–30 accounted for 8%. In 2023, the distribution was more evenly split, with 30% each for those aged 51 and older and 41–50, 25% for the 31–40 age group, and 13% for those aged 21–30. In 2021, the dominant age group was 41–50, representing 34% of respondents.

In total, 18% of the respondents identified as belonging to a community, minority, or marginalised group, and most of those identified as belonging to other ethnic groups and people with disabilities. The proportion of respondents belonging to a community, minority, or marginalised group remained the same as in 2023 and 2021.

An overwhelming proportion (72%) of the respondents were senior managers, primarily executive directors, but there were also other managers, governing board members, and others. The proportions of senior managers in earlier surveys 2021 (56%) and 2023 (52%) were lower.

In 2024, over one-third of respondents (37%) are affiliated with civil society organisations (CSOs) founded between 2011 and 2020. Another 30% represent CSOs established between 2001 and 2010, followed by 14% from organisations founded between 1991 and 2000, and 13% from those established after 2021. Additionally, 6% of respondents are part of CSOs founded in 1990 or earlier. This distribution largely mirrors previous years, with one notable trend: the share of respondents from newly established CSOs—those founded after 2021—has gradually increased, rising from 3% in 2021 to 11% in 2023 and 13% in 2024.

In 2024, all respondents are from officially registered organisations, similar to the survey samples from 2021 and 2023. The vast majority (92%) represent citizens' associations, while 2% are from local branches of international NGOs, and another 2% are from trade unions. A small proportion includes participants

from foundations, non-profit cooperatives, and not-for-profit companies. In 2021, 73% of respondents came from citizens' associations, while in 2024 it rose to 92%. In contrast, participation from non-profit cooperatives has steadily declined—from 12% in 2021 to 10% in 2023, and just 1% in 2024.

In terms of geographic scope, 57% of surveyed civil society organisations (CSOs) in 2024 operate at the national level, 52% at the local level, 30% internationally, and 28% at the regional level. Compared to previous years, there is a decline in the proportion of CSOs with national-level operations, down from 68% in both 2021 and 2023 to 57% in 2024. In contrast, the proportions of CSOs working locally, regionally, and internationally have remained relatively stable over time.

In terms of focus areas, 31% of civil society organisations (CSOs) in 2024 are active in the field of human rights, followed by 25% working on youth and youth rights, and 23% focusing on environmental issues and climate change. An equal share of 18% focuses on social inclusion and gender equality, while 15% concentrates on education, research, and innovation. Additionally, an equal share of 11% of CSOs focus on children's rights and public participation in policymaking. Other areas include arts and culture (10%) and minority rights and non-discrimination (9%). The overall distribution of focus areas remains consistent with those of 2021 and 2023, except CSOs working on media and information, which saw a slight decline, dropping from 8% in 2021 and 9% in 2023 to 3% in 2024.

Regarding the size of the CSOs participating in the 2024 survey (measured by the number of staff), the majority—75%—belong to small organisations with between 1 and 10 permanent, full- or part-time staff and volunteers. Thirteen per cent are from CSOs with 11 to 20 staff members, 7% reported having no personnel, and 4% are affiliated with CSOs employing between 21 and 50 staff members. A notable shift is observed in the growing participation of smaller CSOs: the share of organisations with 1 to 10 staff increased from 63% in both 2021 and 2023 to 75% in 2024. In contrast, participation from CSOs with 11 to 20 staff members declined slightly, from 23% in 2021 and 18% in 2023 to 13% in 2024.

Regarding the size of civil society organisations (CSOs) based on their annual turnover, the 2024 survey revealed the following distribution: 25% of CSOs reported an annual turnover between EUR 100,000 and EUR 500,000, 20% between EUR 5,000 and EUR 25,000, and 17% between EUR 50,000 and EUR 100,000. Additionally, 14% had turnovers ranging from EUR 25,000 to EUR 50,000, 10% reported less than EUR 5,000, 6% indicated no turnover at all, and only 2% exceeded EUR 500,000. This distribution is consistent with the distribution observed in 2021 and 2023, indicating that the sample is stable with regard to CSO financial profiles.

For indicators that have a normative assessment, such as compliance with legislation or standards, the following traffic-light system was used to provide a quick visual guide:

5 – fully meets standards
4 – meets most standards
3 – moderately meets standards
2 – minimally meets standards
1 – does not meet standards

The traffic light system was applied to those indicators where such an assessment was deemed meaningful. It was based either on the data collected through the CSO survey, or on the detailed analysis of applicable laws, policies and procedures against standards.

The remaining indicators provide an overview of year-on-year trends, comparing with data from the baseline in 2021, and the 2023 analysis.

It is important to note that, unlike the other country reports in the 2024 assessment, the Montenegro report was not subject to a validation process with in-country stakeholders. This was due to unforeseen challenges. Therefore this Annex needs to be read with this in mind.



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.

2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

In 2024, there were no amendments to the legal framework governing freedom of association in Montenegro. The Constitution and the Law on Non-Governmental Organisations remain unchanged compared to 2023. The constitutional right to freedom of association has not been subject to legislative revisions. Articles 53 and 79(1)(6) of the Constitution continue to regulate this right in the same manner as outlined in previous reports.

Still, in 2024, the pro-Serbian coalition known as “For the Future of Montenegro,” which includes the New Serbian Democracy and the Democratic People’s Party, proposed a Law on Foreign Agents in Montenegro. This draft law would require non-governmental organisations (NGOs), civil society groups, and media outlets that receive foreign funding to register as “foreign agents” or “agents of foreign influence.” The proposal faced strong condemnation from civil society organisations, which argued that it could stigmatise and limit the independent voices of NGOs and critical media. Analysts have warned that the proposal fails to meet the standards set by the European Court of Human Rights, particularly in terms of the necessity, legitimacy, and proportionality tests for restricting freedom of association.¹ By the end of 2024, the draft law remained unadopted and stalled, as there had been no formal parliamentary proposal or legislative progress. The initiative is widely discredited and inactive, but concerns remain that it could be revived if the political dynamics shift.²

In 2024, a technical institutional change took place: the responsibility for CSO/NGO affairs was transferred to the newly designated *Ministry of Regional and Investment Development and Cooperation with Non-Governmental Organisations*. In the previous reporting period, this mandate was under the *Ministry of Public Administration*.

As in previous years, CSOs/NGOs in Montenegro are required to register in the official registry maintained by the Ministry to obtain legal entity status. The registration process entails the adoption of founding documents—namely, an act of establishment and a statute—and the appointment of governance bodies, in line with Articles 14–19 of the relevant law.

¹ CDT, 2024

² Civicus Lens, 2024

As highlighted in the previous report, a key shortcoming remains the provision in the Law on NGOs assigning the competence to prohibit NGO registration to the Administrative Court. This arrangement raises constitutional concerns, as Article 11 of the Constitution—establishing the principle of separation of powers—implies that such authority should rest exclusively with the Constitutional Court. It is the Constitutional Court that should determine whether an NGO's goals violate the Constitution or legal provisions, and thus decide on the grounds for prohibiting its registration.

During the reporting period, there were no recorded cases in Montenegro of authorities terminating associations through procedures not prescribed by law.

In 2024, there were no amendments to the legislative framework regulating the freedom of peaceful assembly in Montenegro; both constitutional and legal provisions remained intact. Article 52 of the Constitution guarantees the right to peaceful assembly, while allowing for temporary restrictions by competent authorities to prevent disorder, criminal acts, or to address threats to public health, morality, or the safety of individuals and property, by the law.

Consistent with this, Article 14(1) of the Law on Public Gatherings and Public Events permits the police to impose temporary restrictions on public assemblies when necessary in a democratic society to maintain public order, prevent criminal acts, or protect the rights, safety, or health of others. Furthermore, Article 14(4) allows the police to prohibit gatherings that are not properly or timely announced. Additionally, Article 6 of the same law establishes restricted zones for public gatherings, prohibiting assemblies within 10 to 15 meters of key government buildings.

While these restrictions serve legitimate aims such as public safety and rights protection, the principle of proportionality must be assessed case-by-case to ensure alignment with international human rights standards.

In 2024, a total of 347 public gatherings took place in Montenegro³:

- 247 were announced and held.
- 90 were unannounced.
- 10 were spontaneous.
- 35 announced gatherings were cancelled by the organisers.

Additionally, three public gatherings were banned by the Ministry of the Interior in Cetinje for safety reasons, including two religious ceremonies organised by the Montenegrin Orthodox Church.⁴

The Law on Public Gatherings and Public Events is largely aligned with international human rights standards. However, improvements are needed in the following areas:

- The law lacks a clear definition of “spontaneous public gathering.” It is unclear whether such gatherings constitute illegal behaviour.
- Police procedures for managing these gatherings are not explicitly regulated, leading to inconsistent enforcement.
- The current law defines the organiser as the person who announces, organises, and maintains the gathering, all cumulatively. This creates confusion when different individuals perform these roles. The law should be amended to define each role separately and clarify legal responsibility.

These amendments would enhance legal certainty and reduce the risk of arbitrary application, thus ensuring full compliance with international standards.⁵

In 2024, significant amendments were adopted in Montenegro in the area of freedom of expression. In June, the Parliament passed the *Law on Amendments and Additions to the Law on Media*, the *Law on the National Public Broadcaster – Radio and Television of Montenegro (RTCG)*, and the *Law on Audio-visual Media Services*.⁶

3 CDM, 2024

4 CDM, 2024

5 CDM, 2024

6 MMI, 2025

Among the key changes, public sector advertising is now limited to media outlets registered in the Media Registry, and registration has become mandatory. The *Media Pluralism Fund* was increased from 0.09% to 0.20% of the budget, with expanded eligibility to media outlets involved in combating hate speech and disinformation. Access to this fund is limited to outlets that are part of a self-regulation mechanism, have not been banned from broadcasting in the previous six months, and whose founders have not been convicted for spreading hate.⁷

Media outlets must now regulate internal governance through their statutes and are required to consult journalists before appointing an editor-in-chief. Source protection was strengthened by specifying that sources may only be disclosed by court order—not upon a prosecutor’s request.⁸

Fast-track judicial procedures have been extended for cases involving hate speech against all communities, not only minorities, and can be initiated at the request of affected individuals, not solely by prosecutors.

The privatisation of public broadcaster RTCG is explicitly prohibited. RTCG is now obliged to publish both its programming and financial plans. Stricter eligibility criteria have been introduced for NGOs proposing candidates for the governing bodies of RTCG and the Agency for Electronic Media (AEM); NGOs must have had a minimum budget of €3,000 in each of the past three years and spent at least €2,000 on relevant projects.⁹

Candidate selection for the RTCG and AEM councils is now based on institutional support, experience, and development vision. To safeguard against political pressure, only the Council—not the Assembly—can initiate dismissal procedures for its members, though the Assembly must confirm final decisions.

Judicial protection is guaranteed in the appointment and dismissal processes for Council members and directors of both RTCG and AEM.¹⁰

To ensure sustainable funding of local public broadcasters and reduce political interference, a minimum funding scale from local budgets has been introduced, replacing the previous discretionary model.

Regarding compliance with international human rights standards, the changes are in line with obligations under the Council of Europe and international law. Article 5 of the amended Media Law clearly states that media freedom may be restricted only when necessary to protect national security, public order, health, morality, the rights of others, confidential information, or the authority and impartiality of the judiciary.¹¹

According to the World Press Freedom Index 2024, published by Reporters Without Borders (RSF) Montenegro is now ranked 40 out of 180 countries. The country has risen from 104 place in 2021,¹² although there was a slight decline between 2023 and 2024 (39 to 40). When it comes to the countries of the region, North Macedonia is the only country ranked higher (36). One of the most prominent problems noted in the RSF Report is that in Montenegro “journalists are regularly targeted by smear campaigns fuelled by politicians from both ruling and opposition parties.”¹³

In 2024, Montenegro was rated as having «narrowed» civic space by the Civicus Monitor, with a score of 76 out of 100. This rating reflects that while civil society in Montenegro remains active, it continues to operate under significant pressures—such as legal constraints, limited freedoms, and weakening civic institutions. However, the environment does not amount to outright suppression, indicating a moderately restricted yet functioning civic space.¹⁴

7 Sindikat Medija, 2024

8 Sindikat Medija, 2024

9 CCE, 2024(a)

10 CCE, 2024(a)

11 MMI 2025 p2

12 RSF, 2024

13 RSF, 2024

14 Civicus Monitor 2024, Montenegro

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 exercise of their rights

2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

In 2024, there were no changes to the legal framework governing access to effective remedies for CSOs in Montenegro. The existing constitutional and legal provisions remain aligned with international standards, ensuring that CSOs, as legal entities, are entitled to seek judicial or administrative review of decisions affecting their rights. CSOs retain access to administrative dispute procedures in cases such as registration rejection, to court proceedings in representation disputes, and to constitutional appeals in cases of alleged violations of fundamental freedoms. The possibility to address cases before the European Court of Human Rights also remains available once domestic remedies are exhausted.

As in previous years, however, the practical effectiveness of these remedies continues to be limited by longstanding procedural obstacles. In particular, delays in administrative proceedings remain a structural issue. Despite earlier recommendations from relevant institutions, including the Agent before the European Court of Human Rights, no visible improvements have been made to address the inefficiency and protracted nature of these processes. These delays continue to undermine the principle of timely redress, which is central to the concept of an effective remedy.

Independent international bodies continue to express concern over systemic issues in Montenegro's judiciary that undermine the effective exercise of the right to a legal remedy. The UN Human Rights Committee, in its most recent review of Montenegro¹⁵ acknowledged alignment of the legal framework with international standards but raised concerns about the practical implementation of these rights. The Committee particularly noted obstacles to judicial independence, delays in proceedings, and limited progress in enforcing constitutional protections, all of which weaken access to effective remedies. Similarly, the Venice Commission, in its urgent follow-up opinion¹⁶, observed that most of its recommendations on judicial independence, transparency, and accountability remain unimplemented. These institutional shortcomings directly impact the ability of individuals and legal entities—including CSOs—to seek timely and impartial review of administrative or judicial decisions affecting their rights. Complementing these findings, the International Commission of Jurists, following its fact-finding mission to Montenegro,¹⁷ reported continued executive influence on the judiciary, insufficient structural reforms, and ongoing delays in court proceedings. It stressed that these barriers particularly affect the operational space of civil society, whose ability to defend its rights depends on an accessible and impartial judicial system.

Findings from the 2024 CSO Survey are consistent with previous years and confirm that the practical exercise of the right to an effective remedy remains limited. Only 1% of CSOs reported successfully challenging decisions that adversely affected their rights—comparable to 4% in both 2023 and 2021. At the same time, 16% indicated they were unable to challenge such decisions, a figure higher than the 8% from 2023 and similar to the 18% in 2021.

The share of CSOs stating they had not encountered decisions impacting their rights remained relatively stable across all three years.

Challenges related to accessibility also persist. In 2024, 21% of CSOs reported difficulties in accessing

¹⁵ UN HRC, 2025

¹⁶ Venice Commission, 2024

¹⁷ ICJ, 2024

legal remedies, primarily due to the lack of a structured or transparent appeals process. This mirrors levels of concern observed in 2023 and underscores the ongoing presence of procedural obstacles that hinder the effective enforcement of CSO rights.

In conclusion, while the legal guarantees for access to an effective remedy continue to meet international standards on paper, there remain some challenges for implementation. The key challenges identified in prior assessments—especially delays in proceedings and lack of practical access to legal redress—persist in 2024. Given the absence of reform and continued confirmation of these issues through survey findings, the overall assessment remains unchanged.

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 offline;
- 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.

2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

In 2024, there were no changes to the legal framework regulating the protection of CSOs from threats, attacks, judicial harassment, or discriminatory treatment in Montenegro. As in previous years, the protection of both natural and legal persons—including CSOs—is embedded in various constitutional and legal provisions. The Montenegrin legal framework continues to reflect a high degree of formal alignment with international human rights law, covering key areas such as the right to equality, protection from ill-treatment, respect for private life, and prohibition of discrimination.

As in 2023, the Constitution of Montenegro guarantees equal protection of rights and prohibits torture, inhuman treatment, and interference with physical or mental integrity. The Criminal Code further protects individuals and legal entities—including CSOs—by criminalising harassment (Art. 166a), torture (Art. 167), threats to safety (Art. 168), obstruction of association (Art. 182), and discrimination (Art. 443), explicitly including organisations. The Law on Prohibition of Discrimination also defines harassment—including online abuse and surveillance—as a form of discrimination, offering key safeguards for advocacy and minority rights groups.

While the normative framework remains strong, the 2024 legal review reconfirms the observation from previous years that the legislation does not define attacks or threats specifically in relation to CSOs. The general legal provisions apply equally to CSOs and other entities, but the lack of tailored language addressing threats or harassment directed at CSOs limits the visibility and enforceability of these protections in cases targeting civil society actors specifically. Only two provisions—Article 182 of the Criminal Code and Article 443 related to discrimination—explicitly mention organisations.

Concerns raised in previous assessments regarding the implementation of these protections remain valid in 2024. In particular, CSOs working on the rights of LGBTQ+ persons continue to report discriminatory treatment and instances of intimidation, which suggest gaps in enforcement despite legal guarantees. These challenges affect not only individuals associated with these organisations but also limit the safe and equal participation of specific segments of civil society in public discourse. No new institutional or legal measures were introduced in 2024 to address these shortcomings.

Independent monitoring in 2024 continues to confirm that, despite a robust legal framework, CSOs—particularly those advocating for LGBTQ+ rights—remain exposed to threats, harassment, and discrimination in practice. The ILGA-Europe Annual Review 2025¹⁸ documents persistent anti-LGBTQ+ hate speech and physical attacks targeting individuals affiliated with civil society organisations such as Queer Montenegro and LGBTQ+ Forum Progress. These incidents occurred both online and offline, and victims have repeatedly called for stronger institutional protection and more effective sanctioning of perpetrators.

According to the Montenegro Media Institute,¹⁹ a total of 22 cases of threats and attacks against journalists were recorded in Montenegro in 2024. This represents an increase from 16 cases in 2023, although it is lower than the 28 incidents reported in both 2021 and 2022. These incidents included verbal threats, harassment, intimidation, physical assaults, and attacks on property or equipment. A significant portion of these threats originated online, with intimidation via social media and threatening messages becoming increasingly common. The response from law enforcement to these attacks has been inconsistent. While initial actions, such as launching investigations or making arrests, have improved in some high-profile cases, many complaints are often downgraded to misdemeanours or dismissed due to technicalities, like expired statutes of limitations. This lack of effective judicial follow-up fosters a sense of impunity, which discourages journalists from reporting new incidents.²⁰

In November 2024, a notable incident involved journalist Ana Raičković, the editor of the online newspaper Pobjeda. She was physically assaulted and threatened with death by a business owner and his security guards outside a restaurant in Podgorica due to her critical reporting. Fortunately, the police responded quickly and arrested multiple suspects, which is a rare example of prompt law enforcement action in cases of violence against journalists in Montenegro.²¹

According to the BTI 2024 Country Report²², Montenegro's judicial system remains hindered by political stalemate in filling key positions—particularly in the Constitutional Court—and persistent dysfunction, which contributes to a weakened environment for fair and impartial protection of CSOs from threats, attacks, and judicial harassment. Furthermore, a recent media monitoring report confirms a steady rise in online hate speech and disinformation aimed at marginalizing civil society.²³

¹⁸ ILGA Europe, 2025

¹⁹ MMI, 2025

²⁰ MMI, 2025

²¹ CPJ, 2024

²² BTI, 2024

²³ Reporting Diversity Network, 2024

Indicator 1.2.c: Proportion of CSOs that operate effectively without threats, attacks, judicial harassment, in terms of: - number of complaints concerning lack of protection of CSOs;

- number of complaints concerning 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.

Proportion of CSOs that operate effectively without threats, attacks, judicial harassment		
Year	CSOs reported operating without interference	CSOs reported experiencing at least one form of interference
2024	78%	17%
2023	76%	17%
2021	82%	12%

In 2024, 17% of civil society organisations (CSOs) reported experiencing threats, physical attacks, property damage, or unlawful searches and interference with communications by authorities. This figure is consistent with the 17% recorded in 2023 and aligned with the 12% noted in 2021.

In 2024, 78% of respondents indicated they had not encountered any of these problems, which is similar to the 76% in 2023 and close to the 82% recorded in 2021.

Of the CSO respondents in 2024, 3% confirmed that their organisations faced threats and physical attacks, while an additional 4% reported that their members experienced such incidents. These findings indicate no significant change in exposure to violence or intimidation compared to the previous year. Notably, the reporting rate to authorities remains extremely low. Only 1% of organisations and 4% of individual members who faced threats or attacks filed official complaints. In terms of property damage, 3% of CSOs reported incidents in 2024, a figure that is consistent with those recorded in both 2021 and 2023.

Of those who did not file a complaint, their reasons given included a lack of trust in the authorities due to previously ineffective responses, concerns for personal safety, and a lack of knowledge on how to file a complaint.

Reports of authorities interfering with communications remained similar as well, with 2% reported in 2024, 3% in 2023, and 1% in 2021.

However, the majority of respondents to the public officials survey believed that CSOs were sufficiently able to operate effectively without facing threats, attacks, judicial harassment, or discriminatory treatment.

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.

2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The revised Law on the Prevention of Money Laundering and Counter-Terrorist Financing took effect in December 2023, with full implementation throughout 2024. This law marks Montenegro's commitment to combat money laundering and terrorist financing, responding to findings from MONEYVAL²⁴ and the Financial Action Task Force (FATF), which previously placed Montenegro on the FATF «grey list» due to inadequate oversight in the non-financial sectors, lack of transparency in beneficial ownership, and insufficient enforcement.

In addition, these amendments are expected to meet all the requirements for obtaining a positive opinion from the European Payments Council (EPC) to expand the SEPA²⁵ geographic area to Montenegro.

The new law expands oversight to high-risk sectors, strengthens due diligence requirements, and enhances client identification and reporting obligations. Consequently, Montenegro was removed from the FATF «grey list,» indicating improved compliance with international standards.

Additionally, the Montenegrin Ministry of Internal Affairs issued a Rulebook on Ultimate Beneficial Owner (UBO),²⁶ effective July 27, 2024. This rulebook requires entities established before 20 December 2023 to register or update their UBO data in the national UBO Registry by 26 August 2024. Legal entities must use an online application authenticated by a qualified e-signature from a Montenegrin-resident employee or authorised representative, providing detailed information and supporting documents. For complex ownership structures, an ownership diagram and registry extracts are also necessary.²⁷ Non-compliance may result in penalties of up to EUR 20,000 for legal entities and up to EUR 2,000 for authorised representatives.

These legislative changes significantly enhance Montenegro's anti-money laundering framework, aligning it with international standards.

However, in practice, according to the Civic Resource Centre, most of the CSOs are unaware of this, and there is no evidence of the fines being enforced.

²⁴ MONEYVAL, 2023, Anti-money laundering and counter-terrorist financing measures, Council of Europe, Committee of experts on the evaluation of anti-money laundering measures and the financing of terrorism, 2023

²⁵ Single Euro Payments Area

²⁶ CEE Legal Matters, 2024, 2024

²⁷ CEE Legal Matters, 2024, 2024

Indicator 1.3.b: The 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 from the CSO survey reveal a consistent trend over the past three years regarding issues faced by civil society organisations, including judicial harassment, discriminatory funding restrictions, and barriers to financial access. In 2024, 5% of respondents indicated that their activities were limited by these issues, a figure that has remained the same since 2023 and is comparable to the 6% reported in 2021. Conversely, the majority of organisations (90% in 2024) reported no such restrictions, reflecting a stable trend from 89% in 2023 and 86% in 2021.

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

Indicator 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, all else being equal.

2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

In 2024, there were no changes to the legislative framework related to this indicator. As previously reported, associations and foundations in Montenegro are subject to the same financial and legal obligations as other legal entities, including businesses. Under the Law on Accounting and Audit, civil society organizations are required to maintain proper accounting records and submit financial statements—such as balance sheets and income statements—in line with International Accounting Standards (IAS) and International Financial Reporting Standards (IFRS). The scope of accounting obligations may vary depending on the size of the organisation.

CSOs also fall under the standard regime of civil and legal liability applicable to all legal entities. Importantly, they are not subject to more frequent inspections or harsher sanctions than business entities, indicating that they are treated equally under the law in terms of oversight and accountability.

SO 1.5. Central and/or local public authorities have enabling policies and rules for small community organisations and civic initiatives (grass-roots organisations)

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

2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

The legal framework in Montenegro remained unchanged in 2024 regarding the status and operation of unregistered community or local organisations and civic initiatives. Registration continues to be required for acquiring legal personality and accessing public funding, but the law does not criminalise or penalise informal groups for operating without registration. This position is not new, but was reconfirmed in the 2024 legal practice and interpretation.

The Law on NGOs does not include punitive measures for groups that operate without registration, which affirms that informal groups are not restricted from acting collectively.

However, no efforts were made in 2024 to improve legal clarity or introduce provisions that explicitly acknowledge and support the operation of unregistered civic initiatives. As such, while unregistered groups may function without legal obstacles, their legal status remains undefined in domestic law. This creates practical uncertainty, especially for grassroots or community-based initiatives that may prefer to remain informal due to limited resources or administrative capacity.

In summary, the legal environment remains permissive in practice, but there is still a lack of affirmative recognition and support for informal civic organising. While Montenegro does not sanction unregistered operations, the absence of legal recognition limits their access to certain rights and benefits.

The OECD/SIGMA Public Administration Report for Montenegro²⁸ confirms that administrative procedures related to civil society remain generally accessible, and no additional burdens were introduced in 2024 that would restrict the operation of informal groups.

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.

2024	3– moderately meets standards
2023	3– moderately meets standards
2021	3– moderately meets standards

In Montenegro, the legal framework continues to limit the ability of unregistered community or civic groups to participate equally in decision-making processes. In 2024, no changes were made to the Regulation on the election of CSO representatives to state working bodies,²⁹ which restricts participation

²⁸ SIGMA, 2024

²⁹ The detailed criteria and procedure for the selection of organisations' representatives in working groups and other working bodies formed by state administrative bodies, as well as the procedure for conducting a public discussion, are determined by the Regulation on the election of representatives of CSOs to the working bodies of state administration bodies and the conducting of a public hearing in preparation of laws and strategies (Official Gazette of Montenegro, No. 41/18) available at the link <https://www.gov.me/dokumenta/1f353a31-1729-4db3-a378-e8c4610a5b04>

in such bodies to registered organisations only. This regulatory condition excludes unregistered and newly established groups from co-shaping draft legislation and public strategies through formal working groups. Although these groups may take part in public hearings, this participation is consultative and does not offer the same level of influence or continuity in the policymaking process. Therefore, the framework remains only partially aligned with international standards, which recognise the right of informal civil society actors to participate fully in public affairs. The persistence of exclusionary criteria—such as prior experience and tax documentation—further limits access for emerging or grassroots initiatives, with no legal or institutional efforts in 2024 to address these barriers.

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.

2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

In Montenegro, the legal framework in 2024 continues to allow civil society organisations (CSOs) broad access to funding from various sources, both domestic and foreign, without undue restrictions. CSOs are legally permitted to compete for government funds and receive grants and donations from institutional, corporate, and individual donors, as well as from foreign governments and multilateral agencies. According to Article 28 of the Law on Non-Governmental Organisations, CSOs may acquire assets through membership fees, voluntary contributions, gifts, donations, legacies, interest on investments, dividends, rent, income from economic activities, and other lawful means. The law imposes no specific limitations on receiving cash or in-kind donations. However, CSOs are legally responsible for the proper use and management of funds. They must comply with relevant financial regulations, including accounting standards and tax legislation, and are required to file financial reports accordingly. Additionally, like all legal entities, CSOs must adhere to the Law on Payment Transactions, which governs how funds are processed and transferred. Non-profit organisations may also charge fees for services, and donations made to tax-exempt CSOs are deductible under applicable tax rules. All funds acquired must remain within the organisation’s accounts and be used for reasonable salaries, operational expenses, and activities aligned with the organisation’s mission. This legal and regulatory framework ensures that CSOs in Montenegro can operate sustainably and transparently, fully complying with international standards on the freedom of association and funding.

The attempted introduction of a ‘foreign agents law’ by the parliamentary coalition For the Future of Montenegro in October 2024 raised warning flags for civil society in the country. The proposed law would have required CSOs receiving funding from outside Montenegro to register as ‘foreign agents’. The proposal was widely condemned by CSOs and other parliamentary parties and did not make further progress in parliament. A similar initiative in Serbia a few weeks later also failed to progress.

The overall rating for this indicator did not change for 2024. However, should the proposal proceed further in the parliamentary process, it will be reflected in subsequent ratings for Montenegro.

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

The findings from the 2024 CSO survey indicate that there has been no significant change in the use of restrictive administrative practices, such as arbitrary audits, freezing bank accounts, or requiring foreign agent registration. In 2024, only 1% of surveyed organisations reported experiencing such measures, which is similar to the 2% reported in 2023. Notably, no respondents reported these issues in 2021. Conversely, the proportion of Civil Society Organisations (CSOs) that confirmed they had not faced such restrictions has improved slightly over time. In 2024, 90% of respondents stated they had not experienced arbitrary audits, frozen accounts, or foreign agent registration obligations. This figure is close to the 93% reported in 2023 and shows a change from 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.

2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

In 2024, Montenegro remained the only country in the region where state funding for civil society was explicitly mandated by law within the national budget. During the reporting period, there were no changes to the legislative framework governing public funding for civil society organisations (CSOs), and the level of funding available from the national budget remained as defined by existing laws and regulations.

As in the previous years, Article 32 of the Law on Non-Governmental Organisations stipulates that the state must allocate at least 0.5% of the annual national budget to support the work of NGOs. This allocation is distributed across three key areas: a minimum of 0.3% is designated for activities in the public interest, 0.1% is allocated for projects supporting the protection of persons with disabilities, and at least 0.1% is reserved for co-financing or inter-financing of NGO initiatives that receive support from European Union funds. This legal provision aims to ensure a stable and structured approach to public funding for civil society, although the actual implementation and impact may vary.

A significant development in Montenegro in 2024 was the establishment of the region's first state-funded Civic Resource Centre for CSOs, which provides support to civil society organisations in the country. The resource centre activities had previously been funded by the EU. At the same time, there was the first call for programme-based funding for CSOs, providing longer term, core support marking a departure from the traditional project-based approach.

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

The value of actual disbursed funding for CSOs for 2024 was not available at the time of writing.

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.

2024	3 – moderately meets standards
2023	3 – moderately meets standards
2021	3 – moderately meets standards

There were no changes to the legislative framework governing CSOs' funding in 2024. The procedures remain governed by the Law on Non-Governmental Organisations and its accompanying bylaws.

According to Article 32v(2) of the Law, funding commissions must publish public calls on the website of the competent state authority and on the e-Government portal. The Rulebook on Public Calls (Article 3) obliges the commission to publish clear funding criteria. These criteria, as defined in Article 32d, include the quality of proposed projects and programs, as well as the applicant NGO's capacity and relevance to the area of public interest. Though broadly considered fair and relevant, the criteria's application still raises concerns regarding transparency and consistency.

Article 32b(4) stipulates that CSOs' representatives on the funding commission cannot vote on proposals submitted by the organisations that nominated them. However, the Regulation on the Election of CSO Representatives to Working Bodies of State Administration imposes restrictive eligibility conditions for CSOs, and does not provide a mechanism for appointing independent external members to the funding commission. While there is a potential risk of bias, there is still no legal requirement for NGO representatives to formally declare the absence of a conflict of interest. Moreover, these representatives do not act in a personal capacity, which further complicates the integrity and independence of their role—especially when interconnected NGO networks support one another's candidacies.

Additional shortcomings include the residency requirement, which limits commission eligibility to Montenegrin residents, and a lack of clarity if only one eligible candidate applies or when no public call is issued at all (Articles 3, 5, 6, 8, 9 of the Regulation). The limit to Montenegrin residents only is a challenge because the country is very small, with a limited pool of relevant experts. Conflicts of interest are hard to avoid.

Under Article 32d, all submitted projects must be scored by two independent evaluators selected from a publicly announced list by the Ministry of Public Administration. Based on the evaluators' scores, the commission establishes a ranking list (Article 32e). Projects scoring less than 50% of the total points—or under 50% for the first evaluation criterion—are automatically excluded from funding consideration.

Although the Law does not establish broader reporting obligations beyond submission of final reports to the funding authority, additional requirements exist for EU co-funded projects under the 2018 Regulation on Co-Financing. According to Article 10, CSOs must submit copies of progress and final reports to the competent ministry. Article 12 obliges them, upon request, to provide all additional information and financial documentation. In cases of non-compliance, provision of false data, misuse of funds, or breach of contract, the ministry may terminate the co-financing agreement and request reimbursement, including legal interest.

In 2024, the Government adopted the Decision on Priority Areas of Public Interest and Funding Amounts for NGO Projects and Programs, which mirrors the provisions of the 2023 Decision. As there were no changes, the overall assessment remains consistent with the previous year's evaluation.

However, the key issue affecting non-governmental organisations in 2024 was the delay in funding for projects financed from the state budget. Although the call for project proposals was announced

at the end of March 2024—within the legally prescribed timeframe—a major problem arose with the disbursement of funds. Approval was only granted at the end of December 2024, preventing CSOs from implementing the planned activities during the year. Consequently, project implementation was postponed to 2025.

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

2024	5 – fully meets standards
2023	5 – fully meets standards
2021	5 – fully meets standards

In line with the previous indicator, the situation remained the same as in the previous reporting periods, regarding the openness and transparency of the central government institutions and making sufficiently detailed information about the awards publicly available. All the ministries publish information on awards on their websites, with sufficiently detailed information to identify individual awards.

According to the Public Authorities Survey for 2024, a large majority of public officials think that the extent to which relevant authorities make the information on awards of public funding to CSOs publicly available was sufficiently public.

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

2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

According to data from the CSO survey, only 10% of civil society organisations (CSOs) reported that funding is transparent and fair. This figure is similar to 8% in 2021 and lower than the 18% in 2023. Regarding transparency, 40% of CSOs indicated that public funding is either sufficiently transparent or very transparent. However, in terms of fairness, none of the CSOs described the funding as very fair, while 21% considered it to be sufficiently fair.

In contrast, a significant majority of public officials responded that funding to CSOs is provided transparently and fairly.

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

According to the 2024 CSO Survey, 76% of CSOs reported applying for public funding, which is consistent with the figures of 72% in 2023 and 74% in 2021. Of those who applied, 79% stated that their applications were unsuccessful, compared to 68% in 2023 and 77% in 2021. Among the CSOs whose applications were rejected, the majority (59%) believed the primary reason was that authorities tended to fund their preferred organisations—a perception also dominant in 2023 and 2021. Another 21% attributed their rejection to strong competition, while 9% acknowledged that their proposals were not of sufficient quality. Additionally, 7% of CSOs reported that authorities were unwilling to fund work related to the communities they serve and represent.

Among CSOs that did not apply for public funding, 27% cited a lack of realistic chance of success (down from 44% in 2023 and 52.6% in 2021). 15% missed the application deadline (up from 7% in 2023 and 5.3% in 2021), while 12% stated that they either did not need public funding or found the application procedure too complicated. Furthermore, 8% reported that the available funds were too small to justify applying.

The public officials considered the allocation of public funding by their institutions to be inclusive, meaning that funding was accessible to a broad range of CSOs representing various issues and communities.

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

2024	3 – moderately meets standards
2023	3 – moderately meets standards ³⁰
2021	3 – moderately meets standards

In 2024, Montenegro’s tax framework continues to allow corporate donors to deduct up to 3.5% of their total revenues for donations to recognised public-benefit organisations, including CSOs.³¹ Additionally, profits generated by CSOs from economic activity are tax-exempt up to €4,000 annually, provided that the revenue is reinvested in the organisation’s statutory goals.³² These provisions represent positive alignment with international standards encouraging corporate philanthropy.

However, tax incentives for individual donations remain largely absent in practice. While the Law on Personal Income Tax allows certain deductions for documented expenses, it does not explicitly include tax-deductible donations to CSOs.³³

As a result, individuals have little financial incentive to donate, and such giving remains underutilised. This is compounded by the lack of public awareness and unclear administrative procedures, which further discourage individual giving.³⁴

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

According to the Charities Aid Foundation’s World Giving Index 2024³⁵, in Montenegro there has been a decline in the number of people giving money to an organisation. In 2024, 28% of people donated money, compared to 33% in 2023³⁶, and 39% in 2021³⁷.

30 Following a revision to the assessment methodology, the value for this indicator was downgraded from 4 to 3 for 2021 and 2023. The value for 2024 is in line with the new methodology. See methodological guide for details.

31 COF, 2018

32 PwC, 2025

33 PwC, 2025

34 TÜSEV, 2024

35 CAF, 2024

36 CAF, 2023

37 CAF, 2021

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..

2024	3– moderately meets standards
2023	3– moderately meets standards
2021	3– moderately meets standards

In 2024, there were no changes to the tax benefits framework for civil society organisations (CSOs) in Montenegro compared to 2023. The regulatory environment remained consistent. According to the Law on Profit Tax of Legal Entities³⁸ CSOs engaged in non-profit activities continue to be exempt from profit tax. However, those that engage in economic activities must be registered with the Central Register of Legal Entities, as required by the Law on Non-Governmental Organisations. Any profit generated from these activities must be reinvested within Montenegro to support the organisation’s foundational objectives. Article 32 of the same law retains a favourable provision for CSOs registered to conduct economic activities, allowing for a reduction of the taxable base by up to €4,000, provided the profit is used to further the organisation’s goals. While this measure supports sustainability, the threshold has not changed and may need future adjustments to better reflect inflation and current economic conditions. Additionally, Article 6 of the Law still lists a wide range of non-profit entities, including CSOs, as exempt from profit tax. This exemption remains a crucial mechanism for ensuring the financial stability and development of the sector. Furthermore, Article 14(1), which was introduced due to CSO advocacy efforts, continues to apply in 2024. It allows for tax exemptions on domestic donations directed towards public benefit causes, such as health, education, environmental protection, and poverty reduction, thus encouraging philanthropic contributions. Overall, the legal framework continues to provide supportive fiscal measures for CSOs, but no additional reforms or adjustments were made in 2024.

Montenegro remains one of the IPA beneficiaries where there is no Law on Social Enterprises. The process that began in Montenegro in 2013, when a pre-draft Law on Social Entrepreneurship was prepared, alongside a planned strategy and action plan, was halted, and no further steps have been taken since, leaving Montenegro without a dedicated legal framework for social enterprises..

38 Official Gazette, 65/01, 12/02, 80/04

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.

2024	2 – minimally meets standards
2023	2 – minimally meets standards
2021	2 – minimally meets standards

There were no changes in 2024 regarding the legal framework for volunteering in Montenegro. The situation remains the same as in previous years.

The Law on Voluntary Work³⁹ is still in force. However, it continues to conceptualise volunteering primarily as a special form of labour-law relation, rather than as voluntary civic engagement. The long-anticipated draft Law on Volunteering, which had been in development since 2019⁴⁰ and aimed to introduce a clearer and more enabling legal framework, was not adopted in 2024.

As a result, key issues persist. The existing law regulates “voluntary service” with a formalised, contractual approach, which causes confusion and limits practical implementation. This includes administrative burdens, a lack of support for corporate volunteering, and a minimum age limit (15 years) that formally excludes younger pupils, despite their involvement in volunteer activities through school programmes and accredited extracurricular initiatives.

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

2024	1 – does not meet standards
2023	1 – does not meet standards
2021	1 – does not meet standards

As in previous years, no government strategy or programme specifically supporting volunteering was adopted or implemented in 2024. The situation remains unchanged from 2023.

Although the existing Law on Voluntary Work provides that strategic priorities for the development of volunteering should be set through a Strategy for Volunteering Development, such a strategy was not in place in 2024. The last adopted national strategy—the Strategy for Volunteering Development 2010–2015—expired without being replaced.

This ongoing absence of a strategic framework undermines the systematic promotion and support of volunteering, including volunteering in and through CSOs. No dedicated public resources or support programmes targeting volunteering were reported in 2024.

Despite isolated efforts through education or youth programming that encourage voluntary engagement, these are not coordinated or supported under a formal national volunteering policy or funding scheme

³⁹ Official Gazette, 26/2010, 31/2010, 14/2012 and 48/2015

⁴⁰ In 2019, a draft Law on Volunteering was prepared to address key criticisms of the existing Law on Voluntary Work. The draft introduces a new definition of volunteering and removes the term “voluntary work.” It allows companies, under specific conditions, to organise volunteering as part of their Corporate Social Responsibility efforts. Unlike the current law, it exempts organisers from signing contracts for volunteering engagements under 10 hours per week and clearly distinguishes volunteering from vocational training. The draft also replaces the volunteer booklet with a certificate issued by the organiser, detailing the volunteer’s acquired skills and knowledge.

Indicator 1.10.c: Proportion of CSOs that benefit from state employment strategies and programmes.

According to the 2024 CSO Survey, 21% of Civil Society Organisations (CSOs) reported benefiting from government employment programmes, which is consistent with the 19% reported in 2023 but shows a decline from 31% in 2021. The CSOs most commonly mentioned their participation in the Professional Training Programme for University Graduates and Public Works schemes. These programmes, implemented in collaboration with various institutions and organisations, support public benefit and non-profit activities, such as social care, environmental protection, and assistance for older individuals. They aim to promote social inclusion and enhance participants' work skills.

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

There was no volunteering strategy in place in 2024. In line with that, only 1% of respondents in the CSO Survey stated that they benefited from state volunteering strategies and programmes.

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

The proportion of employees in the civil society sector in relation to the total workforce in Montenegro in 2024 is approximately 0.65%.

According to the Monitoring Matrix 2024 Report, Montenegro had a total of 1,590 employees in the civil society sector in 2024.⁴¹ According to the World Bank, the total labour force in Montenegro in 2024 was 245,288.⁴²

Indicator 1.10.f: Percentage of people who have volunteered to give their time to an organisation

According to the CAF World Giving Index 2024, 9% of people in Montenegro reported volunteering their time for an organisation—a slight decrease compared to 11% in 2021, and consistent with the 9% recorded in 2023.⁴³

41 BCSDN, 2024

42 World Bank, 2024

43 CAF, 2024



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, bylaws, 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.

2024	4 – meets most standards
2023	4 – meets most standards
2021	4 – meets most standards

In 2024, the legal framework regulating CSO participation in policymaking remained unchanged. The relevant laws and regulations — namely, the Law on State Administration,⁴⁴ the Regulation on the Election of Representatives of CSOs to Working Bodies,⁴⁵ and the Strategy for the Cooperation of State Bodies Administration and Non-Governmental Organisations⁴⁶ — continued to define procedures for public consultations, including access to draft documents, timeframes for feedback, and criteria for participation in working groups.

Despite the launch of the e-Participation portal⁴⁷ in March 2019 as part of Montenegro's e-Government platform, citizen engagement in public consultations remains problematic. The Centre for Civic Education's 2024 policy brief, «Citizens in Focus»,⁴⁸ identifies significant gaps between the legal framework for public consultations and their practical implementation. A major issue is the failure of ministries to publish mandatory annual lists of laws and strategies for public debate.⁴⁹ As of September 2024, only the Ministry of Justice had fulfilled this obligation.

⁴⁴ Official Gazette of Montenegro", No 78/18, 70/21 and 52/22

⁴⁶ Government of Republic of Montenegro 2022

⁴⁷ eParticipation Portal, 2025

⁴⁸ CCE, 2024(b)

⁴⁹ In 2022, only three ministries complied with the requirement, and in 2023, only the Ministry of Culture and Media did so—only to include an outdated item.

The quality of early-stage consultations is also weak. In 2022, 22 consultation calls were made, but only six resulted in published reports, covering input from just eight participants. In 2023, only six calls resulted in two reports with one meaningful comment. Furthermore, feedback on received comments is often not provided, limiting citizen influence on policy. Reporting on public debates is inconsistent, with only 24 out of 50 required reports published in 2023 and many delayed. Reports often fail to include contributions from live hearings (as opposed to written submissions) and lack clear explanations of how comments were handled. Additionally, the main government platforms for posting consultation materials are not used effectively, with many announcements mis-labelled or difficult to find. In 2023, only six out of 50 calls were published on both platforms as required.

Technical issues further hinder accessibility. Timing of consultations also raises concerns; for instance, legislative discussions were initiated just before major holidays, limiting engagement from civil society and experts. Misclassification of consultations further inflates participation metrics and confuses distinct consultative phases. Finally, the absence of demographic data on participants hampers inclusivity. Without information on gender, age, and minority status, assessing the representation of Montenegrin society in the consultation process is impossible. In summary, while the framework for public consultations exists in Montenegro, its implementation is plagued by delays, low engagement, and a lack of transparency and inclusivity, undermining the credibility of citizen participation in decision-making.⁵⁰

Moreover, the institutional infrastructure for participation has not improved. The Council for Cooperation between the Government and NGOs, a key body intended to foster dialogue, remained inactive in 2024. Despite formal mechanisms, opportunities for inclusive and timely engagement—particularly for unregistered initiatives or CSOs representing underrepresented groups—continue to be limited in practice.

CSOs and the Reform Agenda in Montenegro

The consultation process for Montenegro's 2024–2027 Reform Agenda,⁵¹ mandated by EU regulations, aimed to promote inclusivity, transparency, and effectiveness. It was conducted in two main phases: an initial roundtable held on April 18, 2024, followed by high-level consultations in early May. These events brought together representatives from civil society, academia, the business sector, and public institutions. Out of 63 invited participants, many came from non-governmental organisations, the academic community, and the private sector, contributing to a diverse and participatory process.

Stakeholders were allowed to submit written comments until April 22, and according to government sources, all feedback was processed, and responses were shared with participants. These consultations reportedly informed the finalisation of reform timelines, aligning them with Montenegro's institutional capacities and the European Commission's expectations. The government also demonstrated transparency by publishing various drafts and versions of the Reform Agenda during different stages of its adoption.

However, some limitations affected the quality and inclusiveness of the process. According to independent monitoring reports⁵², only ten days were provided for public feedback, despite national standards calling for 20 to 40 days of consultation. The Ministry of European Affairs confirmed that just 15 written comments were received, primarily concerning the feasibility of proposed deadlines, measures to empower women, and improvements in the rule of law and digital transition. The fate of these proposals remains unclear, as no formal public report on the consultations has been issued, and available information provides only general statements about reviewing the feedback. Moreover, some comments were reportedly deferred for discussion in the later stages of the Reform Agenda's implementation.

Although a second consultation phase was announced for August and September 2024, this

⁵⁰ CCE, 2024(b)

⁵¹ Reform Agenda Monitor, Montenegro 2025

⁵² Institute Alternative, 2025

consisted of interdepartmental government discussions and did not include civil society or citizens. Notably, there were no formal consultations with the Parliament or relevant committees during the entire development process, nor did any parliamentary body initiate discussions or invite government representatives to present the Reform Agenda.⁵³

The 2024 SIGMA Monitoring Report on Montenegro⁵⁴ highlights that while the legal basis for CSO consultation exists, implementation is often symbolic rather than substantive. The report notes that civil society participation is hindered by inactive coordination bodies and a lack of accountability mechanisms to ensure that public feedback is reflected in final policy outcomes. According to the report, Montenegro continued to face challenges in effectively implementing public consultations in the policy-making process. In 2023, only 26% of the laws and strategies adopted were subjected to public consultation; specifically, this included 12 out of 45 laws (27%) and 7 out of 28 strategies (25%). Furthermore, even when consultations take place, only about one-third (34%) are conducted through the central e-Participation portal, which remains underutilised by both citizens and stakeholders, despite the Ministry of Public Administration (MPA) providing clear guidelines for its use. Although ministries generally adhere to the legal minimum consultation period of 20 days and employ a reasonable range of consultation methods—such as public meetings—this does not fully address the limited overall participation. Still, when consultations are conducted, the reports are typically well-prepared, often including feedback on both accepted and rejected comments, which is a positive indication of procedural maturity. Nonetheless, a significant concern remains regarding citizens' perceptions: only 35% believe that the government genuinely involves stakeholders—whether from civil society or the private sector—in shaping legislation and policies. This low level of trust reflects regional trends, as the average for the Western Balkans is 32%, and underscores the urgent need for systemic improvements in transparency, communication, and feedback mechanisms within the consultation processes in Montenegro.⁵⁵

The SIGMA results are in line with the 2024 CSO Survey results, where 21% of the CSO respondents stated that the authorities effectively consulted their CSOs in drafting laws, bylaws, strategies, acts of public interest, or policy reforms, compared to 31% in 2023 and 34% in 2021.

Only 10% of all CSOs covered by the survey stated they had access to the draft document from the beginning of the drafting process to the end of the procedures provided by a governmental body in 2023, a drop from 24% in 2023 and 26% in 2021.

Just 15% of CSOs stated that they had at least 15 days available for commenting, showing a drop of 11 percentage points from 26% reported in 2023, and also below the 22% from 2021.

In 2024, 15% of respondents of CSOs reported their representative was a member of a working group tasked with the development of laws, bylaws, strategies or acts of public interest and policy reforms, similar to 2023 with 20% and 2021 with 23%.

Nevertheless, the Public Officials' survey showed that the majority of the public officials perceived that they effectively consulted CSOs in drafting laws, bylaws and other strategic documents in 2024, which is contrary to the CSOs respondents' perceptions.

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

This indicator is not reviewed.

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 is not reviewed.

⁵³ Reform Agenda Monitor, Montenegro 2025

⁵⁴ OECD/SIGMA, 2024

⁵⁵ OECD/SIGMA, 2024

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.

52024	1 – does not meet standards	16%
2023	1 – does not meet standards	18%
2021	1 – does not meet standards	13%

The 2024 CSO survey indicates a continued perception of limited support from public officials toward civil society organizations (CSOs). In 2024, only 16% of CSO respondents described the attitudes of public officials as supportive, a figure that has remained essentially unchanged from 18% in 2023 and 13% in 2021. Conversely, 74% of respondents viewed public officials as non-supportive in 2024, consistent with 69% in 2023 and 79% recorded in 2021.

On the contrary, many public officials surveyed in 2024 rated their support for CSOs as positive. This highlights a significant discrepancy between the perceptions of CSOs regarding support and how state representatives self-assess their support.

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.

In 2024, Montenegro continued to implement its Strategy for the Cooperation of State Bodies Administration and Non-Governmental Organisations for the period of 2022–2026.⁵⁶ In May 2024, the Action Plan for 2024–2026⁵⁷ was adopted, building on the Action Plan for 2022–2023. While there is a Monitoring Report⁵⁸ for the implementation activities of 2022, reports for 2023 and 2024 are currently unavailable.

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

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

In 2024, Montenegro had an active Strategy for Cooperation between State Administration Bodies and Non-Governmental Organisations for 2022–2026, accompanied by an Action Plan covering the period 2022–2026.

⁵⁶ Government of Republic of Montenegro 2022

⁵⁷ Government of Republic of Montenegro 2024

⁵⁸ Government of Republic of Montenegro 2023

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

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

In 2024, the Government of Montenegro adopted the 2024–2026 Action Plan as an integral part of the Strategy for Cooperation between State Administration Bodies and NGOs. The Action Plan⁵⁹ is supported by a planned budget of approximately 1.1 million EUR, to be financed through the national budget, technical assistance (TA) projects, and contributions from other donors.

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

In 2024, only 14% of respondents rated the Strategy for Cooperation and Development of CSOs as both relevant and effective—a figure unchanged from 2023, but significantly lower than the 45% reported in 2021.

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

This indicator was not assessed for the Montenegro Country Annexe due to research team constraints.

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.

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

As of 2023, the Council for Cooperation between the Government and Civil Society Organisations (CSOs) continued to be non-functional in 2024. The Council has not resumed its activities since October 2021. The government was unable to finalise the establishment of the Council for Cooperation between State Administration Bodies and CSOs, despite making multiple calls for interested NGOs. Although efforts to establish a new Council began in August 2022 with a public call for six representatives from Civil Society Organisations, this process remains incomplete, and the Council has yet to be established.

⁵⁹ Government of Republic of Montenegro 2024



Specific Objective 3

CSO capacity and resilience to carry out their activities effectively 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.

2024	2 – minimally meets standards	27%
2023	3 – moderately meets standards	46%
2021	3 – moderately meets standards	46%

In 2024, accountability and good governance remained significant challenges for Civil Society Organisations (CSOs) in Montenegro, showing a notable decline compared to 2023 and 2021. According to a survey of CSOs, only 27% reported having independent and effective governing bodies. This marks a sharp decline from 46% in both 2021 and 2023.

Another concern is the composition of these governing bodies: 67% of the surveyed CSOs indicated that they include paid staff members in their governing bodies. This figure represents a considerable increase from previous years, where only 41% of organisations in 2021 and 42% in 2023 reported the same practice.

Still, it is worth mentioning that in Montenegro, registered associations are not legally required to have a board; this requirement applies only to foundations.

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.

2024	1 – does not meet standards	18%
2023	1 – does not meet standards	18%
2021	1 – does not meet standards	20%

According to the CSO Survey for 2024, 18% CSOs regularly (i.e. once per year) checked potential conflicts of interest with regard to the political, economic and personal relationships of their governing body, which is the same as in 2023 and less than in 2021, when it was 20%.

According to the CSO Survey, members of the governing bodies of CSOs are required by 36% of organisations to sign a conflict of interest declaration when stepping into their roles. In the case of 18% of CSOs they have to sign it every year and more than a third (37%) of the CSOs have never asked their governing body members to sign such documents.

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.

2024	2 – minimally meets standards	23%
2023	1 – does not meet standards	16%
2021	2 – minimally meets standards	33%

Based on the 2024 CSO survey, 23% of organisations reported that they publish both their governing documents and the structure of their governance. This is a slight increase over 2023, when 16% of CSOs reported doing the same, but marks a notable decline from the 2021 baseline, when 33% of CSOs shared such information publicly.

Further data from 2024 highlight the types of information made available by CSOs show that 60% indicated they publish their governing documents, while 23% stated that the structure of their organisation's board is publicly accessible on their website.

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

2024	2 – minimally meets standards	40%
2023	2 – minimally meets standards	37%
2021	2 – minimally meets standards	39%

Gender equality is a crucial aspect of socio-economic development for creating inclusive and peaceful societies. According to the 2024 Civil Society Organisation (CSO) survey, 40% of civil society organisations reported having gender equality policies in place. This figure is largely consistent with the 39% reported in 2021 and the 37% from 2023.

A closer look reveals a significant disparity between human rights organisations and non-human rights organisations. In 2024, only 32% of non-human rights CSOs reported having gender equality policies, while 42% of human rights-focused organisations had such policies in place.

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

2024	4 – meets most standards	61%
2023	3 – moderately meets standards	59%
2021	3 – moderately meets standards	59%

A defined strategy, strategic plan, mission, vision, and goals are prerequisites for successful operations and a clear direction for CSOs. In 2024, the proportion of respondents who prepared and had such documents in place was 61 %, which is a slight increase from 59% of respondents in both 2021 and 2023.

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 on-line channel of communication.

2024	5 – fully meets standards	98%
2023	5 – fully meets standards	94%
2021	5 – fully meets standards	98%

Over the past three years, the use of online communication channels among CSOs in Montenegro has remained consistently high. In 2024, 98% of CSOs reported using such channels, closely aligning with 94% in 2023 and 98% in 2021. The data reflects sustained digital engagement across multiple platforms.

Facebook remains the dominant platform, used by 90% of CSOs in 2024—up from 75% in 2023 and comparable to 95% in 2021. Instagram holds the position as the second most utilised platform, with 69% of CSOs reporting its use in 2024, marking a steady increase from 57% in 2023 and nearing the 65% reported in 2021.

The use of official websites has remained relatively stable, with 55% of CSOs using them in 2024, showing an increase from 39% in 2023 but similar to 62% in 2021.

Messaging applications such as WhatsApp, Viber, and Telegram have also maintained a notable presence. In 2024, 35% of CSOs used these apps regularly (at least once a month) to communicate their work to the public, compared to 22% in 2023 and 40% in 2021.

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.

In 2024, 16% of CSOs reported cooperating with media outlets, marking a decrease of 13% compared to 2023, when 29% engaged in such cooperation. This level of engagement is also lower than 2021, when 26% of CSOs reported working with the 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.

2024	2 – minimally meets standards	35%
2023	2 – minimally meets standards	28% ⁶⁰
2021	3 – moderately meets standards	42% ⁶¹

Transparency and openness are essential indicators of civil society organisations' (CSOs) commitment to accountability. In 2024, 35% of CSOs reported that they published both annual and financial reports. This figure is relatively consistent with previous years, where 28% did so in 2023 and 42% in 2021.

On the other hand, 13% of organisations did not publish an annual report in 2024. This percentage is similar to the 19% recorded in 2023 and the 16% in 2021, indicating a persistent group of CSOs with limited public reporting.

Among the organisations that did publish reports, 45% made them available online on their websites in 2024. This is a decrease from 50% in 2023 and 57% in 2021, reflecting a gradual decline in digital transparency. Meanwhile, the proportion of organisations providing hard copies of their reports was 19% in 2024, similar to 17% in 2023 but significantly down from 33% in 2021.

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

2024	2 – minimally meets standards	28%
2023	2 – minimally meets standards	27%
2021	2 – minimally meets standards	36%

According to the 2024 CSO Survey results, 28% of civil society organisations in Montenegro reported publicly disclosing information about their sources of funding and the amounts received. This figure is statistically consistent with the 27% reported in 2023 and 36% in 2021.

Indicator 3.3.c: Degree of public trust in CSOs

According to the 2024 *Balkan Public Barometer*,⁶² 37% of the public in Montenegro expressed trust in civil society, while 52% stated they did not trust this sector. These figures show minimal change compared to 2023, when 39% reported having confidence in civil society and 51% expressed distrust.

	Trust civil society	Do not trust civil society
2024	37%	52%
2023	39%	51%

⁶⁰ The 2023 value for Indicator 3.3a was originally published as 37%. Following the recalculation of the value to rectify an error, the revised value for 2023 is 28%.

⁶¹ The 2021 value for Indicator 3.3a was originally published as 54%. Following the recalculation of the value to rectify an error, the revised value for 2021 is 42%.

⁶² Balkan Public Barometer, 2024

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.

2024	5 – fully meets standards	86%
2023	4 – meets most standards	78%
2021	4 – meets most standards	77%

In 2024, 86% of CSOs in Montenegro reported conducting evaluations of their organisation, projects, or internal processes, a small increase over the 78% from 2023 and 77% in 2021. Project-related evaluations continued to dominate, carried out by 80% of organisations, while 20% evaluated internal processes and 11% conducted strategic evaluations—closely following trends from previous years. Among the 12% of CSOs that did not engage in any evaluation activities, the most commonly cited reasons were the absence of projects in 2024 or a lack of sufficient financial capacity.

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.

2024	4 – meets most standards	80%
2023	5 – fully meets standards	81%
2021	4 – meets most standards	80%

According to the 2024 CSO survey, 80% 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 to 2023, when 81% of CSOs stated the same, and to 2021, when 80% of CSOs used research-based approaches. Most common kinds of research implemented by CSOs in 2024 included Survey with specific groups (43%), Public opinion surveys (16%), Randomized control trials (9%), Desk research (32%), Field research (31%) and Focus group discussions (44%).

Eleven percent of CSOs that did not base their work on research and evidence, cited several reasons. These included no need, a strategic focus on other priorities such as afforestation activities or service licensing, limited human resources, volunteer-based operations, and competing obligations that left no time or capacity for conducting research.

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.

2024	5 – fully meets standards	91%
2023	5 – fully meets standards	91%
2021	5 – fully meets standards	88%

According to the 2024 CSO Survey, 91% of civil society organisations in Montenegro reported that stakeholder consultations informed their work. This figure remains consistent with 2023 and closely aligns with 2021, when 88% of CSOs reported the same practice. The most frequently consulted groups were CSO members (64%), followed by local communities (52%), public institutions (48%), and local authorities (43%). National authorities were involved in 29% of consultations, while academic institutions and private businesses were consulted in 24% and 14% of cases, respectively.

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

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

Networking is a crucial strategy for civil society organisations (CSOs) to collaborate, amplify their impact, and achieve shared goals.

In 2024, 80% of CSOs reported being part of a network, whether local, national, or international. This is similar to 2023, when 71% reported being part of a network, but a decrease compared to 61% in 2021.

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

National networks are the most common type of affiliation, with 58% of CSOs participating in them in 2024. This is followed by 44% involved in international networks and 26% in local networks. This distribution is broadly consistent with 2023, but it shows a shift from 2021, when participation in international and local networks was nearly equal, with 38% and 39%, respectively.

Despite strong overall engagement, 14% of CSOs in 2024 reported not being affiliated with any network, a decrease from 24% in 2023. This figure matches the 14% recorded in 2021.

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

In 2024, 41% of surveyed Civil Society Organisations (CSOs) reported participating in networks and cross-sector cooperation with universities, social partners, or private companies. This figure remains relatively unchanged from 43% in 2023 but reflects a notable decrease compared to 65% in 2021.

CSOs engaged in cross-sectoral partnerships with academia, social partners and private sector	
2024	41%
2023	43%
2021	65%

Universities were the most frequent partners in 2024, with 25% of CSOs engaging in collaboration, followed by 21% partnering with the private sector and 12% with social partners. These patterns are consistent with those in 2023, when 25% of CSOs partnered with universities, 26% with private companies, and 13% with social partners.

SO 3.7. CSO have a diversified funding base.

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

2024	3 – moderately meets standards	60%
2023	4 – meets most standards	64%
2021	2 – minimally meets standards	37% ⁶³

When it came to a diversified donor base, 60% of CSOs in 2024 had no single donor type contributing more than 50% of their funding, compared to 64% of CSOs in 2023 and 37% in 2021.

In 2024, 40% of CSOs therefore had at least one type of donor, contributing more than 50% of their funding.

The European Commission emerged as the most common source of funding, with 70% of CSOs receiving support from this donor, a substantial increase compared to 52% in 2023 and 53.2% in 2021. Funding from local and national governments declined slightly, supporting 67% of CSOs in 2024, down from 74% in 2023.

Support from foreign private foundations and international CSOs rose to 57% in 2024, compared to 49% in the previous year. Bilateral donors supported 21% of CSOs, while intergovernmental organisations and domestic private foundations funded 27% and 15% of CSOs, respectively.

A small portion of CSOs—8%—reported having no donor funding at all. These were typically smaller organisations that relied on alternative sources such as membership fees, individual donations, and community contributions to sustain their activities.

⁶³ Value for Indicator 3.7.a was originally published as 45% for 2021. Following the recalculation of the value to rectify an error, the revised value for 2021 is 37%.

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.

2024	3 – moderately meets standards	52%
2023	3 – moderately meets standards	51% ⁶⁴
2021	3 – moderately meets standards	57%

Regarding CSOs raising funds from other sources besides donors (membership fees, corporate/individual giving, and income generated from economic activities) 52% of CSOs stated that in 2024 they had at least one other source of income, compared to 55% of CSOs in 2023 and 57% in 2021, according to the CSO survey responses.

In 2024, 5% of CSOs obtained financial support from crowdfunding, 36% from individual donations, 20% from membership fees, 10% from private businesses, and 8% CSOs got funding from their own business/social enterprise activity/service provision.

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

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

According to CSO survey in 2024, 79% of CSOs in Montenegro reported having employed staff, a figure that remains close to 74% in 2023 and 70% in 2021.

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

The 2024 CSO Survey provides insight into staffing trends within civil society organisations in Montenegro. In 2024, 19% of CSOs reported having no paid staff, indicating a similarity in staffing capacity compared to 25% in 2023 and 27% in 2021. Among organisations with paid personnel, the majority (45%) employed between 1 and 5 staff members. A further 15% reported employing between 6 and 10 people, while another 15% had 11 or more staff—figures that have remained relatively consistent over the past three years.

⁶⁴ The 2023 value for Indicator 3.7b was originally published as 55%. Following the recalculation of the value to rectify an error, the revised value for 2023 is 51%.

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

2024	1 – does not meet standards	1%
2023	1 – does not meet standards	0%
2021	1 – does not meet standards	1%

In 2024, only 1% of CSOs reported having a set of organisational human resources policies in place, covering areas such as recruitment, diversity, equality and inclusion, disciplinary procedures, grievance and complaints mechanisms, performance evaluation, redundancy, remuneration, bullying and harassment, and safeguarding of children and vulnerable adults. This figure remains consistent with 2023 (0%) and 2021 (1%).

At the same time, 44% of surveyed CSOs in 2024 reported not implementing any of these policies, a result similar to 52% in 2023 and a significant drop from 64% in 2021.

When examining individual policies, safeguarding measures for children and vulnerable adults were the most commonly reported, present in 33% of organisations. This was followed by diversity, equality and inclusion policies (39%), recruitment policies (24%), and bullying and harassment policies (24%). Grievance and complaints procedures and performance evaluation policies were each in place in 15% of CSOs, while remuneration policies were adopted by 11%. Disciplinary policies were reported by 10%, and only 2% had a redundancy policy in place.

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.

In 2024, 14% of CSOs reported having both a Recruitment Policy and a Diversity, Equality, and Inclusion Policy. This proportion is relatively consistent compared to 2023 (15%) and 2021 (12%).

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

2024	5 – fully meets standards	91%
2023	5 – fully meets standards	81%
2021	5 – fully meets standards	82%

In 2024, 91% of CSOs reported supporting their employees and volunteers through various training programmes. This figure is relatively similar to 81% in 2023 and 82% in 2021.

Laws, Bylaws, Strategies and other Policy Documents

Short ref	Full name and description
Government of Republic of Montenegro 2022	Strategy for the Cooperation of State Bodies Administration and Non-Governmental Organisations 2022–2026, Government of Republic of Montenegro, March 2022 https://smartbalkansproject.org/wp-content/uploads/2023/06/Strategija-saradnje-organa-drzavne-uprave-i-nevladinih-organizacija.pdf
Government of Republic of Montenegro 2024	Action Plan for 2024–2026 for the Strategy for the Cooperation of State Bodies Administration and Non-Governmental Organisations, Government of Republic of Montenegro, May 2024 https://www.gov.me/dokumenta/b0275d14-41a5-4971-be7a-5e3b29f268d1
Government of Republic of Montenegro 2023	Report on the Implementation of the Strategy for Cooperation between State Administration Bodies and Non-Governmental Organisations 2022–2026 for the Year 2022, Government of Republic of Montenegro, May 2023 https://www.gov.me/dokumenta/5bf83bf5-edcc-4b6f-b2eb-acbfedb3a4bb
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Official Gazette of Montenegro», № 78/18, 70/21 and 52/22)	Law on State Administration, Official Gazette of Montenegro», No 78/18, 70/21 and 52/22 https://me.propisi.net/zakon-o-drzavnoj-upravi/
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Official Gazette of Montenegro», № 78/18, 70/21 and 52/22),	Law on State Administration, Official Gazette of Montenegro, No 78/18, 70/21 and 52/22 https://me.propisi.net/zakon-o-drzavnoj-upravi/
Official Gazette of Montenegro, № 41/18	Regulation on the election of representatives of CSOs to the working bodies of state administration bodies and the conduct of a public hearing in preparation laws and strategies, Official Gazette of Montenegro, № 41/18 https://www.gov.me/dokumenta/1f353a31-1729-4db3-a378-e8c4610a5b04

Analysis, journalists' texts and reports

Short ref	Full name and description
Balkan Public Barometer, 2024	Balkan Public Barometer, Regional Cooperation Council, 2024 https://www.rcc.int/balkanbarometer/results/2/public
BCSDN, 2025	"Regional Assessment of Civil Society in the Enlargement Region – Key Findings 2024", Balkan Civil Society Development Network, June 2025: https://balkancsd.net/novo/wp-content/uploads/2025/07/63-3-MM-Regional-Report-WBT-2024-FINAL.pdf
BTI, 2024	"Montenegro Country Report 2024", Bertelsmann Transformation Index, 2024. https://bti-project.org/en/reports/country-report/MNE
CAF, 2021	"World Giving Index 2021 – Global Trends in Generosity", Charities Aid Foundation, 2021. https://www.cafonline.org/docs/default-source/about-us-research/cafworldgivingindex2021_report_web2_100621.pdf
CAF, 2023	"World Giving Index 2023 – Global Trends in Generosity", Charities Aid Foundation, 2023. https://www.cafonline.org/docs/default-source/updated-pdfs-for-the-new-website/world-giving-index-2023.pdf
CAF, 2024	"World Giving Index 2024 – Global Trends in Generosity", Charities Aid Foundation, 2024. https://www.cafonline.org/docs/default-source/inside-giving/wgi/wgi_2024_report.pdf
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CCE, 2024(b)	"Citizens in Focus – How to improve citizens participation in policy making?", Centre for Civic Education, Zorana Markovic and Petar Knezevic, Podgorica 2024 https://media.cgo-cce.org/2024/10/Gradjani-u-fokusu.pdf
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