

PAR Monitor Report Montenegro POLICY DEVELOPMENT AND COORDINATION

2024/2025



CONTENTS

AUTHORS	3
ABOUT WEBER 3.0	4
ACKNOWLEDGEMENTS	5
EXECUTIVE SUMMARY	6
LIST OF ABBREVIATIONS AND ACRONYMS	11
I. WEBER PAR MONITOR: WHAT WE MONITOR AND HOW?	12
I.1 WEBER'S APPROACH TO MONITORING PAR	12
I.2 WHY AND HOW WEBER MONITORS THE "POLICY DEVELOPMENT AND COORDINATION" AREA	14
II. TRANSPARENCY AND INCLUSIVENESS OF POLICY DEVELOPMENT AND COORDINATION	22
II.1 TRANSPARENCY AND INCLUSIVENESS OF GOVERNMENT DECISION-MAKING PROCESS	22
II.2 TRANSPARENCY OF GOVERNMENT PLANNING AND REPORTING	28
II.3 TRANSPARENCY AND INCLUSIVENESS OF POLICY MAKING AND LEGISLATION DEVELOPMENT PROCESS	36
II.4 TRANSPARENCY AND INCLUSIVENESS OF POLICY IMPLEMENTATION, EVALUATION, AND PARLIAMENTARY SCRUTINY	47
II.5 RECOMMENDATIONS FOR THE POLICY DEVELOPMENT AND COORDINATION AREA	59
II.5.1 TRACKING RECOMMENDATIONS FROM PAR MONITOR 2021/2022	59
II.5.2 RECOMMENDATIONS FROM THE 2024/2025 MONITOR REPORT	63
METHODOLOGY APPENDIX	64
LIST OF REFERENCED SOURCES IN THIS REPORT	72

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ABOUT WEBER 3.0

Building upon the achievements of its predecessors, the WeBER (2015 – 2018) and WeBER 2.0 (2019 – 2023) projects, the **Western Balkan Enablers for Reforming Public Administrations – WeBER 3.0** project is the third consecutive EU-funded grant of the largest civil society-led initiative for monitoring public administration reform (PAR) in the Western Balkans. Its implementation period is February 2023 – July 2026. Guided by the SIGMA/OECD Principles, the first two phases of the initiative laid the foundation for WeBER 3.0's ambition **to further empower civil society organisations (CSOs) to contribute to more transparent, open, accountable, citizen-centric and thus more EU-compliant administrations in the WB region.**

WeBER 3.0 continues to promote the crucial role of CSOs in PAR, while also advocating for broader citizen engagement in this process and inclusive reform measures which are user-tailored and thus lead to tangible improvements. By grounding actions in robust monitoring data and insights, WeBER 3.0 will empower civil society to more effectively influence the design and implementation of PAR. To foster collaborative policymaking and bridge the gap between aspirations and actionable solutions, the project will facilitate sustainable policy dialogue between governments and CSOs through the WeBER Platform and its National PAR Working Groups. Finally, through small grants for local CSOs, WeBER 3.0 bolsters local-level PAR engagement, amplifying the voices of citizens – the final beneficiaries of the public administrations' work.

WeBER 3.0 products and further information about them are available on the project's website at www.par-monitor.org.

WeBER 3.0 is implemented by the Think for Europe Network (TEN), composed of six EU policy-oriented think tanks in the Western Balkans:



By partnering with the Centre for Public Administration Research (KDZ) from Vienna, WeBER 3.0 has ensured EU-level visibility.



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As in the case of the previous editions of the National PAR Monitor reports, published for 2017/2018, 2019/2020 and 2021/2022, special acknowledgements go to the members of the WeBER Platform and the National Working Group in Montenegro, as well as the other stakeholders in Montenegro that shared their experiences through interviews, thus immensely contributing to the quality of this report. They are not individually identified in this report to protect their anonymity.

The WeBER3.0 team would also like to thank its main partners and associates, who have supported the project in research and other activities. Most notably, these are the SIGMA/OECD (Support for Improvement in Governance and Management)¹, the ReSPA (Regional School of Public Administration), and the Ministry of Public Administration of Montenegro, as a project associate.

¹ A joint initiative of the European Union and the OECD.

EXECUTIVE SUMMARY

This report assesses the transparency and inclusiveness of four aspects of policy development and coordination: 1) transparency and inclusiveness of government decision-making process, 2) transparency of government planning and reporting, 3) transparency and inclusiveness of policy making and legislation development process, and 4) transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny. The first aspect examines whether transparency in government decision-making is secured through strategic commitments, legal provisions, and systematic publication of information from government sessions. The second looks at whether the government's planning and reporting obligations are regulated, and whether related documents are published on time, performance-oriented, and accessible in open formats. The third assesses whether policy-making and legislative development are transparent, inclusive, and evidence-based — covering stakeholder participation, impact assessments, consultation reporting and oversight, and the influence of public input on final decisions. The fourth examines legal and practical mechanisms for advance notification, publication of monitoring and ex-post evaluation reports, and stakeholder involvement in parliamentary oversight. The findings cover the period from 2023 until 2025, as well as the end-of-2022 developments not covered in the previous cycle.

The analysis of strategic and legal documents shows that Montenegro foresees certain measures to improve the transparency of government work, although mostly indirectly. The Public Administration Reform Strategy² 2022–2026 recognizes the principles of transparency in the government decision-making process through the preparation of the Draft Law on the Government.³ Similarly, the Medium-Term Work Programme of the Government⁴, as a strategic document, under Goal 5 (Digital Montenegro, Transparent and Efficient Public Administration), foresees the improvement of the document management system, including systems used for electronic Government sessions, and, in line with the Strategy, also envisages the adoption of the Law on the Government. A key advancement planned by this Draft Law, which for the first time establishes an obligation to publish the minutes of Government

² Public Administration Reform Strategy 2022-2026, available at: <https://www.gov.me/dokumenta/7c3b8e38-a038-4f52-9cf5-27f6d72abb39>

³ Draft Law on the Government, available at: <https://www.gov.me/dokumenta/541afa9e-cb70-4cfb-b2df-6df16b3299e1>

⁴ Medium-Term Work Programme of the Government, available at: <https://www.gov.me/dokumenta/927f641e-9d9f-4dd8-8144-416a62fd49b0>

sessions, representing an improvement compared to the existing rules. The current Rules of Procedure of the Government⁵ provide for the publication of agendas, decisions, and press releases, but not the minutes, while the new law further expands the scope of publicly available information, with exceptions for classified data.

In practice, the Government regularly publishes agendas and press releases (100%), as well as the majority of decisions (97.5%), but there are shortcomings in terms of timeliness, with only 17% of decisions published within the legally prescribed deadline. Additionally, minutes are not published at all, and advance publication of agendas is limited and often too late to be meaningful. The most significant remaining issue is still the treatment of confidential items, as agenda points marked as confidential prevent the public from knowing what topics were discussed or what decisions were made in those cases.

Public and civil society perceptions are predominantly negative, especially regarding access to minutes and the clarity of decisions. The level of information provided in Government press releases varies, with some releases offering only basic information, while others include more detailed explanations of adopted documents and decisions.

When it comes to central government planning, our monitoring showed that PAR strategic documents include objectives and activities aiming to better strategic documents planning. Both, Mid-term and annual programmes of the Government were published regularly and timely. The Government Mid-term Programme as well as both annual work plans analysed (for 2025 and 2026) contain performance indicators. The Government reports regularly and in a timely manner on the implementation of its plans. Same applies for the publishing EU Integration plans and reports on implementation. While government planning documents as well as EU integration plans are assessed as bureaucratic and technical, reports on implementation are assessed as citizen friendly, thanks to summaries and graphics presented on general implementation rate. All reports are available only in the pdf formats, and none of the data related to these plans or reports is available on the open data portal.

Two out of three key informants tended to agree that Government planning and reporting activities are transparent, timely, and relatively citizen-friendly, while one key informant fully disagreed with these assessments. Overall, key informants highlighted that planning and reporting documents are often bureaucratic in nature, written in formal and administrative language, and insufficiently adapted for wider public understanding.

⁵ Rules of Procedure of the Government of Montenegro, available at: <https://www.gov.me/dokumenta/f79a82b9-c69e-4a84-87da-c787bad16958>

Public Administration Reform Strategy 2022-2026 recognises the principles of transparency and inclusiveness in policy-making and legislative development through strengthening capacities of civil servants for public consultation and better use of E-Government Portal. Although the legal framework recognises the obligation to publish laws and secondary legislation free of charge in the electronic edition of the Official Gazette, there is no obligation to publish consolidated versions free of charge.

When it comes to inclusive policy and legislative development, our regulatory framework recognises early consultations and consultations when the draft was produced. It also specifies all supporting documentation to be included with a call for public consultation, including the RIA form for laws proposed by the Government. When it comes to early consultations, only 4% of policy documents (3/72) and 5% of laws (7/155) were publicly consulted prior to the drafting process. Monitoring showed that, out of a total of 227 adopted policy documents and laws, for only 85 of them public consultations were held. Public consultations after the drafting phase were held for only 30.56% of policy documents adopted and for only 40.65% laws enacted. After consultations conducted, reports were published in 86.36% of cases for policy documents, while for laws the publication rate was 87.30%. Out of those 85 laws and policy documents for which the public consultations were held, only 24% of public consultations were announced on the e-Government consultation portal along with the relevant documents, and for only 18% a consultation report was published.

Although the e-Government Portal allows users to submit comments directly through the platform, none of the documents had comments available online. It should be noted that our analysis showed that institutions do not push for greater use of e-Consultation portal. In all calls published on the portal, it is stated that comments should be submitted via email or by post, without mentioning submission through the e-Government portal.

According to the Rules of Procedure of the Government of Montenegro, Regulatory Impact Assessment (RIA) must be conducted in the process of preparing a law or other regulations. In January 2026, the Guideline on Conducting Regulatory Impact Assessments and Preparing Regulatory Impact Assessment Reports⁶ was adopted, explicitly stating that regulatory impact assessments are to be carried out for draft laws, proposed regulations adopted by the Government (including decrees and decisions), as well as proposed strategic documents (including action plans, strategies, and programmes), and similar acts. This Guideline will enter into force in January 2027. The RIA

⁶ Guidelines on Conducting Regulatory Impact Assessments and Preparing Regulatory Impact Assessment Reports, January 2026, available at: <https://www.sluzbenilist.me/propisi/7275A943-3071-48DF-97CE-EA9E69877256?page=1>

form generally includes all required elements, with the main exception being the use of external sources of information and data. Out of 155 laws adopted during the observed period, 93% of government-proposed laws included a RIA, although none incorporated a gender impact assessment. Out of 72 policy documents in the observed period, for 44% there are ex ante impact assessments.

Key informants expressed differing views on their participation in working groups for the drafting of laws and policy documents. One informant emphasised that there was not enough time and space for advocacy, while another highlighted that in many cases, proposals were further assessed and either incorporated into the draft or considered for future revisions. Public opinion surveys reflected a negative perception of participation: almost 70% of respondents believe they do not have the opportunity to engage in the drafting of laws and strategic documents in Montenegro.

The analysis shows that Montenegro's framework for transparency, participation, and accountability in policy-making and monitoring remains only partially developed. While the regulatory framework provides certain mechanisms for stakeholder participation and public access to information, these practices are not applied consistently or systematically across sectors and institutions. Significant gaps persist in ensuring systematic stakeholder engagement, regular monitoring and evaluation, timely communication with affected groups, and citizen-friendly presentation of policy implementation results.

In the area of monitoring and evaluation, strategic documents such as the Action Plan 2025–2026 of the Public Administration Reform Strategy⁷ and the Medium-Term Work Programme of the Government⁸ recognise transparency and communication as general principles, but do not include concrete measures specifically aimed at improving transparency and inclusiveness in monitoring and evaluation processes. Existing activities primarily focus on strengthening institutional capacities and reporting mechanisms, while stakeholder participation and public accessibility remain indirectly addressed.

The legal framework also lacks explicit provisions requiring institutions to provide advance notification to affected groups about upcoming legal changes before the formal drafting process begins. Although the Law on State Administration⁹ and related decrees foresee public consultations and publication obligations during the drafting phase, no systematic requirement

⁷ Action Plan 2025–2026 of the Public Administration Reform Strategy 2022–2026, available at: <https://www.gov.me/dokumenta/288d7df0-8c44-4874-a978-5a5368723ab9>

⁸ Medium-Term Work Programme of the Government, available at: <https://www.gov.me/dokumenta/927f641e-9d9f-4dd8-8144-416a62fd49b0>

⁹ The Law on Public Administration, available at: [42c95c3f-0c64-4657-99f4-f014f1912bc8](https://www.gov.me/dokumenta/42c95c3f-0c64-4657-99f4-f014f1912bc8)

exists for early notification prior to the initiation of legislative procedures. The analysis of selected draft laws further confirms inconsistent practice in this regard, as ministries generally failed to demonstrate that timely advance notifications had been systematically provided to affected stakeholders.

At the parliamentary level, the Rules of Procedure of the Parliament of Montenegro¹⁰ formally enable participation of non-state actors in consultative and public hearings. However, participation remains limited in practice and largely consultative, without decision-making authority. Data from parliamentary reports show that non-state actors participated in only a limited number of hearings during the observed period. Interviews with key informants additionally indicate mixed perceptions regarding the effectiveness of participation, particularly due to the absence of formal feedback on how stakeholder proposals are considered in decision-making processes.

The review of sectoral policy monitoring and evaluation practices demonstrates similarly inconsistent implementation. Monitoring reports are not published regularly across all policy areas, and annual reporting practices remain uneven. While some sectors, particularly Competitiveness and innovation, demonstrate more accessible and citizen-friendly reporting practices through the use of executive summaries and visual presentations of findings, other sectors lack reports entirely or publish highly technical documents without summaries or visual tools that would improve public understanding.

Ex-post evaluation practices are also limited. Only a small number of evaluation reports were identified across the selected sectors, with Agriculture and rural development representing the most comprehensive example in terms of including both non-state data and feedback from affected groups. In most other sectors, ex-post evaluations are either unavailable or do not meaningfully incorporate stakeholder perspectives.

¹⁰ Rules of Procedure of the Parliament of Montenegro, available at: [1605826816-poslovnik.pdf](#)

LIST OF ABBREVIATIONS AND ACRONYMS

AP – Action Plan

AWP - Annual Work Plan

CSO – Civil society organization

EU – European Union

EC – European Commission

FOI – Freedom of Information

MTWP - Medium-Term Work Plan

NSA – National Security Agency

OBS – Open Budget Survey

PAR – Public administration reform

PFM – Public Financial Management

Regulatory Impact Assessment (RIA)

ReSPA – Regional School of Public Administration

SIGMA – Support for Improvement in Governance and Management

SAI – State Audit Institution

WB – Western Balkan

WeBER3.0 – Western Balkan Enablers for Reforming Public Administrations

I. WEBER PAR MONITOR

What we monitor and how?

I.1 WeBER's approach to monitoring PAR

The Public Administration Reform (PAR) Monitor methodology was developed in 2015-2016, as part of the first Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform (WeBER) project. Since the onset, WeBER has adopted a markedly evidence-based approach in its endeavour to increase the relevance, participation and capacity of civil society organisations (CSOs) in the Western Balkans to advocate for and influence the design and implementation of PAR. The PAR Monitor methodology is a cornerstone WeBER product, enabling civil society monitoring of PAR based on evidence and analysis.

In line with WeBER's focus on the region's EU accession process, once the SIGMA *Principles of Public Administration* were revised in 2023, the WeBER PAR Monitor methodology was also redesigned in 2024, building on the Principles,¹¹ and on SIGMA Methodology,¹² and complementing the monitoring by SIGMA by providing additional observations focused on transparency, inclusiveness, openness or other aspects of state administrations' work depending on PAR area in question. This revision helps maintain the focus of WeBER's recommendations on EU-compliant reforms, thus guiding the governments in the region towards successful EU accession and future membership. The main changes in the revised PAR Monitor methodology are briefly listed below.¹³

¹¹ OECD (2023), *The Principles of Public Administration*, OECD Publishing, Paris, <https://doi.org/10.1787/7f5ec453-en>

¹² Available at: <https://www.sigmaweb.org/en/publications/documents/2024/assessment-methodology-of-the-principles-of-public-administration.html>

¹³ For detailed information on the scope and process of methodology revision please visit <https://www.par-monitor.org/par-monitor-methodology/>

Table 1: Main changes in the PAR Monitor methodology

STRUCTURE	
In order to align with the new SIGMA methodological approach, the following structural changes are introduced:	
• Introduction of single indicator per PAR area, divided into sub-indicators, further consisting of several sub-indicator elements (i.e. specific criteria assessed), in order to streamline the approach and emphasise the focus on transparency, inclusiveness and openness in each PAR area. • Introduction of types of sub-indicator elements, ensuring that all following aspects of reform are covered: 1) Strategy and Policy 2) Legislation 3) Institutional Set-up 4) Practice in Implementation, and 5) Outcomes and Impact • Introduction of a 100-point scale, allowing for a more nuanced assessment of progress in each PAR area.	
DATA SOURCES	
	Introduction of interviews with “key informants”, i.e. key non-state actors engaged and familiar with the processes. These interviews serve as a data source for the “Outcomes and impact” elements instead of the formerly implemented survey of civil society organisations.
	Use of public perception survey results as a data source for “Outcomes and Impact” elements, and expanding its scope to complement the assessment in five PAR areas, except for “Strategy for PAR”
	Removal of survey of civil servants as a data source due to persistent issues with ensuring adequate response rates across the region’s administrations.
PAR MONITOR REPORTING	
	Six national PAR Monitor reports, one per PAR area (36 in total for the entire PAR Monitor), in order to facilitate timely publication and advocacy for the monitoring results rather than publishing the results of 18 months of research at the end of the process.
	Six regional Western Balkan overview reports, one per PAR area (6 in total)

I.2 Why and how WeBER monitors the “Policy Development and Coordination” area

Meaningful citizen participation in the policy-making processes represents a cornerstone of good governance, by ensuring that decisions reflect the actual societal needs, are developed through dialogue with all stakeholders and affected groups and are subject to public scrutiny. Policies shaped through an open and transparent approach are more legitimate, better informed and evidence-based, and more likely to be effectively implemented. Planning plays a crucial enabling role in this process. When governments adopt, publish, and report on planning documents, they provide predictability, allow stakeholders to engage in a timely manner, and create a basis for assessing whether decisions align with stated strategic objectives. WeBER’s monitoring, thus, focuses on the transparency and inclusiveness of key elements of the policy cycle: from government planning and decision-making, through policy development, to policy implementation and evaluation, and, finally, parliamentary scrutiny. By assessing these interconnected stages, the monitoring examines how key principles of good governance transpose into the everyday practice of public administration, and provides insights into how Western Balkan governments communicate their decisions with the public, and to what extent the voice of the public is heard when key decisions are being made.

Monitoring in the **Policy Development and Coordination area** is based on all six SIGMA Principles in this area:

Principle 2: Public policies are coherent and effectively co-ordinated by the centre of government; decisions are prepared and communicated in a clear and transparent manner.

Principle 3: The government plans and monitors public policies in an effective and inclusive manner, in line with the government fiscal space.

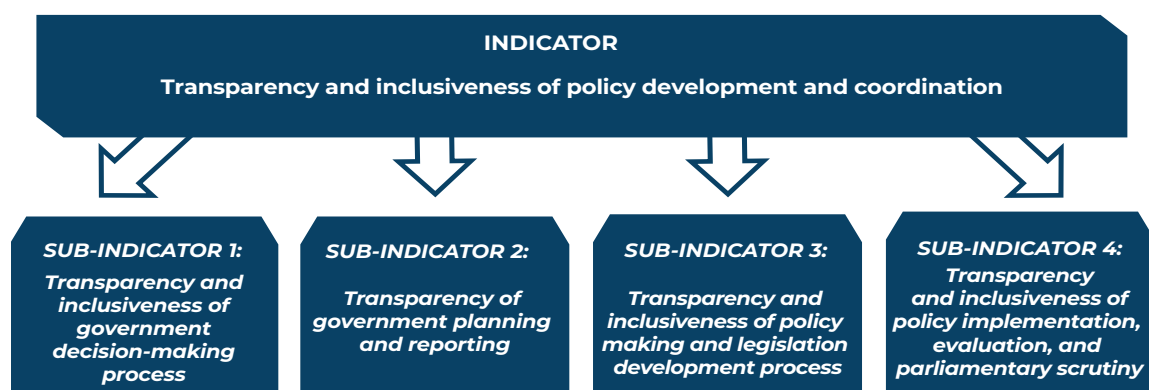
Principle 4: Public policies are developed based on evidence and analysis, following clear and consistent rules for law making; laws and regulations are easily accessible.

Principle 5: All key external and internal stakeholders and the general public are actively consulted during policy development.

Principle 6: Public policies are effectively implemented and evaluated, enhancing policy outcomes and reducing regulatory costs and burdens.

Principle 7: The parliament effectively scrutinises the government policymaking and ensures overall policy and legislative coherence.

These Principles are assessed from the perspective of the availability, accessibility and timeliness of all relevant information on the government planning, reporting and decision-making, while also examining the inclusiveness of policy and legislative development. The focus on transparency and inclusiveness also seeks to determine if policies are regularly monitored, evaluated and subject to parliamentary scrutiny.



The monitoring period for the Policy Development and Coordination covers developments since the last PAR Monitor cycle, which lasted from January until November 2022. Thus, this report focuses primarily on the period from 2023 until 2025, as well as the end-of-2022 developments not covered in the previous cycle. Although this report provides a comparison of findings with previous PAR Monitor editions, country scores are incomparable to the previous monitoring due to methodological changes.

The **first sub-indicator** focuses on the existence of strategic and legal framework provisions that provide for transparent government decision-making, while also examining if key documents are available in practice: agendas for government sessions, meeting minutes, decisions and press releases. For the assessment of outcomes and impact, researchers conduct three key informant interviews with non-state actors who possess significant expertise in the area.

Table 2: Indicator elements under the sub-indicator 1

Indicator element: number and title	Type
E 1.1 There is a strategic document in force that envisages improvement of transparency of government decision-making process	Strategy and policy
E 1.2 Regulations stipulate transparency of government decision-making process	Legislation
E 1.3 Government regularly publishes agenda items, minutes, and press releases from its sessions online	Practice in implementation
E 1.4 Government regularly publishes decisions from its sessions online	Practice in implementation
E 1.5 Key non-state actors consider the Government's decision-making process as transparent	Outcomes and impact

The **second sub-indicator** assesses the timeliness, availability and regularity of publishing of government planning documents and reports on their implementation, while also examining whether performance-based indicators and citizen-friendly elements are present. Monitoring of strategy and policy, legislation, and practice elements is performed by analysing strategic documents, legal acts and official data publicly available on the websites of relevant institutions. Assessment of outcomes and impact is based on the findings obtained from three key informant interviews, as in the previous sub-indicator.

Table 3: Indicator elements under the sub-indicator 2

Indicator element - number and title	Type
E 2.1 There is a strategic document in force that envisages improvement of government planning and reporting practice	Strategy and policy
E 2.2 Regulations stipulate public availability of government planning documents and reports on their implementation	Legislation
E 2.3 Regulations stipulate public availability of government's European integration plans and reports on their implementation	Legislation
E 2.4 Government regularly and timely publishes its annual work plans	Practice in implementation
E 2.5 Government publishes its programme in a timely manner	Practice in implementation
E 2.6 Government's programmed and work plans contain performance indicators for monitoring achievement of results	Practice in implementation
E 2.7 Government regularly and timely publishes reports on the implementation of its work plans	Practice in implementation
E 2.8 Government regularly and timely publishes reports on the implementation of its programme	Practice in implementation
E 2.9 Government regularly and timely publishes its European integration plans	Practice in implementation
E 2.10 Government regularly and timely publishes reports on implementation of its European integration plans	Practice in implementation
E 2.11 Government's reports on implementing its programmes and work plans include assessments of achievement of key results and performance indicators	Practice in implementation
E 2.12 Government plans and reports are citizen friendly	Practice in implementation

Indicator element – number and title	Type
E 2.13 Data contained in the government's reports on implementing work plans are available in open format	Practice in implementation
E 2.14 Key non-state actors consider the Government's planning and reporting activities as transparent, timely and citizen friendly	Outcomes and impact

The **third sub-indicator** seeks to examine if policy and legislation development are transparent, inclusive, and evidence-based, both in the strategic and legal framework and its implementation in practice. This includes meaningful stakeholder participation from the earliest phases, regular and comprehensive reporting on consultations, implementation of and reporting on impact assessments, oversight of consultation requirements, and the impact of public input on final decisions.

Monitoring of strategy and policy, legislation, institutional set-up, and practice aspects is performed by combining various data sources to maximise the reliability of results. It includes qualitative analysis of strategic documents, legal acts and official data that is publicly available or obtained from responsible institutions using FOI requests. The analysis of practice type elements under this sub-indicator is conducted on a sample of public policy documents and legal acts adopted in the period of 12 months preceding the monitoring window. Certain elements are based on a sub-sample of two adopted public policy documents and three adopted laws assessed as having significant impact on society or specific affected groups. For the outcomes and impact assessment, researchers conduct three key informant interviews with non-state actors, members of working groups for the development of sample public policy documents and laws, and use the findings of the WeBER public perception survey.

Table 4: Indicator elements under the sub-indicator 3

Indicator element - number and title	Type
E 3.1 There is a strategic document in force that envisages improvement in transparency and inclusiveness of policy making and legislation development process	Strategy and policy
E 3.2 Regulations envisage transparency and inclusiveness of policy making and legislative development process	Legislation
E 3.3 Regulations stipulate minimum consultation requirements	Legislation
E 3.4 Regulations envisage online and free of charge access to consolidated versions of all policy documents and legislation	Legislation
E 3.5 Regulations stipulate mandatory ex ante assessment of impacts - including on gender equality - during policy making, and publication of IA reports	Legislation
E 3.6 There is a designated government institution for checking compliance with consultations requirements	Institutional set-up
E 3.7 Ex ante impact assessments – including on gender equality - are consistently applied during the development of policy documents	Practice in implementation
E 3.8 Ex ante impact assessments – including on gender equality - are consistently applied during the development of primary legislation	Practice in implementation
E 3.9 Reports on implemented ex ante impact assessments during the development of primary legislation are regularly published online, together with the draft documents	Practice in implementation
E 3.10 Published reports on implemented ex ante impact assessments during the development of primary legislation contain key information	Practice in implementation
E 3.11 Non-state actors participate in the Government-led working groups for policy and legislative development	Practice in implementation
E 3.12 Procedures and decisions of working groups are transparent	Practice in implementation

Indicator element - number and title	Type
E 3.13 Public consultations on policy documents and primary legislation are regularly held	Practice in implementation
E 3.14 Public consultations are conducted in an early phase of policy development	Practice in implementation
E 3.15 Reports on public consultations on policy documents are publicly available	Practice in implementation
E 3.16 Reports on public consultations on primary legislation are publicly available	Practice in implementation
E 3.17 Public consultation reports contain all elements of the implemented consultation process	Practice in implementation
E 3.18 Online, central consultation portal for the implementation of consultations is regularly used	Practice in implementation
E 3.19 Designated government institution regularly checks compliance with public consultation requirements	Practice in implementation
E 3.20 Lead ministries proactively inform on public consultations	Practice in implementation
E 3.21 Consolidated versions of primary and secondary legislation are easily accessible online, and available free of charge	Practice in implementation
E 3.22 Public consultation results have impact on final policy and legislative proposals	Outcomes and impact
E 3.23 Key non-state actors consider the work of the Government-led working groups as transparent and inclusive	Outcomes and impact
E 3.24 Citizens' perception of their opportunity to participate in the development of laws and strategies	Outcomes and impact

The **fourth sub-indicator** focuses on the transparency of policy implementation through availability of monitoring reports and ex-post evaluations, advance notifications to affected groups on the upcoming changes to the legal framework, and involvement of non-state actors in parliamentary deliberations through public hearings. Monitoring of this sub-indicator is based on the review of the strategic framework, regulations and websites and documents of

relevant institutions. For the assessment of outcomes and impact, researchers conduct three key informant interviews with non-state actors, participants of public hearings organised by the parliament.

Table 5: Indicator elements under the sub-indicator 4

Indicator element - number and title	Type
E 4.1 There is a strategic document in force that envisages transparency and inclusiveness of policy monitoring and evaluation practices	Strategy and policy
E 4.2 Regulations envisage sending advance notifications to affected groups on the upcoming changes to the legal framework	Legislation
E 4.3 Parliamentary rules of procedure envisage participation of interested parties in parliamentary discussions, in the form of public hearings	Legislation
E 4.4 Lead ministries publish advance notifications to the affected groups on the upcoming changes to the legal framework	Practice in implementation
E 4.5 Lead ministries regularly publish monitoring reports on implementation of policy documents	Practice in implementation
E 4.6 Monitoring reports on implementation of policies are citizen friendly	Practice in implementation
E 4.7 Lead ministries publish ex-post evaluations on implementation of policies	Practice in implementation
E 4.8 Ex-post evaluations on implementation of policies use external data and information produced by non-state actors	Practice in implementation
E 4.9 Parliament involves stakeholders, affected groups, and other non-state actors in public hearings	Practice in implementation
E 4.10 Online transparency of the work of parliaments	Practice in implementation
E 4.11 Key non-state actors consider involvement of stakeholders in public hearings as effective	Outcomes and impact

II. TRANSPARENCY AND INCLUSIVENESS OF POLICY DEVELOPMENT AND COORDINATION

This section presents the assessment results for Montenegro. Each sub-section presents the results for one sub-indicator (four in total), beginning with a brief overview of developments since the PAR Monitor 2021/2022. This is followed by a detailed assessment of the sub-indicator elements, starting with the policy, legislation and institutional framework, then moving to the practice in implementation, and ending with outcomes and impact. Each sub-indicator assessment concludes with the graph showing the awarded points.

The graph below displays the overall results for the Policy Development and Coordination area in Montenegro, measured on a scale from 0 to 100 points.

Transparency and inclusiveness of policy
development and coordination
(score 0-100)



II.1 Transparency and inclusiveness of government decision-making process

Principle 2: Public policies are coherent and effectively co-ordinated by the centre of government; decisions are prepared and communicated in a clear and transparent manner.

Awarded points per element in sub-indicator 1: Inclusiveness and transparency of government decision-making process¹⁴

Indicator elements	Element type	Score
E 1.1 There is a strategic document in force that envisages improvement of transparency of government decision-making process	Strategy and policy	0.5/0.5
E 1.2 Regulations stipulate transparency of government decision-making process	Legislation	0.75/1
E 1.3 Government regularly publishes agenda items, minutes, and press releases from its sessions online	Practice in implementation	1/2
E 1.4 Government regularly publishes decisions from its sessions online	Practice in implementation	1.25/2.5
E 1.5 Key non-state actors consider the Government's decision-making process as transparent	Outcomes and impact	0/3
Total score for sub-indicator 1		3.5/9

The analysis of strategic and legal documents shows that Montenegro foresees certain measures to improve the transparency of government work, although mostly indirectly. The Public Administration Reform Strategy¹⁵ 2022–2026 recognizes the principles of transparency in the government decision-making process through the preparation of the Draft Law on the Government.¹⁶ Similarly, the Medium-Term Work Programme of the Government¹⁷, as a strategic document, under Goal 5 (Digital Montenegro, Transparent and Efficient Public Administration), foresees the improvement of the document management system, including systems used for electronic Government sessions, and, in line with the Strategy, also envisages the adoption of the Law on the Government.

A key advancement planned by this Draft Law, which for the first time establishes an obligation to publish the minutes of Government sessions, representing an improvement compared to the existing rules. The current Rules of Procedure of

¹⁴ The first sub-indicator focuses on the following SIGMA sub-principles: The centre of government (CoG) enables and facilitates policy co-ordination across ministries and relevant institutions to ensure overall policy coherence and better and more sustainable policy outcomes; Government decisions are prepared, approved and followed up in a transparent, effective and timely manner, based on clear rules and procedures, through the relevant decision-making structures, including government sessions.

¹⁵ Public Administration Reform Strategy 2022–2026, available at: <https://www.gov.me/dokumenta/7c3b8e38-a038-4f52-9cf5-27f6d72abb39>

¹⁶ Draft Law on the Government, available at: <https://www.gov.me/dokumenta/541afa9e-cb70-4cfb-b2df-6df16b3299e1>

¹⁷ Medium-Term Work Programme of the Government, available at: <https://www.gov.me/dokumenta/927f641e-9d9f-4dd8-8144-416a62fd49b0>

the Government¹⁸ provide for the publication of agendas, decisions, and press releases, but not the minutes, while the new law further expands the scope of publicly available information, with exceptions for classified data.

In practice, the Government regularly publishes agendas and press releases (100%), as well as the majority of decisions (97.5%), but there are shortcomings in terms of timeliness, with only 17% of decisions published within the legally prescribed deadline. Additionally, minutes are not published at all, and advance publication of agendas is limited and often too late to be meaningful. The most significant remaining issue is still the treatment of confidential items, as agenda points marked as confidential prevent the public from knowing what topics were discussed or what decisions were made in those cases.

Public and civil society perceptions are predominantly negative, especially regarding access to minutes and the clarity of decisions. The level of information provided in Government press releases varies, with some releases offering only basic information, while others include more detailed explanations of adopted documents and decisions.

The Public Administration Reform Strategy 2022–2026¹⁹, recognizes the importance of improvements of transparency of government decision - making process within the Strategic Objectives **“A functional public administration with effective oversight of its work and the application of the concept of managerial accountability”** and **“Administration without paper”**. Through the Action Plan (AP) for 2025–2026²⁰, the preparation of the Draft Law on the Government is planned.²¹ This law, adopted in February 2026 and currently in parliamentary procedure, introduces a notable transparency improvement - specifically, article 32 establishes an obligation to publish the minutes of Government sessions. This represents a significant step forward, as such publication was not previously explicitly required.

Further, the AP²² provides several activities related to the improvement and expansion of the electronic document management system and the system for managing electronic Government sessions. These include system upgrades,

¹⁸ Rules of Procedure of the Government of Montenegro, available at: <https://www.gov.me/dokumenta/f79a82b9-c69e-4a84-87da-c787bad16958>

¹⁹ Public Administration Reform Strategy 2022-2026, available at: <https://www.gov.me/dokumenta/7c3b8e38-a038-4f52-9cf5-27f6d72abb39>

²⁰ Action Plan 2025-2026 of the Public Administration Reform Strategy 2022-2026, available at: <https://www.gov.me/dokumenta/288d7df0-8c44-4874-a978-5a5368723ab9>

²¹ Draft Law on the Government, available at: <https://www.gov.me/dokumenta/541afa9e-cb70-4cfb-b2df-6df16b3299e1>

²² Action Plan 2025-2026 of the Public Administration Reform Strategy 2022-2026, available at: <https://www.gov.me/dokumenta/288d7df0-8c44-4874-a978-5a5368723ab9>

interconnection with other government platforms, and user training, all under the responsibility of the Ministry of Public Administration and other state bodies, with implementation planned for 2025. While primarily technical, these measures contribute to improved accessibility and traceability of decision-making processes, indirectly supporting greater transparency.

Similarly, the Medium-Term Work Programme of the Government²³, under Objective 5 Digital Montenegro, Transparent and Efficient Public Administration, foresees the improvement of the document management system, including systems used for electronic Government sessions. It also includes the adoption of the Law on the Government as a planned activity.

When it comes to the current regulatory framework, the monitoring shows that there are partial requirements regarding the publication of key information from Government sessions.

According to the Rules of Procedure of the Government of Montenegro²⁴, there is a clear obligation to publish certain elements of Government work. Specifically, the agenda of Government sessions must be published (Article 51), as well as decisions taken at sessions, and press releases (Article 71). However, the Rules of Procedure do not explicitly require the publication of minutes of Government sessions, as evidenced by the relevant provisions (Articles 63 and 69), which regulate minutes but do not mandate their public disclosure.

At the same time, the Draft Law on the Government²⁵ introduces more comprehensive transparency provisions when it comes to publication of minutes. Importantly, article 32 also introduces an explicit obligation to publish the minutes of Government sessions. This represents a significant enhancement of transparency, as such an obligation was not previously established under the existing Rules of Procedure.

A review of the Government website²⁶ that has been done during the monitoring period²⁷ shows that the Government of Montenegro regularly publishes information related to its sessions, although the level of transparency varies depending on the type of material.

During the observed period, the Government held a total of 32 sessions, of which 22 were telephone sessions, accounting for 68.75% of all sessions. Based

²³ Medium-Term Work Programme of the Government, available at: <https://www.gov.me/dokumenta/927f641e-9d9f-4dd8-8144-416a62fd49b0>

²⁴ Rules of Procedure of the Government of Montenegro, available at: <https://www.gov.me/dokumenta/f79a82b9-c69e-4a84-87da-c787bad16958>

²⁵ Draft Law on the Government, available at: <https://www.gov.me/dokumenta/541afa9e-cb70-4cfb-b2df-6df16b3299e1>

²⁶ Official site of the Government of Montenegro (sessions), available at: https://www.gov.me/vijesti?sort=published_at&tags=239&page=1

²⁷ From November 2025. until the end of January 2026.

on the available data, agendas were published for 100% of the sessions, and press releases were also issued in all cases (100%). However, no minutes of Government sessions were published (0%) during the monitoring period.

Importantly, the public was consistently informed about the content of each session. This was ensured either through the publication of agenda items in advance or, where agendas were not published beforehand, through the subsequent publication of materials discussed at the session, often accompanied by linked documents for each individual agenda item. However, the greatest obstacle to full transparency remains the treatment of confidential agenda items. In cases when a material that has been classified with a certain degree of confidentiality is discussed at the session, this material is not published on the Government sessions webpage, neither in its redacted form. The title of the agenda item is replaced with the label “confidential,” with no additional information disclosed regarding its content.

Nevertheless, advanced transparency remains limited. Only 28% of session agendas were published prior to the sessions, and even in these cases, publication typically occurred just one or two hours before the session itself. This indicates that, although the Government formally discloses information in advance, such short notice does not allow for meaningful or timely public insight before decision - making takes place.

A review of the official Government website indicates a high level of publication of adopted decisions during the monitoring period, although significant shortcomings remain in terms of timeliness.

Based on the collected data, a total of 703 decisions were adopted across the observed Government sessions. Of these, 16 were marked as confidential, leaving 687 decisions that were subject to publication. The analysis shows that materials related to 670 of these decisions were published online, representing 97.5% of all decisions that were not labelled as confidential. This demonstrates a strong level of compliance in terms of making decisions publicly available.

However, the timeliness of publication is considerably weaker. Out of the 687 decisions subject to publication, only 119 were published within the required timeframe of seven days following the respective Government session, accounting for just 17%. This indicates that, despite the high overall publication rate, most decisions are not made available to the public in a timely manner, limiting their usefulness for effective public oversight.

Based on interviews conducted with three key informants representing civil society and other non-state actors, the findings indicate mixed perceptions regarding the transparency of the Government's decision-making process. Overall, the qualitative insights reveal a predominantly critical perception of

transparency, especially concerning access to detailed records such as minutes and decisions.

Regarding the transparency of agenda items for Government sessions, one key informant tended to agree that they are transparent, while two tended to disagree, suggesting a generally negative perception on this aspect.

When it comes to the transparency of session minutes, one key informant tended to agree that minutes of the Government's sessions are transparent, while two key informants fully disagree with this statement. All three informants tended to disagree with the statement that decisions from Government sessions are transparent, pointing to a broadly shared view that decision outputs are not sufficiently accessible or clear to the public.

Key informants hold differing views on whether the Government publicly communicates its decisions through press releases. One informant believes that the Government lacks an effective approach to making decisions understandable to citizens, noting that press releases are overly general and formal. Another informant highlights that transparency varies depending on the type of decision. Some decisions (such as draft laws and EU-related reforms) are presented in more detail, while others - particularly those marked as internal or adopted through telephone sessions - are significantly less transparent.

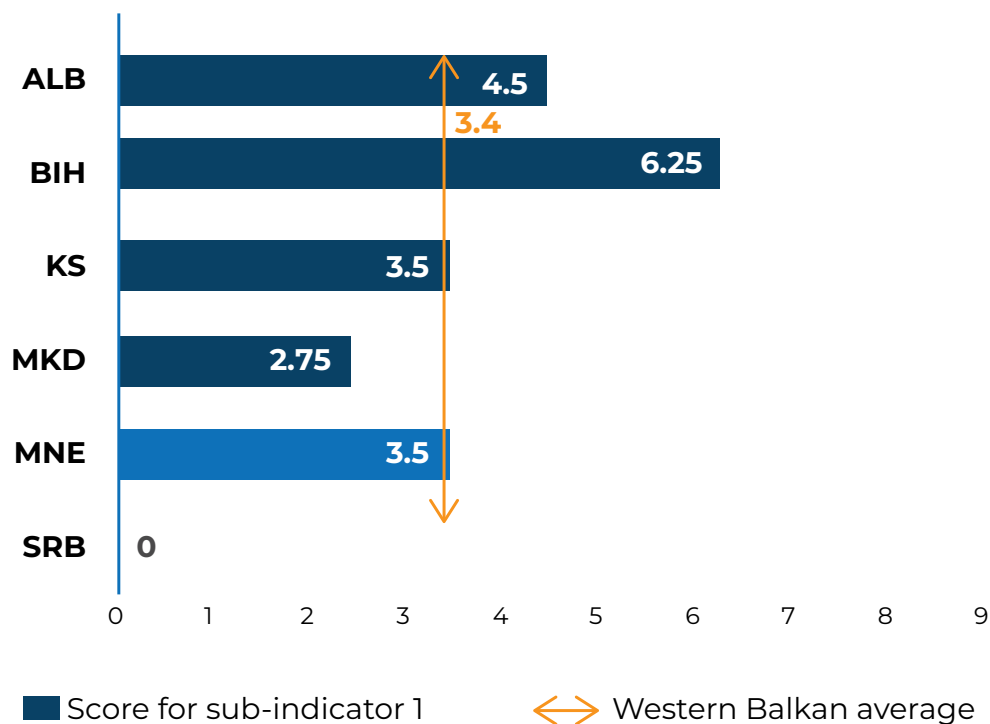
Key informants noted that press releases generally provide a summary of adopted decisions and reflect the Government's official narrative, but they do not offer insight into the broader decision-making process, including alternative options, discussions, or the reasoning behind specific choices.

Key informants emphasise that a transparent decision-making process should include the timely publication of agendas, supporting documents, and analyses before sessions, as well as detailed explanations after decisions are made. They also point to the need to limit the use of telephone and electronic sessions and to ensure greater transparency for politically sensitive decisions.

In essence, transparency means enabling the public to follow the entire decision-making process—from identifying the problem and considering options to making and explaining the final decision.

How does Montenegro do in regional terms?

Sub-indicator 1: Transparency and inclusiveness of the government decision-making process (maximum score 9)



II.2 Transparency of government planning and reporting

Principle 3: The government plans and monitors public policies in an effective and inclusive manner, in line with the government fiscal space.

Awarded points per element in sub-indicator 2: Transparency of government planning and reporting²⁸

²⁸ The second sub-indicator focuses on the following SIGMA sub-principles: Policy planning documents meet quality requirements and contain adequate analysis and information, including on policy objectives, indicators with targets and monitoring framework. They are developed in a participatory manner and are publicly available; Performance and results, including achievement of policy objectives and outcome indicators, are regularly monitored and reported on; monitoring reports are published on time to enable public scrutiny; The government effectively implements EI plans through prioritising and costing of EI-related commitments, taking into consideration the available resources and capacities of the administration.

Indicator elements	Element type	Score
E 2.1 There is a strategic document in force that envisages improvement of government planning and reporting practice	Strategy and policy	0.5/0.5
E 2.2 Regulations stipulate public availability of government planning documents and reports on their implementation	Legislation	0.5/0.5
E 2.3 Regulations stipulate public availability of government's European integration plans and reports on their implementation	Legislation	0.5/0.5
E 2.4 Government regularly and timely publishes its annual work plans	Practice in implementation	1.5/1.5
E 2.5 Government publishes its programme in a timely manner	Practice in implementation	0.75/1.5
E 2.6 Government's programmes and work plans contain performance indicators for monitoring achievement of results	Practice in implementation	1.5/1.5
E 2.7 Government regularly and timely publishes reports on the implementation of its work plans	Practice in implementation	1.5/1.5
E 2.8 Government regularly and timely publishes reports on the implementation of its programme	Practice in implementation	1.5/1.5
E 2.9 Government regularly and timely publishes its European integration plans	Practice in implementation	1.5/1.5
E 2.10 Government regularly and timely publishes reports on implementation of its European integration plans	Practice in implementation	1.5/1.5
E 2.11 Government's reports on implementing its programmes and work plans include assessments of achievement of key results and performance indicators	Practice in implementation	2/2
E 2.12 Government plans and reports are citizen friendly	Practice in implementation	0.75/1.5
E 2.13 Data contained in the government's reports on implementing work plans are available in open format	Practice in implementation	0/1.5
E 2.14 Key non-state actors consider the Government's planning and reporting activities as transparent, timely and citizen friendly	Outcomes and impact	0/3
Total score for sub-indicator 2		14/20

When it comes to central government planning, our monitoring showed that PAR strategic documents include objectives and activities aiming to better strategic documents planning. Both, Mid-term and annual programmes of the Government were published regularly and timely. The Government Mid-term Programme as well as both annual work plans analysed (for 2025 and 2026) contain performance indicators. Government regularly and timely reports on the implementation of GOV plans. Same applies for the publishing EU Integration plans and reports on implementation. While government planning documents as well as EU integration plans are assessed as bureaucratic and technical, reports on implementation are assessed as citizen friendly, thanks to summaries and graphics presented on general implementation rate. All reports are available only in the pdf formats, and none of the data related to these plans or reports is available on the open data portal.

Two out of three key informants tended to agree that Government planning and reporting activities are transparent, timely, and relatively citizen-friendly, while one key informant fully disagreed with these assessments. Overall, key informants highlighted that planning and reporting documents are often bureaucratic in nature, written in formal and administrative language, and insufficiently adapted for wider public understanding

The PAR Strategy sets as a specific goal Objective 5: Strengthening the evidence-based planning system that leads to sustainable policies and the achievement of Government priorities. Although this goal, as well as its activities, is not directly related to the strategic documents planning process, it aligns with methodological criteria, including annual reporting by ministries based on clear objectives and indicators, rather than specifically defining activities or indicators related to Mid-term Government planning or annual planning and reporting. Having in mind that improvements at the ministerial level should lead to better Government-level planning, the research team decided to give points. The planning of the Medium-term work plan (MTWP) and Annual Work Plan (AWP) is an integral part of the overall strategic planning process, which is why the defined activities aim to improve the entire system, rather than only the segments related to the MTWP/AWP.

With regard to the legal framework, government planning and reporting are both regulated by the Rules of Procedure of the Government.²⁹ The Government's Medium-Term and Annual Work programmes are submitted to Parliament and published on the Government's website. The implementation of

²⁹ Rules of Procedure of the Government of Montenegro, available at: <https://www.gov.me/dokumenta/f79a82b9-c69e-4a84-87da-c787bad16958>

the Government's Medium-Term and Annual Work Programmes is monitored by the General Secretariat of the Government, which prepares quarterly implementation reports and submits them to the Government. The Government reviews these reports on a quarterly basis, at the first session following the end of each quarter, while the fourth and final quarterly report also provides an overview of the entire year up to that point.

The Regulation on the Manner and Procedure for the Preparation, Harmonisation and Monitoring of the Implementation of Strategic Documents³⁰ defines what strategic documents are and how they should be prepared, but does not explicitly specify EU integration plans or programmes. The Methodology for Policy Development and the Preparation and Monitoring of the Implementation of Strategic Documents³¹ recognises the Programme of Accession of Montenegro to the European Union as the overarching strategic framework guiding Montenegro's overall development directions.

When it comes to practice, Montenegro stands out among Western Balkan administrations, with almost full disclosure of the observed planning and reporting documents. The assessment was based on two criteria: (1) whether plans and implementation reports are published regularly, covering the last two consecutive planning and reporting cycles, with the exception of multi-annual government programmes, where only the current programme was assessed; and (2) whether they are published in a timely manner, in line with legally prescribed deadlines or, where such deadlines are not defined, within one week of adoption. During the monitoring period, the Government adopted annual work plans for 2026, 2025 and 2024, as well as the Medium-Term Programme for 2024–2027, all of which were regularly published³². All documents, except the Medium-Term Programme³³, were adopted in a timely manner, within one week of adoption. The same applies to the publication of

³⁰ Regulation on the Manner and Procedure for the Preparation, Harmonisation and Monitoring of the Implementation of Strategic Documents, available at:

<https://www.gov.me/dokumenta/23c216b2-3eb7-453c-b0a7-3cdac9e9742e>

³¹ Methodology for Policy Development and the Preparation and Monitoring of the Implementation of Strategic Documents, available at:

<https://www.gov.me/dokumenta/4d95d6d8-ace1-4338-96ce-0f4de29c36b0>

³² Government annual Work Plan for 2026, adopted on 19th of February and published on 27th February 2026. Available here:

<https://www.gov.me/dokumenta/f13ea161-5ff7-4916-94e3-038ce27eab39>

Government Annual Work Plan for 2025, adopted and published on 13th of February 2025. Available at: <https://www.gov.me/dokumenta/ebb3d686-4881-4c32-9479-826a1d63f4c1>

Mid-term Programme with Annual Work Plan for 2024, adopted on 11th of April and published on 23rd of April 2024. Available at:

<https://www.gov.me/dokumenta/ee885398-748f-48fd-912a-29bbac334bfb>

³³ Directorate- General of the Government explained that materials adopted by the Government are generally published on the same day they are adopted. In certain cases, most often of a technical nature, such as in the case of the 2024–2027 Medium-Term Work Programme, the material is published after the conclusions are verified. Conclusions from one session are verified at the following session. In this case, the publication of the MTWP was delayed due to proofreading.

reports. Reports on the implementation of the Annual Work Programme for 2025 and 2026 were published regularly and in a timely manner.³⁴ It should be noted that the Report on the Implementation of the Annual Work Programme of the Government also serves as the Annual Report on the Implementation of the Government's Medium-Term Work Programme.

With regard to planning and reporting on EU-related activities, while the Government had previously adopted four-year EU accession programmes, it decided to shift to two-year plans due to the changed dynamics of the negotiations³⁵. During the monitoring period, the Government adopted the Programme of Accession of Montenegro to the European Union 2024–2027, the Programme for the period 2025–2026, and the latest Programme for the period 2026–2027.³⁶ All programmes were published regularly and in a timely manner. Same applies for publishing reports on implementation. Analysed reports on implementation of the Programme of Accession to the EU for 2024 and 2025 are published regularly and timely.³⁷

Government planning documents generally include a tabular overview of the planned activities, accompanied by an introduction and varying levels of narrative information. There are no graphic elements included. The plans are written in a bureaucratic and formalistic style, but they differ significantly in the level of detail and narrative information provided. The annual plan for

³⁴ Report on the Implementation of the Annual Work Programme of the Government for 2024, adopted and published on 13th of February 2025. Available here:

<https://www.gov.me/dokumenta/ebb3d686-4881-4c32-9479-826a1d63f4c1>

Report on the Implementation of the Annual Work Programme of the Government for 2025 adopted on 19th of February and published on 27th February 2026, Available here:

<https://www.gov.me/dokumenta/f13ea161-5ff7-4916-94e3-038ce27eab39>

³⁵ Ministry for European Affairs: Taking into account the dynamics of the negotiation process and the need to align national legislation with the *acquis Communautaire* of the European Union, the Ministry of European Affairs, as the coordinator of Montenegro's EU accession process, initiated the preparation of a new Accession Programme. This programme plans the alignment of Montenegro's strategic and legislative framework with the EU *acquis* adopted up to 1 October 2024, within 33 negotiating chapters. The programme period covers 2025–2026, with the aim of creating a plan for full alignment with the EU *acquis* by the end of 2026, by which time the closure of all negotiating chapters is planned. The Accession Programme also follows the objectives and measures defined in the Reform Agenda.

³⁶ Programme of Accession of Montenegro to the European Union 2026–2027, adopted and published on 30 January 2026. Available at:

<https://www.gov.me/dokumenta/e7a3bc57-b3bc-4e81-b1f2-58d9026a57f6>

Programme of Accession of Montenegro to the European Union 2025–2026, adopted and published on 13th February 2025. Available at:

<https://www.gov.me/dokumenta/abf74c06-91a3-446d-a88f-6c97667ba2da>

³⁷ Report in Implementation of the Programme of Accession of Montenegro to the European Union 2024–2027, Report for 2024, adopted and published on 13th of February 2025. Available here: <https://www.gov.me/dokumenta/d85074a6-210a-48f8-bf6f-636fd1d58f16>

Report in Implementation of the Programme of Accession of Montenegro to the European Union 2025–2026, Report for 2025, adopted and published on 30 January 2026. Available here <https://www.gov.me/dokumenta/80ef8627-876a-47cd-afa9-44bd5c75724c>

2026 is the most detailed document, as it provides more narrative information in the introductory section and includes an overview of goals by priorities established in the Mid-term plan.

When it comes to publication of performance-based information, Montenegro reports on implementation of the GAWP for 2024 and 2025, also serving as reports on the medium-term programme, presenting progress against objectives and performance indicators. The reports provide separate overviews of performance indicators and activity implementation, including narrative explanations, performance results, and detailed tabular reporting on activities. However, reporting on performance indicators is not consistent, as some indicators measure actual outcomes (such as youth employment rate or HPV vaccination coverage), while others reflect activity-level information, such as the number of trainings conducted. Reports on GOV planning documents include introductions, summaries, graphic elements, and statistical information on ministries presented in tables. Although the documents themselves are bureaucratic in style, they can be considered relatively citizen-friendly because they provide broader contextual statistics, visual elements, tabular overviews by institution, and narrative explanations by priority areas.

The Programme of Accession of Montenegro to the European Union includes a short introduction for each chapter, followed by a tabular overview of activities, responsible institutions, deadlines, and CELEX numbers, considered bureaucratic due to its nature. The Report on the Implementation of the Programme includes introductory summaries, graphic elements on the overall implementation rate, and tabular overviews of implementation by institutions and EU chapters. Although these documents are bureaucratic in nature, they are considered citizen-friendly because they provide summaries and clearly present results by chapter, type of activity, and institution.

All reports are available only in PDF format. It should be noted that the Report on the Implementation of the Programme of Accession of Montenegro to the European Union for 2026 is available only in a scanned PDF format, with no option to search the document. On the open data portal, there is not a single dataset published by the Ministry of European Affairs (responsible for reporting on the implementation of the EU programme), nor any data related to the implementation of the Government work plans.

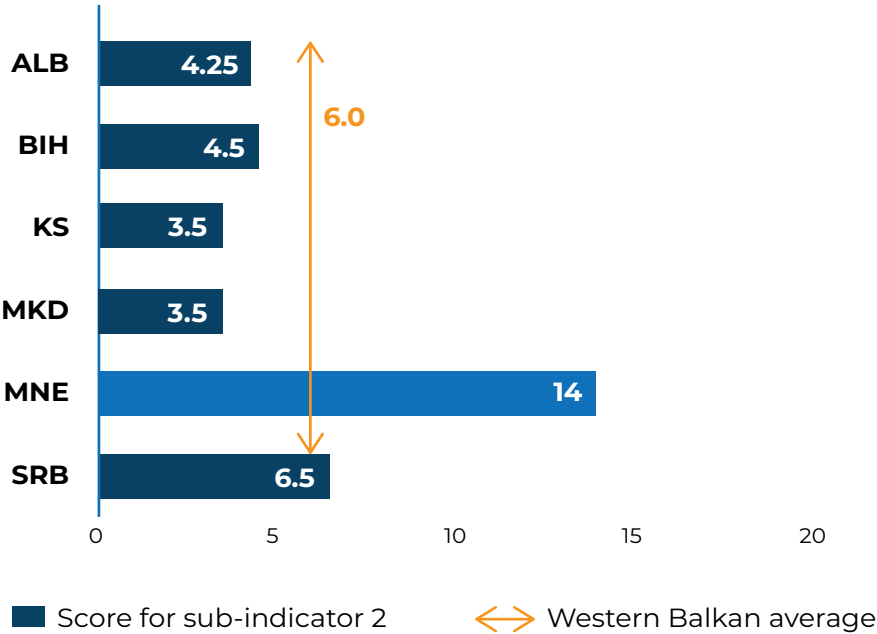
Two out of three key informants tended to agree that Government planning and reporting activities are transparent, timely, and relatively citizen-friendly, while one key informant fully disagreed with these assessments. Overall, key informants highlighted that planning and reporting documents are often bureaucratic in nature, written in formal and administrative language, and insufficiently adapted for wider public understanding. Although priorities, objectives, and reporting results are formally presented, the connection between strategic goals, concrete measures, and practical outcomes is often

unclear, while communication with citizens remains largely limited to the publication of lengthy and difficult-to-navigate documents. One key informant particularly stressed the lack of citizen-oriented communication, noting that: “The government does not have a methodology for communicating with citizens... publication alone does not mean communication.”

ANNUAL WORK PLANS	
Regularly published	✓
Timely published	✓
MULTI-YEAR PROGRAMMES	
Programme published	✓
Timely published	X
EUROPEAN INTEGRATION RELATED PLANS	
Regularly published	✓
Timely published	✓
REPORTS ON IMPLEMENTING ANNUAL WORK PLANS	
Regularly published	✓
Timely published	✓
REPORTS ON IMPLEMENTING MULTI-YEAR PROGRAMMES	
Programme published	✓
Timely published	✓
REPORTS ON IMPLEMENTING EUROPEAN INTEGRATION PLANS	
Regularly published	✓
Timely published	✓

How does Montenegro do in regional terms?

Sub-indicator 2: Availability and comprehensiveness of budgetary documentation (maximum score 20)



II.3 Transparency and inclusiveness of policy making and legislation development process

Principle 4: Public policies are developed based on evidence and analysis, following clear and consistent rules for law making; laws and regulations are easily accessible.

Principle 5: All key external and internal stakeholders and the general public are actively consulted during policy development.

Awarded points per element in sub-indicator 3: Transparency and inclusiveness of policy making and legislation development process³⁸

³⁸ The third sub-indicator focuses on the following SIGMA sub-principles: A whole-of-government policy to promote better regulation, evidence-based and inclusive policymaking is established and applied in practice during policy development and legislative drafting; Procedures are in place and consistently applied and monitored to enable pro-active and effective public consultations with stakeholders and the general public, allowing businesses, non-governmental organisations and citizens, including from vulnerable groups to participate in and inform government policymaking; All primary and secondary legislation, including consolidated versions, is easily accessible and available free of charge through a central online database(s). Administrative guidance documents, forms and materials essential for complying with regulations are easily available for businesses and citizens; Regulatory impact assessment (RIA), or other similar tool(s), is adopted and systematically used to support policy development, facilitate consultation and inform decision-making at all key stages of policymaking, covering both primary and secondary legislation, including the impact on the environment and climate where necessary; Consultation with the general public is conducted in an accessible and transparent manner; Ministries hold constructive dialogue with key external stakeholders and collect, analyse and use all responses when finalising the policy proposal. They transparently report on the outcome of the public consultation process and how consultees' views have shaped and influenced policy; All possible impacts of policy proposals are systematically analysed; reasonable efforts are made to quantify and monetise key impacts, including additional costs on the state budget, businesses and citizens; Ministries have clear internal rules and procedures for planning and managing effectively the development of policies and legislative drafting.

Indicator elements	Element type	Score
E 3.1 There is a strategic document in force that envisages improvement in transparency and inclusiveness of policy making and legislation development process	Strategy and policy	0.5/0.5
E 3.2 Regulations envisage transparency and inclusiveness of policy making and legislative development process	Legislation	1.5/3
E 3.3 Regulations stipulate minimum consultation requirements	Legislation	2/3.75
E 3.4 Regulations envisage online and free of charge access to consolidated versions of all policy documents and legislation	Legislation	0.5/1.5
E 3.5 Regulations stipulate mandatory ex ante assessment of impacts - including on gender equality - during policy making, and publication of IA reports	Legislation	1.5/1.75
E 3.6 There is a designated government institution for checking compliance with consultations requirements	Institutional set-up	0/0.75
E 3.7 Ex ante impact assessments – including on gender equality - are consistently applied during the development of policy documents	Practice in implementation	0/1.5
E 3.8 Ex ante impact assessments – including on gender equality - are consistently applied during the development of primary legislation	Practice in implementation	1/2
E 3.9 Reports on implemented ex ante impact assessments during the development of primary legislation are regularly published online, together with the draft documents	Practice in implementation	0/1.5
E 3.10 Published reports on implemented ex ante impact assessments during the development of primary legislation contain key information	Practice in implementation	1.25/2.5
E 3.11 Non-state actors participate in the Government-led working groups for policy and legislative development	Practice in implementation	2/2
E 3.12 Procedures and decisions of working groups are transparent	Practice in implementation	0.25/2.5
E 3.13 Public consultations on policy documents and primary legislation are regularly held	Practice in implementation	0/2
E 3.14 Public consultations are conducted in an early phase of policy development	Practice in implementation	0/1.5
E 3.15 Reports on public consultations on policy documents are publicly available	Practice in implementation	0/1.5

Indicator elements	Element type	Score
E 3.16 Reports on public consultations on primary legislation are publicly available	Practice in implementation	0/1.5
E 3.17 Public consultation reports contain all elements of the implemented consultation process	Practice in implementation	3.75/3.75
E 3.18 Online, central consultation portal for the implementation of consultations is regularly used	Practice in implementation	0/2.25
E 3.19 Designated government institution regularly checks compliance with public consultation requirements	Practice in implementation	0/1.5
E 3.20 Lead ministries proactively inform on public consultations	Practice in implementation	0/2.5
E 3.21 Consolidated versions of primary and secondary legislation are easily accessible online, and available free of charge	Practice in implementation	0.5/1.5
E 3.22 Public consultation results have impact on final policy and legislative proposals	Outcomes and impact	1.5/3.75
E 3.23 Key non-state actors consider the work of the Government-led working groups as transparent and inclusive	Outcomes and impact	1/3
E 3.24 Citizens' perception of their opportunity to participate in the development of laws and strategies	Outcomes and impact	0.5/4
Total score for sub-indicator 3		17.75/52

Public Administration Reform Strategy 2022-2026 recognises the principles of transparency and inclusiveness in policy-making and legislative development through strengthening capacities of civil servants for public consultation and better use of E-Government Portal. Although the legal framework recognises the obligation to publish laws and secondary legislation free of charge in the electronic edition of the Official Gazette, there is no obligation to publish consolidated versions free of charge.

When it comes to inclusive policy and legislative development, our regulatory framework recognises early consultations and consultations when the draft was produced. It also specifies all supporting documentation to be included with a call for public consultation, including the RIA form for laws proposed by the Government. When it comes to early consultations, only 4% of policy documents (3/72) and 5% of laws (7/155) were publicly consulted prior to the drafting process. Monitoring showed that, out of a total of 227 adopted policy documents and laws, for only 85 of them public consultations were held. Public consultations after the drafting phase were held for only 30.56% of policy documents adopted and for only 40.65% laws enacted. After consultations conducted, reports were

published in 86.36% of cases for policy documents, while for laws the publication rate was 87.30%. Out of those 85 laws and policy documents for which the public consultations were held, only 24% of public consultations were announced on the e-Government consultation portal along with the relevant documents, and for only 18% a consultation report was published.

Although the e-Government Portal allows users to submit comments directly through the platform, none of the documents had comments available online. It should be noted that our analysis showed that institutions do not push for greater use of e-Consultation portal. In all calls published on the portal, it is stated that comments should be submitted via email or by post, without mentioning submission through the e-Government portal.

According to the Rules of Procedure of the Government of Montenegro, Regulatory Impact Assessment (RIA) must be conducted in the process of preparing a law or other regulations. In January 2026, the Guideline on Conducting Regulatory Impact Assessments and Preparing Regulatory Impact Assessment Reports³⁹ was adopted, explicitly stating that regulatory impact assessments are to be carried out for draft laws, proposed regulations adopted by the Government (including decrees and decisions), as well as proposed strategic documents (including action plans, strategies, and programmes), and similar acts. This Guideline will enter into force in January 2027. The RIA form generally includes all required elements, with the main exception being the use of external sources of information and data. Out of 155 laws adopted during the observed period, 93% of government-proposed laws included a RIA, although none incorporated a gender impact assessment. Out of 72 policy documents in the observed period, for 44% there are ex ante impact assessments. Key informants expressed differing views on their participation in working groups for the drafting of laws and policy documents. One informant emphasised that there was not enough time and space for advocacy, while another highlighted that in many cases, proposals were further assessed and either incorporated into the draft or considered for future revisions. Public opinion surveys reflected a negative perception of participation: almost 70% of respondents believe they do not have the opportunity to engage in the drafting of laws and strategic documents in Montenegro.

The key strategic document, the Public Administration Reform Strategy 2022–2026⁴⁰, recognises the importance of transparency and inclusiveness in policy-making and legislative development within the Strategic Objective

³⁹ Guidelines on Conducting Regulatory Impact Assessments and Preparing Regulatory Impact Assessment Reports, January 2026, available at:

<https://www.sluzbenilist.me/propisi/7275A943-3071-48DF-97CE-EA9E69877256?page=1>

⁴⁰ Public Administration Reform Strategy 2022-2026, available at:

<https://www.gov.me/dokumenta/7c3b8e38-a038-4f52-9cf5-27f6d72abb39>

“Planning policies with and for citizens.” Through the Action Plan for 2025–2026⁴¹, greater transparency in public policymaking will be promoted by strengthening the capacities of civil servants responsible for drafting laws and strategies, particularly with regard to standards for conducting public consultations in the legislative and strategic planning processes. The principle of inclusiveness will be achieved under the same strategic objective through an activity focused on the effective use of e-platforms for public participation in policy-making (e-Government), as well as through the promotion of good practices in public involvement in the policy-making process, with a particular focus on consultations at the initial stage of document drafting.

Law on the Publication of Regulations and Other Acts⁴² regulates which documents must be published in the Official Gazette, including laws and secondary legislation. It is further stipulated that these regulations are published in the electronic edition of the Official Gazette, which is free of charge. On the official webpage of the Official Gazette there is an option to search documents by type of the document, key word, institution. However, while all primary and secondary legislation are published in the Official Gazette, there is no obligation or existing practice to publish consolidated versions of legal texts free of charge. Additionally, the Law on Free Access to Information⁴³ states that public authorities are obliged to publish plans, programmes, and strategies on their official websites.

The legal act regulating consultations and the work of working groups for the preparation of laws and strategies is the Decree on the Selection of Representatives of Non-Governmental Organizations to the Working Bodies of State Administration Authorities and on Conducting Public Consultations in the Preparation of Laws and Strategies⁴⁴. Early consultations and public consultations are regulated by the same Decree and follow a similar procedure, but differ mainly in duration and reporting deadlines. In both cases, the call is published on the website of the competent ministry and on the e-Government portal, while comments may be submitted in writing or electronically. Early consultations last at least 15 days, whereas public consultations last between 20 and 40 days, depending on the significance and complexity of the matter.

⁴¹ Action Plan 2025-2026 of the Public Administration Reform Strategy 2022-2026, available at: <https://www.gov.me/dokumenta/288d7df0-8c44-4874-a978-5a5368723ab9>

⁴² Law on Publication of Regulation and Other Acts, Official Gazette 5/2008, available at: <https://www.sluzbenilist.me/propisi/82645E04-9907-4859-A985-AD9FF73E7EF2>

⁴³ Law on Free Access to Information, Official Gazette 44/2012, 30/2017 and 66/2025 - Decision of the Constitutional Court of Montenegro, available at: <https://www.gov.me/dokumenta/f9dcdea6-e2b9-4b1a-a80c-e243a073d7b4>

⁴⁴ Decree on the selection of representatives of Non-Governmental Organizations to the working bodies of state administration authorities and on conducting public consultation the preparation of laws and strategies, Official Gazette 41/2018, available to: <https://www.gov.me/dokumenta/1f353a31-1729-4db3-a378-e8c4610a5b04>

After the process is completed, the ministry prepares and publishes a report on the received comments and recommendations; for public consultations, this must be done within 15 days from the end of the consultation period.

When it comes to early consultations, only 4% of policy documents (3/72) and 5% of laws (7/155) were publicly consulted prior to the drafting process. Public consultations after the drafting phase were held for only 30.56% of policy documents adopted and only 40,65% laws enacted.⁴⁵ During the observed period⁴⁶, the percentage of publicly available reports on conducted consultations was 86.36% for strategic documents, while for laws it was 87.30%. Based on a sample of two strategic documents and three laws⁴⁷, it was found that the consultation reports include all submitted comments and suggestions, as well as responses indicating whether they were accepted or not, along with the corresponding explanations. In addition, reports on public consultations do not clearly distinguish between comments and suggestions received electronically and those submitted during roundtable discussions and similar events; instead, they present consolidated comments collected throughout the public consultation process. Unlike laws and strategic documents, there is no legal obligation to conduct early consultations or public consultations for by-laws.

ADMINISTRATION/ CRITERIA	MNE
Early public consultations held for policy documents	4%
Early public consultations held for laws	5%
Public consultations held for policy documents	30.56%
Public consultations held for laws	40.65%

Although the Decree on the Selection of Representatives of Non-Governmental Organizations to Working Bodies of State Administration Authorities and on the Conduct of Public Consultations in the Preparation of Laws and Strategies stipulates that calls for participation should also be published on the e-Government portal, in practice this portal is not used to a sufficient extent. Monitoring showed that out of a total number of policy documents and laws adopted (227) only 9% of public consultations were announced on the Portal, together with relevant documents, while for only 7% of them a report on consultation was published. Although the e-Government portal offers the

⁴⁵ Public consultations held of 22 out of 72 policy documents adopted, and for 63 laws of total 155 adopted.

⁴⁶ November 2024 - November 2025

⁴⁷ Strategy for the Development of the Social and Child Protection System 2025-2028, Strategy for the Development of Women's Entrepreneurship 2025-2028, Law on Psychological Activity, Law on Higher Education and Law on Business Companies

option to provide comments directly via platform, none of the documents had available comments online (there is space on the portal showing “user, submitted comment, date of the comment, status, institutions answer, date of the answer, and more details button”). Also, while reading published reports, there is no specified part of the report reflecting comments received via platform, not mentioning if any of the comments were received through the platform.

Based on a sample of laws and strategic documents⁴⁸, it can be observed that competent ministries most often publish calls on their official websites, while much less frequently using other communication channels. Only one ministry used its social media platforms to publish a public call, two were published in the media, and one was also published through the e-Government Portal. Although the e-Government Portal allows users to submit comments directly through the platform, none of the documents had comments available online. It should be noted our analysis showed that institutions do not push for greater use of e-consultation portal. In all public consultation calls published on the portal, it is stated that the comments should be submitted via email or by post. Nowhere do they mention submission through the e-Government Portal.

The documents published alongside a call for early consultations and public debate include all necessary details. In the case of a public consultation on the text of a draft law proposed by the Government, the conducted Regulatory Impact Assessment (RIA) is also published. Moreover, there is no institution designated to verify compliance with consultation requirements. Materials are submitted to the Government through the Government General Secretariat, accompanied by a cover letter. If the material has not been prepared in accordance with these Rules of Procedure, the Secretary-General of the Government will request that the proposer align the material with the provisions of these Rules.

According to the Rules of Procedure of the Government of Montenegro, Regulatory Impact Assessment (RIA) must be conducted in the process of preparing a law or other regulation, in accordance with the act adopted by the Ministry of Finance. If the proposer assesses that it is not necessary to conduct a RIA in the process of drafting a law or other regulation, they are required to provide a specific justification for such a decision. In January 2026, the Guideline on Conducting Regulatory Impact Assessments and Preparing

⁴⁸ Strategy for the Development of the Social and Child Protection System 2025-2028, Strategy for the Development of Women's Entrepreneurship 2025-2028, Law on Psychological Activity, Law on Higher Education and Law on Business Companies

Regulatory Impact Assessment Reports⁴⁹ was adopted, explicitly stating that regulatory impact assessments are to be carried out for draft laws, proposed regulations adopted by the Government (including decrees and decisions), as well as proposed strategic documents (including action plans, strategies, and programmes), and similar acts. This Guideline will enter into force on 1 January 2027.

Based on a sample of five laws⁵⁰ adopted by the Parliament during the observed period, it was assessed whether the Regulatory Impact Assessment (RIA) contained the required elements. Each of the RIA included elements related to problem analysis, policy objectives, justification of government intervention (explanatory note), policy options (including the mandatory “status quo” option), and the preferred option with justifications. They also covered affected groups, an assessment of all relevant impacts of the intervention, an estimate of the costs of the preferred option, as well as policy implementation and enforcement mechanisms, and monitoring and evaluation mechanisms. However, there was no clear information on the use of external sources of information and data.⁵¹

The Ministry of Finance has been publishing all conducted regulatory impact assessments since 2012. Within this, all regulatory impact assessment reports have been published for each year and grouped into categories relating to: laws, decrees, decisions, rulebooks, and “other,” which includes memoranda, action plans, and similar documents.⁵²

Out of 155 laws adopted during the observed period, 93% of Government-proposed laws included RIA, although none incorporated a gender impact assessment. Out of 72 policy documents in the observed period, for 44% there are ex ante impacts assessments. Members of Parliament proposed 17

⁴⁹ Guidelines on Conducting Regulatory Impact Assessments and Preparing Regulatory Impact Assessment Reports, January 2026, available at: <https://www.sluzbenilist.me/propisi/7275A943-3071-48DF-97CE-EA9E69877256?page=1>

⁵⁰ Draft Law on Amendments to the Law on Free Legal Aid, Draft Law on Consumer Credit, Draft Law on Amendments and Supplements to the Law on Payment Transactions, Draft Law on Games of Chance, Draft Law on Business Companies

⁵¹ An additional comment from Ministry of Finance received on April 15, 2026: Although for criteria 8–10 (policy implementation and enforcement mechanisms, monitoring and evaluation mechanisms, and use of external sources of information and data) all observed cases were assigned a score of 0, it is important to emphasize that fulfilling these criteria is not strictly required within the framework of drafting primary legislation. The analyzed sample laws, by their nature and normative function, do not necessarily need to include detailed mechanisms for implementation, monitoring, or evaluation, nor explicit references to external sources of data. These elements are more systematically developed in accompanying policy documents (e.g., strategies, programmes, or action plans) rather than in the legal text itself.

Therefore, the assigned scores should not be interpreted solely as a deficiency in the quality of the analyzed documents, but rather as a consequence of the methodological framework applying the same criteria to different types of documents, without fully accounting for their specific characteristics

⁵² All RIA forms since 2012 are available at: <https://www.gov.me/mif/analiza-efekata-propisa-ria>

laws, and these do not have ex ante impact assessments, which is not a legal requirement for laws proposed by Members of Parliament.

For 63 laws that held consultations, 25 did not have an ex ante impact assessment report accompanying the call for the consultation process. Out of 138 laws adopted for which the proposer was the Government, 10 laws do not include an ex ante impact assessment report along with the approved law proposal.⁵³

Measuring the extent to which comments received during public consultations influenced the final draft of a law or strategic document, only one law and one strategic document from the sample incorporated more than 60% of the comments. The best example is the Strategy for the Development of the Social and Child Protection System, which incorporated 100% of the comments received during the public consultation, while the weakest result was recorded for the Law on Psychological Activity, which incorporated 0% of the comments from the public consultation.

When it comes to forming a working group for drafting laws and strategic documents, a state administration authority appoints representatives of non-governmental organizations to the working group based on a public call published on its website and the e-Government portal. The state administration authority is required to publish a list of non-governmental organizations that have submitted complete and proper documentation, as well as a list of those that have not. However, there is no legal obligation to publicly announce the decision on the composition of the working group or the results of the working group's work.

Based on a sample of three laws and two strategies⁵⁴, we examined whether the working groups included representatives of the NGO sector, whether decisions on their establishment—with a full list of members—were publicly available, and whether minutes from working group meetings were published. Of the five documents reviewed, all working groups included representatives of the NGO

⁵³ An additional comment we receive from Ministry of Finance on April 15, 2026: In order to ensure high-quality and comprehensive preparation of analyses by local governments, in October 2020 the Ministry of Finance adopted the Guidelines on the Preparation and Assessment of the Impact Analysis of Decisions and Other Regulations of Local Government Bodies ("Official Gazette of Montenegro", No. 105/20). The Guidelines also include a gender dimension, representing an additional advancement in the scope of regulatory impact analysis. In the previous period, the Ministry of Finance has been actively working on establishing full RIA (Regulatory Impact Assessment) in Montenegro, which represents an important step towards improving the quality of the regulatory process and enhancing the transparency of public policies and regulations. Full RIA, in addition to assessing impacts on the economy, citizens, and the budget, also considers the expected impact of the proposed regulatory solution on society (including the impact on gender equality) and the environment.

⁵⁴ Strategy for the Development of the Social and Child Protection System 2025-2028, Strategy for the Development of Women's Entrepreneurship 2025-2028, Law on Psychological Activity, Law on Higher Education and Law on Business Companies,

sector. However, only one had a publicly available decision on its establishment. Furthermore, none of the working groups had publicly published minutes from their meetings, which we requested through freedom of information requests. Only the Working Group for the Preparation of the Strategy for the Development of the Social and Child Protection System 2025–2028 and the Working Group for Law on Business Companies provided us with the minutes from its meetings, while the Working Group for the Preparation of the Strategy for the Development of Women’s Entrepreneurship 2025–2028 was the only one that had a publicly available decision on its establishment, including a full list of its members.

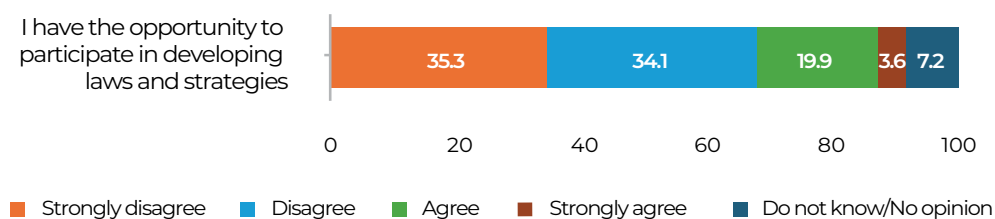
Three key informants who participated in the working groups held differing views on whether the competent ministry makes decisions regarding their proposals within the working group, and whether there is justification provided for accepting or rejecting suggestions. One informant responded that they tend to disagree, while the other two indicated that they tend to agree or fully agree.

Nevertheless, all three key informants confirmed that they received all documentation produced by the working group in a timely manner. One of them emphasised that *there was not enough time and space for advocacy*: their proposals were considered at only one working group session, and the final decision was made during that session. Afterward, there was no willingness from the Ministry’s representatives to revisit or revise their position, as they had other matters to resolve with different members of the working group.

On the other hand, another informant highlighted that there was a shared understanding that the objective was to improve the quality of the law, which fostered professional dialogue and cooperation among participants. After a proposal was submitted, it was typically discussed during working group meetings. Proposals were recorded in meeting discussions and reviewed by the chair and the relevant representatives responsible for drafting the text. In many cases, proposals were further assessed and either incorporated into the draft or taken into account for future revisions.

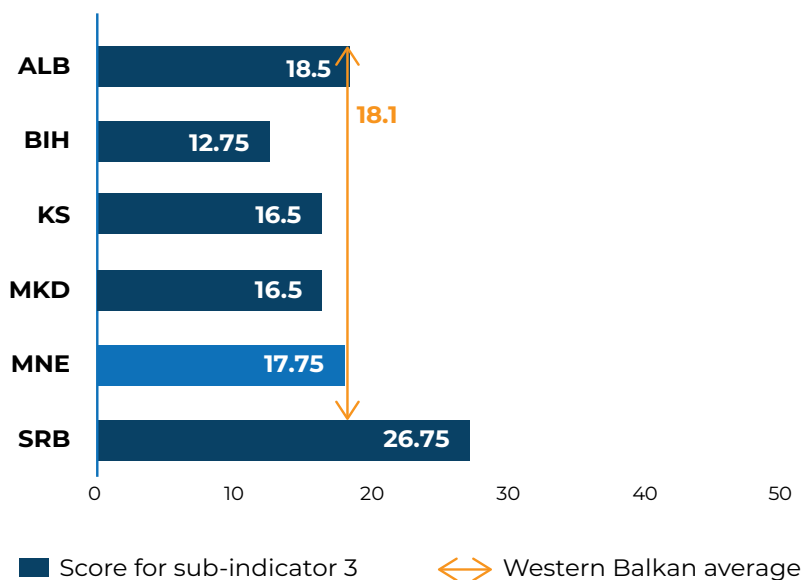
The conducted public opinion survey showed that almost 70% of respondents believe they do not have the opportunity to participate in the drafting of laws and strategic documents in Montenegro.

Chart 1: Share of citizens' responses on an agreement scale to the statement (%)



How does Montenegro do in regional terms?

Sub-indicator 3: Transparency and inclusiveness of policy making and legislation development process (maximum score 52)



II.4 Transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny

Principle 6: Public policies are effectively implemented and evaluated, enhancing policy outcomes and reducing regulatory costs and burdens.

Principle 7: The parliament effectively scrutinises the government policymaking and ensures overall policy and legislative coherence.

Awarded points per element in sub-indicator 4: Transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny⁵⁵

Indicator elements	Element type	Score
E 4.1 There is a strategic document in force that envisages transparency and inclusiveness of policy monitoring and evaluation practices	Strategy and policy	0/0.5
E 4.2 Regulations envisage sending advance notifications to affected groups on the upcoming changes to the legal framework	Legislation	0/0.5
E 4.3 Parliamentary rules of procedure envisage participation of interested parties in parliamentary discussions, in the form of public hearings	Legislation	0.5/0.5
E 4.4 Lead ministries publish advance notifications to the affected groups on the upcoming changes to the legal framework	Practice in implementation	0/1.5
E 4.5 Lead ministries regularly publish monitoring reports on implementation of policy documents	Practice in implementation	0/2.5
E 4.6 Monitoring reports on implementation of policies are citizen friendly	Practice in implementation	0.25/1.25
E 4.7 Lead ministries publish ex-post evaluations on implementation of policies	Practice in implementation	1/2.5

⁵⁵ The fourth sub-indicator focuses on the following SIGMA sub-principles: The responsible institutions effectively monitor policy implementation and ensure regulatory compliance, based on robust and relevant data, including evidence gathering through direct feedback and consultations with affected stakeholders; Ex post evaluation of major laws and policies is an integral part of the better regulation agenda and is linked to the analysis conducted during the development of the policy. The public administration makes evaluation results publicly available and uses them to inform future policy; Businesses and citizens receive advance notification about upcoming changes in the rules and regulations that will affect them, and sufficient time is allowed for the affected groups to adjust to and align with the new regulatory framework; Parliamentary committees debate and scrutinise legislative initiatives, with active participation of government ministers and senior public servants, and ensure consultation with key stakeholders, while also minimising any risks of undue external influence; The parliamentary services provide expert advice and support to members of parliament for initiating and drafting new laws based on evidence and with input from key stakeholders.

Indicator elements	Element type	Score
E 4.8 Ex-post evaluations on implementation of policies use external data and information produced by non-state actors	Practice in implementation	0.5/2.5
E 4.9 Parliament involves stakeholders, affected groups, and other non-state actors in public hearings	Practice in implementation	1.5/2.25
E 4.10 Online transparency of the work of parliaments	Practice in implementation	2/2
E 4.11 Key non-state actors consider involvement of stakeholders in public hearings as effective	Outcomes and impact	0/3
Total score for sub-indicator 4		5.75/19

The analysis shows that Montenegro's framework for transparency, participation, and accountability in policy-making and monitoring remains only partially developed. While the regulatory framework provides certain mechanisms for stakeholder participation and public access to information, these practices are not applied consistently or systematically across sectors and institutions. Significant gaps persist in ensuring systematic stakeholder engagement, regular monitoring and evaluation, timely communication with affected groups, and citizen-friendly presentation of policy implementation results.

In the area of monitoring and evaluation, strategic documents such as the Action Plan 2025–2026 of the Public Administration Reform Strategy⁵⁶ and the Medium-Term Work Programme of the Government⁵⁷ recognise transparency and communication as general principles, but do not include concrete measures specifically aimed at improving transparency and inclusiveness in monitoring and evaluation processes. Existing activities primarily focus on strengthening institutional capacities and reporting mechanisms, while stakeholder participation and public accessibility remain indirectly addressed.

The legal framework also lacks explicit provisions requiring institutions to provide advance notification to affected groups about upcoming legal changes before the formal drafting process begins. Although the Law on State Administration⁵⁸ and related decrees foresee public consultations and publication obligations during the drafting phase, no systematic requirement exists for early notification prior to the initiation of legislative procedures. The analysis of selected draft

⁵⁶ Action Plan 2025-2026 of the Public Administration Reform Strategy 2022-2026, available at: <https://www.gov.me/dokumenta/288d7df0-8c44-4874-a978-5a5368723ab9>

⁵⁷ Medium-Term Work Programme of the Government, available at: <https://www.gov.me/dokumenta/927f641e-9d9f-4dd8-8144-416a62fd49b0>

⁵⁸ The Law on Public Administration, available at: [42c95c3f-0c64-4657-99f4-f014f1912bc8](https://www.gov.me/dokumenta/42c95c3f-0c64-4657-99f4-f014f1912bc8)

laws further confirms inconsistent practice in this regard, as ministries generally failed to demonstrate that timely advance notifications had been systematically provided to affected stakeholders.

At the parliamentary level, the Rules of Procedure of the Parliament of Montenegro⁵⁹ formally enable participation of non-state actors in consultative and public hearings. However, participation remains limited in practice and largely consultative, without decision-making authority. Data from parliamentary reports show that non-state actors participated in only a limited number of hearings during the observed period. Interviews with key informants additionally indicate mixed perceptions regarding the effectiveness of participation, particularly due to the absence of formal feedback on how stakeholder proposals are considered in decision-making processes.

The review of sectoral policy monitoring and evaluation practices demonstrates similarly inconsistent implementation. Monitoring reports are not published regularly across all policy areas, and annual reporting practices remain uneven. While some sectors, particularly Competitiveness and innovation, demonstrate more accessible and citizen-friendly reporting practices through the use of executive summaries and visual presentations of findings, other sectors lack reports entirely or publish highly technical documents without summaries or visual tools that would improve public understanding.

Ex-post evaluation practices are also limited. Only a small number of evaluation reports were identified across the selected sectors, with Agriculture and rural development representing the most comprehensive example in terms of including both non-state data and feedback from affected groups. In most other sectors, ex-post evaluations are either unavailable or do not meaningfully incorporate stakeholder perspectives.

The review of the Action Plan 2025-2026 of the Public Administration Reform Strategy 2022-2026⁶⁰ indicates that transparency and inclusiveness in policy monitoring and evaluation are not systematically addressed through concrete measures or activities. The AP does not include actions specifically aimed at enhancing transparency or inclusiveness in monitoring and evaluation practices. Similarly, the Medium-Term Work Programme of the Government of Montenegro for 2024-2027 does not foresee targeted activities in this area. While transparency is referenced as a general principle-particularly under Priority 1, Goal 5 (Digital Montenegro, transparent and efficient public administration)

⁵⁹ Rules of Procedure of the Parliament of Montenegro, available at: [1605826816-poslovnik.pdf](https://www.parliament.me/poslovnik/1605826816-poslovnik.pdf)

⁶⁰ Action Plan 2025-2026 of the Public Administration Reform Strategy 2022-2026, available at: <https://www.gov.me/dokumenta/288d7df0-8c44-4874-a978-5a5368723ab9>

- this commitment remains at a declarative level without operationalization through specific actions.⁶¹

At the same time, it is important to note that the AP 2025–2026⁶² does foresee a number of activities aimed at improving the overall monitoring and evaluation system, including strengthening the capacities of the Directorate for Strategic Planning, developing additional monitoring and reporting mechanisms, and reporting on external evaluations.⁶³ Nevertheless, these links remain indirect and are not translated into dedicated actions specifically targeting transparency and inclusiveness in monitoring and evaluation processes.

The same applies to the Medium-Term Work Programme⁶⁴, which establishes a framework for monitoring and reporting, including the creation of a Commission responsible for overseeing implementation, analysing challenges, and assessing policy impacts. Still, this mechanism does not explicitly incorporate measures to improve transparency or inclusiveness in monitoring and evaluation processes.⁶⁵

The review of relevant regulations in force at the time of measurement shows that there is no explicit requirement for lead ministries or responsible bodies to publish or send advance notifications to affected groups regarding upcoming changes to the legal framework prior to their enforcement. Neither the Regulation on the Government of Montenegro⁶⁶ nor the Rules of Procedure of the Government⁶⁷ contain provisions establishing such an obligation.

The Law on State Administration⁶⁸ introduces certain transparency and consultation requirements during the drafting phase of legislation and strategies. Article 52 mandates that ministries conduct public consultations (public debates) with interested stakeholders, while Article 6 establishes the general principle of transparency of work, and Article 51 requires publication of information on official websites. However, these provisions relate to consultation and information-sharing rather than advance notification. The law also provides exceptions where public consultations are not mandatory, including in cases related to defence and security, the annual budget, urgent or unforeseen

⁶¹ Meaning that these principles are not operationalized through clearly defined measures, responsibilities, or mechanisms for stakeholder participation.

⁶² Action Plan 2025-2026 of the Public Administration Reform Strategy 2022-2026, available at: <https://www.gov.me/dokumenta/288d7df0-8c44-4874-a978-5a5368723ab9>

⁶³ Activities for the Implementation of the Strategy (PAR), Monitoring and Reporting

⁶⁴ Medium-Term Work Programme of the Government, available at: <https://www.gov.me/dokumenta/927f641e-9d9f-4dd8-8144-416a62fd49b0>

⁶⁵ Responsibilities are clearly assigned, but the absence of concrete actions in this domain means that no points can be awarded under the given criteria.

⁶⁶ The Regulation on the Government of Montenegro, available at: <https://www.gov.me/dokumenta/6e0411f3-14bf-4c2c-a984-36b44c940c23>

⁶⁷ Rules of Procedure of the Government of Montenegro, available at: <https://www.gov.me/dokumenta/f79a82b9-c69e-4a84-87da-c787bad16958>

⁶⁸ The Law on Public Administration, available at: [42c95c3f-0c64-4657-99f4-f014f1912bc8](https://www.gov.me/dokumenta/42c95c3f-0c64-4657-99f4-f014f1912bc8)

circumstances, or minor amendments that do not significantly alter existing regulations.

Further, the Decree on the Selection of Representatives of NGOs in Working Bodies of State Administration Bodies and the Conduct of Public Consultations in the Preparation of Laws and Strategies⁶⁹ regulates stakeholder participation by requiring ministries to publish public calls for consultations and enabling NGO involvement in working groups. It also sets timelines for consultations (20 to 40 days) and obliges the publication of consultation reports. Despite these mechanisms, the decree does not introduce a requirement for advance notification to affected groups prior to the enforcement of legal changes.

Finally, the Draft Law on the Government⁷⁰ similarly does not foresee any obligation to notify the affected public in advance about upcoming changes to the legal framework.

When it comes to participation of interested parties in public hearings in the Parliament, the Rules of Procedure of the Parliament of Montenegro⁷¹ allow it, including public and consultative hearings. Under Article 67, representatives of scientific and professional institutions, other legal entities, non-governmental organizations, as well as individual experts and scholars may take part in the work of parliamentary committees. Their participation is subject to invitation or a submitted request, and requires the consent of the committee chair. However, such participants do not have the right to vote. Additionally, Article 73 provides for the organization of consultative hearings by parliamentary committees in order to obtain relevant information and expert opinions. In this context, representatives of state bodies, NGOs, and scientific or professional experts may participate and present their views. While this framework enables stakeholder involvement in parliamentary discussions, participation is conditional and limited to a consultative role, without decision-making authority.

In order to verify whether lead ministries informed affected groups about upcoming changes to the legal framework, researchers analysed the same sample of laws used for Element 3.10 (three in total)⁷² and reviewed the official websites of the responsible ministries for any publicly available notifications or announcements. Since such information was not available online, requests for free access to information were submitted to the responsible ministries.

⁶⁹ Decree on the Selection of Representatives of NGOs in Working Bodies of State Administration Bodies and the Conduct of Public Consultations in the Preparation of Laws and Strategies, available at: <https://www.gov.me/dokumenta/1f353a31-1729-4db3-a378-e8c4610a5b04>

⁷⁰ Draft Law on the Government, available at: <https://www.gov.me/dokumenta/541afa9e-cb70-4cfb-b2df-6df16b3299e1>

⁷¹ Rules of Procedure of the Parliament of Montenegro, available at: [1605826816-poslovnik.pdf](https://www.gov.me/dokumenta/1605826816-poslovnik.pdf)

⁷² Draft Law on Amendments to the Law on Free Legal Aid, Draft Law on Consumer Credit, Draft Law on Amendments and Supplements to the Law on Payment Transactions

The analysis of the selected sample of three draft laws indicates that there is no clear and consistent evidence that lead ministries provided timely advance notifications to affected groups prior to, or at the latest on the day of, the start of the formal legal drafting process.

In the case of the **Draft Law on Amendments to the Law on Free Legal Aid**, the Ministry of Justice reported that a public call for consultations with interested stakeholders was published at the initial stage of drafting. However, it is not explicitly specified whether this notification was issued before or at the very beginning of the formal drafting process. **For the Draft Law on Consumer Credit**, no response was received from the Ministry of Economic Development, and no information was available online regarding any form of advance notification to affected stakeholders. Regarding the **Draft Law on Amendments and Supplements to the Law on Payment Transactions**, the Ministry of Finance published a public call for participation in consultations on its website and directly notified relevant stakeholders, including all banks in Montenegro and the Banking Association. The public consultation was conducted between 6 September and 16 October 2024, allowing interested parties to submit comments and suggestions. Nevertheless, based on the available information, there is no evidence that these notifications were issued prior to the commencement of the formal drafting process.

When it comes to monitoring reports on the implementation of sectoral strategies, the review of the websites of line ministries across selected policy areas - environment and climate action, transport, energy, competitiveness and innovation, and agriculture and rural development - indicates that such reports are not published regularly on an annual basis.⁷³

In the area of **environment and climate action**, the National Strategy for Sustainable Development of Montenegro until 2030⁷⁴ and the Low-Carbon Development Strategy⁷⁵ does not have available monitoring reports for 2023 and 2024. While reports exist for the Waste Management Strategy (2024)⁷⁶ and the Water Management Strategy (covering 2022–2025)⁷⁷ - these do not reflect consistent annual reporting. In the **transport** sector, the Transport Development

⁷³ Policy documents need to be adopted three years prior to the year of monitoring or earlier and need to be implemented/valid in the year prior to the monitoring. Reports for the last two consecutive calendar years are observed, in line with legal deadlines for their publishing.

⁷⁴ National Strategy for Sustainable Development of Montenegro until 2030, available at: <https://wapi.gov.me/download-preview/67dc487e-097d-41d2-8fd5-7827a19a1f5a?version=1.0>

⁷⁵ Low-Carbon Development Strategy, available at: <https://www.gov.me/dokumenta/6001d01f-6ddd-46dd-8eb4-ac624f68a0cf>

⁷⁶ Report on the implementation of the Waste Management Strategy 2024, available at: <https://www.gov.me/dokumenta/ab2386d2-dd0f-4634-9065-65f4cc47a9da>

⁷⁷ Report on the implementation of the Water Management Strategy (2022–2025), available at: <https://www.gov.me/dokumenta/e093120b-cfe7-410d-93f5-815a3d4703f1>

Strategy of Montenegro 2019–2035⁷⁸ is accompanied only by a consolidated report covering the 2021–2025 period⁷⁹, without separate annual reports for 2023 and 2024. In the **energy** sector, no monitoring reports are available for 2023 and 2024 under the Energy Development Strategy of Montenegro until 2030.⁸⁰ In the area of **competitiveness and innovation**, the Smart Specialisation Strategy 2019–2024⁸¹ is supported only by a final report⁸², while the Strategy for Scientific Research Activity 2022–2026 includes a report for 2024⁸³ but lacks one for 2023. Although some reporting exists, it is not consistent on an annual basis. Finally, in **agriculture and rural development**, neither the Agriculture and Rural Development Strategy 2023–2028⁸⁴ nor the IPARD III Programme 2021–2027⁸⁵ have published monitoring reports for 2023 and 2024.

The analysis of monitoring reports on the implementation of sector policy documents in Montenegro shows mixed results regarding their citizen-friendliness. In several cases, these reports do not meet citizen-friendly criteria, as they lack summaries and visual tools necessary for easy interpretation. Additionally, reporting practices are inconsistent, as monitoring is not conducted on a regular (annual) basis by default, further limiting transparency and usability.

In the areas of **Environment and climate action** - Waste Management⁸⁶ and Water Management⁸⁷ reports are not presented in a citizen-friendly manner. While these documents do exist and serve formal monitoring purposes, they lack key elements that would make them accessible to a broader audience. Specifically, they do not include clear summaries of key findings, nor do they provide graphical or visual elements (such as charts, infographics, or summary tables) that would allow for quick and easy understanding by interested

⁷⁸ Transport Development Strategy of Montenegro 2019–2035, available at: <https://www.gov.me/dokumenta/39f31ac4-a0b6-4228-bff1-47c82e6c5534>

⁷⁹ Information on the Update of the Transport Development Strategy 2019–2035 – Phase I, with the Report on the Implementation of the Transport Development Strategy 2019–2035 (for the period 2021–2025) and the Preliminary Action Plan for 2026–2027, available at: <https://www.gov.me/dokumenta/cd72387b-32aa-4136-bd34-2c9449a585f2>

⁸⁰ Energy Development Strategy of Montenegro until 2030, available at: <https://www.gov.me/dokumenta/eac811f8-4b13-46ce-97c4-412b8d1ebb8a>

⁸¹ Smart Specialisation Strategy 2019–2024, available at: <https://www.gov.me/dokumenta/18205a91-1afc-4eb7-a5cb-8ad5bd0b7712>

⁸² Final report on the implementation of the Smart Specialisation Strategy 2019–2024, available at: <https://www.gov.me/dokumenta/7871a859-32e5-4920-919c-ea7e96ab01fe>

⁸³ Report on the implementation of the Strategy for Scientific Research Activity of Montenegro for 2024, available at: <https://www.gov.me/dokumenta/582ac2ad-b462-4ce5-9eeb-d45919a4356f>

⁸⁴ Agriculture and Rural Development Strategy 2023–2028, available at: <https://www.gov.me/dokumenta/1e9c16c3-8814-49ab-ba89-de4f60f796af>

⁸⁵ IPARD III Programme 2021–2027, available at: <https://www.gov.me/clanak/arhiva-najvaznijih-dokumenata>

⁸⁶ Report on the implementation of the Waste Management Strategy 2024, available at: <https://www.gov.me/dokumenta/ab2386d2-dd0f-4634-9065-65f4cc47a9da>

⁸⁷ Report on the implementation of the Water Management Strategy (2022–2025), available at: <https://www.gov.me/dokumenta/e093120b-cfe7-410d-93f5-815a3d4703f1>

stakeholders. The same applies to the area of **Transport** and the Report on the Implementation of the Transport Development Strategy 2019–2035 (for the period 2021–2025).⁸⁸

In contrast, the area of **Competitiveness and innovation** demonstrates good practice. In particular, the reports accompanying the Smart Specialisation Strategy of Montenegro 2019–2024⁸⁹ and the Strategy for Scientific Research Activity of Montenegro 2022–2026⁹⁰ are presented in a citizen-friendly manner, as they include executive summaries outlining key findings and make use of graphical visualisations (e.g., pie charts and tables). These elements significantly enhance clarity and accessibility.

For **Energy**, no relevant reports were available for 2023 and 2024, while in **Agriculture and rural development**, no monitoring reports were identified for the selected documents.

A review of the websites of line ministries responsible for sectoral policy implementation across five selected policy areas shows limited availability of ex-post evaluation reports in the last three calendar years.

In the area of **Environment and climate action**, at least one ex-post evaluation report is available online, specifically the evaluation of the Strategy for Protection against Ionising Radiation, Radiation Safety and Radioactive Waste Management (2017–2021).⁹¹ For **Agriculture and rural development**, an ex-post evaluation report is also available, namely the Final Ex-post Evaluation Report for the IPARD II Programme (2014–2020).⁹²

However, in the remaining three areas - **Transport, Energy, and Competitiveness and Innovation** - no ex-post evaluation reports have been identified on the websites of the Government or competent institutions within the last three calendar years. In the case of Transport, while some annual sector reports and monitoring reports exist, these do not qualify as ex-post evaluations, as they do not assess final impacts after policy completion.

The analysis of the identified ex-post evaluation reports shows varying inclusion

⁸⁸ Information on the Update of the Transport Development Strategy 2019–2035 – Phase I, with the Report on the Implementation of the Transport Development Strategy 2019–2035 (for the period 2021–2025) and the Preliminary Action Plan for 2026–2027, available at: <https://www.gov.me/dokumenta/cd72387b-32aa-4136-bd34-2c9449a585f2>

⁸⁹ Final report on the implementation of the Smart Specialisation Strategy 2019–2024, available at: <https://www.gov.me/dokumenta/7871a859-32e5-4920-919c-ea7e96ab01fe>

⁹⁰ Report on the implementation of the Strategy for Scientific Research Activity of Montenegro for 2024, available at: <https://www.gov.me/dokumenta/582ac2ad-b462-4ce5-9eeb-d45919a4356f>

⁹¹ Report on the Evaluation of the Strategy for Protection against Ionising Radiation, Radiation Safety, and Radioactive Waste Management, available at: <https://www.gov.me/dokumenta/f74c8de1-d100-4aad-bb32-aeadd75a9b01>

⁹² Final Ex-post Evaluation Report for the IPARD II Programme (2014–2020), available at: <https://www.gov.me/en/documents/849c5710-713a-4b99-9e1a-1c8b375b5873>

of non-state data and feedback from affected groups. The inclusion of external data and stakeholder feedback in ex-post evaluations in Montenegro is limited and inconsistent. Only one sector (Agriculture and rural development) fully meets both criteria, while others either partially meet them or do not meet them at all.

In the area of **Environment and climate action**, two reports were reviewed - The Final Report on the Implementation of the Action Plan for the National Chemicals Management Strategy (2019–2022)⁹³ does not include data produced by non-state actors, nor does it contain feedback from affected or target groups. The Report on Evaluation of the Strategy for Protection against Ionising Radiation, Radiation Safety and Radioactive Waste Management (2017–2021)⁹⁴ includes data produced by a non-state actor (NGO, through in-depth interviews), but still lacks feedback from affected groups. In **Agriculture and rural development**, the Final Ex-post Evaluation Report for the IPARD II Programme (2014–2020)⁹⁵ represents good practice. This report includes both data produced by non-state actors and feedback from affected/target groups, making it more comprehensive and participatory in its approach.

For **Transport, Energy, and Competitiveness and innovation**, no ex-post evaluation reports were identified, and therefore no assessment could be conducted for these sectors.

When it comes to whether stakeholders, affected groups, and other non-state actors participated in parliamentary public hearings on proposed acts, the review covers the 12 months preceding the monitoring period (1 November 2024 - 1 November 2025) and examines the extent and nature of such participation.

According to the available data obtained from the Semi-annual report on the work of the Parliament⁹⁶:

- From 1 January to 31 July 2025, a total of 18 hearings were held, including:
 - 14 consultative hearings
 - 4 control hearings

⁹³ Final Report on the Implementation of the Action Plan for the National Chemicals Management Strategy (2019–2022), available at:

<https://www.gov.me/dokumenta/8af8c54f-d97b-423e-ba52-0cc6f770596e>

⁹⁴ Report on Evaluation of the Strategy for Protection against Ionising Radiation, Radiation Safety and Radioactive Waste Management (2017–2021), available at:

<https://www.gov.me/dokumenta/f74c8de1-d100-4aad-bb32-aeadd75a9b01>

⁹⁵ Final Ex-post Evaluation Report for the IPARD II Programme (2014–2020), available at:

<https://www.gov.me/en/documents/849c5710-713a-4b99-9e1a-1c8b375b5873>

⁹⁶ Semi-annual report on the work of the Parliament, available at:

<https://api.skupstina.me/media/files/1769167410-informacija-o-zakonodavnim-i-nadzornim-aktivnostima-skupstine-crne-gore-za-period-od-1-januara-do-31-jula-2025-godine.pdf>

Out of these, non-state actors participated in 6 hearings.

- For the period November - December 2024, non-state actors participated in 4 hearings (based on the Report on work of the Parliament of Montenegro in 2024⁹⁷).
- Additionally, no non-state actor participation was identified for the period 1 August to 1 November 2025, although this period still falls within the observed 12-month timeframe.⁹⁸

Public hearings were regularly organised during the observed period. However, participation of non-state actors was limited, occurring in a relatively small share of the total number of hearings. This indicates that while the mechanism for public engagement exists, its practical use for inclusive participation remains constrained.

The review of the Parliament's website indicates that there is a well-established practice of publishing key documentation related to law-making, enabling public scrutiny. All draft laws under parliamentary procedure - regardless of whether they are proposed by the Government, members of parliament, or other authorised proposers - are publicly available online.⁹⁹

Draft laws are accompanied by justifications¹⁰⁰, which are published as an integral part of the legislative documentation. This ensures transparency regarding the purpose and rationale behind proposed legislation.

Where applicable, Regulatory Impact Assessments (RIA) are included in the published documentation. In cases where a RIA is not required, a justification explaining its absence is provided, in line with national regulations.¹⁰¹ This means that impact assessment information is consistently available, either directly or through explanation.

⁹⁷ Report on work of the Parliament of Montenegro in 2024, available at: <https://api.skupstina.me/media/files/1767177606-izvjestaj-o-radu-skupstine-za-2024-godinu.pdf>

⁹⁸ Data obtained from the internal records of the IA team

⁹⁹ Official page of the Parliament of Montenegro, available at: <https://www.skupstina.me/>

¹⁰⁰ Available at: <https://zakoni.skupstina.me/zakoni/web/app.php/akt/?naziv=&epa=&brojAkta=&datumOdDan=&datumOdMjesec=&datumOdGodina=&datumDoDan=&datumDoMjesec=&datumDoGodina=&vrstaAkta=Zakon&tipPredlagacaAkta=&oblast=&status=U+proceduri&pageOffset=6>

¹⁰¹ Not all draft laws contain a Regulatory Impact Assessment (RIA). In cases where a draft law includes a Regulatory Impact Assessment, it is published as an integral part of the draft law text or the accompanying documentation submitted to the parliamentary procedure. Therefore, the assessment is published and publicly available whenever it exists. This means that in line with Article 40 of the Rules of Procedure of the Government of Montenegro, the submission of an RIA form is mandatory, either in the form of a completed assessment or a justification explaining why an RIA is not required, accompanied by the opinion of the Ministry of Finance. Accordingly, for draft laws where an RIA is required in line with applicable regulations, the assessment is included in the accompanying documentation submitted to the parliamentary procedure and is publicly available. In cases where an RIA is not required, a justification is provided instead.

Public consultation reports are published when consultations are required by law. These reports are included as part of the accompanying documentation submitted with draft laws. However, proposals submitted by members of parliament are generally not subject to mandatory public consultations¹⁰², and therefore may not include such reports.

Based on interviews conducted with key informants who participated in public hearings during the observed period, the findings show mixed perceptions regarding the effectiveness of participation.

Out of the three identified interviewees¹⁰³, one key informant fully agrees with the statement that parliamentary committees consider their proposals during public hearings. This respondent noted that participation is generally inclusive and that all participants are given equal opportunity to express their views. However, they also highlighted a significant shortcoming: no formal feedback is provided on how contributions are taken into account, raising concerns about transparency and accountability.

The second key informant fully disagrees with the statement that parliamentary committees consider their proposals during public hearings, indicating that parliamentary committees do not consider their proposals, which reflects a negative perception of the effectiveness of participation.

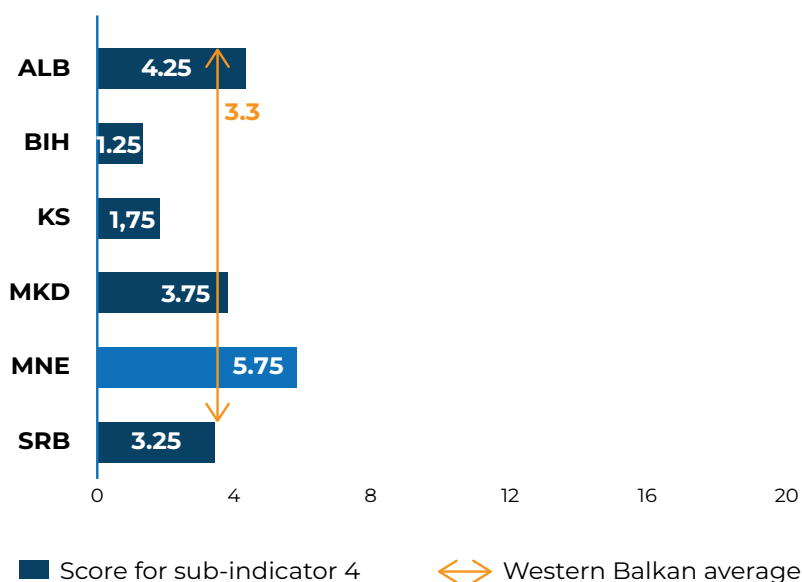
Taken together, these findings point to a divided perception of effectiveness, with one positive and one negative response, and one missing input. This suggests that, in practice, the effectiveness of participation in public hearings is inconsistent, and that mechanisms for demonstrating how stakeholder input influences decision-making remain weak or insufficiently transparent.

¹⁰² The Rules of Procedure of the Government of Montenegro prescribe the obligation to conduct public consultations for Government proposals; however, this obligation does not apply to proposals submitted by Members of Parliament. In other words, Government proposals must undergo public consultation, while parliamentary proposals are not subject to this requirement. The Rules of Procedure of the Government of Montenegro are available at: <https://www.gov.me/dokumenta/f79a82b9-c69e-4a84-87da-c787bad16958>

¹⁰³ Researchers identified 3 interlocutors, from among those who have participated in public hearings in the 12 months preceding the monitoring. The third key informant did not provide a response.

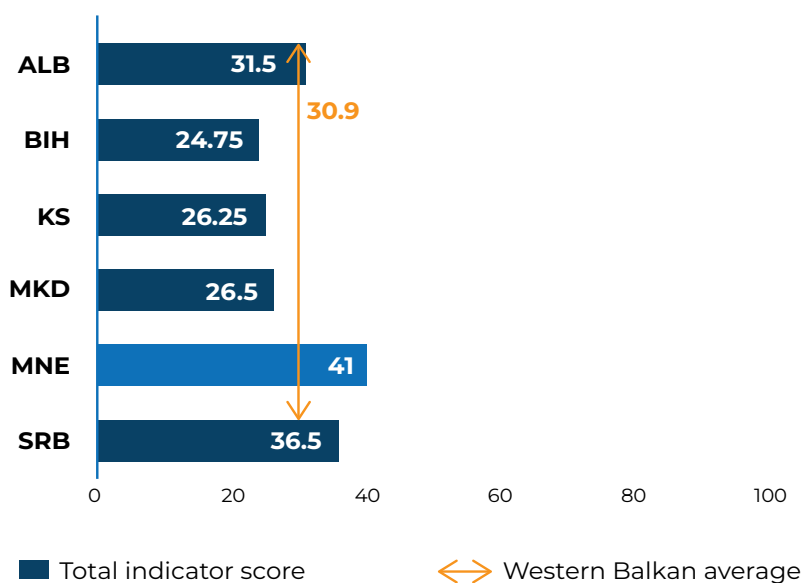
How does Montenegro do in regional terms?

Sub-indicator 4: Transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny (maximum score 19)



Overall scores comparison in the Policy Development and Coordination area

Indicator: Transparency and inclusiveness of policy development and coordination



Regional overview report for Policy Development and Coordination area, with results for all WB administrations is available at: www.par-monitor.org

II.5 Recommendations for the Policy Development and Coordination area

II.5.1 TRACKING RECOMMENDATIONS FROM PAR MONITOR 2021/2022

<i>Recommendations</i>	<i>Type (short/ medium/ long term)¹⁰⁴</i>	<i>Status</i>	<i>Explanation</i>
The work of Government's working bodies, the four commissions, must be made transparent and documentation on their work regularly published, instead of declared confidential as it is the case currently.	Short term	No action taken	No progress in the transparency of these commissions was registered, no information about their work is proactively published
Planning and reporting on the work of the Government should contain qualitative assessments, performance targets and data on indicator achievement, rather than being a dry overview of normative activity.	Long term	Partially implemented	Our monitoring showed certain improvements when it comes to planning and reporting based on performance targets and indicators. The Government Mid-term Programme as well as both annual work plans analysed contain performance indicators. Based on the indicators set in the Mid-term programme, the Government annual plans include the same performance indicators, while activities for that year include specific outputs (usually adopted law/ prepared strategy/report etc). This recommendation is assessed as partially implemented since when it comes to performance reporting, there is a mixture of those indicators (some of them considered as activity information by methodology). Overall, reports include overview of the implementation based on performance indicators, including a more broad overview of the achieved results (presenting baseline values, as well as those planned by the end of the mid-term plan).

¹⁰⁴ Recommendations for which the assessed time for implementation is up to one year are labelled as short-term. Medium-term recommendations should be implementable within a period of one to three years. Long-term recommendations require more than three years to be implemented.

Transparency of Government's decision-making needs to be enhanced so that the public has a comprehensive insight into which materials have been discussed at the Government sessions, even in the case that these materials have been declared confidential, their titles must be on the agenda, in order for the document contents to be confidential and not the fact that it was deliberated upon.	Short-term	No action taken	There were no changes in practice. In cases when materials marked with a certain degree of secrecy is discussed at the Government's sessions, except that material is not published, the public can not even know that it was on the agenda of the session because the name of the material is excluded from the agenda.
The e-Government portal for public consultations should be the central point for all public consultations that are on-going, easy to search and able to inform users of new consultations, with advanced functionalities of interaction that provide opportunity for users to submit comments and the authorities to provide feedback online.		Partially implemented	Although there are technical preconditions for use of the e portal for public consultation, in practice this portal serves more as an info desk, than a tool for more direct engagement. Although the Decree foresees the publication of public consultation calls on the e-Government Portal, in practice this rarely happens. Out of those 85 laws and policy documents for which the public consultations were held, only 24% of public consultations were announced on the e-Government consultation portal along with the relevant documents, and for only 18% a consultation report was published. Although the e-Government Portal allows users to submit comments directly through the platform, none of the documents had comments available online. It should be noted that our analysis showed that institutions do not push for greater use of e-consultation portals. In all public consultation calls published on the portal, it is stated that comments should be submitted via email or by post. Nowhere do they mention submission through the e-Government portal.

The Decree on the selection of NGO representatives to working bodies of the state administration and conducting public consultations in preparation of laws and strategies (Decree) should be amended so as to include the obligation of the authorities to prepare draft document (outline the key directions of the act) in the phase of early consultations (consulting of interested public).		No action taken	There were no changes in this regard.
State authorities should be obligated by the Decree to provide feedback to each individual comment that was received, as opposed to general responses to bulk comments or selective approach in which authorities choose the comments to which they will provide response, currently encouraged by the feedback form prescribed by the Annex 5 of the Decree		No action taken.	There were no changes when it comes to obligation and prescribed form. Our monitoring showed that for five sample documents (three laws and two strategies) reports presented comments listed individually, with clear information on feedback for each comment individually, as well as rationale for each feedback.

The Decree should be amended so as to prescribe the obligation of the authorities to produce reports from early consultations (consulting of interested public) that are not solely a compilation of contributions but also include feed-back to the comments that were received.		No action taken	There were no changes/ amendments of the Decree in the monitoring period.
Work of the working groups tasked with developing laws and strategies should be made more transparent by orderly publishing of materials from their sessions (meeting minutes, draft versions, conclusions).		No action taken.	There were no changes in this regard, Our monitoring showed that for five sample documents, in just one case a decision on establishing the working group was published. There are no published meeting minutes, draft versions or conclusions of those groups.
The procedure and responsibility for preparation of consolidated texts of legislation must be precisely defined by the law, while their availability needs to be free of charge and provided by the Official Gazette of Montenegro.		No action taken.	While all primary and secondary legislation are published in the Official Gazette, there is no obligation or existing practice to publish consolidated versions of legal texts free of charge.

II.5.2 RECOMMENDATIONS FROM THE 2024/2025 MONITOR REPORT

Recommendations from the monitoring cycle 2024/2025 for the Policy Development and Coordination area are listed below. The recommendations are grouped into three types, according to the estimated time needed for their implementation. Recommendations for which the assessed time for implementation is up to one year are labelled as short-term. Medium-term recommendations should be implementable within a period of one to three years. Long-term recommendations would likely require more than three years to be implemented.

- The Government should change practice and provide comprehensive information on the decisions it makes by publishing the complete agenda of the Government's sessions.
- The e-Government portal for public consultations should serve as the central point for all ongoing consultations. Particular emphasis should be placed on its role as the primary channel for submitting comments, rather than merely disseminating information.
- The Government should ensure consistent compliance with legal obligations for public consultations when drafting strategic documents and legislation. Current practice indicates that these requirements are not applied consistently, therefore the Government should systematically involve the interested public and ensure their input is duly considered in line with the law.
- The Government should ensure that gender impact assessment is systematically integrated into Regulatory Impact Assessments (RIA) for all draft laws, regulations, and strategic documents. Although RIA is widely applied in practice, the absence of gender analysis indicates a significant gap that should be addressed in line with existing and upcoming guidelines.
- Work of the working groups tasked with developing laws and strategies should be made more transparent by orderly publishing of materials from their sessions (meeting minutes, draft versions, conclusions).
- The Government should ensure that data from the Medium-Term and Annual Work Programme, the Programme for Accession of Montenegro to the EU, and related implementation reports are made available in open, machine-readable formats through the open data portal, rather than solely as PDF documents.

METHODOLOGY APPENDIX

For producing this report for Montenegro, the following research methods and tools were used for data collection and calculation of elements:

- Analysis of official documentation, data, and official websites
- Requests for free access to information
- Interviews with stakeholders and key informants
- Public perception survey.

Monitoring heavily relied on the analysis of official documents publicly available on the websites of administration bodies and on the data and information contained therein. However, in cases where the data was not available, researchers sent requests for free access to information to relevant institutions in order to obtain information necessary for awarding points for the elements.

Table x. FOI requests sent in Montenegro

Institution	Date of request	Date of reply to the request
Ministry of Labour, Employment and Social Dialogue	20.2.2026	26.3.2026
Secretariat-General of the Government	16.2.2026	16.3.2026
Ministry of Social Welfare, Family Care and Demography	20.2.2026	25.2.2026
Ministry of Education, Science and Innovation	20.2.2026	24.2.2026
Ministry of Economic Development	20.2.2026	3.3.2026
Ministry of Agriculture, Forestry and Water Management	20.2.2026	No reply

Interviews with key informants were conducted and used as a base for point allocation for elements 1.5, 2.14, 3.14, 3.23 and 4.11. Additionally, they were used to collect qualitative, focused, and in-depth inputs on monitored phenomena. Interviews with other stakeholders (such as representatives

of public administration bodies) were additionally used in the research to complement and verify otherwise collected data and findings. Selection of interviewees was based on purposive, non-probability sampling, targeting interlocutors based on their expertise on the topic or involvement in the observed processes.

Key informant interviews were comprised of a set of up to four questions where the participants expressed their agreement on a four-point scale: fully disagree, tend to disagree, tend to agree and fully agree. Points under elements 1.5, 2.14, 3.14, 3.23 and 4.11 were allocated if all key informants stated that they tend to agree/fully agree with the statement. Additionally, a set of open-ended questions was used, allowing for a discussion with interviewees and on-the-spot sub-questions rather than strictly following a predetermined format. Interviewees were given full anonymity in terms of personal information and institutional/organisational affiliation.

Table x. Interviews conducted in Montenegro

Date	Interviewees
05.03.2026.	Key informant 1 - CSO representative member
07.03.2026.	Key informant 2 - CSO representative member
09.03.2026.	Key informant 3 - Representative of the Montenegrin Employers Federation
12.03.2026.(2)	Key informant 4 and 5 - CSO representative members
13.03.2026.	Key informant 6 - CSO representative member
23.03.2026.	Key informant 7 - Representative of the Trade Union of the Forest and Hunting Grounds Management Administration of Montenegro
01.04.2026.	Key informant 8 - CSO representative member

List of interview questions

Element 1.5

The following questions are used for point allocation for element 1.5. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 0.75 points are allocated.

1. To what extent do you agree with the following statement: **Agenda items for the Government's sessions are transparent.**
 - a. fully disagree
 - b. tend to disagree
 - c. tend to agree
 - d. fully agree
2. To what extent do you agree with the following statement: **Minutes of the Government's sessions are transparent.**
 - a. fully disagree
 - b. tend to disagree
 - c. tend to agree
 - d. fully agree
3. To what extent do you agree with the following statement: **Decisions from the Government's sessions are transparent.**
 - a. fully disagree
 - b. tend to disagree
 - c. tend to agree
 - d. fully agree
4. To what extent do you agree with the following statement: **The Government publicly informs on its decisions via press releases.**
 - a. fully disagree
 - b. tend to disagree
 - c. tend to agree
 - d. fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. How are agenda items for Government sessions typically made known to the public or stakeholders?
2. Who usually has access to agenda items before sessions take place, and how does that affect transparency or participation?
3. How useful are the existing records of meeting minutes for understanding how decisions were reached? Additionally, does the current level of transparency of meeting minutes contribute to accountability?
4. Do you find that the decisions made at Government sessions are presented clearly and understandably to the public?
5. Are there types of decisions that are more or less transparent than others? If so, why do you think that is the case?
6. How would you describe the tone and level of detail of Government press releases — are they informative, selective, or general?
7. Do you think the press releases reflect the actual content and rationale of Government decisions?
8. In your opinion, what should a fully transparent and accountable Government decision-making process look like?

Element 2.14

The following questions are used for point allocation for element 2.14. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 1 point is allocated.

1. To what extent do you agree with the following statement:
Government's planning and reporting activities are transparent.
 - a. fully disagree
 - b. tend to disagree
 - c. tend to agree
 - d. fully agree
2. To what extent do you agree with the following statement:
Government's planning and reporting activities are timely.
 - a. fully disagree
 - b. tend to disagree
 - c. tend to agree
 - d. fully agree

3. To what extent do you agree with the following statement:
Government's planning and reporting activities are citizen friendly.
- a. fully disagree
 - b. tend to disagree
 - c. tend to agree
 - d. fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

- 1. Do Government planning documents explain and present clearly Government priorities, objectives, and expected results?
- 2. Are there opportunities for external stakeholders or the public to provide input during the planning stage? Does this practice vary among planning documents?
- 3. When it comes to timeliness, are there mechanisms to ensure that planning and reporting cycles are respected and aligned with budgetary or policy cycles?
- 4. Can you recall a case where the timeliness of reporting (or lack of it) had an impact on policy follow-up or accountability?
- 5. How effectively does the Government communicate the outcomes of its planning and reporting to citizens, in terms of conveying key messages and results? How do you assess citizens' awareness or interest in these documents?

Element 3.23

The following questions are used for point allocation for element 3.23. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 1 point is allocated.

1. To what extent do you agree with the following statement: **In the work of the working groups, lead ministries decide on my proposals/proposals of my organisation (accept them or reject them).**
- a. fully disagree
 - b. tend to disagree
 - c. tend to agree
 - d. fully agree

2. To what extent do you agree with the following statement: **In the work of the working groups, lead ministries provide reasons for decisions to accept or reject my proposals/proposals of my organisation.**
 - a. fully disagree
 - b. tend to disagree
 - c. tend to agree
 - d. fully agree
3. To what extent do you agree with the following statement: **In the work of the working groups, decisions and documents that came as the result of working groups' proceedings are available to me/my organisation.**
 - a. fully disagree
 - b. tend to disagree
 - c. tend to agree
 - d. fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. Reflecting on your experience in participating in working groups, how would you describe the overall atmosphere and dynamics of cooperation?
2. What was the usual process after you submitted a proposal, how was it recorded or followed up?
3. Can you recall examples of proposals that were accepted and others that were not? If there were examples of your proposals being rejected, can you identify if the reasons for rejecting proposals were usually linked to policy priorities, legal constraints, or other factors?
4. Did you feel that your input was considered equally to the inputs provided by representatives of government bodies?
5. Did you find that the lead ministry/institution was open to alternative perspectives or critical feedback?
6. Were there topics or issues where discussion seemed less open or pre-decided?
7. When it comes to decisions and outputs of the working group, when did you usually receive the documents (draft laws/policy documents, meeting minutes, preparatory material, conclusions, etc.): during the process, after each meeting, or only once the final product was published?

8. Were the documents clear enough to understand how different inputs were reflected in the final version?
9. What would you say distinguishes a genuinely inclusive working group from one that is only formally inclusive?

Element 4.11.

The following questions are used for point allocation for element 4.11. Point allocation is determined based on fully agree/tend to agree responses. If all key informants fully agree/tend to agree with the statement, 3 points are allocated.

1. To what extent do you agree with the following statement **During public hearings, parliamentary committees consider my proposals/proposals of my organisation.**
 - a. fully disagree
 - b. tend to disagree
 - c. tend to agree
 - d. fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. How often have you or your organisation taken part in such hearings, and in what policy areas?
2. In your experience, do all participants have equal opportunities to express their opinions?
3. When you or your organisation submitted comments or recommendations, how were they received and treated by members of the committee?
4. After a hearing, do you receive any follow-up information on how your contributions were treated?
5. Do you think that the current feedback mechanisms are sufficient to ensure accountability of parliamentary committees.

The public perception survey is based on a questionnaire targeting the general public (18+ permanent residents) of Montenegro. The survey was conducted through computer-assisted telephone interviewing (CATI) in combination with computer-assisted web interviewing (CAWI).

The survey was conducted between 1st and 12th of February 2025. The margin of error for the sample of 1010 citizens is $\pm 3.51\%$, at the 95% confidence level.

Table X: public perception survey questions in the area of Policy Development and Coordination

Statement 1					
I have the opportunity to participate in developing laws and strategies of the Montenegro.	Strongly disagree	Disagree	Agree	Strongly agree	<i>Don't know/ No opinion</i>

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