Independent Reporting Mechanism

Results Report:
Montenegro 2022-2024

Open
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Partnership

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Executive Summary

Montenegro's third action plan included ambitious commitments around public participation in policy-making, access to information on the work of the government, and transparency of European Union (EU) projects. However, weak political commitment, poor inter-institutional cooperation, and limited civil society engagement negatively impacted the implementation of the action plan. Future action plans could benefit from stronger governmental oversight and civil society involvement, particularly during implementation.

Implementation

Montenegro's third action plan had 20 commitments, covering citizen participation, open data, free access to information, fiscal transparency, and anti-corruption. Many commitments supported Montenegro's EU accession and aligned with strategic documents such as the Public Administration Reform Strategy 2022-2026, the Cooperation Strategy of State Administration Bodies and Non-Governmental Organizations 2022-2026, and the Digital Transformation Strategy 2022-2026. Seven commitments focused on local self-government units (LSGUs).[1] This structure led to some duplication, with similar or identical initiatives planned at both levels, potentially fragmenting implementation efforts due to insufficient coordination.[2]

Despite some early progress in specific areas, most commitments were either not started or were partially completed. The commitments on citizen participation went mostly unfulfilled, including improving the e-participation portal (Commitment 1). Similarly, Commitment 5 on transparency of the use of EU funds saw only limited completion.

Commitment 7 resulted in the government's decision to publish the full agenda of its sessions—excluding classified items—along with other working materials from meetings. Commitment 3 involved efforts to raise public business awareness to engage in policy-making (Commitment 3) and the promotion of the e-petitions platform of the Parliament (Commitment 3). In addition, Commitment 9 resulted in improved accessibility of the Parliament's website for individuals with disabilities.[3]

Participation and Co-Creation

The co-creation process of the third action plan was more structured and showed higher engagement than the previous action plan (2018-2021). The Ministry of

At a Glance

LEVEL OF COMPLETION

2/20	**Complete or substantially complete commitments**

EARLY RESULTS

3/20	**Commitments with early results**
0/20	**Commitments with significant results**

KEY OBSERVATIONS

- Government restructuring affected the continuity of the OGP process and the implementation of the action plan
- The 2022 cyberattack on government websites undermined the implementation of commitments on open data and digital government
- Reduced cooperation between the government and civil society and the international organizations during implementation negatively affected coordination and monitoring of the action plan

Compliance with minimum requirements during implementation: No

Public Administration (MPA), which oversees the OGP process, carried out a citizen survey to gather ideas for the action plan, while the National Democratic Institute (NDI) and the civil society organization Institut Alternativa assisted the MPA in organizing public consultations in several municipalities. However, Montenegro's multi-stakeholder forum, the Operations Team (OT), was inactive during most of the co-creation process after the OT's mandate expired in July 2022. The government was unable to fill vacancies due to the existence of a caretaker government following elections in August 2022.[4] Civil society's influence during the implementation phase is unclear. The MPA did not provide regular updates on Montenegro's OGP website on the completion of the commitments, reportedly due to the 2022 cyberattack on government websites. Many civil society stakeholders remained skeptical of the OGP process as a driver of reform, leading to their disengagement. In April 2025, the MPA initiated a call for membership in the renewed OT for the co-creation of the fourth action plan.[5]

Implementation in Context
Government transitions and shifting political priorities disrupted the implementation of the action plan. The reorganization of government bodies complicated coordination, as ministries and agencies adjusted to new mandates, delaying reforms and altering previously agreed-upon priorities. Weak interagency cooperation slowed decision-making and hindered collaboration on cross-cutting commitments. Additionally, insufficient financial and human resources constrained implementation. Without the engagement of civil society and other international organizations, many commitments lacked external support, technical expertise, and oversight, stalling their progress.

Despite these challenges, Montenegro expanded open government efforts at the local level, with the municipalities of Bar, Plav, and Žabljak joining OGP Local in 2024.[6] These municipalities are implementing commitments on anti-corruption, fiscal openness, climate action, and public participation, offering a model for opening government in Montenegro.

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[1] Open Government Partnership, IRM Montenegro Action Plan Review 2022-2024, 13 July 2023, https://www.opengovpartnership.org/documents/montenegro-action-plan-review-2022-2024/

[2] Ivana Nedovic (Union of Municipalities), interview by the IRM, 5 March 2025.

[3] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

[4] Open Government Partnership, IRM Montenegro Action Plan Review 2022-2024, 13 July 2023, https://www.opengovpartnership.org/documents/montenegro-action-plan-review-2022-2024/

[5] Ministry of Public Administration, Public call for nomination of NGO representatives to the Open Government Partnership Operational Team, 14 April 2025, https://www.gov.me/clanak/javni-poziv-za-predlaganje-predstavnika-nevladine-organizacije-u-operativni-tim-partnerstva-za-otvorenu-upravu

[6] OGP Local, https://www.opengovpartnership.org/ogp-local/

Section I. Key Observations

The key observations below offer reflections from Montenegro's third action plan cycle. These lessons aim to support Montenegro's future action plans and broader open government journey.

Observation 1: Government restructuring affected the continuity of the OGP process and the implementation of the action plan

The current Government of Montenegro was elected on 31 October 2023,[1] resulting in a reorganization of the state apparatus and reallocation of employees.[2] These structural changes shifted the priorities of government bodies and adjustments to the criteria for the action plan during the term of the previous government in 2022.[3] For example, commitments 1, 2, and 3 on citizen participation as well as Commitment 11 (transparency and use of EU funds), did not achieve their intended outcomes due to the absence of legal reforms, insufficient resources, and inadequate interagency coordination.

The implementation of open government reforms requires institutional stability, long-term planning, and cross-government collaboration that extends beyond political cycles. In the future, the MPA and civil society stakeholders could take steps to mitigate the impact of elections and political transitions on the implementation of open government reforms.

Observation 2: The 2022 cyberattack on government websites undermined the implementation of commitments on open data and digital government

In August 2022, a cyberattack disrupted the government's online platforms, crippling much of the public administration's digital infrastructure and exposing vulnerabilities in the country's digital security framework.[4] The attack targeted ministries, the Property Administration, the Revenue and Customs Administration, and the courts, encrypting critical data and files to demand a ransom. Montenegro's open data portal remained inoperable for over two years, until a new version was launched in December 2024, preventing the implementation of OGP commitments related to open data and digital governance. The absence of a functioning platform limited public access to crucial datasets and slowed progress toward greater government openness and accountability.[5] The attack underscored the need for stronger cybersecurity measures to protect open government reforms and ensure the resilience of digital governance systems.

In December 2024, a new open data portal was introduced. It features nearly 400 datasets, categorized by sectors.[6] A key improvement is the expectation that data will be available in machine-readable formats, allowing users to visualize and compare information more effectively. While the early signs of operation are promising, some institutions fail to publish adequate information as required by law.[7] The government could ensure the portal meets its intended purpose and implement the unfulfilled commitments on open data from the third action plan.

Observation 3: Reduced cooperation between the government and civil society and the international organizations during implementation negatively affected the coordination and monitoring of the action plan

During the co-creation process, the Ministry of Public Administration (MPA) received technical support from Institut Alternativa and the National Democratic Institute (NDI) in organizing consultations and outreach. However, the implementation phase lacked meaningful engagement with civil society and international organizations. The inactivity of the multi-stakeholder forum (the Operations Team - OT) left no structured platform for civil society to provide feedback or monitor progress on implementation. Despite government claims of ongoing consultations during the implementation period, the MPA did not regularly update Montenegro's OGP website with information on implementation. The absence of a space for collaboration diminished civil society's interest in participating in the implementation of the action plan.[8]

Without the active support and engagement from CSOs, donors, and international organizations, the implementation process lost momentum. For future action plans, the MPA should continue to actively engage CSOs and international organizations during the implementation phase, not just during the co-creation process. Proactive cooperation with civil society and the international community can enhance the quality of reforms, ensure public oversight, and help address complex governance challenges. Reviving the OT could help restore confidence and foster a more open and participatory OGP process.

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[1] Government of Montenegro, Organizational units, https://www.gov.me/en/organizational-units

[2] Lidija Ljumovic (OGP contact point, Directorate for Innovation, Openness of Public Administration and Cooperation with NGOs, Ministry of Public Administration), interview by the IRM, 20 January 2025.

[3] Bojana Vujovic (Ministry of Public Administration), correspondence with the IRM, 17 February 2025.

[4] Reuters, Montenegro's state infrastructure hit by cyber attack - officials, 26 August 2022, https://www.reuters.com/world/europe/montenegros-state-infrastructure-hit-by-cyber-attack-officials-2022-08-26/

[5] Bojana Vujovic (Ministry of Public Administration), interview by the IRM, 27 January 2025.

[6] BIRN, BIRN Montenegro Hosts Launch of Government Open Data Portal, 16 December 2024, https://birn.eu.com/news-and-events/birn-montenegro-hosts-launch-of-government-open-data-portal/

[7] Vuk Maras (BIRN Montenegro), interview by the IRM, 11 March 2025.

[8] Marko Sošić (Institut Alternativa Podgorica), interview by the IRM, 21 January 2025.

Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

Table 1. Commitments with Early Results

Commitment 7: Improved transparency of the government sessions and discussion materials

Commitment 7: Increase the availability of data on the work of the Government and government bodies

Implementers: General Secretariat of the Government

Context and Objectives

This commitment aimed to enhance public access to key government materials, including the agenda and session materials of the government, irrespective of the session format. Additionally, it aimed to provide information on the work of the government's advisory and working bodies, thereby fostering a culture of openness and accountability.

Early Results: Moderate Results

The commitment's implementation has been limited, resulting in moderate results. Of the six activities, two were completed. The General Secretariat of the Government now publishes the full agenda of government sessions (excluding classified items) and the materials and other state documents from government sessions, including those held via teleconference.[1] These documents provide detailed information about certain processes and decisions, improving public insight into government deliberations.[2] However, without further institutionalization, these efforts may not be sustained in the long term.

Several key aspects of the commitment remain unfulfilled. The by-law regulating the publication of government session materials was not amended. Materials from these sessions are not available in a unified, machine-readable format, limiting their accessibility and usability for civic actors and researchers. Furthermore, the General Secretariat of the Government has not published information about the government's working bodies or created a database of government advisory body members.[3] According to a representative of the Balkan Investigative Reporting Network (BIRN), there is little evidence that the General Secretariat of the Government intends to release information on government activities that could expose questionable practices by public officials.[4]

Looking Ahead

The General Secretariat of the Government could focus on completing the remaining activities, including publishing minutes from advisory and working bodies and creating the database of

advisory groups. The General Secretariat of the Government could also focus on publishing government documents in machine-readable formats (in addition to signed PDFs) and consulting CSOs and data users to improve the quality of the published materials. The General Secretariat of the Government could also learn from other OGP member states that have successfully embedded open government practices. For example, in Estonia's fourth OGP action plan (2018-2020), the Parliament (Riigikogu) made its minutes available on average within three days after each sitting and began publishing information on its work as machine-readable open data.[5]

[1] Government of Montenegro, Information about government sessions, https://www.gov.me/vijesti?sort=published_at&tags=239&at=1&at=8&at=10

[2] For example, see: Government of Montenegro, Draft plan for summer tourist season 2025, 3 April 2025, https://www.gov.me/dokumenta/62b36ffc-18bf-4017-bcbf-f81c57e4c5e1

[3] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

[4] Vuk Maras (BIRN Montenegro), interview by the IRM, 11 March 2025.

[5] Open Government Partnership, Estonia, https://www.opengovpartnership.org/members/estonia/

Section III. Participation and Co-Creation

The co-creation of Montenegro's third action plan improved on the previous action plan cycle through citizen surveys and more public consultations. However, the impact of civil society input was unclear. The implementation period saw less engagement from civil society stakeholders and a lack of regular implementation updates from the government.

OGP in Montenegro

The Ministry of Public Administration (MPA) coordinates the OGP process in Montenegro through the Directorate for Innovation, Openness of Public Administration, and Cooperation with NGOs. The third action plan included commitments from numerous state institutions across different levels of government, such as the General Secretariat of the Government, Parliament, the Union of Municipalities, the Ministry of Finance, the Ministry of Justice, and the Ministry of European Affairs. Independent agencies such as the Council for Competitiveness and the Agency for Prevention of Corruption contribute to ensuring the plan's execution in areas related to access to EU funds and integrity. The third action plan was supported by international organizations such as the United Nations Development Programme (UNDP) and the National Democratic Institute (NDI), which helped organize consultations during the co-creation process, implemented certain activities, and provided technical expertise to the government.[1]

The Operations Team (OT), Montenegro's multi-stakeholder forum, was inactive during much of the co-creation and implementation of the third action plan. Without a structured platform, dialogue between government and civil society was ad hoc and inconsistent. Institut Alternativa, a leading CSO in Montenegro, was skeptical of the OT's ability to influence government decision-making.[2]

The MPA's OGP webpage provides minimal information about the OGP process. The MPA published an end-of-term self-assessment report for the third action plan on 26 March 2025.[3] The report provides a basic overview of the completed activities but does not include sufficient evidence or reflection on the process. Besides this report, the MPA's webpage does not provide sufficient information on the status of the commitment or reflections on challenges encountered during implementation. The absence of information restricted the ability of civil society and the public to monitor progress.

Action Plan Co-Creation

The MPA led the co-creation process for the third action plan, with support from NDI and Institut Alternativa. The co-creation process lasted more than a year (October 2021 to December 2022) and included online and in-person consultations, citizen surveys, interviews with CSOs, and three public hearings on the draft action plan.[4] The OT was largely inactive after the expiration of its mandate in July 2022 and the inability to fill vacancies when Montenegro had a caretaker government following elections in August 2022.[5] Some CSOs found the administrative procedures for joining the OT overly burdensome, discouraging them from applying.[6]

The co-creation process improved on the previous action plan cycle (2018-2021), by engaging more citizens through surveys and outreach outside of the capital.[7] The government accepted

input from civil society and the public through a variety of channels, including a citizen survey and consultations in municipalities. However, civil society expressed concerns about the extent to which their inputs influenced the final commitments. Institut Alternativa, for example, argued the commitments on anti-corruption and freedom of information were insufficient in addressing gaps in these areas, and their proposal on beneficial ownership transparency was not included in the action plan. The MPA documented stakeholder input and published responses to comments from the public hearing. However, the minutes of some internal consultations between government bodies were not published.[8]

Participation During Implementation

Civil society had little involvement in the implementation period. The OT remained inactive and there was no other dedicated space for dialogue between government and non-government actors to discuss the progress of the action plan. In addition, the MPA did not update the OGP website regularly with evidence of implementation of the commitments, reportedly because of the 2022 cyberattack.[9] Government restructuring and inconsistent political engagement hindered the implementation of commitments and undermined the credibility of the OGP process.[10] A key challenge was the lack of trust among CSOs for the OGP process, discouraging proactive engagement.[11] Establishing a functional multi-stakeholder forum and publishing regular implementation updates could strengthen civil society's role and foster meaningful participation in the OGP process.

The IRM uses the OGP Participation and Co-Creation Standards to assess countries' participatory practices throughout the action plan cycle.[12] Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.[13] Due to a grace period, a country's failure to comply with the minimum requirements does not currently have implications for their OGP status.

Table 2. Compliance with Minimum Requirements

Minimum requirement	Co-creation	Implementation
1.1 Space for dialogue: The multi-stakeholder forum, the Operations Team (OT), has been inactive since its mandate expired in July 2022. The number and frequency of government-civil society meetings (either through the framework of the OT or outside of it) during the implementation of the third action plan is unclear. Montenegro's previous OGP webpage has information on the OT's composition and mandate, as well as the government decision establishing the OT in 2018 during the second action plan.[14]	Yes	No
2.1 OGP website: The MPA maintains an OGP webpage that provides information about the third action plan, news on OGP, and the co-creation of the fourth action plan.[15]	Yes	Yes
2.2 Repository: The repository includes information about the co-creation process. The MPA published an end-of-term self-assessment report on 26 March 2025.[16] Standard 2 requires the repository be updated at least twice a year with documents related to the OGP process (co-creation and implementation of commitments). Montenegro's repository was not updated in 2023 or 2024, so the country did not meet this standard during the implementation period of the third action plan.	Yes	No

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3.1 Advanced notice: See the Action Plan Review[17]	Yes	Not applicable
3.2 Outreach: See the Action Plan Review	Yes	Not applicable
3.3 Feedback mechanism: See the Action Plan Review	Yes	Not applicable
4.1 Reasoned response: See the Action Plan Review	Yes	Not applicable
5.1 Open implementation: The MPA and NDI Montenegro took part in four meetings during the implementation of the third action plan. On 17 October 2023, the MPA and the Minister of Public Administration informed the NDI Montenegro about the work of the MPA in strengthening the OGP process and public administration reform.[18] The MPA and NDI Montenegro organized conferences on 7 and 11 December 2023 on improving transparency in the public administration in Montenegro.[19] On 30 May 2024, the MPA and NDI Montenegro held a discussion on the implementation of the third action plan, the priorities and co-creation process of the next plan, as well as the status of the OT.[20] It is not clear which Montenegrin civil society stakeholders attended these meetings and conferences in attendance or if stakeholders were able to comment on implementation progress of the third action plan. Moreover, only one meeting was held during the second year of implementation (2024). Therefore, the IRM assesses that the available evidence fell short of the minimum requirement 5.1, which states "The forum (or government in its absence) organizes at least two meetings per year with civil society to present the results of the implementation of the action plan and obtain comments."	Not applicable	No

[1] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

[2] Marko Sošić (Institut Alternativa Podgorica), interview by the IRM, 21 January 2025.

[3] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024, https://www.gov.me/dokumenta/578d7ab4-5ec9-48ed-99bf-a80cd321c7ac

[4] Lidija Ljumovic (OGP contact point, Directorate for Innovation, Openness of Public Administration and Cooperation with NGOs, Ministry of Public Administration), interview by the IRM, 20 January 2025.

[5] Open Government Partnership, IRM Montenegro Action Plan Review 2022-2024, 13 July 2023, https://www.opengovpartnership.org/documents/montenegro-action-plan-review-2022-2024/

[6] Marko Sošić (Institut Alternativa Podgorica), interview by the IRM, 21 January 2025.

[7] Open Government Partnership, IRM Montenegro Action Plan Review 2022-2024, 13 July 2023, https://www.opengovpartnership.org/documents/montenegro-action-plan-review-2022-2024/

[8] Open Government Partnership, IRM Montenegro Action Plan Review 2022-2024, 13 July 2023, https://www.opengovpartnership.org/documents/montenegro-action-plan-review-2022-2024/

[9] Bojana Vujovic (Ministry of Public Administration) correspondence with the IRM, 17 February 2025.

[10] Slavica Biljarska (NDI - Montenegro), interview by the IRM, 18 February 2025.

[11] Marko Sošić (Institut Alternativa Podgorica), interview by the IRM, 21 January 2025.

[12] Open Government Partnership, OGP Participation and Co-Creation Standards, 2021, https://www.opengovpartnership.org/ogp-participation-co-creation-standards/

[13] Open Government Partnership, IRM Guidelines for the Assessment of Minimum Requirements, 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf

[14] Open Government Partnership Montenegro, Document repository, https://www.otvorenauprava.me/dokumenta/

[15] Government of Montenegro, Open Government Partnership, https://www.gov.me/mju/partnerstvo-za-otvorenu-upravu

[16] Government of Montenegro, Report on the consultation of the interested public on the National Action Plan for the implementation of the Open Government Partnership initiative in Montenegro, 26 March 2025, https://www.gov.me/dokumenta/c365ebd5-5977-4c12-bb9b-7275b24567e0

[17] Open Government Partnership, IRM Montenegro Action Plan Review 2022-2024, 13 July 2023, https://www.opengovpartnership.org/documents/montenegro-action-plan-review-2022-2024/

[18] See https://www.gov.me/clanak/promocija-dobrih-praksi-zemalja-clanica-ogp-a

[19] See https://www.gov.me/clanak/podrska-otvorenoj-i-transparentnoj-upravi and https://www.gov.me/clanak/od-pristupa-informacijama-do-otvorene-vlade

[20] See https://www.gov.me/clanak/nedjelja-otvorene-uprave-open-gov-week-odrzana-diskusija-o-partnerstvu-za-otvorenu-upravu-ogp-u-crnoj-gori

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.[1]

The IRM products provided during a national action plan cycle include:
- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.[2] The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
  - improving practices, policies, or institutions governing a policy area or within the public sector,
  - enhancing the enabling environment to build trust between citizens and the state.

- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
  - o improving practices, policies, or institutions governing a policy area or within the public sector, or
  - o enhancing the enabling environment to build trust between citizens and the state.

- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
  - o improving practices, policies, or institutions governing a policy area or within the public sector, or
  - o enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Borjan Gjuzelov, PhD, and was reviewed by Ernesto Velasco, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM's International Experts Panel (IEP).[3] For more information, refer to the IRM webpage[4] or the glossary of IRM and OGP terms.[5]

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[1] For definitions of OGP terms, such as co-creation and promising commitments, see OGP Glossary, https://www.opengovpartnership.org/glossary/

[2] The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses "Potential for Results" and "Early Results" at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

[3] Open Government Partnership, IRM, International Experts Panel, https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/

[4] Open Government Partnership, IRM Overview, https://www.opengovpartnership.org/irm-guidance-overview/

[5] Open Government Partnership, OGP Glossary, https://www.opengovpartnership.org/glossary/

Annex I. Commitment Data[1]

Commitment 1: Improving the functionality of the e-Participation portal	
Verifiable: Yes **Does it have an open government lens?:** Yes - This commitment was clustered as: Participation of citizens (Commitments 1, 2, and 3 of the action plan) **Potential for results:** Substantial	**Completion:** Limited **Early results:** No Notable Results

This commitment aimed to improve participation of citizens, civil society, and other interested stakeholders in policy-making processes and to increase the use of the e-participation portal. It would standardize the quality of public hearings, and encourage participatory policy-making.[2]

According to the self-assessment report only one of the three activities was implemented. With support of United Nations Development Programme (UNDP), the Ministry of Public Administration (MPA) analyzed the functionality of the e-participation portal, based on a user satisfaction survey. The purpose of this study was to measure citizens' attitudes and preferences regarding the use of electronic services and to provide suggestions for improvement. The results highlighted that a majority of citizens are familiar with the availability of e-services, while on average one in five respondents is satisfied with the use of various e-portals of national institutions.[3] The MPA did not start the other two activities (adoption of a better structure and content of the e-participation portal for easier tracking of public consultations and development of advanced functionalities for statistics).[4]

Commitment 2: Improvement of monitoring the quality of public consultations	
Verifiable: Yes **Does it have an open government lens?** Yes - This commitment has been clustered as: Participation of citizens (Commitments 1, 2, and 3 of the action plan) **Potential for results:** Substantial	**Completion:** Limited **Early results:** No Notable Results

This commitment aimed to strengthen the normative framework around public hearings and monitoring user satisfaction with public hearings. It also entailed reporting on the steps taken by ministries to include different social groups on which law or strategy may have an impact, and reporting on the number of women's organizations that took part in public hearings. The Rules of Procedure for the Government—intended to institutionalize public hearings—were drafted but not adopted. The Directorate for Human Resources and the MPA did not organize the trainings on quality control in public hearings due to limited human resources.[5]

Commitment 3: Better informing and educating the public on opportunities to participate in policy-making

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • This commitment has been clustered as: Participation of citizens (Commitments 1, 2, and 3 of the action plan) • **Potential for results:** Substantial	• **Completion:** Limited • **Early results:** Moderate Results

This commitment aimed to promote public involvement in decision-making. It included, among others, a national campaign on the possibilities of public participation, workshops on civic activism, a hub for students to research public policies, and promoting the use of the Parliament's e-petition platform.

Three of six milestones were completed. The Council for Competitiveness prepared a report on private sector participation in the legislative process[6] and launched an information campaign on opportunities for private sector engagement in policy development. These initiatives were expected to raise awareness and help chambers of commerce, business associations, and entrepreneurs to have a more structured role in shaping economic policies.[7]

The Parliament of Montenegro promoted the "Parliament of Montenegro e-petitions" platform[8] on the Parliament's website[9] and social media channels (Facebook, Instagram, and Twitter/X), and in a video campaign on the Parliamentary Channel.[10] Additionally, informational brochures were distributed at parliamentary events to raise citizens' awareness of opportunities to submit petitions and participate in policy-making.[11] These efforts could serve as a basis for increased public involvement in the work of the Parliament.

The three activities under the MPA and the General Secretariat of the Government were not completed. There is no evidence that a national campaign was launched to inform citizens about public participation opportunities or conducted workshops on civic activism. Additionally, the student hub was not created.[12] A key constraint to implementation was shifting government priorities due to political transitions. Additionally, the lack of a legal or regulatory framework to mandate citizen engagement beyond the e-petition platform limits the potential for sustained impact.

Embedding citizen and business participation mechanisms into governance requires clear procedural guidelines, consistent promotion, and the allocation of resources. This would help make participation not subject to shifting political priorities but firmly integrate it into governance structures. Future action plans could continue unimplemented activities, such as the national participation campaign, civic activism workshops, and the student hub. Additionally, formalizing requirements for public consultations, private sector engagement, and youth participation through legal or regulatory changes could help sustain these reforms. Future efforts could also include monitoring the number of petitions submitted, the extent of private sector contributions to policy-making, and the responsiveness of government bodies.

Commitment 4: Encourage youth participation in the implementation of green policies

• **Verifiable:** Yes	• **Completion:** Not Started

• **Does it have an open government lens?** Yes • **Potential for results:** Modest	• **Early results:** No Notable Results

Under this commitment, the Ministry of Ecology, Spatial Planning and Urbanism and the Ministry of Sports and Youth aimed to organize workshops with young people on developing green policies at the local level. According to the self-assessment report, this commitment was not started due to an unclear division of responsibilities and lack of cooperation between the two responsible ministries.[13]

Commitment 5: Promotion and improvement of open data policy and practices

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • This commitment was clustered as: Open data (Commitments 5 and 16 of the action plan) • **Potential for results:** Modest	• **Completion:** Limited • **Early results:** No Notable Results

This commitment aimed to enhance the visibility and accessibility of Montenegro's open data portal. The MPA planned to develop promotional visuals and videos, recognizing innovative open data initiatives, organizing an annual "Open Data Day," and engaging citizens in identifying new datasets for publication. Additionally, the MPA sought to require public institutions to adopt annual open data plans and publishing schedules.

The only confirmed implementation was for consultations with citizens, open data users, and relevant state institutions on open data publication.[14] There is no evidence that the MPA developed a promotional video for the open data portal (activity 5.1), organized annual awards for outstanding open data initiatives (activity 5.2), or published a calendar for open data publication (activity 5.4). Due to the lack of amendments to the Law on Free Access to Information during the reporting period, the obligation to adopt and report on annual open data plans (activity 5.3) was not implemented.[15] The MPA attributed the limited progress to the recovery from the August 2022 cyberattack, which affected the functionality of the open data portal, as well as the absence of necessary legal reforms of free access to information.[16]

Commitment 6: Improve participatory monitoring of the Law on Free Access to Information

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Modest	• **Completion:** Limited • **Early results:** No Notable Results

This commitment aimed to improve oversight of the implementation of the Law on Free Access to Information. It involved holding public consultations on the annual report on access to information in Montenegro and publishing information on the implementation of the

sanctions envisaged in the law. The commitment did not envision legal amendments that would address tax and trade secrets which state institutions often use to restrict access to public information.[17] Although the government drafted amendments that would address these gaps in 2021 and 2022, due to lack of parliamentary support they were never passed.[18] The Law was again submitted to the Parliament in January 2025.[19]

The implementation of this commitment was limited. According to the self-assessment report, the MPA conducted annual consultations and developed recommendations on the quality and scope of the annual report on the implementation of the Law.[20] However, there are no details about the number of consultations or the scope of the recommendations.

Commitment 7: Increase the availability of data on the work of the government and government bodies

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Substantial	• **Completion:** Limited • **Early results:** Moderate Results

This commitment is assessed in Section II above.

Commitment 8: Participatory monitoring of the exchange of data ex officio, with proposed conclusions for improving the implementation

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Modest	• **Completion:** No Evidence Available • **Early results:** No Notable Results

This commitment aimed to enhance data sharing between state institutions and improve digital interoperability. It focused on analyzing key services missing from the Unified Information System for Electronic Data Exchange, monitoring ex officio data exchanges, and reporting on ways to improve the process. There is no evidence in the self-assessment report that these activities were completed.[21]

Commitment 9: Improve digital accessibility standards for people with disabilities

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • This commitment was clustered as: Digital accessibility (Commitments 9 and 17 of the action plan) • **Potential for results:** Modest	• **Completion:** Limited • **Early results:** Moderate Results

This commitment aimed to improve the accessibility of government websites for persons with disabilities. It involved training civil servants on accessibility standards and improving the accessibility of government websites (including Parliament).

As a result of this commitment, the Parliament of Montenegro's website now features a screen reader, adjustable contrast settings, customizable text size and spacing, special fonts for dyslexia, and options to hide images and animations. Additionally, documents on the Parliament's website are now published in formats that are accessible for individuals with visual impairments. The integration of the UserWay widget on the website allows users to modify the interface to suit their needs, demonstrating a commitment to digital inclusivity.[22] These improvements are a good example for other public institutions.

The milestones led by the MPA were not completed. The ministry did not conduct training for civil servants due to limited human resources and the prioritization of other compulsory trainings (not connected to OGP). Additionally, the ministry has not implemented improvements to make information accessible to visually impaired, deaf, and non-verbal individuals.[23]

Future efforts in this area could directly engage organizations representing people with disabilities to ensure that accessibility measures align with their needs. The IRM recommends aligning Montenegro's approach to accessibility with relevant EU legislation, such as the Web Accessibility Directive.[24] The government could also consider legal and regulatory changes to ensure that accessibility standards extend beyond individual initiatives.[25]

Commitment 10: Increase the transparency of data on the content and execution of the state budget

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • This commitment was clustered as: Budget transparency (Commitments 10 and 14 of the action plan) • **Potential for results:** Modest	• **Completion:** Not Started • **Early results:** No Notable Results

Under this commitment, the Ministry of Finance aimed to publish a 'citizens budget' of the national budget on a permanent basis. This commitment was not started. According to the self-assessment report, this commitment will be implemented with support of EU funding.[26]

Commitment 11: Encourage transparency and use of EU funds

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Substantial	• **Completion:** Limited • **Early results:** No Notable Results

This commitment aimed to inform the public about funding opportunities related to green policies and the European Green Deal while enhancing the disclosure of data on EU-funded projects.

Implementation of this commitment was limited. The implementing ministries did not hold educational workshops on green policies and organized only one EU Info Day for small and medium-sized enterprises, which was conducted in 2023 (originally to take place monthly). The Ministry of European Affairs conducted three training courses on EU project proposal development for small and medium businesses with the support of UNDP and the SMART ANDRIA Blue Growth program.[27] The Ministry of European Affairs started to build a public database on EU-funded projects and expects to finalize the database when additional EU funding is secured.[28]

Commitment 12: Establish a legal framework for the protection of whistleblowers

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Modest	• **Completion:** Not Started • **Early results:** No Notable Results

This commitment envisioned passing amendments to the Law on the Prevention of Corruption for better protection of whistleblowers to align Montenegro's legislation with the EU Directive 2019/1937 on the protection of persons who report violations of EU law. The commitment was not implemented. Parliament adopted a new Law on Prevention of Corruption in June 2024 but, according to a non-governmental expert, there are inadequate provisions for the protection of whistleblowers.[29] The Venice Commission's Urgent Opinion on the law noted that limiting whistleblowing to "threats to the public interest that indicate the existence of corruption" could discourage people from reporting breaches of law which do not contain an element of corruption, and lead to misunderstandings on the side of institutions required to act on such reports and/or protect whistleblowers.[30] The Venice Commission recommended Montenegro to develop a separate Law on Whistleblowing.

Commitment 13: Improve the quality of application of ethics and integrity standards in state administration

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • This commitment was clustered as: Ethics and integrity in public administration (Commitments 13 and 18 of the action plan) • **Potential for results:** Modest	• **Completion:** Substantial • **Early results:** No notable results

The commitment aimed to enhance civil servants' awareness of ethical standards and integrity by conducting training and publishing annual reports on the implementation of integrity plans by state institutions.

The implementation of this commitment was substantial. The Agency for the Prevention of Corruption conducted two trainings in 2023 and 2024 for civil servants on ethics and integrity, and encouraged institutions to publish their annual reports on the implementation of integrity plans, in addition to the legally mandated publication of the plans.[31] According to the self-assessment report, the publication of integrity plans is an established practice among more than half of the institutions.[32] However, the extent to which institutions are now publishing annual implementation reports on their plans is unclear. As a result, there is little evidence that this commitment brought notable results.

Commitment 14: Improve the transparency of data on budget execution of local self-government units

- **Verifiable:** Yes
- **Does it have an open government lens?** Yes
- This commitment was clustered as: Budget transparency (Commitments 10 and 14 of the action plan)
- **Potential for results:** Modest

- **Completion:** Not started
- **Early results:** No Notable Results

The commitment aimed to improve budget transparency at the local level. It envisioned developing guidelines and training on publishing data on local budgets in open format and as simple visual presentations (citizens' budgets) as well as organizing awards for innovations in fiscal transparency in local self-government units (LSGUs).

Implementation did not begin. The government deemed the development of guidelines for publishing local budget distribution data unnecessary, as the Law on Financing Local Self-Government already specifies the type and frequency of budgetary information that LSGUs must publish. As the guidelines were unnecessary, the training and awards were not implemented.[33]

Commitment 15: Improve the transparency of local parliaments

- **Verifiable:** Yes
- **Does it have an open government lens?** Yes
- **Potential for results:** Modest

- **Completion:** Limited
- **Early results:** No Notable Results

This commitment aimed to improve the transparency of the sessions of LSGU assemblies. It entailed analyzing the current state of transparency of assemblies, creating guidelines for improving transparency, and assessing the necessary technical changes and financial resources for broadcasting sessions of LSGU assemblies. According to the self-assessment

report, this commitment was not finished as planned, but a similar guidebook was prepared with support from the OECD and EU's Support for Improvement in Governance and Management (SIGMA) with guidelines for transparency at the local level.[34]

Commitment 16: Promote open data at the local level

- **Verifiable:** Yes
- **Does it have an open government lens?** Yes
- This commitment was clustered as: Open data (Commitments 5 and 16 of the action plan)
- **Potential for results:** Modest

- **Completion:** Not Started
- **Early results:** No Notable Results

This commitment aimed to improve the publication and reuse of open data by LSGUs. It involved workshops for staff in LSGUs on open data disclosure and organizing an "open data caravan" with civil society in three regions. Montenegro's open data portal went offline after a cyberattack on government websites in August 2022. As a result, all activities under this commitment were postponed.[35] With the launch of the new portal in December 2024, these activities are expected to resume.[36]

Commitment 17: Improve the digital accessibility of municipal websites

- **Verifiable:** Yes
- **Does it have an open government lens?** Yes
- This commitment was clustered as: Digital accessibility (Commitments 9 and 17 of the action plan)
- **Potential for results:** Modest

- **Completion:** Not Started
- **Early results:** No Notable Results

This commitment aimed to improve the accessibility of LSGU websites for people with disabilities. It envisioned developing recommendations for LSGU websites on accessibility and promoting good practices of digital accessibility. The MPA had already developed the recommendations in cooperation with the Association of Blind People of Montenegro in 2017[37] and 2019[38] prior to the action plan. No additional guidelines were produced during the action plan period and no promotional activities were carried out.[39]

Commitment 18: Improve the awareness of local officials about standards of ethics and integrity

- **Verifiable:** Yes
- **Does it have an open government lens?** Yes
- This commitment was clustered as:

- **Completion:** Limited
- **Early results:** No Notable Results

Ethics and integrity in public administration (Commitments 13 and 18 of the action plan) • **Potential for results:** Modest	

This commitment aimed to train the staff of LSGUs on ethics and integrity and form councils to monitor the implementation of integrity plans of each LSGU. The Union of Municipalities organized one of the planned three integrity trainings.[40] There is no evidence that LSGUs formed councils to monitor their integrity plans.

Commitment 19: Strengthen the role of local communities in the participation of citizens in local decision-making

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Modest	• **Completion:** Substantial • **Early results:** Moderate Results

This commitment aimed to improve citizen participation in local decision-making. It involved an analysis of citizen involvement in local decision-making, the development of guidelines to strengthen citizen engagement, and the introduction of awards recognizing innovative and effective participatory practices. The commitment was substantially completed. The Union of Municipalities developed Guidelines for Improving Citizen and Local Community Participation in Decision-Making at the Local Government Level.[41] With the support of NDI Montenegro, the Union of Municipalities also organized training sessions for residents of municipalities on participation in decision-making at the local government level.[42]

Commitment 20: Improve e-services at the local level

• **Verifiable:** Yes • **Does it have an open government lens?** Yes • **Potential for results:** Modest	• **Completion:** No Evidence Available • **Early results:** No Notable Results

This commitment aimed to improve e-services at the local level. It entailed analyzing the existing e-services in municipalities and surveying citizens' needs for new e-services. It also entailed creating a platform for e-services and introducing five new e-services at the local level. The self-assessment does not provide evidence on the completion of this commitment.[43]

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[1] Editorial notes:
  1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level.
  2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see Montenegro 2023-2024 action plan, https://www.opengovpartnership.org/wp-content/uploads/2022/12/Montenegro_Action-Plan_2022-2024_December_EN.pdf

3. For more information on the assessment of the commitments' design, see Montenegro Action Plan Review, https://www.opengovpartnership.org/documents/montenegro-action-plan-review-2022-2024/

[2] Open Government Partnership, IRM Montenegro Action Plan Review 2022-2024, 13 July 2023, https://www.opengovpartnership.org/documents/montenegro-action-plan-review-2022-2024/

[3] Ministry of Public Administration and UNDP, Citizen satisfaction with the existing and identification of needs for new e-services, May 2024, https://www.undp.org/montenegro/publications/satisfaction-survey-existing-e-services-and-identification-needs-new-ones-citizens-and-business-community-2024

[4] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

[5] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

[6] Competitiveness Council, Report on inclusion of the private sector in lawmaking processes, May 2023, https://scc.directory/web/publikacije/Uključenost%20privatnog%20sektora%20u%20proces%20donošenja%20zakona/2023/Izvještaj%20o%20uključenosti%20privatnog%20sektora%20u%20proces%20izrade%20zakona%20za%20I%20i%20II%20kvartal%202023.pdf

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[10] CEDEM – Center for Democracy and Human Rights, E-peticije Video, https://www.youtube.com/watch?v=o9td9ioN9O8&ab_channel=CEDEM-Centarzademokratijuiljudskaprava

[11] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

[12] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

[13] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

[14] Ministry of Public Administration, Podrška otvorenoj i transparentnoj upravi [Support for open and transparent administration], December 2023, https://www.gov.me/clanak/podrska-otvorenoj-i-transparentnoj-upravi

[15] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

[16] Bojana Vujovic (Ministry of Public Administration), correspondence with the IRM, 17 February 2025.

[17] Marko Sošić (Institut Alternativa Podgorica), interview by the IRM, 21 January 2025.

[18] Open Government Partnership, IRM Montenegro Action Plan Review 2022-2024, 13 July 2023, https://www.opengovpartnership.org/documents/montenegro-action-plan-review-2022-2024/

[19] Bojana Vujovic (Ministry of Public Administration), correspondence with the IRM, 17 February 2025.

[20] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

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[29] Slavica Biljarska (NDI - Montenegro), interview by the IRM, 18 February 2025.

[30] European Commission for Democracy Through Law (Venice Commission), Montenegro Urgent Opinion on the Draft Law on the Prevention of Corruption, issued on 21 May 2024, https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2024)011-e

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[32] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

[33] Ivana Nedovic (Union of Municipalities), interview by the IRM, 5 March 2025.

[34] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

[35] Lidija Ljumovic (OGP contact point, Directorate for Innovation, Openness of Public Administration and Cooperation with NGOs, Ministry of Public Administration), interview by the IRM, 20 January 2025.

[36] Bojana Vujovic (Ministry of Public Administration), interview by the IRM, 27 January 2025.

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[39] Ivana Nedovic (Union of Municipalities), interview by the IRM, 5 March 2025.

[40] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.

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[43] Ministry of Public Administration, Report on the Implementation of Activities Envisioned by the National Action Plan for the Implementation of the Open Government Partnership Initiative for 2023/2024, December 2024.