Independent Reporting Mechanism

Action Plan Review: Montenegro 2025–2029

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Section I. Overview

Montenegro's fourth action plan mainly continues policy areas from previous action plans, including public participation in decision-making, whistleblower protection, and openness of local government. The action plan includes fewer commitments compared to the previous plan, which could support stronger implementation. The plan's alignment with Montenegro's European Union (EU) accession could incentivize implementation of open government reforms but could also strain limited administrative resources. Key challenges remain weak inter-institutional coordination around OGP and uneven high-level political support for OGP.

Montenegro's fourth action plan (2025-2029) includes five commitments in citizen participation, fiscal transparency, anti-corruption, local government openness, and digital transformation. It is Montenegro's first four-year action plan. The plan is aligned with the 2022-2026 Public Administration Reform Strategy[1] and the 2022-2026 Digital Transformation Strategy.[2]

The IRM has assessed two promising commitments in the Action Plan Review. Commitment 1 aims to strengthen civic participation in decision-making through an interdepartmental body for citizen participation, the development of citizen consultation guidelines, trainings for civil servants, and improvements to the e-Participation system. Commitment 3 seeks to establish an interactive platform and map for citizens to report instances of corruption. These commitments share a common focus on improving interaction between citizens and public institutions, by creating more accessible participation mechanisms and increasing transparency of institutional performance.

At a Glance

MEMBERSHIP

2012	**Joined OGP**

COMMITMENTS

4/5	**Open government lens**
0/5	**Substantial potential for results**

PROMISING COMMITMENTS

- Commitment 1. Increased Citizen Participation in Decision-Making Processes
- Commitment 3: Strengthening Integrity and Public Accountability for the Fight against Corruption

Met the minimum requirements during co-creation: Yes

The fourth action plan mostly builds on the policy areas from the previous (2022-2024) plan, including citizen participation, fiscal transparency, anti-corruption, and digital governance.[3] However, it provides a more structured approach to reform, particularly through the introduction of standardized tools, coordinated mechanisms, and attempts to improve implementation practices. Compared to the previous action plan, the fourth plan includes significantly fewer commitments (five compared to 20). The government's intention was to focus the action plan on feasibility. One civil society stakeholder viewed this as both an improvement, due to greater feasibility of implementation, and a limitation, as several commitments may result in incremental rather than substantial changes.[4] While there is an expanded focus on public sector digitalization and digital governance, no new policy areas are introduced in this action plan, nor new government bodies beyond those previously involved in the OGP process. A public policy expert involved in the development of the action plan noted that this focus of the action plan may have come at the expense of ambition.[5]

During the previous action plan, the Ministry of Public Administration was supported by the National Democratic Institute (NDI) Montenegro and the civil society organization (CSO) Institut Alternativa in organizing discussions and public outreach for the OGP process.[6] For the fourth action plan, by contrast, the ministry successfully led the co-creation process with support from

the Regional School of Public Administration (ResPA) in organizing consultations. Government and civil society stakeholders noted several improvements in the co-creation process compared to previous action plans, including an earlier start and more structured consultations.[7] The ministry also continued some of the positive aspects of the third action plan, including the organization of consultation workshops in multiple locations, allowing stakeholders from different regions of Montenegro to participate and contribute to the development of the action plan,[8] and the publication of the responses from public institutions to stakeholder comments submitted during the public hearing of the draft action plan.[9] Moreover, compared to the previous cycle, there were more people in the Ministry of Public Administration working directly on the development on the fourth action plan.

The re-establishment of the Operations Team, Montenegro's multi-stakeholder forum for OGP, during the co-creation of the fourth action plan, was another positive step for Montenegro's OGP process.[10] The Operations Team was largely inactive for most of the 2022-2024 action plan after its previous mandate expired in July 2022. The Ministry of Public Administration made two calls for non-governmental representatives to apply to the Operational Team, on 14 April and 5 May 2025. The ministry faced difficulties around getting CSOs to become involved in the Operations Team and to get involved in the OGP process.[11] Several CSOs that were previously active in the OGP process, such as Institut Alternativa, did not re-apply for the Operations Team based on their experiences from the previous action plan cycles and their skepticism of the OGP process' ability to influence government decision-making.[12] This highlights a need to rebuild trust among CSOs through iterative dialogue, both within the Operational Team and outside of it. However, the ministry received some feedback from CSOs like "MANS", even though they did not engage in the Operations Team.

A limitation of the fourth action plan is some commitments' focus on improving administrative processes (Commitments 1 and 4), which, while positive, may not generate transformative results. Commitment 4 aims to introduce minimum standards and annual reporting on openness practices, develop standardized digital services, and introduce e-consultations at the local level, but the mechanisms for the enforcement of these changes are unclear. Other commitments introduce reforms focusing on promoting open government among citizens and involving them in reforms but are unclear on their added value to the status quo (Commitment 2) or are susceptible to contextual factors beyond the control of commitment implementers (Commitment 3). Other risks include potential changes in personnel, limited institutional memory, and weak inter-institutional coordination, all of which have affected previous action plan cycles.[13]

Montenegro is currently undergoing European Union (EU) accession negotiations, with a target of joining the EU by 2028.[14] As a result, many reforms in the action plan are closely aligned with EU-driven priorities, particularly in areas such as good governance, transparency, and rule of law.[15] While this alignment could reinforce the relevance of open government reforms in the public administration, it may also place additional pressure on administrative capacities, as key institutions may prioritize EU-related obligations over the implementation of OGP commitments.[16]

As this is a four-year action plan, it will undergo a refresh process at the midpoint of implementation. The IRM recommends that the Ministry of Public Administration and the Operations Team consider using this refresh process to refine commitments, increase ambition where feasible, and address implementation gaps identified during the first two years. The Operations Team's effectiveness as a space for dialogue will require it to meet regularly throughout action plan implementation.[17] Rebuilding trust between institutions and civil society will be essential, particularly through transparent communication and responsiveness to stakeholder input.

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[1] "Public Administration Reform Strategy 2022-2026," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/en/documents/0aaa040b-0413-46b6-a8c7-5b2c10cdc9dc.

[2] "Montenegro Digital Transformation Strategy," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/en/documents/59dcab9b-b0e8-48b7-830b-6e4eab690521.

[3] "OGP Montenegro National Action Plan 2023-2024," Open Government Partnership, accessed September 24, 2026, https://www.opengovpartnership.org/wp-content/uploads/2022/12/Montenegro_Action-Plan_2022-2024_December_EN.pdf.

[4] Miodrag Vujovic (NGO KOD), interview by the IRM, 3 April 2026.

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[5] Nenad Koprivnica (ReSPA Expert involved in the preparation of the action plan), interview by the IRM, 26 March 2026.
[6] "Montenegro Action Plan Review 2022-24," Open Government Partnership, accessed September 24, 2026, https://www.opengovpartnership.org/wp-content/uploads/2023/07/Montenegro_Action-Plan-Review_2022-2024_EN.pdf.
[7] Draško Loncar (Ministry for Public Administration), interview by the IRM, 26 February 2026; Snezana Nikcevic (NVO 35mm), interview by the IRM, 31 March 2026.
[8] "Public discussion on the draft National Action Plan 2026-2029," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/clanak/nacionalni-akcioni-planovi?utm_source=chatgpt.com.
[9] "Report on the conducted public discussion of NAP 2026-2029," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/dokumenta/7ead40fe-8cbc-47fb-b325-ff1954ef207f.
[10] "Report of the initial meeting of the OGP operation team," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/clanak/odrzana-inicijalna-sjednica-operativnog-tima-partnerstva-za-otvorenu-upravu.
[11] "REPEATED PUBLIC CALL FOR NOMINATIONS OF NON-GOVERNMENTAL ORGANIZATION REPRESENTATIVES TO THE OPEN GOVERNMENT PARTNERSHIP OPERATIONAL TEAM," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/clanak/ponovljeni-javni-poziv-za-predlaganje-predstavnika-nevladine-organizacije-u-operativni-tim-partnerstva-za-otvorenu-upravu.
[12] "IRM Montenegro Results Report 2022-2024," Open Government Partnership, accessed September 24, 2026, https://www.opengovpartnership.org/documents/montenegro-results-report-2022-2024-for-public-comment/; Marko Sosic (Institut Alternativa), interview by the IRM, 2 April 2026.
[13] Nenad Koprivnica (ReSPA Expert involved in the preparation of the action plan), interview by the IRM, 26 March 2026.
[14] "A Historic Opportunity for Montenegro to Conclude the EU Accession Process," Delegation of the European Union to Montenegro, April 24, 2026, https://www.eeas.europa.eu/delegations/montenegro/historic-opportunity-montenegro-conclude-eu-accession-process_en.
[15] "Montenegro Report 2025," European Commission, accessed September 24, 2026, https://enlargement.ec.europa.eu/montenegro-report-2025_en.
[16] Nenad Koprivnica (ReSPA Expert involved in the preparation of the action plan), interview by the IRM, 26 March 2026.
[17] Snezana Nikcevic (NVO 35mm), interview by the IRM, 31 March 2026.

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Section II. Promising Commitments

This section analyzes commitments with the most promise to achieve notable results, according to IRM assessment. Promising commitments address a policy area important to stakeholders or the national context. They must be verifiable, have an open government lens, and a modest or substantial potential for results. This review looks at challenges, opportunities, and recommendations to support implementation.

Table 1. Promising Commitments

Commitment 1 aims to develop citizen consultation guidelines for public bodies and an interdepartmental body for citizen participation. It also aims to provide trainings to civil servants and improve the e-Participation portal.
Commitment 3 seeks to create and promote an online interactive map for citizen reporting of corruption.

Commitment 1: Increased Citizen Participation in Decision-Making Processes

Implementers: Ministry of Public Administration

For a complete description, see Commitment 1 of the Montenegro Action Plan.

Context and objectives

This commitment aims to strengthen civic participation in decision-making processes in Montenegro. The milestones are led by the Ministry of Public Administration and entail:

- Creating an interdepartmental body responsible for coordinating and monitoring public participation.
- Creating guidelines and standards for national and local authorities to follow when carrying out public consultations.
- Organizing thematic fora for representatives of the government, civil society, and marginalized groups to discuss public policies.
- Creating a dashboard on Montenegro's e-Participation platform with a record of comments received and how they were considered, the percentage of consultations that publicly report on how the contribution of respondents to the consultation has been used, and anonymized datasets on entries and results of public consultations.
- Organizing trainings for at least civil servants and citizens through seminars, workshops, and online courses to build their capacities in organizing, and participating in, public consultations.

The commitment responds to ongoing gaps in the implementation of Montenegro's participation framework. The 2018 Law on Public Administration stipulates that all ministries must publish a list of laws and strategies on which they will conduct a public hearing within 15 days after the adoption of their annual work program, but few ministries do.[18] The IRM has previously noted that a lack of a central government body overseeing public consultations remains a problem for public hearings in Montenegro.[19] Montenegrin civil society has also noted the limited influence of public hearings on decision-making and low levels of engagement during public consultations, including on the e-Participation platform.[20] According to the European Commission's 2025 report for Montenegro, in practice, CSOs are often not consulted on many laws or important pieces of legislation, such as work related to the Reform Agenda.[21]

Potential for results: Modest

If effectively implemented, the commitment could lead to better implementation of Montenegro's existing regulatory framework around public participation in decision-making and could increase the number of ministries and public bodies that publish calls for public hearings and online

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consultations. The interdepartmental body could systematically monitor ministries' compliance with obligations to publish calls for consultations and public hearings and identify gaps in practice, as well as barriers to be overcome. The proposed guide could help standardize the practices around public consultations. The dashboard to record citizen comments could increase transparency around policy-making and strengthen uptake of the platform among citizens. Evidence of meaningful progress would include an increase in public consultations and hearings as well as increased citizen participation in consultations, higher public awareness of policy development processes, and documented cases where citizen input influenced policy decisions.

The commitment could help bridge the gap between the legal framework for public participation and its practical implementation and lay the groundwork for more ambitious reforms in future action plan cycles. However, the IRM assesses its potential for results as moderate because it lacks clarity around the depth of changes envisioned and their expected sustainability. For example, the commitment does not specify the legal mandate of the interdepartmental body beyond defining, coordinating, and monitoring measures to promote civic participation. It is unclear if this body will have powers to sanction ministries for not adhering to the existing participation framework or whether its mandate will be entirely consultative. Moreover, the scope of the guidelines and standards on public participation is not specified nor is it clear if there will be mechanisms to ensure compliance by national and local government institutions. The commitment also does not explain the impact the thematic will have on the public policies under discussion or on the fora, as well as whether the trainings will be sustained after the end of the action plan.

Opportunities, challenges, and recommendations during implementation

The Ministry of Public Administration is responsible for all five milestones. A previous commitment in the 2022-2024 action plan was not implemented partially due to a lack of interagency coordination.[22] All activities are within the ministry's competences, which may support a coherent approach to implementation.[23] In addition, Montenegro's EU accession negotiations and the political emphasis on governance reforms could encourage institutions to strengthen participatory practices and align consultation mechanisms with European standards on transparency and citizen engagement. Inter-institutional cooperation between the Ministry of Public Administration and other stakeholders involved will be essential to realize the potential of the commitment, particularly in ensuring that line ministries apply the guidelines in their consultation processes. In addition, sufficient resources for all commitment milestones will be crucial in ensuring that they are effectively implemented.

Several challenges may affect implementation. The parliamentary election, to be held by June 2027, could result in changes in government leadership and administrative staff, possibly weakening continuity during implementation, as happened during the previous action plan.[24] Furthermore, citizens may be wary of opportunities for public participation if there continues to be limited feedback provided on how public input influenced decision-making. Finally, limited financial or human resources could delay or limit implementation.

To strengthen implementation, the IRM recommends the Ministry of Public Administration consider the following steps:

- **Ensure that the interdepartmental body has the legal and institutional backing to fulfill its mandate**. For example, Armenia has established a Department on Participatory and Open Government within the Prime Minister's Office and a Prime Minister's Decree.[25] This department is responsible for developing participatory governance mechanisms, monitoring and evaluating participatory processes, implementing open government programs, facilitating cooperation in this area, and addressing issues related to CSOs.
- **Ensure that the interdepartmental body operates transparently**. To safeguard the credibility of the interdepartmental body, it will be important that it operates transparently. The IRM recommends the Ministry of Public Administration publish the decision establishing the interdepartmental body. The IRM also recommends making information available on the body's meetings, including the conclusions adopted or documents produced.
- **Involve civil society within and beyond the OGP Operational Team and government stakeholders from both the national and local level in the development of the public**

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consultation guidelines and standards. This process could involve an initial idea-gathering phase and a second round of feedback on the draft guidelines and standards. As an example, Italy's Participation Hub is developing public participation guidelines that will provide a shared framework and minimum standards for participatory processes at all levels of government, building on the experiences of other national participatory best practices.[26]

- **Promote the public consultation guidelines and standards**. This could involve social media content and direct outreach and training to public bodies, highlighting the added value of public consultation processes.
- **Monitor and assess uptake of the public participation guidelines and standards by national and local authorities**. This could be done by the interdepartmental body and involve regular stocktaking moments of the number of laws published for consultation out of the total number of laws and regulations adopted per public body.
- **Include civil servants directly responsible for implementing public participation processes in public bodies in the trainings and capacity-building workshops**. This would ensure that necessary skills would be passed on and strengthen institutional capacity.
- **Focus on users' needs when designing and implementing improvements to the e-Participation platform**. This could involve an easy-to-find page for institutional responses to citizen feedback, linked to the original public consultation notice, and a section that is visible in the homepage linking to the citizen comment function. As an example, Estonia's system allows citizens to receive notifications about the upcoming draft legal acts, the possibility to track the progress of policy development, and a user-friendly space for co-creation of policies.[27]
- **Promote the e-Participation platform to citizens**. Public awareness material could be developed in collaboration with civil society and could involve social media content and TV or radio promotional spots.
- **Encourage ministries to publish a report of how citizen feedback was considered, showcasing best-performing ministries**. For example, on Croatia's e-consultation portal, comments are linked to specific parts of the proposed act. After a consultation process is finished on Croatia's portal, the comments and the government responses can be downloaded in Excel format.[28]

For the midterm refresh of the 2025-2029 action plan, the Ministry of Public Administration and civil society stakeholders could report on the adoption of the public participation guidelines and the number of public hearings and consultations, institutional responses, and citizen comments published on the e-Participation platform. Stakeholders could then consider adding new milestones addressing potential barriers to the commitment achieving its full potential for the last two years of implementation.

Commitment 3: Strengthening Integrity and Public Accountability for the Fight against Corruption

Implementers: Agency for Prevention of Corruption, Ministry of Justice

For a complete description, see Commitment 3 of the Montenegro Action Plan.

Context and objectives

Commitment 3 aims to develop an interactive corruption map ("Civic Oversight Platform") for citizens to report suspicions of corruption and assess the transparency of national and local institutions. The commitment seeks to address challenges related to underreporting of corruption, low public trust in institutions, and limited visibility of anti-corruption efforts.[29] It reflects both government priorities linked to EU accession and civil society's demands for more accountability tools.[30] The commitment partially builds on the 2024 amendment to the Law on the Prevention of Corruption, which introduced corruption prevention rules for certain public sector employees and whistleblower protections.[31]

The platform would allow citizens to report instances of corruption, anonymously or not, and evaluate institutions based on predetermined indicators, such as promptness, openness to communication, availability of information, and procedural compliance. The citizen reports and

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institutional evaluations would then be visualized on the map. The commitment would also introduce a mandatory institutional response to citizen reports within a specific deadline. The institutional responses would be publicly available, along with monthly reports and public rankings summarizing trends, ratings, number of applications, and institutional responses.[32] The commitment also entails a national awareness campaign and promotion of the platform, including educational activities and periodic surveys on corruption perception.

Potential for results: Modest

At the time of the adoption of this action plan (December 2025), whistleblower reporting and protections in Montenegro are regulated by the 2024 Law on the Prevention of Corruption. Citizens can report instances of corruption in the public sector through the Agency for Prevention of Corruption, by phone, email, or electronic submission to a dedicated system.[33] However, corruption reporting remains limited, as existing mechanisms are perceived by citizens as inaccessible, slow, or ineffective.[34] According to 2024 figures, 75.3 percent of citizens perceive Montenegrin society to be corrupt, while less than half (45.2 percent) believe that institutions have the integrity to fight corruption.[35] In addition, there are no publicly available facts and figures or visualizations of citizen whistleblower reports of corruption instances. According to a 2026 analysis by Transparency International chapters in the Western Balkans, the lack of transparency and complete data on whistleblower reports is a major deficiency of Montenegro's existing framework and an indication of weak oversight.[36]

This commitment could facilitate citizen reporting of corruption, improve the visibility of corruption reporting, and introduce reputational incentives for public institutions. In addition, the mandatory requirement for institutional responses could strengthen public accountability. The commitment calls for an increase by 50 percent in reports of suspected corruption compared to 2025, after the platform is operational (expected in 2027). Meeting this metric would be a strong indication that the platform and awareness campaign have been successful. According to an independent expert, the coordination of this commitment by the Agency for the Prevention of Corruption could support institutions responsible for responding to citizen reports of corruption.[37] In addition, the 2024-2028 Anti-Corruption Strategy, which includes the goal of increasing citizens' awareness of ways to report corruption, EU accession negotiations, as well as the Government of Montenegro's goal of harmonizing national legislation with Directive (EU) 2019/1937 on whistleblower protection, offer a supportive policy environment for implementing the commitment.[38]

This commitment could offer modest improvements to Montenegro's whistleblower protection framework, such as the mandatory institutional response to reports and the automated monthly reports on trends in reporting. However, the key challenge of institutional weakness and procedural and legal gaps are not addressed. Institutional responses to citizen reports may remain formalistic, without leading to disciplinary or criminal proceedings. There is also a risk of incomplete or unrelated submissions, which could strain limited institutional capacities if the platform is not managed efficiently. The effectiveness of the platform will depend on the capacity and willingness of institutions, most importantly the Agency for Prevention of Corruption, to act on reported cases, as well as substantive institutional responses to citizen reports, detailing next steps to be taken and specific sanctions against those involved. It would be important to assess whether the proposed system includes other protection mechanisms, such as ensuring that whistleblowers have access to legal advice if they choose to seek it.

Opportunities, challenges, and recommendations during implementation

This commitment aligns with Montenegro's ongoing efforts on whistleblower protection. In June 2026, the Government of Montenegro adopted a Draft Law on the Protection of Whistleblowers, which will give the country a separate whistleblower protection law and should bring national legislation into closer alignment with EU standards.[39] However, several challenges may affect implementation. High-level political support for implementing anti-corruption activities remains limited, while whistleblowers often face retaliation.[40] Additionally, given the context of limited public trust in institutions in Montenegro, the absence of clear protection mechanisms could discourage individuals from reporting corruption cases, limiting the commitment's ability to achieve its intended results during implementation.

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To strengthen the implementation of the commitment, the Agency for Prevention of Corruption and the Ministry of Justice could consider the following steps:

- **Ensure that the interactive platform is user-friendly.** This could involve creating a pilot version of the platform to be tested by citizens, collecting feedback around the accessibility and ease of use and integrating the feedback into the final version of the platform.
- **Involve CSOs in the development of the platform.** CSOs that have been working in open government, anti-corruption, and rule of law in Montenegro could help identify barriers to platform uptake among citizens and proactively propose solutions.
- **Diversify the national promotional campaign.** To ensure wide reach among different segments of the population, the campaign to promote the platform could include TV and radio spots, as well as social media content on the most popular platforms in Montenegro.
- **Allocate adequate technical and human resources for reviewing, verifying, and processing reports in a timely manner.** Without strong coordination, sustainable resourcing, and clear follow-up procedures, citizens may not see the platform as a useful mechanism for reporting corruption. This could involve a centralized team in the Agency for Prevention of Corruption, which would then consolidate corruption reports and forward them to relevant institutions.
- **Adopt binding inter-institutional protocols with defined responsibilities for institutions involved in the follow-up to citizen reports.** This could involve defining the timeframe by which institutions would have to respond. It could also ensure that the onus of responding falls on the institution receiving the complaint, rather than on the Agency for Prevention of Corruption.
- **Develop clear categorization and filtering mechanisms on the platform.** This could help distinguish corruption-related reports from general citizen complaints.
- **Ensure that whistleblowers can access legal advice through the platform if they choose to seek it**. Citizens should be allowed to seek legal advice while remaining anonymous if they wish to do so.

The platform is expected to be launched around the midpoint of the action plan (Q4 2027). Depending on whether the platform is operational by the midpoint, the government and CSOs could use the action plan refresh process to pilot the platform before its full implementation. Once the platform is functional, it will be important to continuously assess citizens' use, the quantity, timeliness, and quality of institutional responses to citizen reports, and how reports are taken forward. The government and civil society could consider refining the platform to improve reporting quality and credibility. Also, continued engagement with civil society within and outside of the Operational Team in promoting the platform and monitoring its outcomes could further strengthen its credibility and citizens' confidence in it.

Other commitments

Other commitments that the IRM did not identify as promising commitments are discussed below.

Commitment 2 aims to establish an informal "civic budget literacy program" to help citizens better understand how budgets are created, adopted, and executed. The IRM assesses this commitment as having a modest potential for results as it focuses on awareness-raising activities.[41] Commitments from the Ministry of Finance on fiscal transparency in previous action plans have only reached limited completion.[42] This commitment could benefit from stronger focus on concrete budget transparency reforms, such as introducing pilot mechanisms to engage the public during budget formulation or participatory budgeting mechanisms.[43]

Commitment 4 aims for the adoption of minimum standards for openness, the development of template digital services, capacity-building for local government employees, and a system of annual reporting and ranking of local governments according to openness. It also aims to introduce online consultations at the local level. Under the openness standards, all 24 local self-governments (LSGUs) of Montenegro will regularly publish their budget, public procurement procedures, and assembly session meetings in standardized formats. The quantity, quality, and accessibility of publicly available information among LSGUs is uneven.[44] Many LSGUs lack standardized approaches for publishing budgets, contracts, official decisions, and consultation

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opportunities.[45] Lists of councillors, public companies, and institutions and contracts are generally available in most LSGUs, but workplans, recent activity reports, draft laws and strategic documents, and lists of civil servants and decisions are only available to a limited extent.[46]

The IRM assesses this commitment as having modest potential for results, particularly by offering LSGUs standardized formats for publishing key information. However, while the envisioned minimum standards would be legally binding, the absence of enforcement mechanisms in case LSGUs do not adhere to the standards could limit implementation. There is a risk of superficial compliance, where LSGUs meet formal criteria without introducing meaningful improvements in their transparency practices. In addition, the effectiveness of e-consultations will depend on their uptake among LSGUs and citizens, as well as their long-term impact on LSGU decision-making.

The involvement of the Ministry of Public Administration and the Union of Municipalities provide a foundation for coordination and outreach to support implementation.[47] In addition, the high-level political support around strengthening good governance at the local level, as evidenced by the local-level data exchange system and the draft Law on Local Self-Government, could enable the implementation of this commitment.[48] Possible challenges include the uneven administrative capacity among different LSGUs and the risk of formalistic implementation of the minimum standards and the use of e-consultation mechanisms.[49] Moreover, implementation may vary across LSGUs, influenced by the political affiliations and priorities of local leadership.[50]

To strengthen commitment implementation, the Ministry of Public Administration and Union of Municipalities could:

- Monitor LSGU compliance with the adopted openness standards, possibly through regular stocktaking with the involvement of CSOs. The action plan refresh process could offer an opportunity to assess whether the publication standards are being applied by LSGUs in practice and whether participation tools are actively used.
- Provide targeted technical and financial support for LSGUs that may lack capacities to implement the standards.
- Organize peer-learning among LSGUs to exchange good practices and implementation experiences, and troubleshoot problems that may have arisen in implementation

Commitment 5 aims to support digital transformation of the public sector. As written in the action plan, this commitment does not directly advance government transparency, civic participation, or public accountability, and is therefore assessed as having an unclear potential for results. Its milestones, such as developing an artificial intelligence (AI) strategy, strengthening interoperability systems, advancing cybersecurity, expanding digital services, and increasing digital and AI literacy, may exceed the implementation capacities of the lead institutions.[51] In addition, indicators such as increasing digital literacy from 25 percent to 45 percent and systematic application of AI in public administration may be too ambitious for the timeframe of the action plan. At the midpoint, reformers could consider narrowing the scope to more achievable priorities such as improved interoperability and civic access to information in real time and align activities with the future strategy for digital transformation (as the current strategy ends in 2026) and international donor support, as well as engaging civil society to strengthen implementation and oversight.

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[18] "Zakon o drzavnoj upravi [Law on Public Administration]," Government of Montenegro, 15 December 2018, https://gov.me/dokumenta/42c95c3f-0c64-4657-99f4-f014f1912bc8; "Gradani u fokusu: Kako unaprijediti prakse gradanskog ucesca u donosenju odluka? [Citizens in Focus: How to Improve Practices of Citizen Participation in Decision-Making?]" Centre for Civic Education, 2024, https://cgo-cce.org/2024/10/16/gradani-u-fokusu-kako-unaprijediti-prakse-gradanskog-ucesca-u-donosenju-odluka/

[19] "Independent Reporting Mechanism, Action Plan Review: Montenegro 2022-2024," Open Government Partnership, 13 July 2023, https://opengovpartnership.org/documents/montenegro-action-plan-review-2022-2024/.

[20] Maka Meshveliani (NDI Montenegro), interview by the IRM, 10 February 2023; Igor Vidacak (independent expert), interview by the IRM, 9 March 2023; "National Action Plan for the Implementation of the Initiative Open Government Partnership in Montenegro 2026 – 2029," Open Government Partnership, accessed September 24, 2026, https://www.opengovpartnership.org/wp-content/uploads/2026/01/Montenegro_Action_Plan_2026-2029_EN.pdf.

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[21] "EU Country Report Montenegro 2025," European Commission, accessed September 24, 2026, https://enlargement.ec.europa.eu/document/download/9ae69ea7-81d6-4d6a-a204-bd32a379d51d_en?filename=montenegro-report-2025.pdf.
[22] "Independent Reporting Mechanism, Results Report: Montenegro 2022-2024," Open Government Partnership, 8 August 2025, https://www.opengovpartnership.org/documents/montenegro-results-report-2022-2024/.
[23] Nenad Koprivnica (ReSPA Expert involved in the preparation of the action plan), interview by the IRM, 26 March 2026.
[24] Nenad Koprivnica (ReSPA Expert involved in the preparation of the action plan), interview by the IRM, 26 March 2026.
[25] "Armenia: Government establishes new department to boost public participation and principles of open government," CSO Meter, accessed September 24, 2026, https://csometer.info/updates/armenia-government-establishes-new-department-boost-public-participation-and-principles.
[26] "Italy: Strengthening the participation hub," Open Government Partnership, accessed September 24, 2026, https://www.opengovpartnership.org/members/italy/commitments/it0084/.
[27] "Lessons from Reformers: Estonia Shifts from Online Consultation to Co-Creation," Open Government Partnership, 10 August 2020, https://www.opengovpartnership.org/stories/lessons-from-reformers-estonia-shifts-from-online-consultation-to-co-creation.
[28] See Croatia's e-consultation portal, https://esavjetovanja.gov.hr/ECon/Dashboard.
[29] "National Action Plan for the Implementation of the Initiative Open Government Partnership in Montenegro 2026 – 2029," Open Government Partnership, accessed September 24, 2026, https://www.opengovpartnership.org/wp-content/uploads/2026/01/Montenegro_Action_Plan_2026-2029_EN.pdf.
[30] "National Action Plan for the Implementation of the Initiative Open Government Partnership in Montenegro 2026 – 2029," Open Government Partnership, accessed September 24, 2026, https://www.opengovpartnership.org/wp-content/uploads/2026/01/Montenegro_Action_Plan_2026-2029_EN.pdf.
[31] "Montenegro – Urgent Opinion on the draft law on the prevention of corruption," Venice Commission of the Council of Europe, June 2024, https://www.coe.int/en/web/venice-commission/-/opinion-1186.
[32] "National Action Plan for the Implementation of the Initiative Open Government Partnership in Montenegro 2026 – 2029," Open Government Partnership, accessed September 24, 2026, https://www.opengovpartnership.org/wp-content/uploads/2026/01/Montenegro_Action_Plan_2026-2029_EN.pdf.
[33] "Report Corruption!," Agency for Prevention of Corruption, accessed September 24, 2026, https://www.antikorupcija.me/en/.
[34] "National Action Plan for the Implementation of the Initiative Open Government Partnership in Montenegro 2026 – 2029," Open Government Partnership, accessed September 24, 2026, https://www.opengovpartnership.org/wp-content/uploads/2026/01/Montenegro_Action_Plan_2026-2029_EN.pdf.
[35] "Corruption in Montenegro: A System Rooted in Distrust and Selective Justice," Maja Marinović, Centre for Civic Education, 7 December 2024, https://cgo-cce.org/en/2024/12/07/corruption-in-montenegro-a-system-rooted-in-distrust-and-selective-justice/.
[36] "Protected or exposed? Whistleblower protection in the Western Balkans: Progress and challenges," National Endowment for Democracy, p108, accessed September 24, 2026, https://ti-bih.org/wp-content/uploads/2026/05/Whistleblower-Protection-in-the-WB-WEB-FINAL.pdf.
[37] Nenad Koprivnica (ReSPA Expert involved in the preparation of the action plan), interview by the IRM, 26 March 2026.
[38] "2024-2028 Anti-Corruption Strategy," Government of Montenegro, accessed September 24, 2026, https://track.unodc.org/uploads/documents/AC-strategies/Montenegro-Anticorruption_Strategy-2024-2028-MON.pdf.
[39] "Press release from the 132th cabinet session," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/en/article/press-release-from-the-132th-cabinet-session.
[40] "Between Anti-Corruption Reform and Decline: Examining Key Actors, Strengths and Weaknesses in the Western Balkans and Türkiye's National Integrity Systems," Transparency International, 19 June 2024, https://files.transparencycdn.org/images/2024_NISReport_BetweenAnti-CoruptionReformAndDecline_English.pdf; "Making the Western Balkans Safe for Whistleblowers," Transparency International, 19 June 2024, https://www.transparency.org/en/blog/making-the-western-balkans-safe-for-whistleblowers.
[41] Marko Sosic (Institut Alternativa), interview by the IRM, 2 April 2026.
[42] "IRM Montenegro Results Report 2022-2024," Open Government Partnership, accessed September 24, 2026, https://www.opengovpartnership.org/documents/montenegro-results-report-2022-2024-for-public-comment/.
[43] "Open Budget Survey 2025: Montenegro," International Budget Partnership, accessed September 24, 2026, https://internationalbudget.org/open-budget-survey/country-results/2025/montenegro.
[44] Nenad Koprivnica (ReSPA expert involved in the preparation of the action plan), interview by the IRM, 26 March 2026; "Transparency for Accountability," Nikola Durasevic, Centre for Civic Education, 6 December 2024, https://cgo-cce.org/en/2024/12/06/transparency-for-accountability/.

[45] "National Action Plan for the Implementation of the Initiative Open Government Partnership in Montenegro 2026 – 2029," Open Government Partnership, accessed September 24, 2026, https://www.opengovpartnership.org/wp-content/uploads/2026/01/Montenegro_Action_Plan_2026-2029_EN.pdf.
[46] "How Much are Montenegrin Local Self-Governments (Non)Transparent?," Mira Popovic, Centre for Civic Education, 25 April 2019, https://cemi.org.me/storage/uploads/yv46gJQgFLpq1pgQwl6z8BJD2H5X2xAv5U9RUeE8.pdf.
[47] Nenad Koprivnica (ReSPA expert involved in the preparation of the action plan), interview by the IRM, 26 March 2026.
[48] "The "Digital Transformation of Local Self-Governments" project has been completed – Montenegro connects all municipalities into a single digital system," United Nations Montenegro, 29 May 2026, https://montenegro.un.org/en/316392-digital-transformation-local-self-governments-project-has-been-completed-montenegro-connects; "Press Release from the 126th Cabinet Session," Government of Montenegro, 14 May 2026, https://www.gov.me/en/article/press-release-from-the-126th-cabinet-session.
[49] Nenad Koprivnica (ReSPA expert involved in the preparation of the action plan), interview by the IRM, 26 March 2026.
[50] Snezana Nikcevic (NVO 35mm), interview by the IRM, 31 March 2026.
[51] Snezana Nikcevic (NVO 35mm), interview by the IRM, 31 March 2026.

Section III. Methodology

This product is a concise, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, represent a high priority for country stakeholders, acknowledged as a priority in the national open government context, or a combination of these factors.

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 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 the Action Plan Review, the IRM reviews commitments using three indicators:

1. Verifiability: The IRM determines whether a commitment is verifiable as written in the action plan. The indicator is assessed as:

- **Yes/No:** Are the stated objectives and proposed actions sufficiently clear and include objectively verifiable activities to assess implementation?
- Commitments that are not verifiable are considered not reviewable, and no further assessment is carried out.

2. Open Government Lens: The IRM determines if the commitment relates to the open government values of transparency, civic participation, and/or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance. Based on a close reading of the commitment text, the indicator is assessed as:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform, influence, or co-create policies, laws and/or decisions? Will the government create, enable, or improve participatory mechanisms for minorities, or marginalized or underrepresented groups?

  Will the government improve the enabling environment for civil society (which may include NGO laws, funding mechanisms, taxation, reporting requirements, et cetera)? Will the government improve legal, policy, institutional, or practical conditions related to civic space such as freedom of expression, association, and peaceful assembly that would facilitate participation in the public sphere? Will the government take measures which counter mis- and disinformation, especially online, to ensure people have access to reliable and factual information (which may include digital and media literacy campaigns, fact-checking, or fostering an independent news media ecosystem)?
- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

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3. Potential for Results: The IRM analyzes the expected results and potential that would be verified in the IRM Results Report after implementation. Potential for results is an early indication of the commitment's possibility to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area. The indicator is assessed as:

- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review focuses its analysis on promising commitments. Promising commitments are verifiable, have an open government lens, and at least a modest potential for results. Promising commitments may also be a priority for national stakeholders or for the particular context. The IRM may cluster commitments with a common policy objective or that contribute to the same reform or policy issue. The potential for results of clustered commitments is reviewed as a whole.

This review was prepared by the IRM in collaboration with Borjan Gjuzelov, PhD as researcher and German Emanuele as external expert reviewer. This report was prepared in accordance with the IRM Procedures Manual and guidance on artificial intelligence (AI). During the internal review process, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).[52] The IRM methodology, product quality, and review process are overseen by the IEP.[53]

[52] "International Experts Panel," Open Government Partnership, accessed 15 July 2024, https://www.opengovpartnership.org/about/who-we-are/international-experts-panel.
[53] For more information, see: "Overview – Independent Reporting Mechanism," Open Government Partnership, accessed 15 July 2024, https://www.opengovpartnership.org/irm-guidance-overview.

Annex I. Commitment Data[54]

Commitment 1: Increased Citizen Participation in Decision-Making Processes

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

Commitment 2: Improvement of Fiscal Transparency

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

Commitment 3: Strengthening Integrity and Public Accountability for the Fight against Corruption

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

Commitment 4: Improved Openness of Local Self-Governments

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

Commitment 5: Accelerated Digital Management

- Verifiable: Yes
- Does it have an open government lens? No
- Potential for results: Unclear

[54] Editorial note: For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, not individual commitments. Commitment short titles may have been edited for brevity. For the complete text of commitments, please see: https://www.opengovpartnership.org/wp-content/uploads/2026/01/Montenegro_Action_Plan_2026-2029_ME.pdf.

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Annex II. Action Plan Co-Creation

The IRM uses the OGP Participation and Co-Creations Standards to assess countries' participatory practices throughout the action plan cycle.[55] Countries are encouraged to aim for the full ambition of the standards and to meet the minimum requirements.[56] The OGP Criteria and Standards Subcommittee determines if a country has acted according to OGP process.[57]

Table 2. Compliance with Minimum Requirements

Minimum requirement	Met?
1.1 Space for dialogue: The Ministry of Public Administration reformed multi-stakeholder space (MSF) for dialogue, the Operations Team, during the co-creation of the fourth action plan. The MSF is coordinated by the Ministry of Public Administration and involves civil Operations Team through consultations and workshops.[58] During co-creation, the Operations Team met in May, July, and December 2025.[59] Information on stakeholder participation in action plan development was published on the ministry's OGP webpage.[60]	Yes
2.1 OGP website: There is a publicly accessible website that contains the current action plan, information about the co-creation process, as well as information on the implementation of previous action plans.[61]	Yes
2.2 Repository: A dedicated OGP page on the Ministry of Public Administration's website functions as the country's OGP repository. The page was regularly updated with information about the co-creation process until October 2025 but has not been updated since the fourth action plan was adopted in December 2025. No information about implementation of the action plan's commitments is available online.	Yes
3.1 Advanced notice: Information about the consultation process, including a calendar of participation opportunities was published on the official government website in March 2025, more than two weeks prior to the start of consultation workshops in May 2025.[62] The preparation and co-creation period lasted between February and October 2025.[63]	Yes
3.2 Outreach: During the co-creation process three in-person workshops were held in Budva, Kolašin, and Podgorica, covering different regions of the country. The workshops brought together government and non-government stakeholders to explain the goals and activities included in the draft, discuss the draft action plan, and collect comments.[64]	Yes
3.3 Feedback mechanism: The consultation process included three in-person workshops and an online questionnaire for citizens, CSOs, and business, providing stakeholders with opportunities to submit written comments and suggestions on the draft National Action Plan.[65] These mechanisms enabled input from a broad range of stakeholders, including civil society, public institutions, and interested citizens. Public consultations were open for 30 days during co-creation, allowing sufficient time for participation and feedback.[66]	Yes
4.1 Reasoned response: A report on the public consultation process was prepared, documenting stakeholder comments and suggestions received during the co-creation phase. The report documented all proposals received in detail and the government responses to each of them.[67]	Yes
5.1 Open implementation: The IRM will assess whether meetings were held with civil society stakeholders to present implementation progress and enable civil society to provide comments at least twice a year.	Not applicable

As of the writing of this report (July 2026), the dedicated OGP page on the Ministry of Public Administration's website does not have information about commitment implementation. To ensure that the OGP process meets the minimum requirement around transparency of implementation information, the IRM recommends the Ministry of Public Administration and the Operations Team collect implementation information and publish updates on the commitments regularly on the national OGP website, at least twice per year.

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

[56] "IRM Guidelines for the Assessment of Minimum Requirements," Independent Reporting Mechanism, 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf.
[57] On 1 August 2025, the OGP Criteria and Standards Subcommittee adopted a resolution on Temporary Suspension of the Enforcement of Time-Bound Minimum Requirements for Participation and Co-Creation, for all members currently implementing plans delivered on or after 1 January 2024, https://www.opengovpartnership.org/wp-content/uploads/2025/08/Resolution-of-CS-on-the-Temporary-Suspension-of-the-Enforcement-of-Time-Bound-Minimum-Requirements-2.pdf; For information on the OGP Procedural Review Policy see: https://www.opengovpartnership.org/procedural-review/#IC.
[58] "Report of the initial meeting of the OGP operation team," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/clanak/odrzana-inicijalna-sjednica-operativnog-tima-partnerstva-za-otvorenu-upravu.
[59] "Report of the initial meeting of the OGP operation team," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/clanak/odrzana-inicijalna-sjednica-operativnog-tima-partnerstva-za-otvorenu-upravu; "Report of the second meeting of the OGP operation team," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/clanak/odrzana-druga-tematska-sjednica-operativnog-tima-partnerstva-za-otvorenu-upravu; "Report of the meeting of the OGP operation team," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/clanak/odrzana-sjednica-operativnog-tima-partnerstva-za-otvorenu-upravu.
[60] "Javni poziv za predlaganje predstavnika NVO u Operativni tim Partnerstva za otvorenu upravu [Public call for nominations of NGO representatives to the Open Government Partnership Operational Team]," Government of Montenegro, 14 April 2025, https://www.gov.me/clanak/javni-poziv-za-predlaganje-predstavnika-nevladine-organizacije-u-operativni-tim-partnerstva-za-otvorenu-upravu.
[61] "Open Government Partnership," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/mju/partnerstvo-za-otvorenu-upravu; "NAP 2026-2029," Government of Montenegro, 25 December 2025, https://www.gov.me/dokumenta/dc4919d0-0fe5-42cb-83e1-0d1a42929acf.
[62] "Calendar of consultations," Government of Montenegro, please see: https://www.gov.me/clanak/ko-kreiranje-nacionalnog-akcionog-plana-2026-2029.
[63] The start of the co-creation process in February 2025 was marked by the call for consultation with the public, https://www.gov.me/clanak/javni-poziv-za-konsultovanje-zainteresovane-javnosti-o-izradi-nacionalnog-akcionog-plana-za-sprovodenje-inicijative-partnerstvo-za-otvorenu-upravu-u-crnoj-gori-2, and ended with the regional workshops held as part of the discussion on the draft action plan in October 2025, https://www.gov.me/clanak/odrzane-regionalne-radionice-u-okviru-javne-rasprave-o-nacrtu-nacionalnog-akcionog-plana-za-sprovodenje-inicijative-partnerstvo-za-otvorenu-upravu-u-crnoj-gori-2026-2029.
[64] "Public discussion on draft National Action Plan 2026-2029," Government of Montenegro, see: https://www.gov.me/clanak/nacionalni-akcioni-planovi?utm_source=chatgpt.com; "Invitation for public discussions," please see: https://www.youtube.com/watch?v=bIlsx0Yu1e4.
[65] "Program for public consultations," Government of Montenegro, accessed September 24, 2026, https://www.gov.me/dokumenta/f88241f2-ae00-4dd7-afbc-1ecc7a9d6b3a.
[66] Draško Loncar (Ministry for Public Administration), interview by the IRM, 26 February 2026.
[67] "Report of conducted public consultation NAP 2026-2029," Government of Montenegro, accessed September 24, 2206, https://www.gov.me/dokumenta/7ead40fe-8cbc-47fb-b325-ff1954ef207f.