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ANNEX 5

to the Commission Implementing Decision on the financing of the multi-country multiannual action plan on an EU Civil Society Facility and Media Programme in favour of the Western Balkans and Türkiye for 2024-2025

Action Document for “EU Civil Society Facility and Media Programme for Montenegro 2024-2025”

MULTIANNUAL ACTION PLAN

This document constitutes the multiannual work programme in the sense of Article 110(2) of the Financial Regulation, and annual and multiannual action plans and measures in the sense of Article 9 of IPA III Regulation and Article 23(2) of NDICI - Global Europe Regulation.

1. SYNOPSIS

1.1 Action Summary Table

Title	EU Civil Society Facility and Media Programme for Montenegro 2024-2025 Multi-country multiannual action plan on an EU Civil Society Facility and Media Programme in favour of the Western Balkans and Türkiye for 2024-2025
OPSYS	OPSYS business reference: ACT-62283
ABAC	ABAC Commitment level 1 number: JAD.1299145 (allocation 2024) JAD.1299146 (allocation 2025)
Basic Act	Financed under the Instrument for Pre-accession Assistance (IPA III)
Economic and Investment Plan (EIP)	No
EIP Flagship	No
Team Europe	No
Beneficiar(y)/(ies) of the action	The action shall be carried out in Montenegro.
Programming document	IPA III Programming Framework
PRIORITY AREAS AND SECTOR INFORMATION	
Window and thematic priority	<i>Window 1: Rule of Law, Fundamental Rights and Democracy</i> Thematic Priority 2: Fight against corruption Thematic Priority 5: Fundamental rights Thematic Priority 6: Democracy

	Thematic Priority 7: Civil Society (Partially windows 2, 3 & 4)			
Sustainable Development Goals (SDGs)	Main SDG: Goal 16: Peace, Justice and Strong Institutions Other significant SDGs: Goal 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture Goal 5: Achieve gender equality and empower all women and girls.			
DAC code(s)	Main DAC codes: 150150 Democratic participation and civil society (50 %) 41010 - Environmental policy and administrative management (20%) 15153- Media (20%) 16066 - Culture (5%) 43073 - Food safety and quality (5%)			
Main Delivery Channel	23000 - Developing country-based NGO 60000- Private Sector Institution 40000-Other multilateral Institutions			
Targets	<input type="checkbox"/> Climate <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Biodiversity			
Markers (from DAC form)	General policy objective	Not targeted	Significant objective	Principal objective
	Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Aid to environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Gender equality and women's and girl's empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Reproductive, maternal, new-born and child health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Nutrition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	RIO Convention markers	Not targeted	Significant objective	Principal objective
	Biological diversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Internal markers and Tags	Policy objectives	Not targeted	Significant objective	Principal objective

EIP	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EIP Flagship	YES <input type="checkbox"/>		NO <input checked="" type="checkbox"/>
Tags:	YES		NO
Transport	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Energy	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Environment and climate resilience	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Digital	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Economic development (incl. private sector, trade and macroeconomic support)	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Human Development (incl. human capital and youth)	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Health resilience	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Migration and mobility	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Agriculture, food security and rural development	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Rule of law, governance and Public Administration reform	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Other	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Digitalisation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tags	YES		NO
digital connectivity	<input type="checkbox"/>		<input checked="" type="checkbox"/>
digital governance	<input checked="" type="checkbox"/>		<input type="checkbox"/>
digital entrepreneurship	<input type="checkbox"/>		<input checked="" type="checkbox"/>
digital skills/literacy	<input checked="" type="checkbox"/>		<input type="checkbox"/>
digital services	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tags	YES		NO
digital connectivity	<input type="checkbox"/>		<input checked="" type="checkbox"/>
energy	<input type="checkbox"/>		<input checked="" type="checkbox"/>
transport	<input type="checkbox"/>		<input checked="" type="checkbox"/>
health	<input type="checkbox"/>		<input checked="" type="checkbox"/>
education and research	<input type="checkbox"/>		<input type="checkbox"/>
Migration	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reduction of Inequalities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COVID-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

BUDGET INFORMATION	
Amounts concerned	<p>Budget line: 15.020101.01</p> <p>Total estimated cost: EUR 5 380 000</p> <p>Total amount of EU budget contribution EUR 5 000 000</p> <p>The EU contribution is for an amount of EUR 1 250 000 from the general budget of the European Union for financial year 2024 and for an amount of EUR 3 750 000 from the general budget of the European Union for financial year 2025, subject to the availability of appropriations for the respective financial years following the adoption of the relevant annual budget, or as provided for in the system of provisional twelfths.</p> <p>This action is co-financed in joint co-financing by:</p> <ul style="list-style-type: none"> - grant beneficiaries for an amount of indicatively EUR 280 000; - entrusted entities for an amount of indicatively EUR 100 000.
MANAGEMENT AND IMPLEMENTATION	
Implementation modalities (management mode and delivery methods)	<p>Direct management through:</p> <ul style="list-style-type: none"> - Grants - Procurement <p>Indirect management with the entity(ies) to be selected in accordance with the criteria set out in section 4.3.3.</p>
Final date for concluding grant contracts	<p>For 2024 Budget: At the latest by 31 December 2025</p> <p>For 2025 Budget: At the latest by 31 December 2026</p>
Indicative operational implementation period	<p>For 2024 Budget: 72 months following the adoption of the Financing Decision</p> <p>For 2025 Budget: 84 months following the adoption of the Financing Decision</p>

1.2. Summary of the Action

The **overall objective** of the action is to strengthen participatory democracy in Montenegro and support the EU integration process through an enhanced contribution by civil society and media organisations. The action will support a more enabling environment for civil society and media organisations to be effective, transparent and accountable independent actors and drivers of change able to influence, monitor, and advocate in different sectors such as: good governance, rule of law, health and social sector, environmental, climate change, biodiversity, agriculture and culture. Particular focus should be given to actions at the local levels. The action will increase the capacities of media/journalists to contribute to public debate and democratic reforms.

The intervention will improve civic participation, in particular of youth and women, in all aspects of society - political, economic and social.

1.3 Beneficiaries of the Action

The action shall be carried out in Montenegro

2. RATIONALE

2.1.Context

An empowered civil society is a crucial component of any democratic system and should be recognised and treated as such by state institutions. Civil society also plays an important role in the EU integration process, helping to ensure that citizens have sufficient influence on and ownership of the reforms leading to EU accession. Media plays a key role in providing accurate, reliable information and in enabling informed public debate. In the accession context, the state of affairs as regards civil society is assessed as part of the political criteria and particularly the “*Functioning of Democratic Institutions*” along with the role played by the Parliament and the elections in a functioning democratic society. Freedom of expression and media freedom are assessed under *Cluster 1 “Fundamentals”*, in particular under Chapter 23 “*Justice and Fundamental Rights*” and also under Chapter 10 “*Information Society and Media*”.

Civil society also plays an active role in the Montenegro’s economic reform programme (ERP)¹ by monitoring the main developments and the challenges in the coming period. Likewise, civil society is set to play a role in the roll-out of the new growth plan for the Western Balkans and its related Reform Agenda.² Civil society can provide input and monitor the progress of the regulatory environment and structural reforms that authorities need to implement in the coming years in order to achieve socio-economic convergence. For instance, the civil society can engage in dialogue about labour reforms and youth unemployment measures. As set in the New Growth Plan for the Western Balkans it will provide “opportunities to boost socio-economic convergence and bring our partners closer to the EU’s single market in many areas”, thus civil society as a whole and youth organizations should be active part of this process.

Civil society and media organisations in Montenegro already play an important role in promoting democratic debate, protecting fundamental rights and equality, and in contributing to key sectoral reforms. Their engagement already enhances the participation of citizens in decision making processes, through consultations and civic participation. However, the engagement needs to become even more effective, inclusive and transparent both at central and local level. Civil society needs to fully contribute with its expertise and knowledge to all processes and in all areas covered by the *acquis* from policy creation to monitoring. Media have to be able to operate freely and independently to contribute in a qualitative way to the public debate.

According to the Montenegro 2023 Report³ “*An empowered civil society is a crucial component of any democratic system and should be recognised and treated as such by state institutions.*” The report also acknowledges that “*The role of civil society is recognised and promoted. However, the legal and institutional framework regulating cooperation between state institutions and civil society still needs to be improved*”.

The main national strategic document in Montenegro is the *Strategy for Cooperation between the government bodies and with Non-governmental organizations 2021-2026*⁴ The on-going Strategy is in line with the *DG NEAR Guidelines for EU Support to Civil Society in the Enlargement Region 2021-2027*, which aims at achieving the following outcomes: (i) a conducive environment for civil society to carry out its activities (ii) strengthened cooperation and partnership between CSOs and public institutions (iii) reinforced CSO capacity and resilience to carry out their activities effectively.

¹ SWD(2023) 106 final, COMMISSION ASSESSMENT, Economic Reform Programme of Montenegro 2023-2025.

² COM (2023) 691 final. COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS “New growth plan for the Western Balkans”, Brussels, 8.11.2023.

³ SWD (2023) 694 final. COMMISSION STAFF WORKING DOCUMENT Montenegro 2023 Report Accompanying the document Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2023 Communication on EU Enlargement policy, Brussels, 8.11.2023 .

⁴ National Strategy for Cooperation with Non-governmental Organizations 2021-2026 and Action Plan 2022-23.

The Strategy also reflects the current Law on Non-Governmental Organizations that foresees public funding to the sector.

The guiding principle for EU's support to media freedom in Montenegro are contained in the EU legislation related to the media, especially new upcoming regulations (European Media Freedom Act, Digital Service Act, Anti-SLAPP directive, etc.), as well as the Montenegro reports, which issue specific recommendations to follow for the upcoming reporting period.

Frequent consultations with civil society in Montenegro, bring forth the following views : i) efforts are still needed to ensure meaningful and systematic consultations of the Government with civil society and follow up mechanisms ii) the financial sustainability of Civil Society Organisations remains a major challenge and the legal and regulatory framework for CSOs is still an issue and iii) public funding is insufficient to sustain CSOs' initiatives, in particular in the social sector and iv) alternative sources of funding are not yet widely available.

In terms of support to specific sectors, this action will address the strategic priorities of Window 1 - Rule of Law, Fundamental Rights and Democracy - Thematic Priority 2: Fight against corruption; Thematic Priority 5: Fundamental rights; Thematic Priority 6: Democracy; Window 2: Good Governance EU acquis alignment, good neighbourly relations and strategic communication - Thematic Priority 1: Good governance; Window 3: Green agenda and sustainable connectivity - Thematic Priority 1: Environment and climate change; Window 4: Competitiveness and inclusive growth - Thematic Priority 3: Agriculture and rural development.

By focusing on these sectors, the action is in line with the EU-Western Balkans Strategy and the Flagship Initiative on Rule of Law. It is also in line with the European Green Deal and will support the Guidelines for the Implementation of the Green Agenda for the Western Balkans, notably for sustainable food systems and rural areas and biodiversity: protection and restoration of ecosystems.

2022 was declared the European Year of Youth, and, in October, the European Commission launched the Youth Action Plan in EU External Action⁵ (2022-2027) to promote the engagement of young people as strategic partners, supporting their empowerment and participation to contribute to sustainable development, equality and peace. The European Union and the Western Balkans also launched a joint forward-looking Agenda on Innovation, Research, Education, Culture, Youth and Sport, a long-term strategy for cooperation with the region. Through increased investments in Research, Education, Culture, Youth and Sport, the Western Balkans Agenda and its proposed actions will contribute to the region's economic and societal development and cooperation. It will seek to respond to the high rate of youth persons under the age of 30 who is not employed, in education or training (so-called NEETs), the EU created the Youth guarantee⁶.

In terms of complementarity with EU assistance, this action will complement and reinforce the involvement of civil society in some of the on-going programmes: *Energy Support Package*, *EU for Public Administration Reform*, *EU for Environment and Climate action* policies and *EU connectivity and green agenda*, as well as, the *Support to the agriculture sector* and the *IPARD III 2021-2023*. Moreover, it foresees to support engagement of civil society and youth organisations in the future Labour and Social Inclusion Sector Operational Programme. It will also complement the ongoing EU-funded *Regional Programme on Local Democracy in the Western Balkans (ReLOaD)* and *Technical Assistance to Civil Society Organisations (TACSO)* aimed at increasing and improving the capacities, networking, exchange of best practices and democratic role of CSOs at the regional level, as well as support a civil society friendly environment. In the

⁵ https://international-partnerships.ec.europa.eu/document/fe1bcd30-58da-4a37-ab2a-61848789da60_en

⁶ Youth guarantee is a EU commitment that entitles young people to receive a good quality offer of employment, traineeship, apprenticeship, or continued education within four months of leaving school or becoming unemployed. [https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32020H1104\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32020H1104(01)&from=EN)

Youth component the action will reinforce complementarity with RCC Youth Lab, RYCO programmes or RELOAD youth component.

In terms of complementarity with other donors' assistance in the identified sectors of support, the action will complement the support of the Norwegian regional civil society programme SMART Balkans (2021-2025), the Austrian Development Agency regional support in environment.

2.2.Problem Analysis

Area of support 1: Civil Society participation in the EU integration process across various policy areas

Short problem analysis

There is a need for Civil Society Organisations (CSOs) in Montenegro to expand their role in monitoring and participating in the reform process of various sectors related to Montenegro's accession process to the EU. The CSOs have varying needs for capacity building in function of their development levels.

Although some CSOs already have good capacity and know-how they remain very circumscribed to particular fields such as the rule of law, justice and good governance and they still lack *financial capacity* to perform effective interventions. Small and medium sized CSOs, in particular in more remote parts of Montenegro, could usefully draw on external expertise, knowledge on best-practices regionally and worldwide and support to their organisational, human resources and project management capabilities.

CSOs have a dual role to play, keeping citizens informed of their actions as well as voicing their concerns towards the public authorities in all areas of the EU accession process. Therefore, this is area of support targets a multi-sectorial policy dialogue in addition to building the capacities of CSOs.

Despite some improvements, there is insufficient policy dialogue between CSOs and the government on the chapters of the EU accession process. There is a strong need for reinforced mechanisms to bring in civil society's knowledge and expertise into the drafting of legislation. An effective partnership with the Government (both at central and local level) still needs to be reinforced.

Currently, the cultural sector is not organised enough to be able to significantly influence policy making and raise awareness on the transformative power of culture and art and its positive impact on the economy. The action will support CSOs to increase their capacity to propose policy actions and become recognised interlocutors of the Ministry of Culture and Media and other relevant stakeholders and also to raise awareness on good cultural management.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

The Ministry of Public Administration is responsible for the overall implementation the Strategy of Cooperation with Non-governmental Organizations and its monitoring is oversee by the Council of Cooperation with NGOs⁷.

⁷ On October 2022, it was adopted a new Decision on Council for Cooperation of State Administration Bodies and Non-Governmental Organisations The Council for Cooperation with NGO is composed by 6 members from line Ministries and 6 from Non-governmental Organizations. It's shared by the Ministry of Public Administration.

In addition to CSO, key stakeholders are different Ministries in charge of the sectors but also the municipalities at local level. There are also some donors, mainly UN agencies, USAID, British Embassy, NORAD and Austrian Cooperation that are involved in some of the sectors.

Area of support 2: Local CSOs' contribution to local development.

Short problem analysis

Montenegro is the smallest country in the Western Balkans but still it faces regional disparities. Therefore as part of their priorities of economic development policy, the Government of Montenegro recognized to need to increase the competitiveness of economy, offer new job possibilities, attract investors and overcome regional disparities in the country.

Montenegro has 25 local self-government units and the local governments have different competences⁸ and their own budget. As part their budget⁹ they can also finance non-governmental organizations and establish partnerships.

Local NGOs can support local development, however in most cases are small, technically poorly equipped organisations, dedicated to solving problems in the local community. Lack of financial resources and dependence on short-term projects has a negative impact on the continuity of their activities. Non-governmental organisations lack the technical skills necessary for organisational management, project planning, as well as specialist knowledge in the areas in which they carry out their activities.¹⁰

Recent public consultations¹¹ confirm the need for more local development activities and to strengthen the cooperation between local authorities and civic movements, in order to increase capacity and recognition of key stakeholders (civil society, youth organisations and other local authorities, other public sector bodies) as drivers of local development.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

The stakeholders of this support area are groups put into or facing a situation of vulnerability and civil society organisations across the board.

Area of support 3: Youth Participation in different policy areas

Short problem analysis

Young people represent a fifth of the population in Montenegro but decision makers often lose focus of their importance and adequate inclusion in different policies. Montenegrin society is also characterised by high “brain drain” due to the desire of educated people to leave the country, which constitutes a challenge for a small country. The main reasons for young people to leave the country are economic and the hope to find a better job based on merit¹².

Civic participation, through civil society organisations (CSOs) as the main channel, remains vital for success and sustainability of the EU accession process and needed reforms. With adequate capacities and networking, CSOs can engage citizens and among them especially marginalised groups, and contribute, together with

⁸ Law on Self-governments, 2011

⁹ Law [on Local Self-Government Financing](#)

¹⁰ Monitoring Matrix on Enabling Environment for Civil Society Development, Country Report for Montenegro 2021, CRNVO, Podgorica 2021

¹¹ Under the Reload project

¹² Youth Study Montenegro 2018/2019, Friedrich Ebert Stiftung.

governments, to dealing with the challenges of EU accession. One problem that Montenegro is facing is the level of youth inclusion – political, economic and social. This is particularly important, while young in Montenegro constitute around one-fifth of the population and their level of political, economic and social participation remain far from the levels projected in the Council of Europe’s *Agenda 2020*, as indicated in *Youth Participation Index*.¹³

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

The newly approved National Youth Strategy 2022-2026 determines the main policies for youth in Montenegro. The overall implementation of the Strategy is under the Ministry of Sports and Youth. According to the Law on Youth¹⁴ the Council on Youth is a body tasked with monitoring the youth policy implementation, as envisaged by the Youth Strategy.

Main stakeholders are youth organizations, civil movements, the Ministry of Sports and Youth and other line Ministries, Municipalities and youth centers.

The action will explore synergies with different regional programmes targeting youth, as Reload, RYCO and RCC to just mention a few.

Area of support 4: Measures to increase sustainability of civil society

Short problem analysis

The civil society is not equally developed in all parts of the country and in every sector related to the EU accession process. Recent consultations with civil society, pointed out new areas of interest for civil society engagement. Meanwhile the majority of the CSOs in Montenegro are highly dependent on donor funding that is available in the form of action grants. In recent consultations¹⁵, civil society indicated that they need support for administrative costs such as staff and equipment. However, it is also clear that civil society organisations need to reinforce their links with citizens and at the same time to develop other forms of funding including membership fees and crowdfunding.

Some comparatively weaker civil society groups include minority groups, youth organisations, civic movements and grassroots organisations in some of the less developed sectors such as agriculture, culture and environment.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

This area of support targets small civil society organisations’, civic and grassroots movements’ and local informal groups’ with weak capacity.

Government authorities and government structures that enable participation of civil society in a meaningful dialogue on the government’s policies, legislative bodies, businesses and individuals interested in philanthropy and full range of citizens are stakeholders to this area of support.

¹³ CoE projected values are in large discrepancy from the actual levels in the 5 countries: for political participation, CoE projected 30,23, while in the region it ranges from 2,19 (Turkey) to 4,43 (Montenegro); for economic participation CoE projected 42,4, while the values range from 4,22 (N. Macedonia) to 5,95 (Albania). See: <https://ybhwt.eu/youth-participation-index/>

¹⁴ Law on Youth (June 28, 2016)

¹⁵ Online consultation conducted in February with support from TACSO.

Area of support 5: Freedom of Expression and Media

Short problem analysis

Montenegro is a small media market with a population of approximately 625 000 people but the country has a very large number of media outlets. According to the Agency for Electronic Media, there are 16 commercial TV stations, 27 commercial radio stations, as well as a national public broadcaster with four channels and 21 local public service broadcasters (6 TV and 15 radio stations). There are also three daily newspapers (Vijesti, Dan, Pobjeda) registered in Montenegro, one weekly political magazine (Monitor) and one news agency (MINA). There is a large number of online news portals, including a number of unregistered outlets.

Montenegro has a pluralistic media environment but a deep political polarisation of the media scene persists, while growing competition from big regional media places additional strain on the local media market. Self-regulatory mechanisms are weak and an effective protection of journalists and other media workers needs to be improved as journalists still receive threats and are subject to attacks. The overall level of professionalism and ethical reporting in the media landscape needs to be improved.

Revised media legislation and a comprehensive media strategy remain to be adopted, through inclusive dialogue with media and civil society, and in line with the EU acquis and relevant European standards. Sustained efforts are needed to counter disinformation and limit the effects of online harassment and hate speech without disproportionately limiting freedom of expression. Fostering both investigative journalism and independence of journalists are vital issues for Montenegro's EU integration. In addition, a constructive approach needs to be adopted by the media on both side of the political spectrum, as they should play an important role in trying to overcome differences and polarisation in the society rather than exacerbate them.

The 2023 Commission report on Montenegro noted that there was again limited progress in the area of freedom of expression.

Identification of main stakeholders and corresponding institutional and/or organisational issues (mandates, potential roles, and capacities) to be covered by the action

The main stakeholders of this action are electronic, online and print media outlets and media NGOs operating in Montenegro. Media outlets have experienced hardship since the COVID-19 pandemic struck as well as the economic crisis. Most have struggled to cover even operating costs and staff salaries. This is why various institutions have stepped up support in Montenegro. In December 2021, the Ministry of Public Administration, Digital Society and Media allocated approximately EUR 300 000 in grants for 36 print and online media projects from the Media Pluralism and Diversity Fund established under the 2020 Media Law. In June 2022, the Council of the Agency for Electronic Media awarded, from the same Fund, approximately EUR 220 000 in grants to 11 broadcasters. In addition, the authorities continued to provide different forms of financial support to media outlets against the fallout of the COVID-19 crisis, including through exemption of broadcasting fees for 2022.

2.3.Lessons Learned

The choice of priority areas for this action was guided by the consultations (written consultations, February 2023) organised by the EU Delegation. Civil society actors, participating and contributing to the process has also highlighted the need to further support civil society in some important policy areas. Support to CSOs in different fields are already part of the on-going support of the EU delegation but other sectors still remain less supported. Considering the limited capacity of state institutions to liaise and cooperate with civil society, the National Resource Center and the local resource centres have become the reference point for many CSOs in the country and the action will ensure the continuation and further development of its activities and services. Further support to media and freedom of expression remains needed in view of lack of progress in these areas crucial for EU accession.

The midterm review of the Civil Society and Media Facility 2016-2017¹⁶ provided useful recommendations among which the recommendation to support middle-sized CSOs and strike a balance between financial support to small and large CSOs still holds true. For this reason and based on the successful sub-granting results of the recent CSF projects, this action will continue to encourage Financial Support to Third Parties (FSTP) in order to have a large outreach to grass-roots organisations as well as non-typical civil society actors such as individuals and informal groups, notably in the field of culture, consumer protection and local civic engagement. Based on the findings in the recent consultation of civil society (written consultation, February 2023) and conclusions of the most recent regional seminar on FSTP (TACSO, December 2022, Belgrade), FSTP should be kept flexible as the idea behind FSTP is to take risks and genuinely reach out to actors who would otherwise not have the capacity to apply to donors' funding opportunities and match their requirements. Consequently, the focus of intermediary organisations in organising FSTP should be on what outputs/outcomes could potentially be achieved through a project rather than on the quality of the applications themselves. In this regard, capacity building, even before starting FSTP, was mentioned as a key element of success to try to help applicants develop their ideas. This action will integrate all lessons learnt in the field of FSTP.

Previous support schemes provided to media have shown that media outlets have extremely limited knowledge and capacity to write and implement action grants. Furthermore, capacities have not improved through various media support schemes or training provided. This indicates that the media need simplified and more flexible supporting mechanisms.

3. DESCRIPTION OF THE ACTION

3.1. Intervention Logic

The overall objective of the action is to strengthen participatory democracy and the EU integration and approximation process in Montenegro through an enhanced contribution by civil society and media.

The Specific Objectives (Outcomes) of this action are:

1. CSOs' contribution to the EU integration process in a gender-sensitive manner is reinforced
2. The enabling environment for media freedom and pluralism is enhanced and media professionalism increased.

The Outputs to be delivered by this action contributing to the corresponding Specific Objectives (Outcomes) are:

- 1.1 Increased capacities of CSOs to engage in the **EU integration** process;
- 1.2 Improve **youth inclusion and participation in different policy areas**;
- 1.3 Increase capacities of CSOs to contribute to **local policy making and development** and ensure **sustainability**;
- 1.4. Improved and **enhanced cooperation** between CSOs and state institutions;
- 2.1. **Enhanced capacities of media outlets**, organisations and journalists to develop media literacy and disinformation resilience, practice investigative journalism, ensure media professionalism and foster partnerships

The underlying intervention logic for this action is that if capacities of CSOs are increased, the cooperation between CSOs and state institutions is improved and the enabling environment is improved, then CSOs' contribution to the EU integration process will be reinforced. Moreover, if capacities and professionalism of

¹⁶ TACSO, Mid-term Review for CSF 2016-2017

media outlets and journalists are increased and the enabling environment for media freedom is enhanced, then media's contribution to the EU integration process will be enhanced.

3.2. Indicative Activities

Indicative list of activities to outputs

Activities related to output 1.1 “Increased capacities of CSOs to engage in the EU integration process in various thematic areas”, through:

- a. A Call for proposals will be launched to support the work of organisations in various sectors that can contribute to the Montenegro's EU accession process and that are complementary to some of the EU support or areas that are underfunded. The assistance will contribute to increase the relevance and sustainability of civil society through innovative approaches and partnerships that promote participatory democracy and increased awareness.
- b. Framework Partnership Agreements with associated operating grants. A call for Framework partnerships and associated grants for implementation will be launched at the beginning of 2025 (specific sector/themes will be determined during the preparation of the call) following the rationale used in this call, namely that of enhancing the expertise, oversight and advocacy of CSOs in sectors important for the EU integration and/or in underfunded sectors/areas, and increasing their partnerships with the institutions. **Operating grants** will fund the operationalisation of the annual strategic plans of the selected framework partners.

Activities related to output 1.2. “Increased capacities of CSOs to promote **youth inclusion and participation** in different policy areas”

A call for proposals will be launched to support CSOs, including youth organisations, student associations, civic movements and youth in general to enhance inclusion of youth perspectives across different policy areas.

Activities related to output 1.3. “Increased capacities of civil society organisations to contribute to **local policy making and development**”

A call for proposals will be launched to support CSOs engaging in local (municipal) policy making and development.

Activities related to output 1.4. “Increased capacities of civil society to ensure **sustainability and enhanced cooperation** between CSOs and state institutions”

A tender will be launched to contract an entity which will provide strategic support to CSOs, making sure that the support does not overlap with that of the National Resource Centres. Support may include better gender mainstreaming in all actions, better sustainability of the actions, strategic advocacy and efficient communication (especially for local and grassroots organisations), enhanced media coverage of the topics prioritised within the programme, fostering interaction between CSOs and the media, and projects' impact monitoring and visibility. The tender will include a component for support to public institutions at central or local level in order to improve partnerships with CSOs.

Activities related to output 2.1. “Enhanced capacities of media outlets, organisations and journalists to develop **media** literacy and disinformation resilience, practice investigative journalism, ensure media professionalism and foster partnerships”

Support will be provided through an international organisation which has specific knowledge and capacity to help the professionalisation of the media. Its role will be to help foster professional, investigative and ethical reporting by encouraging media partnerships and collaborations at national as well as local level. Activities will encourage media to create a social space where dialogue is encouraged and difference of opinion respected. The role of the media should be one of convergence rather than deepening the polarisation in the society. The international organisation will provide

capacity building and guidance on constructive journalism as well as provide third party support/re-granting. Improving media literacy and fight against Foreign Information Manipulation and Interference will also be tackled.

The specific characteristics of this activity will be to work very tightly with all media in the country from different sides of the political spectrum. Since the media outlets are as polarised as ever and are difficult to get together around one table, the activity should try to decrease the political tension in the media sphere and try to find common grounds for media to work jointly on topics such as: democratisation of the country, improving social cohesion, EU integration etc.

The action has to be carried out by an entity with a long-standing tradition and experience of working with the media (preferably with a strong presence and experience of working in Montenegro) and a strong sense of neutrality. The entity carrying out this action has to have technical and administrative competence and experience when it comes to working with different media outlets, and be able to generate the trust of different parties in the media landscape, currently characterised by strong polarisation.

3.3.Mainstreaming

Environmental Protection, Climate Change and Biodiversity

Environmental and climate change considerations will be taken into account during the implementation of projects activities. All grant beneficiaries and contractors will be strongly encouraged to act in line with best practice and make responsible use of office materials, travel arrangements and energy efficient principles. In addition, action grants targeting environmental and climate change protection organisations will be proposed and encouraged through the implementation of the various activities.

Besides addressing environment as one of the main priorities, the Action shall support environmental policies and environmental friendly implementation activities (i.e. plastic free etc.), including in sub-granted projects. The Action should also contribute to instigate more environmental friendly behaviours also in all public events, inviting participants and beneficiaries to apply behaviours which do no harm to the environment in all project related and non-project related activities. The action supports and empowers CSOs to further increase their action in the areas of environmental, biodiversity and climate protection. The action will have positive environmental impact, as its activities will strengthen the role and capacities of CSOs in implementing conservation measures and conserving valuable biodiversity elements thereby improving environmental conditions in the short- to long-term. The use of investigative journalism with further support the work on environmental issues. The action will also directly address climate change issue, by implementing measures that will mitigate climate change effects.

Gender equality and empowerment of women and girls

As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G1. This implies that the Action shall support gender equality and women's and girl's empowerment under all activities, thus allowing the professional development and participation of women in all the sectors addressed by this programme. These aspects shall be taken into account under all phases of the implementation and for this reason the guidelines for the calls for proposals resulting from this Action will have for every priority area a specific requirement on gender equality and women's and girl's empowerment (equal access to trainings and other activities for women, etc.).

The action will be in line with the EU Gender Equality strategy 2020-2025¹⁷. The different needs and priorities of women, men, girls and boys will be considered in the action, and a gender analysis will be done in this regard, when applicable. Montenegro has a gender equality legal framework in place and there is a new Gender Equality Council. In 2016 to Gender equality Law was amended with clearer definitions, improved provisions on penalties and better referral mechanism. Gender equality action plan adopted (2017-2021) but lacks adequate resources.

Gender Equality Index is developed by the European Institute for Gender Equality (EIGE) and is used to measure inequalities in all EU member states and in the relevant IPA III beneficiaries. Base on its methodology the National Statistical Office of Montenegro publish a 2020 report, indicating that Montenegro scored 55 (out of maximum 100 points) and lower than the EU average of 67.4. There is an inherent problem related to money and power according to the report. The notable lack of women's participation in political life, as well as in entrepreneurship, where women constitutes only 9.6%. Unfortunately, women are a minority in Parliament and underrepresented in the Government; similarly, only a small percentage of business owners are women. Following the 2020 parliamentary elections, the number of women MP has decrease. On the other hand, the civil society sector has shown to be a key area for women's leadership. It is a striking example that women lead many of the most influential and most developed CSOs in Montenegro. This phenomenon clearly shows that civil society in Montenegro has a great potential to incite women to become active participants in the area of policy-making and advocacy, if they are given the opportunity to develop their capacities and engage in civic activism. Organisations active in these areas will be involved in the consultations for specific Call for proposals and will be targeted among the beneficiary of the capacity building components.

The issue of gender equality has been highlighted as a priority under the CSO consultation undertaken by the TACSO needs assessment held in December 2019 in Montenegro and also in the consultation for the CSF 2021-23 organised in April 2021 with TACSO's support.

The European Thematic Instrument for Democracy and Human Rights targets gender equality as one of the key themes, namely fight against gender based violence, economic empowerment and political participation of women should tackle those recognised priorities. Montenegro adopted the 2016-2020 strategy on combating family violence. The law fulfil most of the standards but implementation is lagging behind.

The delegation supports different small grants (up to EUR 60,000) that target flight against domestic violence and promote gender equality, as well as safety for women journalists, though different grants under the Civil Society Facility.

Human Rights

The Action will target freedom of expression under its media and democracy priority area and it will generally follow a human-rights based approach, taking into consideration special individual needs of different groups. The Action shall continuously seek rights based friendly implementation modalities under all activities and try to reach out, by involving them, vulnerable and marginalised groups. This shall be translated in ensuring accessibility (physical and virtual) for people with different type of disabilities in all project related activities, involving systematically vulnerable groups (minorities, especially Roma, LGBTIQ and other) and women. The action will contribute to improve the social inclusion of the above-mentioned vulnerable groups and fight racism and all forms of discrimination, including antigypsyism.

Although the CSF has always been open to all EU integration related areas of CSOs intervention, including minorities and vulnerable groups, it has been noticed over the years that LGBTIQ, Roma and women's rights CSOs are more likely to apply for grants awarded under Thematic Instrument for Democracy and Human

¹⁷ COM (2020)152 final: Communication from the Commission to the European Parliament, the Council, the European and Social Committee and the Committee of the Regions; A Union of Equality: Gender Equality Strategy 2020-2025, Brussels, 5.3.2020

Rights, rather than the CSF. The main reason for this circumstance is most probably the lower threshold for minimum grants and the less rigid co-financing requirements (5% instead of 10%). In order to mitigate the risk of minorities being excluded entirely from the CSF, financial support to third parties will remain a possibility for smaller CSOs to benefit from EU funding.

Disability

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D1. This implies that accessibility (physical and virtual) for people with different type of disabilities in all project related activities will be ensured.

Democracy

The Action directly supports democracy by supporting the principles of good governance, notably citizen participation, accountability, transparency and also freedom of expression and media.

3.4.Risks and Assumptions

Category	Risks	Likelihood (High/Medium/Low)	Impact (High/Medium/Low)	Mitigating measures
External environment	<u>Risk 1:</u> the political climate (and/or elections results) generates instability and shrinking space for civil society.	Low	High	The EUD will continuously monitor the situation and seek dialogue with the authorities with the aim to ensure continuous engagement of the civil society, particularly in the accession negotiations process.
External environment	<u>Risk 2:</u> the situation of freedom of expression and pluralistic and independent media further deteriorates	Medium	High	Continuous monitoring of the media environment and support to independent media will be essential, particularly in the accession negotiations process. When not possible, cooperation with the European Endowment for Democracy should be sought.
People and the organisation	<u>Risk 3:</u> Further limitation in human resources capacity and/or shift in mandate and/or strategic orientation of the public stakeholders involved in the regulation and coordination of the priority areas	Medium	High	As regards human resources development, the EU accession process entails strengthening sector governance structures and processes. The EUD will continuously monitor the situation and seek dialogue with the authorities with the aim to ensure continuous strategic engagement in line with EU requirements in the priority areas addressed by the action.

	addressed by this action.			
People and the organisation	<u>Risk 4:</u> Limited capacity of civil society to respond to call for proposals launched under this action in the different priority areas.	Low	High	This action document is based on the results of consultations with civil society and lessons drawn from monitoring and evaluation. The guidelines will be drafted carefully so to ensure sufficient response from civil society without jeopardising less capacitated organisations (through FSTP).

External Assumptions

Important assumption is a stable political situation in the country. The Presidential and Parliamentary elections in 2023 may contribute to a period of instability in particular with the main institutional partners and possibly some media outlets.

The inclusion of civil society in the working groups and different partnerships to contribute to the EU accession process will depend on the political commitment.

Equally important is that the legal frameworks in which civil society and media operate remains conducive for their operations and that the exercise of the freedom of association and expression is guaranteed to all stakeholders. Thus, the assumption is that the situation as regards the exercise of fundamental rights and freedoms in the country will be respected.

3.5.Indicative Logical Framework Matrix

Results	Results chain: Main expected results	Indicators	Baselines (values and years)	Targets (values and years)	Sources of data	Assumptions
Impact	To strengthen participatory democracy and the EU integration and approximation process in Montenegro through an enhanced contribution by civil society and media.	1 Value of V-Dem Participatory Component Index 2 No. of closed chapters in EU Accession Negotiations	1 2022: ME 0.53 2 2021 values (no. of closed chapters out of 33-35) ME: 3	1. 2030 at least 0.64 2 ME: 33	1 V-Dem Annual Democracy report https://www.v-dem.net/publications/democracy-reports/ 2. European Commission Annual Reports	<i>Not applicable</i>
Outcome 1	<i>CSOs contribution to the EU integration process is reinforced; Cooperation between the government and civil society is strengthened; and CSO capacity and resilience is increased</i>	1.1 conducive environment index disaggregated by IPA Beneficiary 1.2 CSO – public institution cooperation index disaggregated by IPA Beneficiary 1.3 CSO capacity and accountability index disaggregated by IPA Beneficiary	1.1 2021 ME: 3.35 1.2 2021 ME: 2.00 1.3 2021 ME: 3.33	1.1 2030: at least 3.8 1.2 2030: at least 3.8 1.3 2030: at least 3.8	EU Guidelines Assessment Report	
Output 1 related to Outcome 1	<i>Increased capacities of CSOs to engage in the EU integration process in various thematic areas</i>	Public trust in civil society index	2022: 41	2030: 51	Regional Cooperation Council's Balkan Barometer https://www.rcc.int/balkanbarometer/results/2/public	Assume that public trust in CSOs is proportional to their performance in advocating for citizens, and working on behalf of citizens. The indicator is therefore a useful proxy for the performance of CSOs in advocacy work
Output 2 related to Outcome 1	<i>Increased capacities of CSOs to promote youth inclusion and participation in various policy areas</i>	1.youth Participation Index (Political, Social 2.Increased youth participated in local and central government policies	1.YPI(2022) 10.3 2. n/a	1. YPI 11 2. 1000 youth engaged in different policies	1.Youth participation Index (YPI) https://www.divac.com 2.Monitoring reports from implementing partners	

Output 3 related Outcome 1	<i>Increased capacities of civil society organisations to contribute to local policy making and development</i>	<i>Number of vulnerable citizens benefiting from support for local development</i>		600	<i>Monitoring reports from implementing partners and external evaluations (ROM)</i>	
Output related Outcome 1	<i>Increased capacities of civil society to ensure sustainability and enhanced cooperation between CSOs and state institutions</i>	1. CSO funding sources index 2 CSO – public institution cooperation index	1. 2021 ME 3 2. 2021 ME 2	1. 2030: at least 4.5 2. 2030: at least 3.8	1. CSO funding sources index 2 CSO – public institution cooperation index	DG NEAR Guidelines for EU Support to Civil Society
Outcome 2	<i>The enabling environment for media freedom and pluralism is enhanced and media professionalism increased.</i>	2.1 MPM index of fundamental protection 2.2 MPM index of Market Plurality 2.3 MPM index of Political independence	 2.1 2022 ME 45 2.2 2022 ME 68 2.3 2022 ME 64	 2.1 2030 at most 36% 2.2 2030 ME 63 2.3 2030 at most 59%	 2.1 2.2, 2.3 Media Pluralism Monitor from the Centre for Media Pluralism and Media Freedom at the Robert Schuman Centre (https://cmpf.eui.eu/mpm-2022-interactive/)	2.1 MPM index of fundamental protection 2.2 MPM index of Market Plurality 2.3 MPM index of Political independence
Output related Outcome 2	<i>Enhanced capacities of media outlets, organisations and journalists to develop media literacy and disinformation resilience; practice investigative journalism; ensure media professionalism; and foster partnerships</i>	1. Number of media partnerships formed 2. Increased number of relevant media products	1. 0 2. 0	1. At least 4 2. At least 20	Project reports and media monitoring	Media accept to collaborate and explore the concept of constructive journalism

4. IMPLEMENTATION ARRANGEMENTS

4.1. Financing Agreement

In order to implement this action, it is not envisaged to conclude a financing agreement with Montenegro.

4.2. Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 72 months from the date adoption by the Commission of this Financing Decision.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer in duly justified cases.

4.3. Implementation modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures¹⁸.

4.3.1. Direct Management (Grants)

4.3.1.1 Grants

- **Civil Society participation in the EU integration process across various thematic policy areas.**
 - (a) **Purpose of the grant(s):** Increased capacities of CSOs to engage in the EU integration process in various thematic areas¹
Contributing to Output 1.1.
 - (b) **Type of applicants targeted:**
Applicants will have to be
 - civil society organisations and networks; and
 - legal person; and
 - non-profit-making

4.3.1.2 Grants

- **Support to Civil society organisations, including youth organisations, student associations, civic movements and youth in general to implement actions that contribute to youth inclusion and participation across different policy areas.**

¹⁸ [EU Sanctions Map](#). Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

(a) Purpose of the grant: Increased capacities of CSOs to promote youth inclusion and participation in various policy areas.
Contributing to output 1.2.

(b) Type of applicants targeted:

Applicants will have to be:

- Formal and informal groups;
- civil society organisations and networks, and
- non-profit-making

4.3.1.3 Grants

- **Support to different key stakeholders to contribute to local development.**

(a) Purpose of the grant: Increased capacities of civil society organisations to contribute to local policy making and development.
Contributing to output 1.3.

(b) Type of applicants targeted:

Applicants will have to be:

- Formal (legal entities) and informal groups
- civil society organisations and networks, and
- non-profit-making

The part of the action under the budgetary envelope reserved for grants may, partially or totally and including where an entity is designated for receiving a grant without a call for proposals, be implemented in indirect management with an entity, which will be selected by the Commission's services using the following criteria:

- relevant extensive technical experience in working with CSOs/media organisations and in supporting the civil society and media sectors;
- demonstrated operational capacity to manage projects of similar size, and to ensure a proper implementation of FSTP schemes.

4.3.2 Direct Management (Procurement)

Procurement will contribute to achieving Output 1.4: Increased capacities of civil society to ensure sustainability and enhanced cooperation between CSOs and state institutions.

4.3.3 Indirect management with a pillar-assessed entity

A part of this action (output 2.1 on Freedom of Expression and Media) may be implemented in indirect management with a pillar-assessed entity, which will be selected by the Commission's services using the following criteria: presence of specific technical sector/thematic expertise in the field of media and/or in particular working with Montenegrin media across the political spectrum, and logistical, financial and management capacities to implement a programme of the foreseen size.

The implementation by this entity entails management and implementation of all aspects of the action, including budget implementation tasks (procurement and grant award procedures as relevant), to support the achievement of Output 2.1 of the present action.

4.3.4 Changes from indirect to direct management mode (and vice versa) due to exceptional circumstances

If the implementation modality under indirect management as defined in section 4.3.3 cannot be implemented due to circumstances beyond the control of the Commission, the modality of implementation by grants under direct management would be used according to the following section 4.3.1:

(a) Purpose of the grant: Activity that will contribute to achieve Output 2.1 on Freedom of Expression and Media

(b) Type of applicants targeted:

The types of applicants targeted should:

- be a legal person and
- be a civil society organisation, or a consortium of civil society organisations or
- be an International Organisation.

4.4. Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

The Commission's authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult (Article 28(10) NDICI-Global Europe Regulation).

4.5. Indicative Budget

Indicative Budget components	EU contribution 2024 (amount in EUR)	EU contribution 2025 (amount in EUR)	Indicative third- party contribution ¹⁹ (amount in EUR)
Outcome 1 composed of	1 250 000	2 750 000	280 000
<i>Grants (direct management) – cf. section 4.3.1</i>			
Civil Society participation in the EU integration process		1 250 000	150 000
Support to youth participation	600 000		30 000
Support to different key stakeholders to contribute to local development		1 000 000	100 000
<i>Procurement (direct management) – cf. section 4.3.1</i>			

¹⁹ The indicative third-party contribution will be provided by the selected implementing partners.

Support to capacity to CSOs and sustainability and to government	650 000	500 000	N.A.
Outcome 2 composed of		1 000 000	100 000
<i>Indirect management with a pillar-assessed entity – cf. section 4.3.3.</i>			
Media support		1 000 000	100 000
Grants – total envelope under section 4.3.1.	600 000	2 250 000	
Procurement – total envelope under section 4.3.2	650 000	500 000	
Indirect management with a pillar-assessed entity – total envelope under section 4.3.1		1 000 000	
Evaluation – c.f. section 5.2 Audit – c.f. section 5.3 Strategic Communication – c.f. section 6	N.A.	To be covered by another Decision	N.A.
Totals: EUR	1 250 000	3 750 000	380 000

4.6.Organisational Set-up and Responsibilities

The action will be managed by the EUD.

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in the above governance structures set up for governing the implementation of the action.

4.7.Pre-conditions

No pre-conditions foreseen.

5. PERFORMANCE MEASUREMENT

5.1.Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its Outputs and contribution to the achievement of its Outcomes, and if possible at the time of reporting, contribution to the achievement of its Impacts, as measured by corresponding indicators, using as reference the logframe matrix (for project modality

The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews).

Arrangements for monitoring and reporting, including roles and responsibilities for data collection, analysis and monitoring:

Monitoring will be carried out by the Delegation of the European Union to Montenegro, possibly with the support of external consultants performing regular monitoring visits. The EU Delegation staff or assigned monitors will hold regular contacts and carry out monitoring visits to all grant beneficiaries.

Monitoring can also be undertaken by the Result Oriented Monitoring, Administrative and Technical Assistant (ATA) or by Technical Assistance contract.

The monitoring and evaluation will include regular, yearly, regional meetings including CSOs representatives, in order to analyse the state of play and advancement towards the set targets. TACSO assessment against the Civil Society guidelines is an additional source of data and monitoring tool. All the findings of the monitoring and evaluation will feed into the preparation of the EU annual reports.

5.2.Evaluation

Having regard to the importance of the action, a final evaluation will be carried out for this action or its components contracted by the Commission

It will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account the next Civil Society Facility and Media Programmes 2025 onwards.

The Commission shall form a Reference Group (RG) composed by representatives from the main stakeholders at both EU and national (representatives from the government, from civil society organisations (private sector, NGOs, etc.), etc.) levels. If deemed necessary, other donors will be invited to join. The Commission shall inform the implementing partner at least 1 month in advance of the dates envisaged for the evaluation exercise and missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports shall be shared with the Beneficiary and other key stakeholders following the best practice of evaluation dissemination. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the Beneficiary, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

The financing of the evaluation shall be covered by another measure constituting a financing Decision.

5.3.Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

6. STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

All entities implementing EU-funded external actions have the contractual obligation to inform the relevant audiences of the Union's support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. To that end they must comply with the instructions given in the 2022 guidance document [Communicating and raising EU visibility: Guidance for external actions](#) (or any successor document).

This obligation will apply equally, regardless of whether the actions concerned are implemented by the Commission, the Beneficiary, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU Member States. In each case, a reference to the relevant contractual obligations must be included in the respective financing agreement, procurement and grant contracts, and contribution agreements.

7. SUSTAINABILITY

Although most of the legal framework for civil society organisations to operate is in place, challenges still remain regarding transparency on allocation of funds from the state budget. Therefore, it is important to continue to support the government structures and mechanisms to allocate funding in a transparent and

professional way. This action will support this process further. Moreover, financial support to CSO is also part of this action in order to support their development and possibility to improve their capacity in participating in the policy dialogue.

Therefore the sustainability of the action will result from the successful implementation of the grant contracts as well as the technical assistance, since its main objective will be the strengthening of the CSOs capacity to become financially sustainable, especially through their own fund-raising abilities, as well as through an established mechanism for transparent public funding and entrustment of management of EU funds to Montenegro authorities.

Appendix 1: IDENTIFICATION OF THE PRIMARY INTERVENTION LEVEL FOR REPORTING IN OPSYS

A Primary intervention (project/programme) is a coherent set of results structured in a logical framework aiming at delivering development change or progress. Identifying the level of the primary intervention will allow for:

- ✓ Differentiating these Actions or Contracts from those that do not produce direct reportable development results, defined as support entities (i.e. audits, evaluations);
- ✓ Articulating Actions and/or Contracts according to an expected common chain of results and therefore allowing them to ensure a more efficient and aggregated monitoring and reporting of performance;
- ✓ Having a complete and exhaustive mapping of all results-bearing Actions and Contracts.

The present Action identifies as

Group of contracts level (i.e: i) series of programme estimates, ii) cases in which an Action Document foresees many foreseen individual legal commitments (for instance four contracts and one of them being a Technical Assistance) and two of them, a technical assistance contract and a contribution agreement, aim at the same objectives and complement each other, iii) follow up contracts that share the same log frame of the original contract)		
<input checked="" type="checkbox"/>	Group of contracts	Grant contracts, 1 Service contract and 1 Contribution Agreement