



CHAPTER 27 TRAPPED IN TIME

Shadow Report for Chapter 27 – Environment and Climate Change

May, 2025

This report provides an analysis of the state of alignment of Montenegro's legislative and institutional framework in the field of energy with the EU acquis, identifying key challenges and offering recommendations for accelerating the accession process within Chapter 27.

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I INTRODUCTION

Chapter 27 – Environmental Protection and Climate Change – is one of the most challenging and financially most demanding chapters in the Montenegrin EU Accession process. Albeit it was formally opened in 2018, it is clear that the Montenegrin institutions have been facing challenges related to implementation of these commitments for a long period of time. Effective implementation of European standards requires strong institutions, political will, significant financial investments, long-term strategic planning and, most importantly, active participation of citizens and civil society. Given the complexity and scope of the EU acquis related to this chapter, as well as the increasingly more evident need for urgent action regarding climate change and the preservation of natural resources, it is of utmost importance that the public has insight into the actual progress, obstacles, and the quality of implementation of the measures and policies carried out by the Government.

Montenegro has taken numerous steps towards alignment with the EU acquis, which was especially achieved through improvement of the legislative framework, adoption of strategic documents, and implementation plans. However, despite the visible progress in formal terms, the process of implementing the EU acquis in the field of environment and climate change is progressing slowly and inconsistently, while this path has been characterised by numerous obstacles. Insufficient transparency, fragmented competences, lack of administrative capacity, institutional coordination, financial resources, limited oversight of the implementation of regulations, and frequent conflicts between economic interests and the protection of natural resources—both at the national and local level—indicate that environmental protection still remains low on the list of political priorities.

It is especially concerning that the key areas, such as waste management, air protection, protection of water, nature and climate policy – are far below the satisfactory level for implementation in practice and alignment with the European standards. Financial investments in the environmental sector have been chronically insufficient, while the oversight and control mechanisms in relation to implementation of legislation have not been developed to the extent which would ensure efficient implementation of the commitments which have been assumed in this regard. Montenegro substantially relies on international assistance, which is especially related to international assistance, and primarily focused on resources available through the EU funds, which still remain insufficiently exploited. At the same time, although the role of civil society is nominally recognized through strategic documents and decision-making processes, in practice it remains marginalized, which further complicates the oversight of policy implementation and reduces public trust in the reform process in the field of environment.

This shadow report represents the contribution of civil society to monitoring reform processes in the field of environment and climate change, with the aim of providing an overview of the current situation and highlighting key challenges, shortcomings in the implementation of laws, and policies which are not aligned with sustainable development goals and European standards. Particular attention is devoted to case studies which illustratively demonstrate the attitude of institutions towards environmental issues.

This Report is going to present the degree of implementation of commitments from the Action Plan for meeting the closing benchmarks in Chapter 27 – Environment and Climate Change, for the period from June 2024 to May 2025, while it is also going to provide recommendations for strengthening the process of transposition and implementation of EU legislation covered by Chapter 27.

We believe that these reports represent a key instrument for enhancing transparency and accountability in the European integration process, particularly in the area of environmental protection. The purpose of such reports is not only to provide an objective insight into the actual state and dynamics of reform implementation, but also to contribute to strengthening institutional accountability, encourage more effective decision-making, and enable a higher-quality dialogue between policymakers, civil society, and citizens. At the same time, such independent analysis has an important educational function, as it helps raise awareness about the importance of the environment, both as a fundamental element of sustainable development and as an everyday value that directly affects the quality of life of all citizens of Montenegro.

II METHODOLOGY

This shadow report is an output of joint effort of civil society organisation which act within the Coalition 27 (MNE: “Koalicija 27”) and other independent experts from the area of environmental protection and climate change. The methodological approach is based on combination of qualitative and quantitative data sources, as well as on policy analysis and monitoring institutional processes in Montenegro.

Key data sources include:

- Legislative and strategic documents, including laws, by-laws, national and local strategies, as well as reports prepared by the relevant ministries and institutions;
- EU reports and documents, including European Commission’s annual reports on Montenegro’s progress in the accession process, sectoral analyses, and guidelines from the EU acquis;
- Statistical data from the national and international institutions, such as Environmental Protection Agency, MONSTAT, etc.;
- Case studies which shed light on specific ecological challenges and institutional practices, which depict examples from different areas of Montenegro;
- Media content and public documents, as well as supplements and clarifications provided by the official and unofficial sources.

This shadow report for Chapter 27 includes the following sub-areas: horizontal legislation, water quality, air quality, waste management, nature protection, climate change, industrial pollution, chemicals, civil protection, and noise. Each sub-area includes:

- overview and assessment of state of the subject matter;
- strategic and legislative framework, implementation of legislation;
- key recommendations for resolving the identified issues.

The principles of openness and inclusivity led the preparation of this Report, whereby these principles were coupled with the principles of transparency and protection of public interest, all while taking an actively responsible approach to the data analysis and presentation. The conclusions are based on credible and verifiable sources. The Report does not claim to depict an exhaustive picture of all segments of Chapter 27, but it rather aims to highlight the key areas in which urgent improvements are needed, as well as to provide examples of good practice that can serve as a model for further steps in the European integration process.

III GENERAL OVERVIEW

The opening benchmark for Chapter 27 – Environment and Climate Change was met on 28 July 2016, when the Government of Montenegro adopted the National Strategy for the Transposition, Implementation, and Application of the EU Acquis in the Field of Environment and Climate Change, along with the Action Plan for the period 2016–2020.

Chapter 27 was opened in December 2018, at the Intergovernmental Conference in Brussels, after which Montenegro received the European Commission's Joint Position containing eight closing benchmarks for its closure. The EU Joint Position for Chapter 27 defined the following eight closing benchmarks that Montenegro is obliged to meet in order to achieve internal readiness for the chapter's closure in the coming period.

The Government of Montenegro adopted the Action Plan for meeting the closing benchmarks for Chapter 27 – Environment and Climate Change on 18th February 2021, which represents the overarching strategic document for the field of environment and climate change. The Plan foresees biannual reporting to the Government and the European Commission. The Action Plan defines clear steps regarding: the activities that need to be undertaken; the manner of implementation of the defined activities; the competent institutions responsible for fulfilling the specified obligations; the deadlines for completing the activities; and the sources of financing, including an estimate of the resources required for the implementation of the defined activities (where it was possible to carry out precise identification of the necessary resources).

The Action Plan defines the total of 251 obligations, which are divided as follows:

- horizontal legislation: 17,
- air quality: 19,
- waste management: 37,
- water quality: 33,
- protection of nature 71: (out of which 19 obligations are defined within the Ulcinj Saline Action Plan),
- industrial pollution: 15,
- chemicals: 27,
- noise: 12,
- civil protection: 9 and
- climate change: 11.

The following institutions are responsible for implementation of the abovementioned obligations: the Ministry of Ecology, Sustainable Development and Northern Montenegro; the Ministry of Spatial Planning, Urbanism and State Property; the Ministry of Energy and Mining; the Ministry of Justice; the Ministry of Human and Minority Rights; the Ministry of Economic Development; the Ministry of Agriculture, Forestry and Water Management; the Ministry of Interior; the Ministry of Health; the Office for European Integration; the Maritime Safety Administration; the Water Administration; the Administration for Food Safety, Veterinary and Phytosanitary Affairs; the Customs Administration; the Hydrocarbons Administration; the Forest and Hunting Management Administration; the Institute of Hydrometeorology and Seismology; the Environmental Protection Agency; the Geological Survey of Montenegro; the Institute

of Public Health of Montenegro; the Public Enterprise for Coastal Zone Management; the Public Enterprise for National Parks; the Ecotoxicology Testing Centre; the Judicial Training Centre; the Natural History Museum; and the Association for the Improvement of Water Supply, Wastewater Treatment and Disposal in Montenegro.

The following institutions are also competent for implementation of the obligations: The Parliament of Montenegro, the State and Basic Prosecutor's Offices, as well as all 24 local self-government units. Identified responsible actors also include: the University of Montenegro, the Institute of Marine Biology, as well as managers of protected areas, local water and wastewater utilities, operators of industrial facilities, and civil society organizations.

Within the Seventh Biannual Report on the implementation of the Action Plan for meeting the closing benchmarks in Chapter 27 – Environment and Climate Change, covering the period March–August 2024, the degree of implementation of measures with a due date amounted to 24% (36 measures), while 35% (53 measures) were partially implemented. For measures with a continuous deadline, 49% (47 measures) were implemented, and 44% (42 measures) were partially implemented. During the reporting period, the Eighth Biannual Report on the implementation of the Action Plan for meeting the closing benchmarks in Chapter 27 – Environment and Climate Change, covering the period September 2024–February 2025, had not yet been adopted.

During this reporting period, the Government of Montenegro adopted:

- Information on the state of the environment for 2023 (10th October 2024)
- Decision on the distribution of profits of the Limited Liability Company “Centre for Ecotoxicological Research” (17th May 2024)
- Business Report of the LLC Environmental Protection Fund for 2023, including the Financial Statement and the Final Account (06th June 2024)
- Fifth National Report on the implementation of obligations under the Joint Convention on the Safety of Used Fuel Management and on the Safety of Radioactive Waste Management (19th September 2024)
- Business Report and Financial Statement of “CETI” LLC Podgorica (17th May 2024)
- Environmental Monitoring Program for 2024 (14th March 2024)
- Information on the Radioactive Waste (RAW) storage facility (26th December 2024)
- Rulebook on the classification, packaging, and labelling of chemicals in accordance with the United Nations Globally Harmonized System (“Official Gazette of Montenegro”, No. 017/24)
- Regulation on prohibited and permitted methods of use, production, and placing on the market of chemicals posing unacceptable risks to human health and the environment (“Official Gazette of Montenegro”, No. 070/18, 076/20, 134/22, 057/24)
- Rulebook on the content of reports on mercury sources and the method of maintaining mercury storage records (“Official Gazette of Montenegro”, No. 103/24)
- Rulebook on the list of POPs substances, procedures for managing POPs waste, and threshold concentrations of POPs substances related to the processing and disposal of waste containing or contaminated with POPs (“Official Gazette of Montenegro”, No. 098/24)
- Information on completed audit studies for individual protected areas with focus on National Parks (26th December 2024)

- Decisions on the designation of Natural Monuments “Sopot” and “Dražin vrt” (04th July 2024)
- Draft decision on the designation of the Natural Monument Ratac with Žukotrlica (27th March 2024)
- Proposal of a program of measures for achieving or maintaining good status of Montenegro’s marine environment (04th July 2024)
- Rulebook on establishing the list of permitted plant, animal, and fungal species and the method of updating the list (“Official Gazette of Montenegro”, No. 098/24)
- Rulebook on establishing the list of invasive alien species of concern in Montenegro and/or the EU and the method of updating the list (“Official Gazette of Montenegro”, No. 068/24)
- Information regarding the Initiative for obtaining Government consent for concluding annexes to land lease agreements for the placement of temporary structures in National Park “Durmitor” (1st November 2024)
- Government considered and adopted information regarding the case of providing shelter services for a brown bear cub (20th June 2024).
- Decision on the establishment of the Commission for conducting auctions for the allocation of emission credits.
- Decision on amending the decision on the establishment of the Commission for conducting public auctions for the allocation of emission credits.
- Decision on modifying the decision on the establishment of the Commission for conducting auctions for the allocation of emission credits.
- Plan for the implementation of the Kigali Amendment for 2024–2029
- Decision on the allocation of funds collected through the auction for the allocation of emission credits for 2023 (“Official Gazette of Montenegro”, No. 068/24).
- Decisions on increasing the share capital of the Limited Liability Company “Centre for Ecotoxicological Research” (20th November 2024)
- Work Program and Financial Plan of LLC “Centre for Ecotoxicological Research” – Podgorica for 2024 (28th March 2024)
- Law on Protection from Ionizing Radiation, Radiation and Nuclear Safety and Security (“Official Gazette of Montenegro”, No. 049/24 of 29th May 2024)
- Program for monitoring the quality of liquid petroleum fuels for 2024 (“Official Gazette of Montenegro”, No. 093/24)
- Information on the state of the environment for 2023
- Medium-Term Program and Government Work Program for 2024 (10th October 2024)
- Business Report and Financial Statement of LLC “Centre for Ecotoxicological Research” – Podgorica for 2023 (17th May 2024)
- Fifth National Report on the implementation of obligations under the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management (19th September 2024)
- XLVII, XLVIII, and XLIX National Reports and Statements on nuclear materials, prepared by the Ministry and submitted to the International Atomic Energy Agency (27th February, 07th May, and 08th July 2024)
- Annual National Report on Nuclear Materials, classified “SECRET” (30th May 2024)
- Program of measures for achieving or maintaining good status of Montenegro’s marine environment (04th July 2024)
- Medium-Term Government Work Program for 2024–2027

- Rulebook on the program of active substances for assessment (“Official Gazette of Montenegro”, No. 090/24)
- Rulebook on classification, packaging, and labelling of chemicals in accordance with the UN Globally Harmonized System (“Official Gazette of Montenegro”, No. 017/24)
- Draft National Profile on Asbestos Exposure in Montenegro with a Draft Action Plan for 2025–2026 (06th February 2025)
- Final Report on the implementation of the Action Plan for the implementation of the Minamata Convention 2019–2023 (15th November 2024)
- Rulebook on the detailed content and method of maintaining the register of environmental polluters
- Government adopted information on the implementation of the SOLARI 5000+ (70 MW) project for individuals and legal entities (18th April 2024)

Assembly of Montenegro adopted the following:

- Law on Protection from Ionizing Radiation, Radiation and Nuclear Safety and Security (“Official Gazette of Montenegro”, No. 049/24)

III ASSESSMENT OF CONDITION

Montenegro achieved *limited progress* in implementation of the Action Plan for meeting the closing benchmarks related to Chapter 27 – Environment and Climate Change. Implementation of the planned obligations is slow, with a high proportion of partially fulfilled measures and frequent extensions of deadlines. It is essential to intensify the enforcement of laws, adopt sectoral strategies and secondary legislation, particularly in the areas of waste management, air quality, nature protection, and climate change. It is essential to establish a sustainable financing system and strengthen institutional and administrative capacities in order to ensure that the obligations under Chapter 27 are met within the defined deadlines. During the reporting period, the “Eighth Biannual Report on the Implementation of the Action Plan for the period September 2024 – February 2025” had not yet been adopted.

No progress has been made in the area of **horizontal legislation**. Numerous challenges continue to burden the system, including a lack of adequate administrative capacity at both the national and local levels, limited resources of inspection authorities, and insufficient inter-institutional cooperation. It is essential to establish an effective control and coordination mechanism between Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (EIA), as well as activities and responsibilities related to the assessment of acceptability for the ecological network (AA). Furthermore, it is crucial to develop formalized protocols and cooperation mechanisms among inspection services, the police, the prosecution, and the courts in order to ensure consistent and effective enforcement of laws in the area of environmental responsibility and fight against environmental crime. Efforts should be made to specialize judges and prosecutors in managing environmental cases, alongside establishment of continuous professional development programs for judicial staff. Environmental crime, as a growing threat, requires joint and coordinated action by all relevant actors — state institutions, the non-governmental sector, private enterprises, the media, and citizens.

No progress has been made in the area of **air quality** during the reporting period. Montenegro continues to experience delays in the adoption and updating of the Air Quality Management Strategy and its associated Action Plan, which imposes significant constraints on the regular implementation of pollution reduction measures. This is particularly related to areas in which the exceeded limit values have been established under European Union legislation. Air quality plans have neither been developed nor revised in compliance with the requirements of Directive 2008/50/EC on ambient air quality and cleaner air for Europe. Local self-government units have yet to establish an effective air quality monitoring systems or to maintain a register of polluters, which further impedes collection and submission of the relevant data to the Environmental Protection Agency. Indoor quality monitoring is not conducted, while cumulative impact assessments of pollution on public health is still lacking, all of which highlights substantial deficiencies in an integrated approach to environmental protection and public health. It is imperative for Montenegro to systematically strengthen its air quality monitoring network, ensure continuous operation of monitoring stations, and expand monitoring coverage, particularly in urban areas. Additionally, institutional and administrative capacities must be reinforced to support the preparation of emission inventories, development of projections, and the effective implementation of emission reduction policies.

Limited progress has been made in the area of **waste management** during the reporting period. The fact that the National Waste Management Plan has still not been adopted is especially concerning, along with the planned schedule for the adoption of the remaining secondary legislation necessary for further

alignment with European Union legislation. The process of transposing EU regulations in this field has been ongoing for nearly a decade, while practical implementation continues to lag significantly. Montenegro is currently not prepared for comprehensive reforms in the waste management sector, whether it be in terms of normative, infrastructural, institutional, or financial capacities. The introduction of new obligations - such as mandatory bio-waste recycling, establishment of a functional Extended Producer Responsibility (EPR) system, prohibition of landfilling recyclable and biodegradable waste, separate collection of paper, metal, plastics, and glass, and the achievement of ambitious reuse and recycling targets - requires a thorough reorganization of the existing waste management system. Continuous efforts are also needed in relation to remediation of numerous illegal landfills and elimination of the ongoing practice of using temporary disposal sites, which remain present in almost all municipalities.

Limited progress has been made in the area of **water quality**. Efficient water resource management still requires substantial infrastructural investments and financial resources, with special emphasis on construction of wastewater treatment plants in municipalities which are still not equipped with such facilities, expansion and modernisation of sewage networks, as well as protection of water sources. Albeit water losses are being identified, they are not addressed systematically, which highlights the urgent need for the procurement of modern leak detection equipment and improvement of rational water resource management. Significant challenges persist in the construction and operation of existing wastewater treatment plants, the absence of a reliable system for measuring wastewater quantity and quality, and the underdeveloped monitoring of treated effluent discharges. The current situation regarding sewage sludge disposal in Montenegro is unacceptable and poses a serious risk to the environment and water resources. It is imperative that the Government promptly adopts the National Waste Management Plan, which should include a Sewage Sludge Management Plan as an integral component.

No progress has been made in the area of **nature protection**, which is due to delay in adoption of the key laws and strategies, which hinders implementation of the European standards and fulfilment of international obligations. Urgent measures are required to: strengthen the institutional and administrative capacities of protected area managers, adopt management plans, establish continuous biodiversity monitoring, enhance and reinforce inter-institutional cooperation, integrate biodiversity protection into all sectoral policies, and ensure effective and responsible management of the most valuable natural resources. The transformation of the Public Enterprise “National Parks of Montenegro” has not yet been completed. The Government of Montenegro and Ulcinj Municipality have not yet made a decision on the establishment of the enterprise “Ulcinj Salina Nature Park,” and the corresponding management plan has still not been adopted. Work on mapping Natura 2000 habitats and species is ongoing, with 76% of the terrestrial and 10% of the marine territory having been mapped as of March 2025. The forestry sector reform has been further delayed due to postponed implementation of the new Forest Law and delays in adoption of the decision on establishment of a forest management company, which is intended to assume responsibility for managing forest resources.

Limited progress has been made in the area of **industrial pollution**. The Pollutant Release and Transfer Register (PRTR) in Montenegro has been technically installed but is not yet operational - it remains in a testing phase during which the Environmental Protection Agency is entering the existing data, while they are simultaneously working on identification of the relevant operators. Activities have commenced on establishing the Register of Facilities Using Organic Solvents or Producing Products Containing Volatile

Organic Compounds (VOC facilities), while identification of relevant entities using these substances in their operations is ongoing. Ecological reconstruction of the Pljevlja Thermal Power Plant and the district heating system of Pljevlja is in its final phase, with works scheduled for completion by November 2025. However, although implementation of “Industrial Waste Management and Cleanup – IWMCP” project marked completion of the main reconstruction of the red mud basin and finalisation of the Environmental Impact Assessment report, remediation of the black environmental hotspot – the red mud basin at the Aluminium Plant Podgorica (KAP) – has not yet been carried out. It is necessary to continue strengthening the capacities of the environmental inspection services by increasing the number of inspectors, providing continuous training, and equipping them with modern monitoring equipment to ensure effective and regular inspection of industrial installations in accordance with European standards.

Limited progress has been made in the area of chemicals management. Albeit the regulatory framework has been aligned with the EU legislation to a great extent, implementation is hindered by limited institutional capacities and weak intersectoral cooperation. Key challenges which remain are the absence of a publicly accessible Register of Chemicals and Biocidal Products, the lack of a Poison Control Centre, and the underdeveloped and insufficiently modernized monitoring of POPs and PAHs. Identification and remediation of all sites contaminated with polychlorinated biphenyls (PCBs) are necessary, while asbestos management continues to pose a significant challenge due to the absence of registries of asbestos containing products and registries of occupational diseases, which complicates risk assessment and implementation of preventive measures.

No progress has been made in the area of **noise protection** during the reporting period, which is indicative of serious challenges in implementation of the planned measures. Activities related to raising public awareness about the impacts of noise, strengthening administrative capacities, and organizing training programs are still lacking, while the preparation of strategic noise maps for the three main roads has not been carried out. It is urgently necessary to initiate the development of noise management action plans in urban agglomerations and along major traffic routes. Development of a software solution for noise data entry and displaying noise level data holds special significance, whereby implementation of these activities would improve public awareness and enhance the role of the Environmental Protection Agency.

Limited progress has been made in the area of **climate change**. Implementation of policies and legislation faces significant delays, including the postponement of the adoption of the key Climate Change Law, which is essential for further alignment with the EU ETS Directive 2003/87/EC, the National Adaptation Plan, and the National Climate and Energy Plan. These delays indicate a lack of institutional coordination and a strategic approach, which is slowing down the fulfilment of international obligations and the targets defined under the Paris Agreement. Albeit the Nationally Determined Contribution (NDC) has been updated with more ambitious emission reduction targets for 2035 (55% reduction for 2025–2030 and 60% for 2031–2035), achievement of these targets depends on strengthening administrative capacities, financial support, and the establishment of a functional system for monitoring, reporting, and verification of emissions (MRV).

All obligations in the area of **civil protection** *have been completed*, thereby this sub-sector has been formally provisionally closed. Nevertheless, despite the progress achieved, including the adoption of the Disaster Risk Reduction Strategy for the period 2025–2030 and technical integration with European emergency systems (sTESTA, CECIS), the need for further enhancement of operational capacities and

sustainable systemic solutions still remains, particularly in response to forest fires and other increasingly frequent natural disasters.

IV HORIZONTAL LEGISLATION

Overview and assessment of condition

Although the legislative framework in the area of horizontal legislation is fully aligned with EU acquis, no progress has been achieved in practice during the reporting period. Implementation remains limited, particularly regarding access to information held by public authorities, public participation in decision-making, application of SEA and EIA procedures at the local level, access to justice and liability for environmental damage, as well as the prosecution in cases of environmental crime. It is necessary to improve the coordination of SEA, EIA, and AA procedures as well as to intensify efforts to establish an effective mechanism for quality control of decisions by competent authorities, in order to ensure consistent application of the law and enhance legal certainty.

Legislative and strategic framework

No significant activities have been implemented in the area of horizontal legislation during the reporting period, which is indicative of a delay in implementation of obligations stipulated by the Action Plan.

Environmental Impact Assessment – EIA / Strategic Environmental Assessment – SEA – In accordance with the information available, national-level workshops were held in 2024 with the aim of strengthening administrative capacities in the area of Environmental Impact Assessment (EIA), whereby two experts took part in these workshops. Additionally, a workshop on the application of EIA and SEA, which was aimed at strengthening capacities at both national and local levels, was implemented through the TAIEX support instrument in the period from 21st until 22nd November 2024. With the goal of further enhancement of capacities for implementation of the Environmental Impact Assessment Law in local self-governments, the Environmental Protection Agency organized one workshop during 2024.

The Environmental Protection Agency (EPA) developed the “*Guide through the Environmental Impact Assessment Procedure*” [https://epa.org.me/2025/01/17/vodic-kroz-postupak-procjene-uticaja-na-zivotnu-sredinu/in December 2024](https://epa.org.me/2025/01/17/vodic-kroz-postupak-procjene-uticaja-na-zivotnu-sredinu/in%20December%202024). This activity was implemented at the initiative of the Arhus Centre Nikšić and in cooperation with the NGO “Ozon.”

No progress has yet been made in establishing a control mechanism for quality review of decisions issued by the Environmental Impact Assessment Commission or other competent authorities. The absence of a systematic quality review allows for subjective interpretations and variations in the application of legal procedures, which directly affects the level of environmental protection.

Pursuant to the Environmental Protection Law (“Official Gazette of Montenegro,” No. 52/16, 073/19), the Agency issued: one (1) Decision granting approval of a Safety Report and one (1) Decision on the Accident Prevention Plan for a Seveso installation.

Pursuant to the Environmental Impact Assessment Law (“Official Gazette of Montenegro,” No. 075/18), the Regulation on Projects Subject to Environmental Impact Assessment (“Official Gazette of RCG,” No. 020/07; “Official Gazette of Montenegro,” No. 047/13, 053/14, 037/19), and the relevant Rules adopted under this Law, a total of one hundred and seven (107) Environmental Impact Assessment (EIA)

procedures were completed. Of these: fifty-six (56) environmental consents were issued for EIA reports; forty-two (42) decisions were made that no EIA report was required; three (3) procedures were suspended; and six (6) applications were rejected. Additionally, three hundred and ninety-six (396) opinions were issued on urban planning and technical conditions, along with one hundred and thirty-seven (137) other correspondence documents.

Pursuant to the Strategic Environmental Assessment Law (“Official Gazette of RCG,” No. 080/05; “Official Gazette of Montenegro,” Nos. 073/10, 040/11, 059/11, 052/16), and based on submitted requests, the Environmental Protection Agency issued six (6) approvals for Strategic Environmental Assessment (SEA) reports and one (1) decision rejecting approval. Additionally, the Agency issued thirty-two (32) opinions based on submitted requests.

During the period 1st September 2024 – 31st March 2025, four transboundary procedures were conducted, in which Montenegro participated as a potentially affected party. Consultations were carried out with Bosnia and Herzegovina (Preliminary Environmental Impact Assessment procedure for the Buk Bijela Hydropower Plant project, Foča Municipality, and the Bileća Hydropower Plant project) and with the Republic of Serbia (for the Draft Spatial Plan for the special-purpose area of the Bistrica reversible hydropower system and the Potpeć Hydropower Plant, and the Draft Energy Development Strategy of the Republic of Serbia until 2040 with projections until 2050).

Institutions responsible for implementation of horizontal legislation frequently face a lack of human and technical resources, which significantly limits the effective application of regulations in practice. Furthermore, weak inter-institutional and cross-sectoral coordination remains a key challenge. These shortcomings are evidenced by recent cases involving differing interpretations of competencies between the Ministry and the Environmental Protection Agency, such as the assessment of the need for Environmental Impact Assessment (EIA) in the case of pine and cypress logging at the former barracks site in the Zagorič settlement (outside the boundaries of the “Gorica Forest Park” protected area), the construction of the Carine Hotel in Baošići, and the Ski Resort Kolašin 1450 project. These cases highlight the need to strengthen institutional coordination and legal certainty in the implementation of SEA/EIA procedures.

INSPIRE Directive – In October 2024, the Ministry of Spatial Planning, Urbanism, and State Property established the Department for National Spatial Data Infrastructure and Information Systems. The Department is responsible for supporting the establishment of a national geoportal in line with the INSPIRE Directive, developing geospatial information systems, and preparing policies, strategies, and projects related to spatial data. Thanks to funds secured from the IPA instrument (up to EUR 300,000), the preparation of tender documentation for the creation of the Geoportal has commenced. On 27th February 2025, the Government established the Council for Spatial Data Infrastructure to provide expert support and monitor implementation. By Q4 2025, the planned outputs include: a dedicated website, a register of spatial data infrastructure linked to INSPIRE areas, and a metadata catalogue.

Environmental Liability (ELD) – Despite the existence of a legal framework governing environmental liability, the implementation of Directive 2004/35/EC on Environmental Liability (ELD) remains significantly limited in practice. Mechanisms for preventing and remedying environmental damage are not fully functional, indicating insufficient operational capacity for law enforcement. In the absence of effective oversight, inspection capacity, and practical instruments for damage assessment and compensation, implementation remains restricted.

Pursuant to the Environmental Liability Law (“Official Gazette of Montenegro,” No. 27/14, 55/16), in 2024 the Environmental Protection Agency issued: two (2) decisions granting approval for proposed remediation measures, five (5) decisions on determining environmental damage, and four (4) decisions on urgent remediation measures.

Environmental Crime – A major deficiency is the insufficiently effective access to justice in environmental matters, as judicial processes are lengthy, and environmental organizations often lack party status or face high litigation costs. Case law in environmental protection is limited, with fines being the most common sanction in these misdemeanour proceedings. Decisions are often delayed, and the proportion of dismissed or acquitted cases is significant, indicating potential challenges in evidence collection and interpretation. Judges frequently impose minimal statutory penalties, citing mitigating circumstances, even where the law prescribes fixed fines. Establishing a causal link between the offense and its environmental impact is often difficult, further complicating prosecution.

Cooperation between inspection services, police, prosecution, and courts in prosecuting environmental crimes currently occurs on an ad hoc basis, without formal coordination mechanisms. The absence of a national framework and collaboration protocols, weak information exchange, and inconsistent interpretation of competencies further hinder the effective enforcement of laws and combatting environmental crime. It is necessary to establish a sustainable institutional mechanism that ensures systematic and coordinated action by all relevant stakeholders.

In 2024, pursuant to Chapter XXV of the Criminal Code, a total of 517 criminal charges were recorded, of which 315 were resolved.

Criminal charges ¹					
Chapter XXV Crimes against the Environment and Spatial Planning	Unresolved charges from the previous period	Charges received during the reporting period	Total currently processed	Resolved charges	Unresolved charges at the end of the year
	127	390	517	315	202

It is concerning that, in 2024, the number of reported persons for criminal offenses against the environment increased by 1.28%, with 390 persons reported (compared to 385 in 2023). The majority of criminal reports relate to the following offenses: forest theft (72 persons), illegal fishing (10 persons), construction of facilities without notification and required documentation (267 persons).

Submitters of criminal reports pursuant to Chapter XXV – Crimes against the Environment and Spatial Planning:

¹ Report on the Work of the Prosecutorial Council and the State Prosecutor’s Office for 2024

Submitters of criminal charges ²							
State prosecutor's office acting ex officio	Police Administration	Inspectorates	Other state authorities	Injured parties	NGO	Legal entities	Natural persons
20	161	37	99	8	6	8	51

During the reporting year, criminal offenses were most frequently detected by the police, by officers of the Pljevlja Forest Administration – Plav Regional Unit, by officers of the National Park “Prokletije,” by the forestry inspector, as well as on the initiative of the State Prosecutor’s Office, particularly following action in KTR cases. In the reporting year, as in previous years, a significant number of criminal complaints were also filed against unidentified perpetrators, mostly for the criminal offenses of aggravated theft, theft, and forest theft.

The low resolution rate of criminal complaints in the area of Environmental Pollution (Article 303) and Unauthorized Exploitation of Natural Resources (Article 308b) is the result of the complex process of collection of evidence, the need for additional expert examinations, as well as the limited technical and human capacities of the competent institutions.

By applying the instrument of deferred prosecution, in 2024 state prosecutors, pursuant to Article 324 – Forest Theft of the Criminal Code, collected €1,200 (3 payments) from suspects and transferred these funds to humanitarian organizations and public institutions, while €1,285 (3 payments) was paid as compensation to injured parties. There were 6 cases of deferred prosecution.

Illegal logging remains the most prevalent form of environmental crime in Montenegro, particularly in border areas with Albania and Kosovo, where small organized criminal groups are involved in these activities. The presence of corruption within the competent institutions further enables the unhindered continuation of such unlawful practices. In order to address this issue, during the reporting period the Supreme State Prosecutor held a meeting with the Director of the Police Administration, the Acting Director of the Forest and Hunting Management Administration, and the Director of the Environmental Protection Agency. Key challenges in combating illegal logging were identified during this occasion - including weak inter-institutional coordination, thereby an agreement was reached to intensify cooperation in order to more effectively suppress this harmful practice.

According to the 2024 Annual Report of the Protector of Human Rights and Freedoms³, no significant progress has been made in the prevention and remediation of environmental problems, while shortcomings remain evident in informing citizens, involving them in decision-making, and in the work of inspection bodies. During the reporting period, five complaints were submitted regarding violations of the right to environmental protection, relating to issues such as noise, air pollution, illegal landfills, poor waste management, non-transparent concession procedures, regulation of riverbeds, access to water, road infrastructure, the problem of abandoned animals (stray dogs), and others. Persistent challenges include insufficient public education, slow administration, and overly formalistic approaches by institutions (e.g., failure or delays in providing responses, excessively formalistic replies, lengthy procedures, and failure to apply the principle of assistance to parties). The Protector highlights the need

² Report on the Work of the Prosecutorial Council and the State Prosecutor’s Office for 2024

³ Report on the work of Protector of Human Rights and Freedoms for 2024 (March 2025)

to strengthen inspection oversight, primarily by reinforcing the preventive role of inspections, ensuring continuous supervision and consistent enforcement of laws, as well as by adopting key strategic documents in the field of environmental protection. The importance of transparent law-making and public participation is also emphasized, so that citizens and civil society can act as active partners in shaping public policy, laws, and other regulations. Finally, the development of ecological awareness through public debates, media, and educational programs is underscored, with the aim of fostering a culture of environmental responsibility and strengthening so-called “*environmental democracy*”.

For the purpose of strengthening capacities for the implementation of the Criminal Code and the Eco-crime Directive, in cooperation with the Judicial and Prosecutorial Training Centre, the following activities were organized: Training on the topic “Criminal Offenses in the Field of Environmental Protection” was held on 4th October 2024 in Podgorica, with the participation of 16 representatives of the judiciary. In October 2024, a national workshop “Environmental Crime in Montenegro and the Balkan Region” was held, with the participation of representatives from the police, inspectorates, customs, judiciary, and the NGO sector. Within the framework of the regional project on access to justice in environmental and climate disputes, focus group meetings were held (29th October 2024) as well as a final meeting for the preparation of the Action Plan against Environmental Crime (5th December 2024). A representative of the Training Centre participated in the 16th meeting of the Task Force on Access to Justice (Aarhus Convention), held in Geneva on 18–19 February 2025, organized by UNECE.

Public participation - Albeit the legal framework provides for access to information and public involvement, citizens and civil society continue to face numerous obstacles – ranging from limited access to documents and short deadlines, to a formalistic approach to consultations and the weak influence of their views on decision-making. The lack of capacity of local authorities to organize consultation processes further hampers meaningful dialogue. Political and economic instability, as well as indifference toward environmental issues, further reduce the level of participation. This Report once again emphasizes that greater public involvement contributes to reducing conflicts and to more robust and sustainable decision-making in the field of environmental protection.

The Fifth National Report on the Implementation of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention) was submitted to the United Nations Economic Commission for Europe (UNECE) at the end of January 2025. The activities of the Aarhus Centres during the period 2021–2024 were focused on ensuring reliable and timely environmental information, exchanging information with relevant institutions, and providing support to the interested public and the NGO sector on issues related to the environment and human health. A particular concern remains the absence of an integrated, comprehensive, and efficient environmental information system that would consolidate all environmental data, strengthen cooperation and information exchange among different institutions, and address the insufficient participation of the public in the process of adopting legislation that may have a significant impact on the environment.

Ministry of Ecology, Sustainable Development and Development of the Northern Montenegro adopted the “*Guideline for access to Information Held by the Ministry of Ecology, Sustainable Development and Development of the Northern Montenegro*” in February 2025. This guideline was adopted in accordance with Article 11 of the Law on Free Access to Information (“Official Gazette of Montenegro”, No. 044/12, 030/17). <https://www.gov.me/dokumenta/e1abf481-9e8c-4fdb-8e05-c8599dab092a>

Ministry of Ecology, Sustainable Development and Development of the Northern Montenegro published several public calls for participation of Non-Governmental Organisations in work groups for development of laws and rulebooks, as well as for their participation in consultations and commissions, with special emphasis on areas of sustainable development, environmental protection, noise, seismological and hydrometeorological affairs. Additionally, Ministry of Agriculture, Forestry and Water Management published calls for involvement of NGOs representatives in drafting laws in areas of fisheries, aquaculture and state aid.

Effective implementation of horizontal legislation, which encompasses access to information, public participation in decision-making, and the right to legal protection in environmental matters, forms the foundation of transparent and accountable management of natural and spatial resources. Although Montenegro has formally undertaken obligations under the Aarhus Convention and the EU legal framework, practice often reveals the limited scope of these rights in reality. The following case studies - termination of the concession agreement for the “Brskovo” mine after strong civic opposition, a legal initiative by a resident of Pljevlja due to chronic air pollution, and the public controversy surrounding the urban development project “Velje brdo” - illustrate key challenges in the implementation of horizontal obligations, neglect of professional and public oversight, and the restricted role of citizens in decision-making processes. These examples point to insufficient transparency, low levels of citizen participation in the early stages of decision-making, and limited access to justice, but also to the growing willingness of citizens to use available legal mechanisms and public pressure as tools for defending the public interest, safeguarding the right to a healthy environment, and preserving natural resources.

Case study: Termination of the concession agreement for “Brskovo” mine

Introduction

This case is related to termination of the concession agreement for ore exploitation in the area of the former “Brskovo” mine near Mojkovac and represents an example of the effectiveness of civic activism in environmental protection in Montenegro.

Chronology of events

- December 2010 – The Government of Montenegro and the company *Brskovo Mine* LLC signed a 30-year concession agreement for detailed geological exploration and exploitation of sulphide polymetallic ore (Pb, Zn, Cu, FeS₂, and other accompanying metal sulphides) in the exploration–exploitation area of the former “Brskovo” mine near Mojkovac.
- 2023 – A public hearing was held on the Draft Detailed Spatial Plan and SEA Report for the Brskovo concession area for mineral exploitation. Citizens and activists expressed concern about the disregard of risks from mercury and heavy metals.
- A Civic Initiative was formed, issuing several public statements about threats to human health and the environment.
- The civic initiative “*Healthy Mojkovac*” addressed UNESCO regarding the case, which led to a reaction at the UNESCO session in Riyadh in 2023, requesting that Montenegro submit, by December 2024, among other things, an assessment of the project’s impact on Durmitor National Park.
- The Government established a State Commission, which recommended termination of the concession agreement.
- The Government engaged an international law firm, which conducted a detailed analysis of the available documentation and proposed that all objections be submitted to the concessionaire with a 60-day deadline to remedy the irregularities.
- The concessionaire failed to respond within the defined period – the agreement was automatically terminated on 30th May 2024.

Case analysis

The Brskovo case highlights the importance of public participation in environmental decision-making. Citizens and non-governmental organizations successfully exerted pressure on the institutions through protests, media campaigns, and international mechanisms. Involvement of the civic initiative in the work of the State Commission was of special importance in this case, which contributed to the transparency and legitimacy of the process.

Conclusion

This case shows that civic activism, when organized, informed, and grounded in facts, can have a decisive impact on the protection of the public interest and natural resources. It also underscores the importance of access to information, public involvement in the early stages of planning, and cooperation with institutions.

Case study: Civic activism and legal fight for clean air – the case of Elzana Hrković from Pljevlja

The town of Pljevlja, as one of the most polluted areas in Montenegro, has been facing serious air pollution problems for years, particularly during the winter months. The main causes are emissions from the Pljevlja Thermal Power Plant, the use of coal for household heating, and unfavourable meteorological conditions that prevent air circulation. The case which stands out among the many citizens affected by this problem, is the case of Elzana Hrković, a resident of Pljevlja who decided to seek justice through the courts.

Case description

Elzana Hrković, a resident of the town of Pljevlja, filed a lawsuit against the State of Montenegro, claiming that the polluted air in her town directly violated her right to a healthy life, freedom of movement, and a dignified life during the winter months.

The court upheld her claims, accepted the lawsuit, and ordered the State to pay her compensation for non-material damages, recognizing the violation of her fundamental human rights as a result of the institutional failure to provide adequate environmental protection.

Significance of the ruling

This verdict has multiplicative significance:

- Novelty in judicial practice: For the first time in Montenegro, a citizen won a lawsuit against the state over air pollution, creating space for similar claims by other affected citizens.
- Message to the institutions: The court clearly emphasized that the state has an obligation to safeguard the constitutionally guaranteed right of citizens to a healthy environment.
- Civic activism: Elzana Hrković's initiative demonstrated how individual engagement can lead to societal changes and encourage collective action

Conclusion and recommendations

The case of Elzana Hrković is a key example of how an individual can initiate change and highlight institutional shortcomings in protecting the right to a healthy environment. It should serve as an incentive for:

- Greater state accountability in managing pollution and enforcing environmental standards;
- Proactive citizen participation through legal and institutional mechanisms;
- Strengthening institutional capacities for the protection of the environment and public health;
- Amendments to the legislative framework to improve access to justice in cases of environmental harm.

This case sets an important precedent that encourages broader mobilization of citizens and civil society, sending a clear message that decision-makers must adopt concrete and effective measures to reduce pollution and protect public health. Increased public pressure can be crucial in prompting decisive and effective action by policymakers. Citizens, through such initiatives, have the power to influence decision-making, and greater public engagement can be key to achieving real change.

Case study: Amendments to the Spatial-Urban Plan (PUP) of Podgorica and the “Velje Brdo” Project

Project “Velje brdo” symbolises the wider problem related to the manner in which spatial and natural resources in Montenegro are managed through *ad hoc* decisions, without consistent application of laws, without consideration of expert opinions and without proper citizen involvement. Albeit the Government is formally declaring dedication to European integration and the Green Agenda, the practice often shows that the situation is quite the opposite, whereby spatial planning is at the crossroads between Montenegro’s obligations to align with European standards and domestic political and economic priorities.

“Velje Brdo” is an ambitious initiative of the Government of Montenegro to construct a new urban settlement designed to provide affordable housing for around 42,000 people. The plan foresees the development of approximately 3 million square meters of residential and commercial space, which could lead to irreversible land degradation, reduction of green areas, increased pressure on ecosystems, and additional strain on already overburdened urban infrastructure (water supply, transport, sewage).

Construction in the Velje Brdo area of Podgorica exemplifies the concerning practice in which natural resources and the public interest are subordinated to short-term urban and economic interests. Velje Brdo has significant natural values - including rich biodiversity, forest cover, natural landscapes, and the function of a green buffer zone and microclimate regulator for the city - which should be treated as a valuable public resource rather than land designated for large-scale construction.

Citizen protests and the positions of numerous NGOs reflect a clear need for broader social consensus and greater public involvement in decisions concerning common goods. In this case, no Strategic Environmental Assessment (SEA) was carried out, while the Spatial-Urban Plan of Podgorica has still not been adopted, further underscoring the lack of transparency in the process and the breach of fundamental principles of planning and sustainable development.

Despite these challenges, the Government of Montenegro remains committed to the project, presenting it as strategically important for the country’s development and for improving citizens’ quality of life. The Coordinating Body for project implementation is actively preparing planning, infrastructural, and financial projections to secure the project’s long-term sustainability.

All activities in the Velje Brdo area should be suspended until the adoption of key planning documents - primarily the Spatial Plan of Montenegro until 2040, as well as the harmonized Spatial-Urban Plan of Podgorica. Furthermore, a Strategic Environmental Assessment must be carried out in line with national legislation and EU standards. Although the housing complex has already been declared a project of public interest and included in the draft of the new spatial plan, it is important to emphasize that this draft is not final and remains subject to revision and approval by the competent institutions. Instead of accelerated urbanization, a sustainable alternative should be considered - protecting the natural values of Velje Brdo by potentially declaring the area a forest park or protected landscape. Such an approach would allow limited construction of low-rise buildings and the development of public facilities aligned with the principles of green infrastructure, urban ecosystem protection, and the public interest, thereby preserving the ecological and social value of this area in the long term.

Inspection oversight

By decision of the Parliament of Montenegro of 30th August 2024, amendments to the law were adopted which decentralized the Administration for Inspection Affairs, transferring competences to the ministries. A Coordinating Body for the Harmonisation and Oversight of Inspection Activities was established and commenced its work on 25th December 2024. Its main tasks include coordinating inspections, harmonising work programmes, proposing training, issuing recommendations, and overseeing the implementation of inspection oversight.

In order to ensure the smooth functioning of inspections, the Ministry of Public Administration adopted, within the prescribed timeframe, the Rulebook on Inspector Identification Cards ("Official Gazette of Montenegro," No. 115/2024), which entered into force on 3rd December 2024.

Following the abolition of the Administration for Inspection Affairs, the Ministry of Ecology, Sustainable Development and Northern Montenegro assumed responsibility for environmental inspection on 1st October 2024. The Environmental Inspection within the Ministry operates as part of the internal organisational unit – the Environmental Inspection Department. The Rulebook on Internal Organisation and Systematisation of Jobs in the Ministry was adopted on 25th November 2024, according to which 15 positions were established in the Environmental Inspection Department (14 for environmental inspectors and 1 for an independent adviser III). Out of this number, 8 inspector posts and 1 adviser post have been filled, with oversight being carried out across the entire territory of Montenegro.

During the reporting period (1st January - 31st December 2024), the Environmental Inspection conducted 1,831 inspections, identifying 708 irregularities.

To remedy these irregularities, inspectors issued 156 warnings and adopted 418 decisions. During the reporting period, 38 conclusions were adopted imposing fines for non-compliance with decisions (in the total amount of €50,900). In addition, 17 criminal complaints were filed.

The Environmental Inspection submitted 3 requests to the Environmental Protection Agency to initiate procedures for determining environmental damage or imminent threat of environmental damage. During the reporting period, the Environmental Inspection also acted upon requests from the Environmental Protection Agency concerning cases initiated ex officio to establish environmental damage or imminent threat thereof, and in this context, submitted requested documentation or undertook relevant actions in line with its competences.

For committed offences during the reporting year, inspectors issued 10 misdemeanour orders in the total amount of €8,900. In addition to misdemeanour orders, inspectors filed 60 motions with the misdemeanour courts to initiate misdemeanour proceedings.

During the reporting period, 503 initiatives from the civil sector, NGOs, and supervised entities were submitted, on the basis of which the Environmental Inspection carried out oversight. These initiatives most frequently related to waste removal, implementation of measures from Environmental Impact Assessment (EIA) reports, noise, and construction activities in protected areas.

Within the Forestry and Hunting Management Administration, a Forestry, Hunting and Plant Protection Inspection Unit was established (12 officers), and within the Water Administration, a Water Inspection Unit was established (9 officers). However, the inspection report for forestry, hunting, and plant protection was not available.

In 2024, the Water Inspection carried out 1,308 inspections, during which 229 irregularities were identified. The irregularities were most frequently related to: lack of water acts (conditions, consents, and permits), exploitation of river sediments without the prescribed consent, control of the quality of discharged wastewater, verification of compliance with the requirements of water acts, depositing materials on water land, monitoring of bathing water quality, and direct discharge of wastewater into recipients without ensuring treatment to the effluent standards (emission) prescribed by legislation.

With the aim of addressing the 229 identified irregularities, inspectors issued 29 warnings with measures and adopted 87 decisions, including: orders to obtain a water permit (31), decisions on the establishment of sanitary protection zones (3), bans on the exploitation of natural resources (9), temporary bans on the use of bathing water (11), and measures for equipping wastewater treatment plants and monitoring surface water quality (5). Further measures included prohibitions of works on water property and bathing areas, orders to remove deposited materials and dams, transfer of rights under water permits, extensions of deadlines for compliance, as well as decisions rejecting applications (5) and suspending proceedings (3). In addition, 29 conclusions on the suspension of proceedings were adopted.

Key recommendations

- **Environmental impact assessment reports**, taking into consideration all the possible impacts, alternative solutions and the necessary mitigation and compensation measures, **must be improved**.
- It is necessary to provide a **control mechanism which is going to enable verification of the assessment of quality of decision** which is adopted by the Commission for assessment of environmental impact assessment reports;
- **Strengthening administrative capacities and continuous training** of local and national officials for implementation and monitoring of SEA/EIA procedures. It is necessary to provide technical support and digital in order to ensure more efficient document processing and monitoring implementation of measures.
- Through amendments to the Law on Strategic Environmental Assessment, **establish a legal obligation to carry out SEA for concession plans on watercourses** for energy production (construction of small hydropower plants), with the aim of assessing cumulative impacts on ecosystems, biodiversity, climate change, and other aspects.
- It is necessary to **establish a system for monitoring and reporting on the implementation of recommendations from the EIA/SEA processes**, including regular reporting on environmental protection measures and project impacts, in order to ensure accountability, transparency, and alignment of further development with environmental objectives.
- It is necessary to **improve procedures for granting concessions, as well as to define SEA procedures** for forest and game management plans.
- A more effective response and adequate prosecution by judicial authorities are required for issues and cases concerning the protection of nature and the environment.
- Proactive cooperation with non-governmental organizations is needed to encourage their participation in the Environmental Impact Assessment and Strategic Environmental Assessment processes.
- Ensure consistent implementation of the Aarhus Convention in practice through genuine, rather than merely formal, involvement of civil society, while improving transparency and taking into

account all relevant stakeholders – non-governmental organizations, local communities, media, and the expert and scientific public – in the decision-making process.

- Define a systemic framework which is going to connect businesses, potential environmental polluters, and insurance companies in order to create conditions for the effective application of the Law on Environmental Liability.
- Establish effective cooperation between the competent institutions responsible for implementing the Law on the Environment and the Law on Access to Information, and simplify procedures for access to information.
- Strengthen the capacities of inspection services and ensure consistent implementation of inspection oversight measures.
- Improve the availability of information and documentation through digital platforms.
- Intensify and strengthen cooperation between inspections, the police, prosecution offices, and courts through the establishment of cooperation protocols, organization of training, and exchange of knowledge among these institutions.
- Develop and implement educational programmes to inform citizens about their rights in the field of environmental protection, including access to information, participation in decision-making, and legal mechanisms for environmental protection.



1. AIR QUALITY

1.2. Overview and assessment of condition

No progress has been made in the area of air quality, and the current situation can be described as concerning and insufficiently proactive. The slowed pace of fulfilling undertaken obligations not only deepens existing environmental and health risks for citizens but also directly delays Montenegro's progress in meeting its commitments under Chapter 27. Although the legislative framework is largely aligned with EU standards, further harmonisation with directives such as the NEC Directive and the Ambient Air Quality Directive is required, along with the urgent implementation of concrete measures to reduce air pollution. Air quality remains one of the most serious environmental challenges in Montenegro, particularly regarding concentrations of suspended particles in urban areas, as well as pollution caused by particulate matter (PM) and sulphur dioxide (SO₂) in the northern part of the country.

Almost all activities in the field of air quality are stagnating, as they depend on the adoption of key strategic documents – the Air Quality Management Strategy (2025–2029) and the National Energy and Climate Plan, which should also align with the Draft Amendments to the Law on Air Protection – none of which have yet been adopted. The absence of air quality plans, a polluter register, and local monitoring systems, as well as the lack of reporting by polluters, further exacerbates the situation. Moreover, there is still no monitoring of indoor air quality or assessment of the cumulative impact of pollution on public health.

1.3. Legal and strategic framework

The adoption of the Law on Amendments to the Law on Air Protection, which would establish the necessary legal basis for by-laws to ensure further alignment with the revised Directive on the Reduction of National Emissions of Certain Atmospheric Pollutants (NEC Directive 2016/2284/EU), has been postponed to the fourth quarter of 2026.

There is a significant delay in the adoption of the Air Quality Management Strategy for the period 2026–2029, which, according to the Work Programme of the Ministry of Ecology, Sustainable Development and Northern Montenegro, was planned for the fourth quarter of 2025. At the last meeting of the Subcommittee on Transport, Energy, Environment, Climate Change and Regional Policy (June 2024), Montenegro committed to adopt the Air Quality Management Strategy for the period 2026–2029 following the adoption of the National Energy and Climate Plan (NECP), in order to ensure consistency between the documents. Once the NECP is adopted, it will be necessary to prepare emission projections and define realistic obligations for Montenegro to reduce emissions for the period up to 2029 and beyond 2030. The National Air Quality Management Strategy should also include a Programme of Measures for Reducing Emissions of Pollutants covered by the NEC Directive, planned for the first quarter of 2025. However, no progress was made during the reporting period.

It is due to these delays, that the preparation and updating of local (municipal) air quality plans has also been postponed. Air quality plans have been developed for Pljevlja, Nikšić and Podgorica, but most of their content is general in nature and, to date, they have become partially outdated. The Municipality of Pljevlja has also prepared a short-term action plan to reduce SO₂ emissions during pollution episodes, which contains more concrete measures and implementation deadlines, while other municipalities where limit values have been exceeded have not prepared action plans.

The Environmental Protection Agency continued to publish air quality data both on its website – real-time data – and monthly air quality reports, which, after data validation, were provided by the Centre for Ecotoxicological Research, the institution responsible for air quality monitoring. In this reporting period as well, household heating remained the largest source of air pollution.

The transport sector is currently recording an increase in pollutant emissions, making it necessary to introduce stricter standards for both new and existing vehicles in order to slow this trend over time. However, the current requirements for the import of new and used vehicles are not sufficiently stringent, while the use of electric and hybrid vehicles remains very limited. Industrial sources and other energy sector sources are not numerous in Montenegro and are regulated through permits based on Best Available Techniques (BAT).

Although Montenegro has made significant progress in establishing a comprehensive legislative framework for air pollution, it has not yet taken steps to achieve the set objectives. The same applies, to some extent, to other measured pollutants, but the deviation from the guidelines is most pronounced for PM_{2.5}.

All monitoring stations significantly exceed both the 2021 World Health Organization Air Quality Guidelines (5 µg/m³ annual average) and the revised EU limit values (10 µg/m³ annual average, to be applied from 2030). The latest analysis by the United Nations Environment Programme (UNEP) indicates that the town of Pljevlja in Montenegro has the highest mortality rate in the Western Balkans due to poor air quality, with approximately 310 deaths per 100,000 people and an average life expectancy reduction of 13 months.

The strengthening of the air quality monitoring system is currently underway. At present, the Environmental Protection Agency (EPA) is conducting a tender for the procurement of air quality monitoring equipment, with the aim of acquiring the necessary analysers and reducing the downtime of monitoring stations. The recently adopted new Air Quality Directive (EU) 2024/2881 provides for the mandatory use of air quality modelling, in line with rules that are yet to be adopted, thus introducing additional obligations for national authorities.

Activities on the final phase of the environmental reconstruction of the Pljevlja Thermal Power Plant began in March 2025, with the adaptation to new environmental standards expected to last seven and a half months at a cost of €75 million. The reconstruction is scheduled for completion by the end of 2025. According to the Draft National Energy and Climate Plan, submitted to the Energy Community for review, the Pljevlja Thermal Power Plant is to cease operations by 2041, thus aligning with long-term decarbonisation objectives.

Montenegro has applied air pollution charges for some time, in accordance with the Law on the Environment, with revenues directed to the budget of the Eco-Fund. Albeit in place, the amount of these eco-charges remains low and fails to provide a sufficiently strong incentive for financing measures aimed at reducing pollution and improving air quality, as they have not been updated since 2008. The Eco-Fund initiated a proposal to increase these charges through amendments to the *Regulation on the Amount, Calculation Method, and Payment of Environmental Pollution Charges*, suggesting that they be aligned with the consumer price index. However, to date, the Ministry of Ecology, Sustainable Development and Northern Montenegro has not adopted any legal act concerning the reform of these fees, thus leaving the fiscal instrument largely ineffective.

A slight improvement in air quality with respect to PM concentrations, compared to the previous year, may partly be the result of measures which were implemented with the aim of improvement of energy efficiency of buildings, particularly in Pljevlja, whereby this is also due to the fact that energy source has been changed for a significant number of individual boilers: coal replaced by pellet. To sustain this trend, it is essential to intensify all planned measures and to complete, within the envisaged timeframe, both the environmental reconstruction of the Pljevlja Thermal Power Plant and the construction and technical works on the district heating system in Pljevlja, which would make the greatest contribution to reducing pollutant emissions in the urban area of the Pljevlja basin.

The Programme for Promoting Energy Efficiency in Households, adopted in April 2024 on the initiative of the Ministry of Energy, aims to improve both energy efficiency and air quality, particularly in the urban areas of the northern and central regions. A total of €8.8 million has been secured for its implementation, mostly from the IPA III fund, with contributions from the Eco-Fund and the Municipality of Pljevlja. The programme consists of two components: support for energy efficiency measures in individual housing units (€7.5 million) and the improvement of collective housing buildings in Pljevlja (€1.1 million), while €200,000 has been earmarked for management and promotion.

The former Ministry of Tourism, Ecology and Northern Region Development prepared informational material on proper household combustion practices, albeit it was not actively distributed among citizens, thus highlighting the limited use of educational and promotional tools to reduce emissions from this sector.

The Ministry of Ecology, Sustainable Development and Northern Montenegro, in cooperation with UNICEF, developed a guide for children and young people on monitoring and managing air quality.

Application “Vazduh” (*ENG: Air*), available at www.epa.org.me/vazduh/, recorded high traffic over the past year without any operational interruptions. In 2024, particular attention was devoted to monitoring the communication between field stations and the application. The website was upgraded with the display of the air quality index. In 2025, the completion of the “Raven” project is planned, which will result in the launch of a new application for monitoring air quality in Montenegro.

The website for monitoring pollen concentrations: www.polenmontenegro.wixsite.com/polenepa, provides a weekly overview of the pollen situation in Montenegro and, due to its specific nature, is updated and supplemented on a weekly basis. In 2024, activities were carried out to develop a new, more modern and advanced website on pollen concentrations in Montenegro. This activity has already been initiated, and a completely new website with a new domain will be available during 2025 (<https://polen.org.me/>). In addition, there are plans to expand the network with several additional pollen monitoring stations.

The Ministry of Ecology, Sustainable Development and Northern Montenegro, acting on the proposal of the Environmental Protection Agency, adopted the Programme for Monitoring the Quality of Petroleum-Derived Liquid Fuels for 2024, in accordance with the Law on Air Protection, published in the “Official Gazette of Montenegro”, No. 093/24 of 27th September 2024. In addition, the Report on the Quality of Petroleum-Derived Liquid Fuels for 2023/24 was prepared and submitted.

Pursuant to the Law on Air Protection (“Official Gazette of Montenegro”, No. 25/10, 40/11, 43/15, 073/19), the Environmental Protection Agency issued one (1) Decision on air quality monitoring.

1.4. Key recommendations

- Adopt the *Law on Amendments to the Law on Air Protection*, thereby ensuring further alignment with Directive (EU) 2016/2284 on the reduction of national emissions of certain atmospheric pollutants (NEC Directive).
- Finalise the Air Quality Management Strategy for the period 2026–2029 following the adoption of the National Energy and Climate Plan (NECP), in order to ensure consistency between the two documents.
- Develop projections for the reduction of emissions of pollutants covered by Directive (EU) 2016/2284, based on an updated air pollutant emissions inventory, to be revised every two years on a continuous basis.
- Continue improving and modernising the national air quality monitoring network to reduce downtime of monitoring stations, and consider expanding the network in urban areas currently not covered by monitoring.
- Adopt air quality plans for zones where pollutant concentrations exceed any established limit or target value, accompanied by Action Plans for their implementation.
- Organise continuous training and capacity building at both state and local levels in order to improve the preparation of emission inventories, develop future emission projections, and update the complete emissions data history.
- Establish a functional polluter cadastre.
- Ensure that all new and existing industrial installations apply Best Available Techniques (BAT) to reduce pollutant emissions into the air.
- Complete the environmental reconstruction of the Pljevlja Thermal Power Plant.
- Require local governments and polluters to provide reports on monitoring carried out.
- Promote the use of alternative zero-emission heating systems (such as heat pumps, electric radiators, and district heating) through economic instruments (subsidies, tax incentives, and other financial mechanisms).
- Ensure continuous, regular, accurate, and timely information for citizens on air quality through local media, social networks, billboards, and applications.



2. WASTE MANAGEMENT

2.1. Overview and assessment of condition

Limited progress was achieved during the reporting period in the sub-area of waste management. Albeit the improvement of the legislative framework through alignment with EU law is a positive step, following the adoption of the new Law on Waste Management, much remains to be done, particularly with respect to adopting the necessary secondary legislation, finalising the State Waste Management Plan, and establishing an effective system of implementation and enforcement.

Montenegro continues to face numerous challenges in the field of waste management, including the need for waste prevention programmes, management plans covering all waste streams (at both state and local levels), increasing the recycling rate, and establishing a system for the separate collection of paper, metal, plastic, and glass. It is essential to map and safely dispose of historical hazardous waste while improving the characterisation and categorisation of hazardous waste, promote the prevention of industrial waste generation and ensure its environmentally sound disposal, develop an extended producer responsibility scheme (particularly for batteries and accumulators), and address the problems of illegal landfills and waste tyre management. Effective implementation of legislation requires strengthening the capacities of local governments and municipal companies, improving inspection oversight, and making greater investments in infrastructure and technology in line with EU standards.

2.2. Legal and strategic framework

In the area of legislative transposition, the Law on Waste Management (“Official Gazette of Montenegro”, No. 034/24 of 12th April 2024, No. 092/24 of 25th September 2024) was adopted after years of delay due to the political situation in the country. Pursuant to the Law, the Ministry of Ecology, Sustainable Development and Northern Montenegro planned the adoption of 43 secondary legislative acts (35 rulebooks and 8 regulations) to complete the waste management framework and facilitate its implementation. Some of these acts will specifically regulate waste containing mercury and persistent organic pollutants (POPs).

Pursuant to the Law on Waste Management, the following acts were adopted during the reporting period:

- Rulebook on criteria for the cessation of waste status for certain types of waste, as well as limit values for hazardous substances in waste (“Official Gazette of Montenegro”, No. 20/25);
- Rulebook on the conditions to be met by a company or entrepreneur engaged in the collection or transport of waste (“Official Gazette of Montenegro”, No. 20/25);
- Rulebook on calculating the insurance sum for issuing permits for the treatment and/or disposal of waste, the transport of waste in terms of equipment and means for collection or transport, and staffing requirements (“Official Gazette of Montenegro”, No. 20/25);
- Rulebook on the conditions for registration of waste collectors, the manner of maintaining the register, and the method of calculating the insurance sum (“Official Gazette of Montenegro”, No. 20/25);

- Rulebook on types of bulky waste (“Official Gazette of Montenegro”, No. 20/25);
- Regulation on the fee payable by sellers of lightweight plastic carrier bags with a wall thickness of over 50 microns (“Official Gazette of Montenegro”, No. 105/24);
- Rulebook on the handling of construction waste, the methods and procedures for its treatment, conditions for filling with construction waste, conditions and manner of disposing of cement-asbestos construction waste, as well as conditions to be met by construction waste treatment facilities (“Official Gazette of Montenegro”, No. 20/25);
- Rulebook on the content of reports on mercury sources and the manner of keeping records on mercury storage (“Official Gazette of Montenegro”, No. 103/24); and
- Rulebook on conditions, content of plans, content of applications and documentation required for issuing permits for the management of mining waste, details of the plan and reporting in case of a major accident in mining waste management, as well as criteria, characterisation, classification, and reporting on mining waste (“Official Gazette of Montenegro”, No. 20/25).

The Draft National Waste Management Plan for the period 2025–2029, the overarching strategic document for this area, has been prepared and a public consultation carried out. However, the Plan and the accompanying Report on the Public Consultation were not adopted by the end of Q4 2024, as initially planned. The new deadline for adoption is Q3 2025. In the meantime, on 1st November 2024, the Government adopted the Report on the Implementation of the National Waste Management Plan for 2023.

The then Ministry of Tourism, Ecology, Sustainable Development and Northern Region launched the Aarhus Caravan project, in cooperation with the Eco-Fund and the Environmental Protection Agency, which ran from 1st to 16th July 2024. During this period, presentations and training sessions were held in all municipalities across Montenegro with the aim of promoting the new Law on Waste Management.

Pursuant to the Government Work Programme, the adoption of the Draft Law on Communal Services was planned for 2024. The working group prepared the draft law, submitted it to institutions for opinion, and aligned it with the Secretariat for Legislation. However, following the Constitutional Court’s decision to annul two paragraphs of Article 6 of the Decree on Detailed Elements and Methodology for Determining the Prices of Communal Services (a secondary act adopted pursuant to the Law on Communal Services), further interventions were made to the draft in order to ensure that the prescribed provisions would not represent an obstacle for the by-law regulating the issues under review by the Court. Due to the restructuring of state administration, a new Working Group was established, which continued the work on the Draft Law on Communal Services. The new deadline for adoption is Q4 2025. At its session held on 8th February 2024, the Government gave its consent to the Decision on the Amount of Fees Payable by Providers of Communal Services in 2024.

Montenegro, as an EU candidate country, is obliged to establish a functional Integrated Waste Management System (IWMS), which is considered one of the priorities on its path towards EU accession. The focus is on waste reduction, reuse and recycling, the complete prevention of illegal disposal,

landfilling and incineration of waste, as well as the application of the “polluter pays” principle. Accordingly, the draft National Plan sets out the following key quantitative waste management targets: by 2028, to ensure that at least 30%, and by 2030 at least 50% of waste such as paper, metal, plastic and glass — collected from households and similar sources — is prepared for reuse and recycling. By 2028, the plan foresees that 25% of packaging waste will be recycled: 30% of glass packaging, 30% of paper and cardboard, 40% of metal, 15% of plastic packaging and 5% of wood.

In 2023, Montenegro generated 1,314,292.4 tonnes of waste, of which 55% originated from the industrial sector, while hazardous waste accounted for 23.7% of the total volume⁴. Compared to 2022, the overall amount of waste decreased by 6.9%, with increases recorded in industry (+13.2%) and households (+6.6%), and decreases in construction (–43.3%) and services (–26.8%). A total of 1,293,286.9 tonnes of waste was treated (+10.1%), of which 54.1% was landfilled.⁵

In 2023, a total of 360,136.8 tonnes of municipal waste was generated (+7.2% compared to 2022), of which 96.7% was collected, equalling 577.5 kg per capita (+6.1% compared to the previous year). A total of 350,094.9 tonnes of municipal waste was treated (+11.8%), with 91.1% being landfilled/disposed of.

Recycling preparation included 3,958 tonnes of packaging, 74 tonnes of hazardous WEEE, 2,493 tonnes of batteries, and 377,375 tonnes of waste from thermal processes. The amount of recycled waste increased by 22.1% compared to 2022.

The lack of infrastructure, absence of effective separate waste collection systems, and insufficient environmental awareness among citizens continue to contribute to this situation. Improving the recycling rate requires investments in education, infrastructure development, and the implementation of effective waste management systems.

According to data from the Environmental Protection Agency, in 2023 a total of 2,997 tonnes of lubricating waste oil and other hazardous liquid waste was collected and handed over to an authorised collector. Regarding waste edible oils, 554 tonnes were collected during 2023; however, there is no information available on their further treatment.⁶

During the reporting period, 37,106 tonnes of construction and demolition waste were collected, but no data is available on the subsequent management of this waste, which is generated in significant quantities.

In Montenegro, municipal wastewater treatment plants are operational in Podgorica, Mojkovac, Budva, Herceg Novi, the joint facility for Tivat and Kotor, Nikšić, Pljevlja, Šavnik, Žabljak, Berane, while there are also four smaller plants in Virpazar, Rijeka Crnojevića, Luštica, and Jaz. Construction of wastewater treatment plants is planned in other municipalities, to be completed no later than 2035. No progress has been made in establishing an organisational structure for the collection and treatment of sewage sludge, which continues to be mostly stored within facilities or exported.

⁴ Generated and Treated Waste – MONSTAT, Release No. 139/2024

⁵ Generated and Treated Waste – MONSTAT, Release No. 139/2024

⁶ Generated and Treated Waste – MONSTAT, Release No. 139/2024

The Ministry of Health has concluded a concession contract for the collection of medical waste with the consortium OMP Ekomedika, composed of the company Ekomedika from Podgorica and the Italian firm Officine Meccaniche Perjani Srl Vinovo. The protocol regulates the collection of waste under the following codes: 18 01 01 (sharps other than 18 01 03), 18 01 03 (waste whose collection and disposal is subject to special requirements to prevent infection), and 18 01 04 (waste the collection and disposal of which is not subject to special requirements to prevent infection, e.g. linens, plaster bandages, bedding, single-use clothing, cloth, diapers). According to the concession study on medical waste management, the projected annual amount of waste is 654 tonnes. In 2023, the concessionaire collected and treated 485 tonnes of medical waste. Medical waste treatment centres operate in Berane and Podgorica.

The quantities of veterinary waste are difficult to estimate. There is no precise record of livestock deaths on farms, municipal companies do not maintain records of dead animals, the tradition of home slaughter persists, and there is no facility for processing by-products (a plant is planned in the municipality of Bijelo Polje).

For the purpose of improvement of the overall waste management system, it is necessary to establish organised and continuous data collection on waste composition through systematic surveys and detailed records of waste types, quantities, and origin. The establishment of a Waste Management Information System (WMIS) is urgently required. Moreover, although municipalities are obliged to submit annual reports on waste management and issued permits, most fail to do so regularly, and even when reports are submitted, the data is often incomplete or unreliable, which seriously limits the ability to plan and supervise waste management effectively.

Možura landfill is currently more than 85% full, and it is estimated that the existing capacity will suffice only until the end of 2026. Expansion is therefore necessary, and in cooperation with the Ministry of Ecology, a Feasibility Study and Conceptual Design for new sanitary cells have been completed. Land covering 44,430 m² has been purchased, securing capacity for the next 8–10 years.

Studies have also been prepared on electricity production from landfill gas and on leachate treatment, but their implementation has not yet begun. As of 7th May 2024, the landfill has been opened for waste disposal from both legal and natural persons. The symbolic disposal fees aim to reduce illegal dumping and encourage proper waste management. In the first few months, a strong response was observed – 53,897.48 tonnes of waste were collected.

Livade landfill in Podgorica currently receives waste from eight municipalities, with Mojkovac and Kolašin expected to follow soon. Capacity is filling up rapidly – the projected lifespan of sanitary cells has been reduced from 5–6 years to around 3 years due to the increased volume of waste. The third cell has been closed, the fourth is in operation, and construction of the fifth and sixth cells is planned, which would extend the landfill's operation by another eight years. A feasibility study is underway for a waste-to-energy facility at the Livade landfill in Podgorica, as envisaged in the Draft National Waste Management Plan 2025–2029, which is still pending adoption. This measure raises serious concerns due to potential negative impacts on human health and the environment, given that such facilities in several European countries have been associated with air and soil pollution from heavy metals and dioxins. Moreover, it represents an expensive and systemically unsustainable technology that requires a constant waste

inflow, thereby discouraging investment in prevention, recycling, and reuse. The planning of an incinerator comes at a time when the European Union is phasing out this practice in favour of solutions aligned with the circular economy and the Green Deal principles, including DNSH – “Do No Significant Harm.”

Remediation of the “Mislov do” landfill was completed in cooperation with the Ministry of Ecology, Sustainable Development and Northern Montenegro and the Municipality of Nikšić, at a cost of around half a million euros. The next phase will focus on land reclamation in cooperation with environmental activists. The Municipality of Nikšić also intends to purchase the land where the landfill was located from a private owner, to whom rent had been paid for more than two decades. Together with the World Bank, financial resources in the amount of €220,000 have been secured for the preparation of technical documentation for the construction of a Regional Waste Management Centre in Nikšić, which should be completed by May/July 2025.

The remediation of the unmanaged disposal site “Zakršnica” in Mojkovac is ongoing. The contracted value of the works amounts to €4,228,330.04, while supervision costs €83,490.00. The project was initially scheduled to be completed by the end of December 2024, but due to adverse winter weather conditions, the deadline has been extended. Approximately 90% of the works have already been completed.

Construction of another sanitary landfill with a regional recycling centre in the northern region has been ongoing for more than a decade. According to the draft National Waste Management Plan, the designated location is Čelinska Kosa in Bijelo Polje, with a total capacity of 340,000 m³.

The resolution of the environmental problem of the large volumes of waste tyres is expected through the introduction of the Extended Producer Responsibility (EPR) system, which in this case applies to car tyre importers, making them responsible for the management of waste tyres at the end of their service life. For the EPR system in Montenegro to become operational, it is first necessary to adopt a series of secondary legislative acts and create preconditions for its implementation. The Regulation on the establishment, collection, processing and functioning of an organised system for waste tyres is scheduled in the Ministry’s Work Programme for the fourth quarter of 2025. However, tyres currently disposed of in nature and at landfills will not be covered by this system, and this remains an urgent issue to be addressed without delay. Specific activities must be defined for the collection and processing of waste tyres already stockpiled across Montenegro—on fields, meadows, river valleys and other sites, as well as at landfills—where they pose a serious threat to the environment and human health, particularly in the event of burning.

Adoption of the Regulation on the Fee to be Paid by Retailers of Lightweight Plastic Carrier Bags with a Wall Thickness of more than 50 Microns (“Official Gazette of Montenegro”, No. 105/24 of 31st October 2024), pursuant to Article 62, paragraph 13 of the Law on Waste Management (“Official Gazette of Montenegro”, No. 034/24 of 12th April 2024, No. 092/24 of 25th September 2024), marked an important step in improving the state of waste management. The fee is calculated on the basis of monthly reports on the number of bags placed on the market, which retailers are required to submit to the Environmental Protection Agency. The amount of the fee is set at €0.03 per bag. Revenues collected are transferred to the Environmental Protection Fund and these funds are exclusively used for financing and co-financing awareness-raising activities, public information, and campaigns on the harmful effects of plastic bag use.

According to the Ministry of Ecology, Sustainable Development and Northern Montenegro, the Eco-Fund of Montenegro collected €301,279 from November 2024 to the end of February 2025 due to this measure. During the same period, the sale of plastic bags was halved compared to the previous year, while an analysis at the Podgorica landfill showed a 70% reduction in the number of plastic bags. These results demonstrate the positive impact of the newly introduced measures on reducing plastic bag use and protecting the environment.

One of the significant steps towards fulfilling the obligations under Chapter 27 is the establishment of a waste monitoring system and a Pollutant Release and Transfer Register (PRTR), mechanisms which enable improved control and management of environmental issues. The Environmental Protection Agency, in cooperation with the Ministry of Ecology, Sustainable Development and Northern Montenegro and the Eco-Fund, established the 3R information system and the PRTR, which are still not publicly accessible. The Register – Record – Report (3R) system was developed within the World Bank project “*Industrial Waste Management and Cleaning*” with the aim of digitalising and automating the process of issuing permits and approvals for waste management, as well as creating a cadastre of environmental polluters. The purpose of the 3R system is to automate activities and procedures related to the management of registers, documents and reporting on waste generation and handling, covering all participants in the waste management chain – from producers and collectors, through processors, to the competent authorities of local self-governments. The system is designed to comply with the applicable legal framework and to enable effective record-keeping, reporting and cadastre management of environmental polluters.

Through the “*Project for the Improvement of the Pollutant Release and Transfer Register (PRTR) in the Western Balkans and the Republic of Moldova*”, which was funded by a grant from the German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety, a PRTR with a pollutant emissions database was defined, enabling the public to efficiently access environmental information. The project includes the development of IT tools for proper data storage and statistical processing, online submission of applications for registry entry, and the establishment of a secure connection with EU databases. A presentation of the information system was held at the end of July 2024, while its full functionality was established in early November 2024, after which the system was handed over to the Environmental Protection Agency for management. The next phase foresees training sessions for external users of the system (business entities, waste operators, and other relevant stakeholders) to enable electronic submission of annual waste reports, pollutant register entries, and applications for waste management permits.

According to the Work Programme of the Ministry of Ecology, Sustainable Development and Northern Montenegro, the adoption of the *Rulebook on Amendments to the Rulebook on the Manner of Maintaining the Polluters’ Cadastre* is planned for the third quarter of 2025, with the aim of further alignment with PRTR regulation.

During 2024, the Environmental Protection Agency sent 198 notifications to business entities and entrepreneurs (potential polluters) regarding the obligation to submit Reports on the Quantity of Waste Generated. Based on the reports submitted by polluters, the Agency calculates eco-fees in accordance with the applicable Regulation on the Amount of Fees, the Method of Calculation and Payment of Fees for Environmental Pollution (“Official Gazette of the Republic of Montenegro”, No. 26/97, 9/00, 52/00 and

“Official Gazette of Montenegro”, No. 33/08, 5/09, 64/09, 40/11, 49/11, 119/22). On the basis of the submitted Annual Reports on the Quantities of Waste Generated, the Agency managed to calculate eco-fees for all obligors and, out of a total of 257 processed reports, issued Decisions for 144. The analysis of data on the received reports and issued decisions regarding eco-fees for the period 2020–2024 shows a significant positive trend and an increase in the awareness and responsibility of obligors, as well as better implementation of the system for collecting eco-fees, in line with the requirements of the EU acquis in the field of environmental protection.

The project “Industrial Waste Management and Cleanup”, the contract for which was signed almost a decade ago, has not yet been fully completed, as the issue of industrial hazardous waste from the Podgorica Aluminium Plant (KAP) remains unresolved. Regarding the red mud basins and the solid waste landfill located on the KAP site, funds were provided within the project budget for the preparation of technical documentation for remediation. The technical documentation was prepared and approved in 2022, but remediation cannot be implemented because the land on which the red mud basins are located is privately owned. The Budget Law for 2024 allocated funds for the implementation of the project “Reform in the Field of Waste Management”, which, among other things, includes the remediation of the solid waste landfill at the KAP site.

During 2024, the Environmental Protection Agency established a working team tasked with conducting an inventory of historical waste throughout Montenegro, visiting abandoned factories and facilities, and thus undertaking activities to promote the prevention of industrial waste and ensure environmentally sound disposal. A total of 56 potential waste holders were identified.

Pursuant to the Law on Waste Management (“Official Gazette of Montenegro”, No. 34/24, 92/24) and secondary legislation, during 2024 the Environmental Protection Agency conducted a total of seven hundred twenty-eight (728) administrative procedures, issuing: fourteen (14) decisions for waste treatment, twenty-seven (27) permits for the transit of non-hazardous waste, one hundred nine (109) permits for the import of non-hazardous waste, thirty-six (36) decisions on the registration of companies in the register of waste collectors, fourteen (14) decisions on the registration of transporters, nine (9) decisions on the registration of companies in the register of traders and brokers, one hundred two (102) decisions on the registration of companies in the register of exporters of non-hazardous waste, three hundred thirty-three (333) consents and decisions on waste management plans of waste producers, six (6) permits for the export of hazardous waste, one (1) permit for the transit of hazardous waste, and seventy-seven (77) decisions rejecting applications.⁷

According to information provided by local self-government units, a total of three hundred thirty-four (334) unregulated dumpsites of various sizes have been registered – ranging from smaller illegal dumps to larger wild landfills with significant amounts of waste. However, the issue of feedback from local authorities regarding the number of rehabilitated sites remains unresolved. The removal and remediation of unregulated dumpsites falls under the responsibility of local self-governments, which in most cases lack sufficient infrastructural and human resources capacities. Although municipal utility companies are making efforts to remove such dumpsites, new waste – most often bulky, green, and construction waste – soon reappears at the same locations. During 2024, the Eco Fund, in cooperation with the Ministry of Ecology, Sustainable Development and Northern Montenegro, carried out the remediation of fifty-five

⁷ Report on Work of the Environmental Protection Agency for 2024

(55) unregulated dumpsites, out of a total of sixty-two (62) reported sites. Remediation of the remaining three dumpsites, located in the municipality of Kolašin, is ongoing.

Municipality	Number of remediated dumpsites	Surface (m²)	Quantity of removed waste
Nikšić	3	10.000	more than 1.500 m ³
Plav	6	8.953,1	around 40 t
Bar	1	1.000	more than 830 t
Bijelo Polje	18	3.500	more than 1.400 m ³
Danilovgrad	8	1.650	around 500 m ³
Berane	5	92.687	around 40.000 kg
Zeta	10	6.970	around 350.000 kg
Andrijevica	4	2.900	around 200 t

Activities of the Eco Fund in 2024 focused heavily on strengthening municipal waste management infrastructure. A total of €2,015,850.67 was allocated for the purchase of communal equipment, out of which €2,003,265.02 was spent. In April 2024, the Environmental Protection Fund launched a public call for the allocation of €1,148,000 in non-refundable funds for the procurement of communal equipment. Out of this amount, €648,000 was intended for mobile equipment and €500,000 for immovable equipment. In addition, €100,000 was earmarked for the collection of household e-waste. Immovable equipment worth €836,189 (with a subsidy of €568,349 provided by the Eco Fund) was distributed to companies from ten municipalities, enabling the procurement of more than 1,000 containers, semi-underground containers, a press container, balers, a recycling machine, glass bells, and about 3,000 bins. Mobile equipment worth over €2.1 million (with a subsidy of €978,501) was awarded to municipalities and public utility companies from 15 cities. The procured machinery included waste collection trucks, four multifunctional combined machines, a freight vehicle for waste transport, an electric waste transport vehicle, two excavators, a grab loader, two street-cleaning vehicles, and street-cleaning brushes. In August 2024, Eco Fund announced a new public call for the procurement of communal equipment and waste management devices for municipal companies that had not received subsidies earlier that year. Through this project, an additional 19 semi-underground containers, 3 multifunctional vehicles, a garbage truck, 2 waste removal vehicles, 3 street-cleaning machines, composters, 10 metal containers, and 2 roll containers for sludge were procured. Increasing the Eco Fund budget in the future would significantly contribute to the development of infrastructure for waste disposal, separation, and recycling, as well as the elimination of illegal landfills.

Pursuant to the Law on Waste Management (“Official Gazette of Montenegro”, No. 34/24, 92/24) and secondary legislation, in 2024 the Environmental Protection Agency conducted a total of (728) administrative procedures, issuing: (14) decisions for waste processing, (27) permits for the transit of non-hazardous waste, (109) permits for the import of non-hazardous waste, (36) decisions on the registration of companies in the register of waste collectors, (14) decisions on the registration of transporters, (9) decisions on the registration of companies in the register of traders and waste brokers, (102) decisions on the registration of companies in the register of exporters of non-hazardous waste, (333) consents and decisions on waste management plans of waste producers, (6) permits for the export of hazardous waste, (1) permit for the transit of hazardous waste, and (77) decisions rejecting requests.

In 2024, the Ministry of Ecology, Sustainable Development and Northern Montenegro continued financing NGO projects in the field of waste management, with the aim of improving the system and raising environmental awareness. A total of 60 applications were submitted, and 21 projects received funding, covering three main areas: improving “door-to-door” waste collection (7 projects), construction waste management (7 projects), and household composting (7 projects). The total amount allocated was €150,000.

Environmental Protection Agency is implementing the project “Preparation of the national inventory of banks of waste controlled substances and the development of a national plan for managing these substances”, approved at the 93rd session of the Executive Committee (ExCom) in December 2023. With the adoption of the Law on Waste Management, it is necessary to adopt secondary legislation covering the management of waste substances and equipment containing these substances. Questionnaires were prepared for data collection and will be distributed to key stakeholders.

In 2024, the Environmental Protection Agency also launched the project *“Strengthening the system for plastic waste management in Montenegro”*, aimed at preventing and reducing plastic waste, especially single-use plastics in the hospitality sector. It is planned that 100 hospitality establishments will receive substitute products for plastics and will be able to apply through a public call. Participants will sign a Memorandum of Understanding with the Agency and will be awarded the label “plastic-free zone”. The project also envisages at least two coastal cleanup actions to reduce plastic waste on beaches and in the sea. During 2024, work was carried out on preparing the public call.

Another project of the Environmental Protection Agency, *“Raising awareness on ecological plastic waste management in Montenegro”*, focuses on analysing the quantities and types of plastic waste and products placed on the market over the last five years. The collected data will allow better planning of measures to reduce plastic waste. A list of plastic products identified in waste was prepared, enabling a clearer understanding of its structure, as well as data on products placed on the market during the same period, in cooperation with producers, distributors, and competent authorities. A comprehensive report is being prepared to be delivered to the Slovak BRS partner, which will include an analysis of trends in production, consumption, and plastic waste management, serving as the basis for further policy development and measures to reduce plastic waste in the country.

To promote recycling and highlight the importance of inter-institutional cooperation, Environmental Protection Agency, together with the company “Deponija”, organized a recycling campaign, as well as actions for the removal of electronic waste and office furniture from the Agency.

2.3. Key recommendations

- Adopt secondary legislation necessary for the effective implementation of the Law on Waste Management.
- Adopt the National Waste Management Plan of Montenegro for the next five-year period.
- Adopt local waste management plans for all municipalities, aligned with the new National Waste Management Plan, and monitor their implementation.
- Continuously strengthen the capacities of institutions at both state and local level for monitoring and implementing waste management legislation.
- Provide incentive measures for citizens to implement primary waste separation.

- Establish and implement a system of primary municipal waste separation, accompanied by ongoing campaigns to promote waste as a resource.
- Intensify efforts to resolve the issue of temporary landfills for municipal and non-hazardous construction waste.
- Introduce waste morphological composition analysis, which provides key information on waste structure, enabling more effective recycling systems and reduction of total disposed waste.
- Ensure the functioning of a unified system for collecting data on waste types and quantities, and enable public access to waste collection and management statistics.
- Ensure the functioning of a hazardous waste polluters' register.
- Introduce extended producer responsibility (EPR) schemes for specific products (e.g. electronic equipment, batteries, tyres, packaging).
- Strengthen the capacities of environmental inspectors, as well as municipal inspections at the local level, to improve oversight of the implementation of the Law on Waste Management.
- Establish a functional and mandatory system for separate collection of biodegradable waste (such as kitchen and green waste), alongside infrastructure development for composting and/or biogas production. Expand the existing network of treatment plants for biodegradable waste to cover the entire territory of Montenegro.
- Secure funds for financing landfill remediation projects, as well as infrastructure for waste separation, sorting, and recycling.
- Develop a Sludge Management Plan defining the collection, handling, and treatment of sewage sludge at both national and local levels.
- Consider establishing regional waste management companies to enable more efficient use of resources, better organization of waste collection and processing, and reduced costs.
- Launch national and local awareness-raising campaigns, with a particular focus on school-based education, using different media and practical activities to increase citizens' awareness of proper disposal, recycling, and reuse of waste.



3. WATER QUALITY

3.1. Overview and assessment of condition

Although legislation in the sub-area of water quality is fully aligned with the EU acquis, Montenegro has made **limited progress** in implementing the obligations set out in the Action Plan. Further alignment is needed with the legislation on drinking water and marine environment protection (Directive 2008/56/EC). The main challenges remain outdated or missing water supply and sewage infrastructure, insufficient sanitary protection of water sources, weak oversight, and lack of financial resources. Particular emphasis should be placed on improving the monitoring and reporting system through the establishment of an integrated information system, which would enable more effective planning, supervision, and management of water resources at both national and local levels.

It is necessary to accelerate legislative and planning activities, ensure continuous monitoring of water quality and communal services, work on the rehabilitation, modernization, and expansion of water supply and sewage networks, build wastewater treatment plants in all municipalities, secure stable financing, and enhance transparency in water quality reporting. Furthermore, efforts should be intensified to implement ongoing projects, secure financial resources for projects with already prepared technical documentation, and continuously work on preparing documentation for new projects in line with the strategic plans of the water sector.

3.2. Strategic and legislative framework

During the reporting period, no concrete activities were undertaken on further alignment of the legislation in the field of drinking water quality, since the adoption of amendments to the Law and accompanying secondary legislation was postponed to Q4 2025 – Q1 2026. Such postponement extends the period in which citizens lack full legal and institutional protection with respect to water quality, thus indicating insufficient institutional commitment to addressing this matter of direct relevance for public health. Water safety plans, which should identify all potential risks and protection measures – from the source to the tap – have not yet been introduced in practice.

A working group was established to draft the Law Amending the Law on Water Supply of the Montenegrin Coast, the adoption of which had been planned for 2024. Upon the recommendation of the Secretariat for Legislation, the necessary supplements were introduced, particularly concerning provisions on investment fees. Following harmonisation, the Draft Law will be resubmitted to the relevant institutions for opinion. Due to staff shortages, activities are planned to continue in the upcoming period.

Preparation of the *Proposal of Law on Water Services* had been envisaged for 2024 within the Government's work programme. Following changes in the institutional structure, it was decided that the Law on Water Services would not be adopted as a standalone act, but rather that its amendments and supplements be incorporated into the drafting of the new Law on Communal Services.

Revision of the *Water Management Strategy*, the key strategic document underpinning the reform of the water sector, is scheduled for Q4 2025.

During the reporting period, Montenegro continued implementing measures from the Action Plan for alignment with the MSFD and marine environment protection, including monitoring, pollution reduction, and biodiversity conservation. Progress was achieved in cooperation with relevant institutions, albeit the full requirements of the MSFD have not yet been met, thus requiring additional efforts and resources. On

4th July 2024, the Government adopted the *Programme of Measures for the Preservation of Good Marine Status*, thereby laying the foundation for drafting the Marine Environment Protection Strategy, scheduled for the end of 2025. However, the annual monitoring of the marine ecosystem for 2025 will not be carried out due to the lack of budgetary resources, despite being a legal obligation and a key tool for assessing status, conservation, and protection of the marine environment. Such a failure in planning may have serious consequences for ecosystems, public health, and Montenegro's international standing as a member of the Barcelona Convention.

The *Bathing Water Monitoring Programme* was formally adopted in 2024, and its full implementation requires at least four consecutive bathing seasons, in line with Directive 2006/7/EC. Activities have so far been only partially implemented. It is recommended to continue consistent implementation of the programme, with comprehensive monitoring of all designated bathing sites, the application of standardised methodology, and regular annual reporting with clearly defined indicators. It is also necessary to prepare administrative and technical capacities in time for the assessment and classification of bathing waters, expected in 2028, and to plan additional measures to improve quality where there is a risk of pollution. According to the analysis conducted by the Public Enterprise for "Morsko dobro" in June 2024 across 114 locations: 79.8% of sites recorded excellent water quality, 13.2% good, 5.3% sufficient, and 1.8% poor. These data indicate that water at most bathing sites is sanitary compliant and safe for swimming and recreation.

In December 2024, the Government of Montenegro adopted the *Monitoring Programme for Surface and Groundwater for 2025*, which covers the monitoring of both the chemical and ecological status of water. According to the latest available data from 2023, progress was recorded – the number of water bodies with good surface water quality increased, while groundwater was assessed as good in 100% of cases. However, the main risks for groundwater remain untreated wastewater and solid waste from diffuse sources, particularly during dry periods. Albeit positive trends have been observed, water quality monitoring is hindered by financial constraints, a lack of staff and equipment at the Institute of Hydrometeorology and Seismology, as well as the absence of domestic biological reference values. Currently, data from neighbouring countries are being used, thus pointing to the need for the development of national standards. Given the increasing frequency of droughts and low river flows, further investment is necessary in monitoring capacities for both the quality and quantity of water, as well as in alignment with European legislation and environmental standards, to ensure the long-term security and sustainability of water resources.

The establishment of the Working Group for the implementation of the *Programme of Measures from the water management plans* was initiated in 2024, albeit it was not officially constituted during the reporting period.

Flood risk management plans for the Adriatic and Danube basins are currently in their final drafting stage. In 2024, strategic environmental assessments (SEA) were carried out, and two public debates were held – on 17th September in Bijelo Polje and on 18th September in Podgorica. Water Administration submitted SEA reports for the plans to the Environmental Protection Agency, which invited the public to provide comments by 6th May 2025. The plans are expected to be adopted in 2025, after the completion of public consultations and the acquisition of all necessary approvals, and subsequently published on the official websites of the Ministry of Agriculture, Forestry and Water Management and the Water Administration.

The Wastewater Management Plan in Montenegro for the period 2020–2035 envisages that 37 agglomerations will be equipped with wastewater treatment plants and appropriate collector systems, in line with Directive 91/271/EEC. The deadlines for equipping are defined according to the size of the agglomeration: by 2031 for those above 50,000 PE, by 2033 for those between 15,000 and 50,000 PE, and by 2035 for those below 15,000 PE. Although the Action Plan foresaw the establishment of a reporting system for the implementation of this plan, to date no practice of regular reporting has been established, and the last available report dates back to 2020, thus indicating the need for greater transparency and institutional monitoring of the implementation of planned obligations.

The Programme for the construction of collector systems and municipal wastewater treatment plants for the period 2025–2027 was adopted in line with the Wastewater Management Plan (2020–2035) and envisages the construction of 885 km of collector network and 29 plants, so as to ensure full wastewater treatment in all 37 defined agglomerations by 2035. The total investment costs amount to €472 million, of which 54% is foreseen from EU funds and 43% from national sources. Works have already been completed in Andrijevica, Petnjica, Bar and Ulcinj, while significant investments have been implemented in Podgorica. Tenders have been launched for works in Kolašin, Mojkovac and Rožaje. Moreover, on 2nd July 2024 WBIF grants were approved for projects in Pljevlja, Nikšić, Kotor, Tivat, Ulcinj and Cetinje, in a total amount exceeding €75 million.

In February 2024, the Government of Montenegro adopted the *Water Concessions Plan*, aimed at attracting private investments through clearly defined and legally grounded procedures. The Plan includes one spring, “Veliki Maljen” in Gornja Bukovica, Šavnik municipality, for the use of part of its water for commercial bottling, while the other two sites concern the extraction of groundwater for technological purposes (heating and cooling system) at the “The Capital Plaza” centre in Podgorica, and for the needs of the Trebjesa brewery in Nikšić. Two concession procedures were launched – one for the use of water from the “Veliki Maljen” spring in Šavnik, and another for the Trebjesa brewery in Nikšić. The procedure for “Veliki Maljen” advanced through the preparation and adoption of the Concession Act, a public consultation, a public tender and the selection of a bidder, with “Per Aqua” LLC Šavnik ranked first, and the preparation of the Draft Decision on granting the concession currently underway. The concession procedure for the Trebjesa brewery is in the stage of supplementing the documentation required for the preparation of the Concession Act.

This report highlights the fact that the *Water Pollution Protection Plan for the period 2019–2024* has expired, while the Water Law stipulates that a new plan must be adopted every six years. Although the drafting process for the new plan should already be underway, there is no information from the line ministry on its initiation.

The Government of Montenegro adopted the *Programme on the Use of Funds for Water Management for 2024*, published in the Official Gazette of Montenegro (“Official Gazette of Montenegro”, No. 52/24). The Programme allocated a total of €491,200 for financing water management obligations and needs in 2024. The funds will be directed to the following purposes: collection of inputs, preparation and revision of planning and project documentation (€40,000), regulation of watercourses, regular maintenance and condition control (€260,000), professional supervision of works and provision of conditions for works execution (€15,000), implementation of measures envisaged by strategic and planning documents in the field of water management (€35,000), management of the water information system (€108,000), and funds necessary for the functioning of the Programme (€33,200).

In accordance with the Law on Financing Water Management, a provisional calculation of water charges for 2024 was carried out during the accounting period, amounting to €5,344,757.63. Of this total, revenue from the provisional calculation of charges for water pollution protection amounted to €763,203.11, from charges for water use €4,284,743.33, and from concession charges for the use of water for commercial bottling purposes €296,811.19.

According to the 2023 report of the Institute of Public Health, numerous problems were identified in the functioning of public water supply systems. Drinking water reservoirs in several towns are not adequately protected (they must be equipped with sanitary protection zones), while distribution networks are outdated and prone to frequent breakdowns and high losses (particularly in the peripheral parts of urban areas where the situation is further aggravated by unauthorized connections). Disinfection of water is also not consistently applied across all systems, mainly due to the lack of automatic dosing systems and residual chlorine monitoring, which exist only in a few larger urban waterworks. In addition, informing the public about water safety must become a systematic and transparent obligation of the competent institutions, rather than an occasional practice. Although some progress has been made in water-use efficiency, it is still unclear what share of available resources is actually used, which is a key indicator for assessing the risks of overuse and potential shortages. To improve the current situation, investments are needed in infrastructure modernization, alignment with legislation, and the implementation of modern technologies and methods for water quality control, alongside regular inspection oversight.

During 2024, the Water Inspectorate collected 49 water samples for laboratory testing: 32 wastewater samples, 2 surface water samples, 2 drinking water samples, and 13 bathing water samples. Out of the total, 13 samples were found to be non-compliant. The result of these laboratory analyses – with more than one-quarter of the samples failing to meet the prescribed standards – is alarming and requires the immediate attention of the competent institutions. This is particularly significant if non-compliance concerns drinking and bathing water, as it directly endangers human health. Non-compliant wastewater samples also pose a risk if such waters are not properly treated before discharge, as they may cause contamination of surface and groundwater. In any case, this outcome should be treated as a serious warning that additional inspections, improved sanitary protection, stricter enforcement of legal provisions, and strengthening of the water management and protection system are urgently needed.

Although the Water Information System was formally established at the end of 2023, while a geodatabase model was developed for the purpose of river basin management plans, the establishment and maintenance of the system is still in its second phase. In 2024, a total of €491,200 was allocated for its development and functioning, including equipment procurement, automation of data exchange with relevant institutions (Institute for Hydrometeorology and Seismology, MONSTAT, Real Estate Administration, Public Enterprise for Coastal Zone Management, Directorate for Emergency Situations), and the preparation of a register of polluters and groundwater. For the system to become fully operational and sustainable, it must be fully aligned with legislation, supported by adequate infrastructure and trained staff, as well as timely identification of implementation challenges. During 2024, the Ministry of Public Administration conducted a review of the Water Information System, which confirmed that the system is largely aligned with the legal framework and that activities for its further improvement have already been initiated. The Ministry granted consent for the implementation of the second phase of system improvement through act no. 04-046/24-781/4 of 3rd February 2025. The finalisation of the polluter register will provide an accurate picture and record of potential polluters, who will also be obliged to pay water protection charges, while ensuring all necessary data for calculating such charges and

establishing a system for monitoring their collection. Furthermore, the water cadastre covering the period 2013–2023 was digitised and the data entered into the Water Information System. For 2025, the completion of the second phase is planned, which will enable automated data exchange and greater availability of information to the public.

Despite some progress in the wastewater sector, Montenegro still faces serious infrastructural and institutional challenges. According to 2024 data, around 55.8% of the population is covered by wastewater collection systems, while secondary treatment covers 33%, and tertiary treatment only covers 22.9% of the total load. Although there are seven major wastewater treatment plants (WWTPs) in cities such as Podgorica, Nikšić, and Budva, their capacities remain insufficient to meet the needs of the population. By 2035, the connection rate to the sewage system is expected to increase to 93%. To achieve this goal, investments of around €472 million are planned, covering the construction of new facilities as well as the expansion and improvement of existing capacities.

However, implementation of legal obligations and institutional coordination remain problematic. The Ministry of Ecology, Sustainable Development and Northern Montenegro must more proactively notify local and state authorities of the obligation to submit water permits for wastewater discharge by 31st January of the current year, in order to establish accurate records in line with the Law on Municipal Wastewater Management. Another chronic issue is the irregular submission of reports by municipal companies managing WWTPs, while the quality of submitted data is often questionable. A working group to be coordinated by MONSTAT, bringing together all relevant institutions to unify wastewater treatment plant data, has not yet been established. The recommendation of the State Audit Institution⁸ to form working teams for each plant — tasked with analysing the current situation, identifying key challenges, and proposing concrete measures to improve plant performance — has not been implemented. Moreover, the planned tender of the Ministry for the development of software and procurement of equipment to establish an information system for monitoring the operation of wastewater treatment plants (WWTPs) was not launched during 2024.

Relations between the Government and local self-governments in implementation of wastewater treatment plant (WWTP) infrastructure projects in Danilovgrad and Botun (Zeta) reveal serious weaknesses in coordination, planning, and execution. Lack of alignment on key issues, such as site selection and the fulfilment of obligations, slows down the projects, increases the risk of losing international funding, and highlights the need for stronger institutional cooperation and accountability. Albeit there is a clear awareness of the necessity for a modern wastewater treatment system, the absence of consensus and transparency in decision-making is causing project delays. Thus, successful implementation of such infrastructure projects requires open communication, recognition of local community perspectives, and the pursuit of compromise solutions which are going to satisfy the interests of all stakeholders.

It is necessary to carry out detailed inspections and analyses to detect improper connections of stormwater to sewage systems in order to prevent negative impacts on wastewater quality. An additional challenge is the insufficient coordination among institutions managing sewage networks and WWTPs, which hampers the resolution of both technical and organisational issues.

⁸ Report on the Implementation of Recommendations from the Performance Audit “Effectiveness of Wastewater System Management” (March 2024)

During 2022, Water Administration Water Administration initiated collection of data for development of the Operational Plan for the Protection against Accidental Water Pollution for waters of national importance in 2022. A draft plan was prepared in October 2023 and submitted for comments to the Water Council and the Administration for Inspection Affairs. On 26th August 2024, the Ministry of Agriculture, Forestry and Water Management provided comments for revision. Upon adoption of this plan, local self-governments will be required to develop their own operational plans for waters of local importance, as well as to establish appropriate registers. The fact that the plan has not yet been adopted, albeit being a key document for managing risks to water resources, highlights insufficient efficiency, lack of commitment, and weak institutional coordination.

In the coming period, activities which shall be implemented in the area of municipal wastewater include: continue implementation of ongoing projects, ensure financing for projects with prepared technical documentation, prepare technical documentation for new projects in line with the Wastewater Management Plan for the period 2020–2035, and improve the monitoring of WWTP operations in agglomerations through the establishment of an information system.

In July 2024, the Western Balkans Investment Framework (WBIF) Operational Board approved investment grants in the total amount of €62.12 million for improving water supply and wastewater treatment in several Montenegrin municipalities. Among the projects are the construction of sewerage networks in Pljevlja and Nikšić (€17.83 million), the improvement of wastewater collection systems in Kotor, Risan and Perast (€3.97 million), Tivat (€9.69 million), and the construction of a WWTP in Ulcinj (€30.63 million).

The 2024 Water Inspectorate Annual Report identified 229 irregularities. In order to address them, inspectors issued 29 warnings and adopted 87 decisions, including: orders to obtain a water permit (31), determination of sanitary protection zones (3), bans on the exploitation of natural resources (9), bans on the use of bathing waters (11), requirements to equip wastewater treatment plants (5), as well as other measures such as removal of deposited material, transfer of water permits, prohibition of works, and extensions of execution deadlines. Additionally, 29 decisions to discontinue proceedings were issued. During the reporting period, 76 fines were imposed through administrative enforcement procedures, amounting to a total of €122,300. Out of this, 13 fines worth €19,100 were voluntarily paid, while proceedings for the remaining 63 fines, totalling €103,200, are still ongoing. For oversight and control to be more effective, it is necessary to increase the number of qualified and competent inspectors – there are currently only nine of them – and to improve their material and technical equipment. It is also essential that the competent judicial institutions provide adequate support to the inspectorate services so that the measures imposed by inspectors carry full legal weight and effect.

3.3. Key recommendations

- Continuously strengthen cooperation and capacity-building of administrative staff in the competent institutions responsible for the implementation of water quality legislation.
- Establish measurements of the quantity and quality of wastewater and monitoring of discharged treated wastewater.
- Water Administration should take measures to ensure that local authorities and polluters (business entities) provide data on the calibration of measuring devices and proper measurement of wastewater.

- Accelerate activities on the development of the second phase of the Water Information System, which includes the water polluter cadastre.
- Establish records of all entities obliged to pay water pollution charges, ensure the availability of all data necessary for the calculation of the fee, and set up a system for monitoring its collection.
- Expand the wastewater collection network to areas without adequate services, with 885 km of newly built pipelines by 2035.
- Ensure adequate treatment of municipal wastewater through the construction of 37 treatment plants, fully operational by 2035.
- Local self-governments should intensify project activities on improving water supply and wastewater collection, as well as expropriation and resolution of property-related issues necessary for the implementation of active projects.
- Establish and expand sanitary protection zones for all drinking water sources that are essential for public water supply.
- Develop agglomeration plans at the level of local self-governments.
- Strengthen inspection oversight across the entire territory of the country, both at the national and local levels. Control needs to be improved, particularly regarding the use of water for hydropower construction, water pollution, construction along riverbanks, and preservation of wetland habitats.



4. NATURE PROTECTION

4.1. Overview and assessment of condition

Nature protection represents one of the key areas in Montenegro's EU accession process, and the implementation of measures defined by the final Action Plan is of essential importance for improving the situation in this area. However, the pace of fulfilling the undertaken obligations shows serious delays and limited institutional efficiency, thus jeopardising the achievement of the strategic goals of nature conservation, the fulfilment of EU standards, as well as international commitments. It is necessary to accelerate legislative and planning activities and ensure consistent application of the existing regulations in order to raise the protection of natural resources to the level required by the EU integration process. In particular, the adoption of the Law on Nature Protection should be prioritised, as it would enable the fulfilment of key obligations conditioned by its adoption and improve alignment with EU standards.

In the area of nature protection, Montenegro is partially aligned with the EU acquis, but **no progress** was made during the reporting period in implementation of planned activities. It must be recognised that Montenegro will not be able to meet EU standards in the field of nature protection solely by adopting laws and strategies – real progress under Chapter 27 will be measured through their consistent and effective implementation in practice. It is crucial that laws are applied without exceptions, especially in cases where economic interests conflict with nature conservation goals. This implies rejecting projects that do not meet ecological criteria, conducting all relevant impact assessments (EIA, SEA, appropriate assessment), and making decisions based on professional, independent, and transparent procedures, free from political or economic pressures. Only in this way can true institutional commitment and responsibility towards nature protection be demonstrated.

4.2. Legal and strategic framework

Despite the recognised importance of nature protection in the context of European integration, Montenegro faces serious delays in adopting key laws and strategies, thus slowing down implementation of nature conservation policies and the fulfilment of international obligations. The lack of updated normative frameworks and weak institutional capacities negatively affect the management of natural resources and the preservation of biodiversity. Nature protection is still not sufficiently prioritised at the political level, whilst cross-sectoral cooperation and institutional coordination remain insufficiently effective. To avoid further deterioration and enable progress under Chapter 27, it is urgent to strengthen institutional capacities, accelerate normative processes, and ensure the consistent application of existing regulations.

Adoption of the new Law on Nature Protection, which was initially planned to be carried out in the form of amendments to the existing law, is now scheduled for the second quarter of 2025 due to the extensive scope of changes required during drafting. The new law aims to strengthen the nature protection system by establishing effective management mechanisms for protected areas, regulating access to genetic resources, ensuring the care of wild animals, and controlling trade in wild species. It will also fulfil obligations under the Action Plan for Chapter 27, including the designation of competent authorities for the implementation of EU Regulation 511/2014. Within the EU4GREEN project, in June 2024, an international expert was engaged to prepare comments on the draft law, which are currently under review by DG NEAR. In addition, a financial plan is being developed as part of the RIA form which is required for adoption of the law.

Despite the importance of the new Law on Nature Protection, its preparation is progressing slowly and with insufficient transparency. The draft law has not yet been formally presented to the public through a public consultation, explained in part by the fact that the process remains in its internal phase due to the ongoing review of DG NEAR's comments. However, the prolonged harmonisation of inputs from stakeholders and the extended expert analysis highlight serious institutional weaknesses in planning and legislative capacities. It is urgently necessary for the competent authorities to ensure a more transparent process, enable inclusive participation of all relevant actors, and thus contribute to a higher-quality and more sustainable legislative outcome.

When it comes to the overarching strategic framework for nature protection, the National Biodiversity Strategy with an Action Plan for the period 2026–2035 has not seen significant progress. The main reason lies in administrative delays within the UNEP office in Nairobi and the late engagement of necessary experts. According to the most recent communication, the procedure is in its final stage, and the Ministry has been requested to sign an Amendment extending the project until February 2026. In line with this, information for the Government has been prepared.

Based on the current Law on Nature Protection, the *“Rulebook on the List of Habitat Types and Species, including Bird Species, Priority Habitat Types and Species for which Natura 2000 Ecological Network Sites Should be Designated”* was adopted. This rulebook is essential for alignment with the EU Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC), and it lays the foundation for the establishment of the Natura 2000 ecological network in Montenegro.

The obligations related to strengthening the legislative framework for the protection of wild species in Montenegro, albeit recognised as a priority, have been postponed until 2025. The Work Programme of the Ministry foresees the adoption, in the second quarter of 2025, of the *Rulebook on Amendments to the Rulebook on Detailed Conditions for the Trade in Protected Wild Plants, Animals and Fungi*, aimed at alignment with international standards and obligations under the CITES Convention. Furthermore, adoption of the *National List of Protected Wild Species of Plants, Animals and Fungi* – an important instrument for fulfilling the obligations stemming from the Convention on Biological Diversity, the Convention on Migratory Species and the Bern Convention – has also been rescheduled for the second quarter of 2025. In addition, adoption of the *Rulebook on the List of Wild Bird Species that May Be Legally Offered for Sale, Transported and Kept*, in accordance with the Law on Nature Protection, the Law on Game and Hunting, and the Birds Directive, is planned for the fourth quarter of 2025. These repeated delays thus underline the urgent need to accelerate legislative activities and strengthen institutional capacities for the effective implementation of Montenegro's international commitments in the field of nature protection.

Although adoption of the *Rulebook on the Manner and Conditions of Collection, Use and Transport, Monitoring of Population Status, and the List of Wild Animal, Plant and Fungal Species Used for Commercial Purposes with Quotas* was envisaged to be carried out in 2025, in accordance with the Chapter 27 Action Plan (activity 5.35), a review of the 2025 Work Programme of the Ministry of Ecology, Sustainable Development and Northern Region shows that this activity was not included. The absence of this rulebook thus prevents the establishment of an effective system for controlling the exploitation of wild species, including monitoring population impacts, setting sustainable quotas, and ensuring transparency in the collection and trade of species used for commercial purposes.

On the basis of the Law on Invasive Alien Species, two secondary legislative acts were adopted in Montenegro in October 2024, namely:

- Rulebook on the List of Permitted Alien Species, the Method of Updating the List, and the Method of Conducting Risk Assessments;
- Rulebook on the List of Invasive Alien Species of Concern in Montenegro and/or the European Union, and the Method of Updating the List.

These secondary legislative acts form the basis for establishing a system of early detection, rapid response, and control of invasive species, which can have severe consequences for biodiversity and the economy. The Law on the Prevention of Introduction and Spread of Invasive Alien Species, although adopted in 2019 with deferred implementation until 2021, has not been effectively applied by 2025. A lack of coordination between sectors (nature protection, agriculture, forestry, water management, health, inspection bodies, police, and customs), combined with the absence of systematic education, further hinders the establishment of an effective control system. Although invasive species represent one of the key threats to biodiversity, the issue remains largely absent from the nature protection policy agenda. In the context of Chapter 27, it is urgent to initiate the application of the Law, strengthen capacities, and involve the expert community.

In line with the Action Plan, Montenegro must enhance the capacities of competent institutions for issuing permits and enforcing controls over alien and invasive alien species. It is necessary to develop capacities for risk assessment of invasiveness, breeding in closed systems, issuing permits for the use of invasive alien species for scientific and other purposes, as well as implementing eradication measures and ecosystem restoration. In this regard, in July 2024, with the support of UNOPS, a workshop titled “Capacity Building on Procedures for Permits and Control of Alien and Invasive Alien Species” was held with the aim of strengthening institutional capacities for implementing invasive species regulations.

Preparation of the *Law on Amendments to the Law on National Parks* is underway, with adoption planned for the fourth quarter of 2025, in order to align with the results of the boundary revision of NP “Skadar Lake” and NP “Durmitor,” as well as with the future Law on Nature Protection. The Environmental Protection Agency has prepared Studies for NP “Skadar Lake” and NP “Durmitor,” while the revision Study for NP “Lovćen” is expected in 2025. The amendments will include new boundary descriptions, clarification of provisions on fees for the use of goods in parks, and clearer definitions of conditions for activities within parks, thereby ensuring greater legal clarity and coherence in the nature protection legislation.

At its session held on 26th December 2024, the Government of Montenegro adopted the *Information on the completed revision studies for certain protected areas*, with a particular focus on national parks. The revision process was launched in 2021 for 37 areas originally protected in 1968 under the Decision on the Protection of Natural Monuments. During 2023 and 2024, the Environmental Protection Agency prepared draft revision studies for 29 areas that retain their status as protected natural monuments, while for 8 areas no revisions were carried out due to the impossibility of spatial location (mainly individual trees) or the permanent degradation of their natural values. The preparation of municipal decisions on proclamation and the organization of public hearings is currently underway.

On 4th July 2024, the Government of Montenegro adopted the Decisions on proclaiming “Sopot” and “Dražin vrt” natural monuments, thereby granting formal protected status to these two sites, which had

been under preventive protection since 2021. This increased the number of marine protected areas in Montenegro to five.

Regarding the “Ratac with Žukotrlica” natural monument, due to the large number of comments and objections – particularly those concerning the reduction of the proposed boundaries – the preparation of the final proclamation decision has been postponed to the fourth quarter of 2025 in order to allow for additional consultations with competent institutions and the local population.

Throughout 2024, intensive activities were carried out to improve the system of nature protection through the revision of existing and preparation of new protection studies. The Environmental Protection Agency conducted extensive field research and prepared draft studies for several significant sites (the Mrtvica River with its surroundings, Kapetanovo and Brničko Lakes, the Čehotina River in the municipality of Bijelo Polje, Dulovina forest park, Lukavica with Mali and Veliki Žurim in the municipality of Nikšić, and the “King Nikola’s Ban” area in Nikšić), marking an important step towards the formalization of protection for new areas and the improvement of management in existing ones.

In parallel, local self-government units, such as Cetinje (Lipska Cave) and Bijelo Polje (Đalovića Gorge), initiated procedures for the revision of existing protected areas, highlighting the growing role of the local level in nature protection processes.

On 4th July 2024, the Government adopted the Programme of Measures for Achieving or Maintaining Good Marine Environmental Status of Montenegro, thus creating the conditions for the preparation of the Marine Protection Strategy in line with the Law on Marine Environment Protection (“Official Gazette of Montenegro”, No. 073/19).

In 2024, Montenegro launched activities for the preparation of the *National Action Plan for combating the illegal killing, taking, and trade of migratory birds (IKB) for the period 2025–2030*, in line with the Rome Strategic Plan 2020–2030 and international obligations stemming from the Bern Convention and the CMS MIKT initiative. In September 2024, a regional workshop on this topic was held in Podgorica, organized by the CMS Secretariat and the Ministry of Ecology, Sustainable Development and Northern Montenegro, with the participation of representatives from Balkan countries. The preparation of the National Action Plan has been formally included in the 2025 Work Programme of the Ministry, thereby confirming the institutional commitment to addressing the problem of illegal bird killing in Montenegro through a strategic and coordinated approach.

In line with the obligations under Chapter 27 and the strategic objectives for biodiversity conservation, Montenegro continues to face serious challenges regarding the collection and processing of data covering the entire territory of the country. Albeit certain foundations were laid in previous years, the lack of comprehensive information on species and habitats, coupled with the limited scope of monitoring programmes, prevents accurate assessments of their status and level of threat. The currently available data is mostly related to distribution of species listed in Annex II of the Habitats Directive and the Birds Directive, which is insufficient for a holistic overview of the state of biodiversity. Thus, it is urgent to strengthen capacities for data collection, analysis, and systematisation through the development of an integrated information system that enables the updating and expansion of databases. This would create the preconditions for more effective monitoring of nature status and the implementation of protection measures.

The state of biodiversity in Montenegro is assessed through the *National Environmental Monitoring Programme*. However, this programme does not provide sufficient information to assess habitat and species trends, nor to support evidence-based biodiversity decision-making. In 2019/2020, the biodiversity monitoring programme was discontinued, and the biodiversity section was excluded from the (annual) Environmental Status Report. Since then, no official documents analysing the current state of flora, fauna, or their habitats have been published. Moreover, there is no official biodiversity and habitat inventory in Montenegro, although in previous years Natura 2000 species and habitat inventories were carried out as part of several projects, but only for limited spatial coverage.

Insufficient financial resources for the implementation of annual biodiversity monitoring, despite legal obligations, and the absence of a structured system for collecting, processing, and managing biodiversity data continue to represent a serious problem in Montenegro. This directly undermines the country's ability to effectively monitor and protect its natural resources, as well as to take informed and timely decisions. In addition, fragmented institutional responsibilities and the lack of integration of nature protection into other sectoral policies further complicate effective planning and implementation of measures for the conservation of natural resources and biodiversity, despite progress in alignment with EU policies.

Nature protection in Montenegro is still not recognized as a national priority, as confirmed by the 2024 Budget Execution Report – only 1.1% of the total budget was allocated to this area and spatial planning, with a high degree of dependence on external sources of funding. Such budgetary allocation may jeopardize the achievement of set objectives and implementation of necessary reforms in the field of nature protection and sustainable development.

Continuous efforts are invested in data collection and establishment of the Natura 2000 ecological network. By March 2025, 76% of Montenegro's land territory and 10% of its marine territory had been mapped. In 2024, habitat and species mapping was supported by the state budget, the GEF 7 project "*Integration of Biodiversity into Sectoral Policies and Practices and Strengthening the Protection of Key Biodiversity Hotspots in Montenegro*", and the IPA III project "*Support to the Establishment of the Natura 2000 Network for Montenegro*". The goal is to complete mapping of the entire land area by 2026. In June 2024, a new EU-funded project worth €1.29 million was launched to support this process. However, the establishment of the Natura 2000 network faces serious challenges: insufficient institutional capacities, lack of experts and technical resources, incomplete data, and limited political and budgetary priority. Progress has been slowed by weak coordination, and without clear political will, capacity strengthening of institutions, and active involvement of local communities, it is unlikely that Montenegro will be able to establish the Natura 2000 network by the time of EU accession.

Although a legal framework for the management of national protected areas in Montenegro exists, its implementation in practice continues to show serious weaknesses, particularly at the local level. Most protected areas function only formally – without appointed managers and adopted management plans. These areas face chronic financial and administrative constraints, a lack of trained staff, professional services, systematic monitoring, on-the-ground protection, and adequate equipment, along with weak inter-institutional cooperation. A positive step was taken in April 2025 when the first meeting of the Coordination Mechanism for Nature and Biodiversity Protection was held, which brought together representatives of relevant ministries, protected area managers, local governments, inspection bodies, and the expert community. Regular coordination meetings and data exchange were agreed upon,

accompanied by a joint message on the urgent need for coordinated action to preserve Montenegro's natural values.

In order to meet the obligations set out in the Action Plan (points 5.4 to 5.8) concerning the improvement and provision of effective management and conservation of protected areas at the national level, as well as the establishment of a comprehensive system of strict protection for species and habitats, the Government of Montenegro must prepare a detailed Action Plan with clearly defined steps, timelines, progress indicators, and a budget. The Action Plan should cover measures for effective management of the protected area network, protection of strictly protected species and habitats, strengthening of administrative and inspection capacities, improvement of the permitting system, and coordination of relevant institutions in order to meet EU requirements in the field of nature protection.

Transformation of the Public Enterprise "National Parks of Montenegro" (*MNE: Nacionalni parkovi Crne Gore - JPNPCG*), as one of the key reforms, has been stagnating for years without concrete activities, with the lack of capacity and resources cited as the main reasons. The new deadline for this obligation has been shifted to 2025–2026. However, the process remains both problematic and slow, pointing to deep systemic weaknesses in the management of protected natural assets. JPNPCG has often been subject to reorganisations, political influence, and frequent changes of leadership, resulting in institutional instability, weak continuity, and centralisation instead of professionalisation and reform. Effective transformation of national park management is essential, as the EU has made it clear that Montenegro's ability to manage future Natura 2000 sites will depend directly on the quality of governance of its existing nationally protected areas.

In the coming period, Montenegro must establish a comprehensive legal and institutional framework for the protection of wild species, which includes drafting and adopting the National List of Protected Wild Species – particularly those covered by the Habitats Directive, the Birds Directive, and relevant international agreements (Activity 5.8 of the Action Plan). In addition, the state is obliged to introduce and implement measures prohibiting the destruction of habitats, killing, disturbance, and capture of protected species, as well as to ensure effective supervision and an adequate sanctioning policy in cases of violations. However, although the deadline for this activity was set for the fourth quarter of 2024, there is still no information that the preparation of the list has even begun, nor is any data about this process publicly available. The lack of transparency highlights limited capacities and insufficient institutional commitment to this important area.

During 2024, the Environmental Protection Agency worked on preparation of Red Lists of plants, fungi, odonata, and ecosystems, while the Red List of fish was completed. Although, according to the plan, they were supposed to be finalized by the first quarter of 2025, there is no official information on their completion. The lack of available data makes it difficult to plan further measures for the protection of species and habitats.

In the same year, an interactive digital map of conservation priority areas was finalized and promoted to all interested stakeholders, while in cooperation with the General Secretariat of the Government, Guidelines were prepared for integrating biodiversity and climate change into sustainable development within the Methodology for policy-making, as stated in the 2024 Annual Report of the Ministry of Ecology, Sustainable Development and Northern Montenegro.

It is particularly necessary to establish clear and strict control mechanisms when issuing permits for industrial and economic activities that may have negative impacts on protected species and habitats –

such as offshore seismic surveys (oil and gas) – which must be carefully assessed in line with ecological standards. Hunting also needs to be strictly regulated and sustainable, with a complete ban on hunting protected and rare species, in order to ensure the long-term preservation of biodiversity.

Although the legal framework for inspection controls is in place, its implementation in practice is limited by weak inter-inspection coordination and insufficient resources. Activity 5.9 of the Action Plan foresees strengthening inspection controls through the cooperation of several competent authorities – environmental, forestry, hunting, veterinary, phytosanitary, and fisheries inspections – as well as coordination with customs, police, and gamekeepers. In practice, however, these services operate in ‘isolation’, without clearly defined roles and a joint approach. It is necessary to improve inter-inspection cooperation, enhance the training and equipment of inspectors, and ensure consistent and timely enforcement of penalties. Weak sanctions and the slow judicial system allow the continuation of illegal activities such as poaching, illegal logging, and wildlife trafficking. For this reason, it is essential to increase investment in inspection capacities, improve coordination among competent institutions, and align practices with EU standards, which would significantly contribute to the effective protection of natural resources and progress in the EU integration process.

During 2024, the Environmental Inspectorate carried out 1,831 inspections, identifying 708 irregularities. These were mostly related to: discharges of wastewater into public sewage systems or natural recipients without the required permits and without water quality control; conducting activities in protected natural areas without authorization from competent authorities; keeping protected species in captivity without approval and under inadequate conditions; improper waste management and failure to comply with environmental impact assessment studies; air and water pollution, noise exceedances, failure to submit data for the polluters’ register; exposure of individuals to radiation, improper storage of chemicals, chemical soil contamination; and lack of measures to prevent chemical accidents.

In order to address the identified irregularities, inspectors imposed 156 warning measures and issued 418 decisions. During the reporting period, 38 conclusions were adopted related to fines for non-compliance with decisions, amounting to a total of €50,900. Seventeen criminal charges were filed.

The Environmental Inspectorate also submitted three requests to the Environmental Protection Agency for assessment of damage or imminent risk to the environment and acted on the Agency’s requests in relation to ongoing procedures. Ten misdemeanour orders were issued in the total amount of €8,900, while 60 requests for the initiation of misdemeanour proceedings were submitted to the courts. In addition, the Inspectorate processed 503 initiatives from civil society and NGOs, mainly related to waste, environmental impacts, noise, and works in protected areas. This highlights the ongoing need for strengthening institutional capacities and inspection oversight in order to ensure more effective environmental protection.

Based on the Law on Nature Protection (“Official Gazette of Montenegro”, No. 54/16) and the Law on the Ratification of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (“Official Gazette of FRY”, No. 11/01), a total of 256 administrative procedures were conducted. Out of these, the following were issued: thirteen (13) permits for the import and export of non-protected plants, fungi, and animals; one hundred and four (104) permits for activities and operations in protected natural areas; thirty-two (32) decisions for scientific and educational research in protected areas; twenty-five (25) permits for collecting non-protected plants, fungi, and animals; one (1) permit for the introduction of an alien species; seven (7) permits for research in speleological sites; two (2) permits for keeping wild

animals in captivity; four (4) re-export CITES permits; three (3) export CITES permits; and two (2) import CITES permits. In addition, fifty-three (53) requests were rejected, while ten (10) procedures were terminated.

In accordance with the Law on Nature Protection (“Official Gazette of Montenegro”, No. 54/16 and 18/19) and the Law on the Ratification of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (“Official Gazette of FRY”, No. 11/01), forty-five (45) opinions were issued regarding the need for CITES permits and all other permits pursuant to the Law on Nature Protection.

The working group of the Environmental Protection Agency prepared a draft *Protocol on the Treatment of Injured Wild Species*, but its implementation is not possible without the establishment of a wildlife rescue centre, which represents a key precondition for the application of the envisaged measures. Montenegro currently lacks adequate facilities for the care of injured animals, and the Protocol also needs to be harmonized with the new Law on Nature Protection. As for the *Protocol on the Treatment of Wild Species that are Kept or Imported Illegally* (Activity 5.11 of the Action Plan), its preparation has been postponed until 2026, following the adoption of the Laws on Nature Protection and Hunting. Without a clear legal framework that defines competences, procedures, and responsibilities, there are no conditions for the effective care of confiscated or illegally kept animals, nor for the implementation of the Protocol. The absence of a legal framework and infrastructure points to insufficient institutional readiness and slows down alignment with EU standards in the field of nature protection.

Although Montenegro recognizes the importance of establishing a shelter for injured and confiscated wild animals – a Rescue Centre (for terrestrial and marine species)/CITES Centre – the process is marked by uncertainties and institutional incoherence. Currently, two potential locations are being discussed in parallel – Podgorica and Berane – without a clear decision on final implementation. In Podgorica, a 10,000 m² plot has already been secured, a main design project prepared, and Eko-fund resources allocated, which makes this project significantly more mature for realization. On the other hand, Berane is mentioned as part of a broader proposal for a CITES Centre under the IPA III program, but without concrete steps toward implementation. This dual-track approach, where two initiatives are promoted simultaneously without focused decision-making and coordination, points to weaknesses in strategic planning and reveals a chronic lack of institutional efficiency, political will, and operational readiness to seriously address the systemic protection of wild species. As a result, the establishment of the necessary infrastructure for wildlife protection, in line with European and international standards, is being seriously delayed.

Implementation of Action 5.34 of the Action Plan, which concerns the designation of competent authorities for issuing permits and inspection oversight in line with Regulation (EU) 511/2014 on the application of the Nagoya Protocol, is conditional upon the adoption of the new Law on Nature Protection, which slows down the establishment of a control system over genetic resources. For effective implementation of the Nagoya Protocol, capacity building of competent institutions through training on permit issuance and compliance control was planned, but this activity has not been fully realized. A partial contribution was made through training organized under the “PLAC” project, while systematic education of relevant institutions is still lacking. It is therefore recommended to urgently develop a training plan and ensure the inclusion of all competent actors in order to establish a functional permit system and secure compliance with international obligations.

Based on the Law on Nature Protection (“Official Gazette of Montenegro”, No. 54/16) and the Law on Ratification of the Convention on International Trade in Endangered Species of Wild Fauna and Flora, a total of 256 administrative procedures were conducted, resulting in: thirteen (13) permits for the import and export of non-protected plants, fungi and animals, one hundred and four (104) permits for performing activities in protected natural areas, thirty-two (32) decisions for scientific and educational research in protected areas, twenty-five (25) permits for collecting non-protected plants, fungi and animals, one (1) permit for the introduction of alien species, seven (7) permits for research in speleological sites, two (2) permits for keeping wild animals in captivity, four (4) CITES re-export permits, three (3) CITES export permits, two (2) CITES import permits, as well as fifty-three (53) decisions rejecting requests and ten (10) decisions on termination of proceedings.

Within the framework of the GEF 7 project, numerous activities aimed at strengthening the management and protection of biodiversity in Montenegro were carried out. A Coordination Body for the improvement of protected area management was established. Technical support included the introduction of digital tree marking, procurement of ranger equipment, drones for monitoring, and pheromone traps. The Coordination Body for the implementation of the Action Plan “Man and the Biosphere – Tara River Basin” was also reactivated, accompanied by workshops and seminars. A contract was signed for biodiversity research in Orjen, Sinjajevina, Đalovića Cave and Nikšić, to improve data for future protected areas. Public calls were prepared for sustainable agricultural practices and improved management of protected areas, including the development of a business plan for the Nature Park “Ulcinj Salina”. In addition, the public call for hiring a consultant on the resilience of nature parks and critical infrastructure was extended.

4.2.1. Ulcinj Salina

During the reporting period, certain activities were implemented to preserve and revitalize the Ulcinj Salina, but overall progress remains limited, particularly in terms of concrete infrastructural and institutional steps. Temporary management is still carried out by the Public Enterprise “National Parks,” despite the political agreement reached in October 2024 to establish a separate company, “Ulcinj Salina Nature Park,” jointly owned by the Municipality of Ulcinj and the Government - with the Government’s formal decision yet to be adopted. During the reporting period, two meetings were held at the Ministry of Finance and one at the Ministry of Ecology, Sustainable Development and Northern Development, where it was proposed to the Mayor of Ulcinj that the ownership structure should consist of 60% Government and 40% Municipality, along with a model for the functioning of the future company once established.

Within the framework of the Nature Returns project, a ten-year Management Plan was developed, and nine business ideas for sustainable practices at the Ulcinj Salina site were selected to receive expert support for business plan development. The Draft Management Plan for the “Ulcinj Salina Nature Park” was submitted to the Municipality of Ulcinj for comments in March 2025. In October, a stakeholder workshop was organized to support the preparation of the Draft Management Plan.

Within the IPA project, at the end of June 2024, a contract was signed for the development of a conceptual design for the revitalization of the Salina infrastructure (PPF NAT.03 Rehabilitation of Ulcinj Salina Nature Park – Conceptual Design), covering canals, basins, embankments, pumping stations (including Đerane 31), and visitor infrastructure. The process of preparing the project proposal through which the Ministry

of Ecology will apply for IPA funds is still ongoing, while the earliest possible date for the availability of funds is the end of 2026.

Members of the Working Group prepared and submitted to the EC the 20th and 21st quarterly reports on the level of implementation of measures for the protection of Ulcinj Salina for the periods July – September and October – December, respectively.

During the year, several activities were also carried out within international and national projects – including biodiversity monitoring, removal of invasive species, and educational campaigns. However, the lack of a functional management structure and legal status of the park remains a key obstacle to the full protection and valorisation of this important ecosystem.

The multi-year delay in marking the boundaries of the protected area (Activity 5.23 of the AP) points to a serious lack of institutional coordination and accountability. Clearly defined and marked boundaries are a prerequisite for effective site protection and the prevention of illegal activities, such as poaching. Although temporary management was entrusted to the Public Enterprise “National Parks”, and funds for boundary marking were provided by the Municipality of Ulcinj, field activities have still not been carried out. The revision of the boundaries, including the possibility of expansion (e.g. the inclusion of the Đerane pumping station), remains unresolved, while the new deadline for implementation has been moved to 2026. To date, 18.68 km of boundaries have been physically marked, but it is not clear whether these markings are fully aligned with the applicable spatial planning documentation.

At the Eighth International Conference on the Protection of Ulcinj Salina (November 2024), many previously given promises were reiterated –establishment of a management structure, selection of a management model, staff recruitment, preparation of acts and regulations, formation of an Expert Council, adoption of decisions on the use of natural resources, and implementation of trainings. Although the announcements sound encouraging, their repeated reiteration over many years without concrete deadlines and results points to stagnation. Without the actual implementation of the announced measures, the effects on the protection, conservation, and sustainable management of the Salina remain questionable, while public and international partners’ trust continues to erode.

Despite some progress, advancement in the protection of Ulcinj Salina remains limited and far below expectations, especially in the context of fulfilling the Action Plan for Chapter 27. Delays in making key institutional decisions, the absence of a functional management structure, and the lack of infrastructural works highlight the chronic lack of political will and administrative efficiency. This situation seriously threatens Montenegro’s ability to ensure the sustainable management of the Salina in line with European nature protection standards.

Prolonged postponement and the absence of concrete accountability undermine the country’s credibility in the EU accession process and send a message that nature protection is a low priority. Without urgent institutional and operational measures, Montenegro risks missing an important opportunity to demonstrate its commitment to European ecological standards.

4.2.2. Forestry

The EU continuously reminds Montenegro of the need to designate competent authorities in line with timber regulations and to implement FLEGT requirements. However, significant delays in legislative and

institutional reforms in the forestry sector jeopardize the achievement of sustainable development goals, the preservation of forest ecosystems, and alignment with EU standards. Although the new Law on Forests was adopted at the end of 2024, its implementation framework has not been established – the new state-owned enterprise has not been formed, secondary legislation has not been adopted, and the necessary funds and equipment have not been secured. The Ministry of Agriculture, Forestry and Water Management demonstrates a low level of transparency and operational capacity, which is also reflected in the continuation of old practices, such as the non-transparent concession model of forest management.

Although it has been included in the official planning, the *Decision to establish a state-owned enterprise for forest management in Montenegro*, has still not been adopted, and the new deadline has been moved to the second quarter of 2025. The functional analysis of the forestry sector, which should serve as an expert basis for the decision, is still under preparation. The establishment of this enterprise is crucial for abandoning the inefficient concession model, which has led to overexploitation of forests, losses for the state budget, and stagnation in the development of the wood industry. The new model would enable more sustainable and equitable resource management, stronger control, and better valorisation of forest potential. Adopting this decision is essential for the implementation of the new Forestry Development Strategy and alignment with the goals of sustainable development, with expected positive effects on the budget, employment, the economy, and the preservation of forest ecosystems.

There are indications that the interests of certain concessionaires, who have profited for years from unregulated forest management, have influenced the postponement of the implementation of the new Law on Forests (“Official Gazette of Montenegro”, No. 77/2024). Although the law entered into force in August 2024, its application, initially planned for 1st January 2025, has not started, raising doubts about the political will to carry out the reform and jeopardizing sustainable forest management and the fulfilment of international obligations.

The Final Report on the Implementation of the Forestry Development Strategy for the period 2021–2023 has been drafted and prepared for submission to the General Secretariat of the Government of Montenegro for review. Although the adoption of this report was postponed to the first quarter of 2025, the activity has still not been realized. The new Strategy for the period 2025–2030 and the accompanying Action Plan for the period 2025–2026 remain in draft form, without being formally submitted to the Government. The non-adoption of the Strategy has been explained by the non-establishment of the state enterprise, which makes the planned activities difficult to implement and inadequately designed.

The Report on the Implementation of the Forest Management Program for 2023 was supposed to be included in the Ministry’s Annual Report. Since the Annual Report was not adopted, the Report on the Implementation of the Forest Management Program for 2023 has not been realized either. In April 2024, the Government adopted the Draft Forest Management Program for 2024, and in November adopted amendments and supplements to the Program, which increased the planned quantities of timber for supplying the rural population from 44,708 m³ to 83,273 m³. The Report on the Implementation of this Program, although planned for the first quarter of 2025, was not realized within the set deadline.

In July 2024, the Report on the Health Condition of Forests for 2023 was adopted, containing data on the state of forest ecosystems based on the monitoring program, which is an integral part of the annual Forest Management Program. During 2024, due to a lack of budgetary funds, Forest Development Plans were not prepared, also because of the absence of the necessary by-laws.

The Program for the Development of Wood Processing and Furniture Production 2025–2028 remains in draft form, and although its adoption was planned for the first quarter of 2025, the delay has been explained by the dependence of its Action Plan on the Decision on the Establishment of the State Forest Management Enterprise. In that case, the activities might be unrealistically planned. Another reason for the delay is the dependence on the adoption of the new Law on Forests and the Forestry Development Strategy 2024–2028, which were not finalized on time.

The reorganization of the forestry sector in Montenegro aims to improve forest management and align with EU regulations, particularly EUDR and FLEGT, which has been partially achieved with the adoption of the Law on Forests, defining the competent authorities (Activity 5.36 AP). However, full alignment with the EUDR requires the adoption of the Law on the Trade of Timber and Timber Products, which will enable more effective trade control, reduce the grey economy, and improve records, including the integration of timber into the tax system (VAT). The Ministry of Agriculture, Forestry, and Water Management plans to adopt this law by the end of 2025.

The Directorate for Wood Industry has significantly contributed to the implementation of the Decision on restricting the export of wood assortments, valid until May 2025, which has proven effective in curbing uncontrolled exports and mitigating negative trends in the sector. Thanks to this measure, the export of unprocessed wood has decreased 189 times compared to 2015, while pellet exports increased 7.6 times, indicating a positive shift toward greater processing and valorisation of timber resources within the country.

The activity related to FSC certification of forest management has been postponed from the previous period and was not implemented during 2024. The reason lies in the absence of the necessary reorganization of the Forestry Administration into a limited liability company (LLC), which, as a legal entity, could hold the FSC certificate. The adoption of the new Law on Forests created the legal prerequisites for establishing such a company, but its realization remains delayed.

Despite the fact that the development of software and the establishment of a forest information system and digital monitoring - envisaged by the Law on Forests to be implemented by October 2027 at the latest - was planned back in 2021, no progress has been made to date. This seriously undermines sustainable forest management and protection. The lack of an operational database hampers the monitoring of logging, the identification of illegal activities, and the implementation of forestry policy, while also directly affecting the fulfilment of obligations under Chapter 27. Although the system was supposed to be financed through the IPA 2018 project worth €400,000, with the application of barcode technology for activity tracking, no advancement in implementation has been achieved, calling into question the efficiency of future forest management in Montenegro.

In 2024, Montenegro recorded a significant increase in forest fires, with 82 fires in state-owned forests affecting an area of 5,768.57 ha, and 64 fires in private forests covering 432.79 ha, representing a deterioration compared to 2023. The Forest and Hunting Management Administration prepared annual forest fire protection plans for all regional units and engaged 89 observers, at a total cost of €119,645. However, effective forest fire protection requires the urgent adoption of the Rulebook on fire protection measures, securing seasonal labour, constructing water intakes and fire protection infrastructure, and procuring machinery, equipment, and implementing preventive silvicultural measures.

On 27th June 2024, the Government of Montenegro adopted the Brown Bear Management Plan, and the preparation of an annual Action Plan is underway. Although the adoption of the Action Plan for 2025 was

scheduled for the fourth quarter of 2024, it was not completed due to the unresolved composition of the Intervention Team, which includes representatives of various institutions and experts (veterinarians, inspection authorities, hunting ground users, institutions for nature protection and protected areas, etc.), responsible for emergency interventions in case of threats or damage caused by bears. Due to incomplete delegation of team members, preparation of the plan was postponed to the first quarter of 2025, while preparatory activities are ongoing. Nevertheless, despite this postponement, the plan has still not been adopted, and it is urgently necessary to finalize the formation of the team and complete the Action Plan to ensure adequate protection and management of this protected species.

A total of 228 criminal charges and 3 misdemeanour charges were filed concerning state forests, and 79 misdemeanour charges regarding private forests. In addition, 18 criminal charges were filed for the usurpation of 64.9 ha of state-owned land.

The low implementation rate of key reform activities in the forestry sector—including delays in establishing the state forest management company, inadequate implementation of the Law on Forests, and the absence of accompanying strategic and operational documents—points to a serious level of non-compliance with obligations under Chapter 27, particularly regarding sustainable natural resource management, alignment with EU regulations (EUDR and FLEGT), and institutional readiness to implement environmental protection policies.

4.2.3. Hunting

The Draft Law on Amendments to the Law on Game and Hunting, adopted by the Government of Montenegro in March 2024, has passed all necessary committee procedures and received support from the relevant parliamentary bodies, including a positive opinion from the Legislative Committee and the Committee on Tourism, Agriculture, Ecology, and Spatial Planning. Additionally, at the session held on 26th December 2024, the Committee submitted an amendment concerning legal-technical corrections and harmonization with the main text. The plenary debate has also been completed, with only the voting remaining. Despite all these steps, the obligation has not yet been finalized. The adoption of this law is crucial for harmonizing national legislation with EU standards regarding biodiversity conservation and sustainable game management.

The Draft Law on Amendments to the Law on Game and Hunting envisages changing the name of the planning document *Game Development Program for the period 2025–2034* into the *Hunting Development Strategy* in order to align with the valid *Regulation on the manner and procedure of drafting, harmonizing, and monitoring the implementation of strategic documents*. Since the *Hunting Development Program* has so far served as the umbrella strategic document in the field of hunting, it is logical for it to be adopted for a period of ten years – which corresponds to the duration of hunting ground concessions and the validity of hunting plans as lower-level planning documents. The Strategy is planned for adoption in Q2 2025, according to the Government's Work Program, and the delay results from the non-adoption of the Draft Law on Amendments to the Law on Game and Hunting.

In order to align with the Birds Directive (2009/147/EC) and the Habitats Directive (92/43/EEC), the formation of a Working Group for defining hunting seasons and hunting species is planned after the adoption of the law (deadline: 2025), while the adoption of the new Rulebook on Hunting Seasons has been postponed to 2027, in order to allow for scientifically based field research and to achieve full compliance with the directives.

In 2024, activities related to the management of the brown bear population were carried out, including the adoption of the Brown Bear Management Action Plan for 2025, which also envisages intervention culling in cases of threats to humans or property. A Management Plan for the wolf (*Canis lupus*) is also being prepared, which, together with the plan for the brown bear, will form the backbone of large carnivore conservation in line with EU standards.

Progress in the field of hunting remains limited due to delays in the adoption of legal and strategic documents, which slows down alignment with the EU acquis, particularly the Habitats Directive and the Birds Directive. The lack of comprehensive data on game populations and their habitats, as well as limited cooperation between relevant institutions, the scientific community, and hunting ground users, prevents the definition of sustainable quotas and protection measures in accordance with the principle of maintaining a favourable conservation status of species. It is necessary to strengthen institutional capacities, ensure regular research, and improve mechanisms of coordination and data exchange.

4.2.4. Exploitation of sand and gravel

By Decision of 1st November 2022, the Ministry of Agriculture, Forestry and Water Management established an Operational Interdepartmental Team tasked with monitoring all watercourses, particularly the Morača River, in order to suppress illegal exploitation of river deposits. To date, the team has held six meetings, during which representatives of competent institutions expressed readiness for intensified controls and joint measures, to be defined through an Action Plan. Although the Government mandated the Ministry to provide quarterly reports on the results, the last publicly available report dates back to February 2023, with no further updates on the team's work.

The Water Law stipulates that exploitation of river deposits can only be carried out with a water permit and a concession agreement. However, since 2017, Water Administration has not issued any concessions or approvals for such activities. According to the 2024 report of the Water Inspection, 33 criminal charges were filed: in one case for illegal construction on state-owned water property (submitted to the State Prosecutor's Office), and in 17 cases for illegal exploitation of sand and gravel (submitted to the Police Administration and Prosecutor's Office for further assessment of potential criminal liability). The lack of transparency and regular reporting on the work of the interdepartmental team for combating illegal sand and gravel exploitation seriously undermines the effectiveness of the natural resource protection system. Without up-to-date information, it is difficult to track progress and assess the real impact of undertaken measures, while at the same time leaving room for doubts about fairness and consistency in law enforcement. The absence of regular reports may indicate weak institutional cooperation, which reduces the effectiveness of field inspections and timely responses to unlawful activities. Poor coordination among the police, inspection services, and ministries has led to an increase in illegal practices and hindered law enforcement. Particularly concerning is the growing loss of public trust in institutions due to the lack of accurate and accessible information. Such distrust undermines environmental protection efforts and weakens the legitimacy of the authorities.

It is therefore recommended that the Government ensure quarterly, publicly available reporting on the activities of the interdepartmental team and strengthen inter-institutional coordination to enable more effective action and protection of water resources.

4.3. Key recommendations

- Ensure timely adoption and implementation of laws and by-laws in the field of nature protection and hunting, in line with deadlines set in the 2025 Government and Ministry Work Programme.
- Adoption of by-laws should follow the adoption of framework legislation in nature protection, enabling further alignment with the EU acquis (in particular the Habitats Directive, Birds Directive, CITES Regulation, FLEGT and EUDR, Regulation (EU) 1143/2014), thus avoiding delays in application and ensuring practical implementation.
- Ensure full implementation of the Law on Invasive Alien Species – particularly on early detection, control and monitoring of invasive alien species.
- Adopt the Biodiversity Strategy with an Action Plan for 2026–2035 and the Forestry Development Strategy.
- Accelerate the formation of a Working Group and initiate scientifically based field research as soon as possible, to ensure full alignment of the new Rulebook on Hunting Seasons with the Birds and Habitats Directives by 2027.
- Reassess the transformation of national parks into a state-owned company in the context of public interest and nature protection, and ensure the registration of protected area boundaries in the cadastre to guarantee legal certainty and prevent misuse.
- Clarify legal provisions related to fees and activities in national parks to ensure effective implementation in practice.
- Adopt a decision on establishing a state-owned company for forest management and provide adequate financial and technical capacities (machinery, staff, IT equipment) for its effective functioning.
- The Government of Montenegro and the Municipality of Ulcinj must, without further delay, adopt a formal decision on establishing the “Ulcinj Salina Nature Park” company and secure the necessary financial resources for start-up capital, in order to form a permanent and operational management body.
- Adopt all necessary acts for establishing a sustainable management model for Ulcinj Salina Nature Park, including decisions and rulebooks, as well as enabling construction of basic infrastructure and strengthening institutional capacities for functional management.
- Physically mark the boundaries of Ulcinj Salina Nature Park in accordance with cadastral data, to prevent illegal activities and ensure effective management and protection of the area.
- Strengthen the capacities of the Public Enterprise for National Parks of Montenegro in managing marine protected areas.
- Improve the institutional framework and management system of protected areas through clear categorisation, establishment of effective protection regimes, and implementation of adequate conservation measures to safeguard biodiversity and ecosystems.
- Finalise mapping and scientific evaluation of potential Natura 2000 sites (pSCI and SPA), adopt and formally submit the preliminary list of Natura 2000 sites to the European Commission.
- Establish a centralised biodiversity information system – creating a national database of species, habitats and protected areas, which will serve as a basis for evidence-based decision-making and reporting under international obligations (e.g. Birds and Habitats Directives, Bern Convention, SDG targets).

- Establish a continuous biodiversity monitoring system to enable timely collection, analysis and publication of data on species and habitats. This system should provide the basis for informed decision-making, detection of negative impacts on ecosystems, and alignment with national and international legislation.
- Integrate biodiversity into sectoral policies – sectors such as energy, tourism, agriculture, forestry and fisheries must include conservation goals and measures through strategic documents, impact assessments and green budgeting.
- Establish a centralised information system for forest resources using electronic identification (barcodes), to improve control, prevent misuse and support sustainable exploitation, ensuring more effective planning, protection and decision-making in the forestry sector.
- Adopt a National List of Protected Wild Species, in line with the EU Habitats and Birds Directives, covering all species of European importance and ensuring strict protection of endangered species.
- Develop and implement an environmental impact assessment system for all significant projects (infrastructure, industrial and economic activities) in protected areas, to avoid or minimise harmful effects on biodiversity and natural resources.
- Strengthen coordination among inspection services (environmental, forestry, hunting, veterinary, fisheries, customs) and carry out joint inspection actions to ensure effective enforcement of the law, including prevention of illegal logging, poaching and wildlife trade, as well as protection of species and sites, in line with EU regulations. Enhance technical and administrative capacities of inspection services and ensure continuous staff training.
- Provide stronger administrative and professional capacities, as well as inter-sectoral coordination, for institutions involved in the legislative process and implementation of nature protection laws.
- Ensure transparency in decision-making processes related to nature protection, including public access to data on protected areas, species and biodiversity monitoring, and enable involvement of relevant stakeholders in decision-making.



5. INDUSTRIAL POLLUTION

5.1. Overview and assessment of condition

Limited progress has been achieved in the normative framework and planning in the field of industrial pollution, but significant challenges remain in implementation, supervision, and capacities for managing industrial emissions, which are crucial for alignment with the requirements of the Industrial Emissions Directive (IED-2010/75/EU). It is necessary to strengthen the environmental inspection, digitalise emission monitoring, and ensure regular public reporting in line with Directive 2010/75/EU. A functional PRTR register of polluters, as well as a register of installations using organic solvents or producing volatile organic compound (VOC) emissions, should be established without further delay. The issuance of IPPC permits is progressing slowly, with delays in adopting by-laws and limited administrative capacities. Most installations do not have systems for continuous emission monitoring, and there is a lack of effective dialogue between regulators and industrial operators on needs and obligations related to IPPC procedures. It is recommended to improve the public permit register, strengthen monitoring of water, air and soil in industrial zones, remediate environmental hotspots, and establish a unified electronic system to support administrative procedures for permit issuance and supervision. Transparency and public participation in these procedures should also be enhanced.

5.2. Strategic and legislative framework

The Government of Montenegro adopted the strategic document *Industrial Policy of Montenegro 2024-2028* with the accompanying *Action Plan for Implementation for 2024* at its session held in August 2024. This fulfilled the condition for the provisional closure of Negotiating Chapter 20 - Entrepreneurship and Industrial Policy, which was formally closed at the Intergovernmental Conference in Brussels on 16 December 2024. By adopting this document, Montenegro also met one of the key obligations from the Government's Medium-Term Work Programme for the period 2024–2027, under Priority 2: “A stable financial and economic system for a prosperous state and its citizens”, and contributed to achieving Goal 7: “An economy developed to the level of the European standard of living”.

The Report on implementation of the Action Plan for 2024, which monitors implementation of the Industrial Policy of Montenegro 2024-2028, was adopted in March 2025. The report assessed that a satisfactory level of implementation of planned activities was achieved in 2024.

The Environmental Protection Agency launched an initiative to amend the Law on Industrial Emissions, with the aim of introducing the obligation for operators to bear the costs of the Expert Commission, as provided under Article 14 of the law. Based on this initiative, the Law on Amendments to the Law on Industrial Emissions (Official Gazette of Montenegro, No. 34/24) was adopted. Since this is national legislation, there is no direct provision in EU primary law that would allow for a full compliance assessment of this solution, although the measure is in line with European environmental protection principles.

In line with the Law on Industrial Emissions, the Environmental Protection Agency continuously issues and revises integrated permits for operators (Activity 6.7). Pursuant to the Law on Industrial Emissions (Official Gazette of Montenegro, No. 017/19), in 2024 the Agency issued one (1) decision on extending the validity of an integrated permit.

Pursuant to the Law on the Environment (Official Gazette of Montenegro, Nos. 52/16, 073/19), the Agency adopted one (1) Decision granting consent to a Safety Report and one (1) Decision approving a Major Accident Prevention Plan for a Seveso installation.

In accordance with the Law on Industrial Emissions, in the fourth quarter of 2024, the *Guidelines for the Use of Best Available Techniques for Common Waste Gas Treatment and Management Systems in the Chemical Sector* were adopted, while the adoption of the Guidelines for the Use of Best Available Techniques was postponed to Q5 of 2025.

Montenegro has made significant progress in strengthening its legal and institutional framework in order to align with the Protocol on Pollutant Release and Transfer Registers (PRTR). In line with the Ministry's 2025 Work Programme, the adoption of the *Rulebook on Amendments to the Rulebook on the Manner of Maintaining the Polluter Cadastre* is planned for the third quarter of 2025, for further harmonization with PRTR regulations. The activity of establishing and precisely defining the Pollutant Register (PRTR), which includes a database on pollutant emissions and ensures efficient access to environmental information (Activity 6.2.AP), has been only partially implemented. The register is in the testing and finalization phase, although it was originally planned to be fully operational by the end of 2024.

According to available information, the software for the PRTR in Montenegro has been installed, but it is not yet operational. Through the project "Improving Pollutant Release and Transfer Registers in the Western Balkans and the Republic of Moldova", a National Assessment of legal, institutional and technical needs, as well as capacity-building requirements, was carried out with the aim of establishing the register within the Environmental Protection Agency. In February 2024, a two-day training session was held for operators and Agency representatives on the use of the software developed for this system. The software is currently in the testing and implementation phase within the Ministry of Public Administration, and once approval is obtained from the competent authorities, it will become operational and ready for use.

During the installation process of the PRTR system (PRTR 24), intensive cooperation was achieved with the team responsible for application development, with the aim of aligning all procedures with the requirements of the Ministry of Public Administration. On 22nd February, training sessions were organized presenting the process of creating and implementing PRTR and e-PRTR systems, demonstrating the operation of the software solution for e-PRTR reporting, as well as the methods used for data collection and reporting in practice. Data for four of the largest polluters have been entered into the software, followed by communication with the European Environment Agency in order to create a special section for Montenegro, into which the data will be uploaded.

In addition, in December 2024 Montenegro expressed its interest in continuing the project through "Phase II", which will focus on improving the current software solution and conducting further training for operators and representatives of the Environmental Protection Agency, in order to ensure the effective use of the tool and increase the efficiency of the system.

The Environmental Inspectorate carries out regular inspections with the aim of continuously verifying the implementation of measures and conditions prescribed by issued integrated permits. According to the Report on the Implementation of the Action Plan for Meeting the Closing Benchmarks in Chapter 27 – Environment and Climate Change for the period March–August 2024, the following activities were implemented: 14 inspection controls were carried out, 1 request for initiating a misdemeanour procedure was submitted, 1 decision was issued, in 6 cases warnings were given on identified irregularities, while 2

administrative enforcement decisions were adopted with imposed and collected fines amounting to a total of €8,000. In an additional 2 cases, decisions were issued with fines totalling €8,500, for which the deadline for payment has not yet expired.

Considering the complexity of industrial plants and the potential risks they pose to the environment and public health, there is a clear need to strengthen the capacities of the Environmental Inspectorate – both in terms of human resources and technical equipment. It is also necessary to improve the system for monitoring the implementation of measures and enforcement of imposed sanctions, ensure greater transparency in the work of inspection bodies, and establish effective and continuous oversight of their operations. Special focus should be placed on more frequent and targeted inspections of entities where irregularities were previously identified, in order to prevent repeated violations of regulations and raise the overall level of compliance with environmental protection requirements.

Adoption of a Specific Implementation Plan for the Industrial Emissions Directive remains of crucial importance for fulfilling obligations under Chapter 27 – Environment and Climate Change. The European Union acknowledges Montenegro's commitment to preparing this plan but at the same time calls for its concretization through the submission of a comprehensive document containing a precise timeline for issuing integrated permits to industrial facilities, plans for their alignment with Directive requirements, cost assessments, sources of financing, and clearly defined implementation phases. Such a plan is essential for effective alignment with EU standards and for enabling timely, systematic, and sustainable management of industrial emissions.

Regarding the identification and reduction of emissions originating from operators of installations using organic solvents in line with Chapter V of the Industrial Emissions Directive 2010/75 (Activity 6.10), implementation of a UNOPS project is currently underway. Within this framework, installations that use organic solvents in their operations will be identified, in accordance with the Law on Industrial Emissions, while efforts will also focus on building and improving the capacities of both operators and administrative authorities. The establishment of a Register of installations using organic solvents or products containing volatile organic compounds (VOC installations) is foreseen as an outcome of the UNOPS project.

According to the available data, Montenegro has not published official statistics on volatile organic compound (VOC) emissions for 2024. The most recent data available covers the period 2010–2022. Based on these data, the most significant sources of VOC emissions in Montenegro are the household heating sector (around 40%), road transport, and mining. Smaller contributions come from the use of solvents, agriculture, and industrial sources.⁹

The database for keeping records of issued permits is continuously updated with new information. In 2025, it is planned to continue using this database until the new web application with an integrated database of issued permits becomes functional and adequate for the Agency's needs, which is being intensively worked on.

The Electric Power Company of Montenegro (EPCG) launched the final phase of the ecological reconstruction of the Pljevlja Thermal Power Plant and the city district heating project on 31st March 2025. The completion of works is expected by the end of November 2025, with a project value of approximately €70 million (excluding VAT). After that, a test start-up phase is scheduled to last until 1st February 2026, followed by a two-month period for error elimination (February–April 2026). Performance testing is

⁹ Fourth Environmental Performance Reviews for Montenegro Series No. 60

planned for the period 1 April – 1 June 2026. More than 90% of the equipment (mainly sourced from China) has already been delivered and partially installed, while the remaining equipment is expected in June 2025. The reconstruction will result in reduced emissions of harmful gases, increased energy efficiency, and provision of environmentally acceptable heating and cleaner air for the citizens of Pljevlja. Information on the implementation of the project was submitted to the Government of Montenegro in August 2024, in line with the Government's Annual Work Programme for that year. The project foresees construction and/or reconstruction of the following process systems: the flue gas desulphurisation system (DeSOx), a new flue gas denitrification system (DeNOx), a new wastewater treatment system (WWTP), the extension of the existing and construction of a new auxiliary boiler house (AB), new boilers and burners, a cooling tower (CT), a new system for internal transport of ash and slag (ITAS), noise protection measures for the power plant including silencers (NP), and a heat source for the district heating system of the town of Pljevlja (DH). The main design was revised in full, while amendments and supplements to the revised main design will be introduced over time.

According to the Report, during implementation of the project it was determined that certain issues related to the connection of the newly constructed facilities to the existing infrastructure of the thermal power plant had not been precisely defined in the main contract, which left them unresolved since the beginning of the works. To address these issues, the investor initiated negotiations with the contractor, and the process includes defining the exact scope and content of the connection works, the locations and technical parameters of the connection points to the existing infrastructure, as well as a clear allocation of costs between the investor and the contractor, in line with the applicable contract and its annexes. All aspects are expected to be agreed upon and formalized by mid-August 2025 at the latest. The solutions will be fully aligned with the legislative framework of Montenegro, including environmental protection and climate standards, to ensure the lawful and sustainable implementation of the project. However, while the ecological reconstruction will reduce NOx emissions by up to 70% and eliminate elevated concentrations of nitrogen oxides in Pljevlja, as well as reduce SOx emissions by up to 80%, it will not result in lower CO2 emissions.

5.3. Key recommendations

- Accelerate the harmonization of the legislative framework with the Industrial Emissions Directive through the adoption of the necessary secondary legislation, and ensure the full application of the "best available techniques" (BAT) in all relevant industries.
- Accelerate the process of issuing IPPC permits through strengthening institutional and technical capacities, adopting all necessary secondary legislation, and introducing a digital system for monitoring emissions, in order to ensure the full implementation of the Industrial Emissions Directive.
- Finalize and establish the PRTR and integrate it into the national database, with public access.
- Intensify activities on the identification of facilities falling under the SEVESO regulation, with the aim of establishing a comprehensive register and ensuring the effective application of measures for the prevention of major industrial accidents.
- Complete the ecological reconstruction of TPP Pljevlja and the district heating of the city of Pljevlja within the planned timeframe.
- Commence remediation of "black spots" of industrial pollution (the red mud basin in Podgorica) as soon as possible.

- Create a framework for application of the EMAS mechanism and the EU eco-labelling system, with the aim of encouraging environmentally responsible management and sustainable production, and prepare guidelines for the application of the EMAS system.
- Strengthen the capacities of the environmental inspection by increasing the number of inspectors, providing continuous training, and supplying modern monitoring equipment, in order to ensure effective and regular supervision of industrial facilities in line with European standards.
- Ensure transparency in the implementation of measures against industrial pollution through regular public disclosure of data on emissions, inspection findings, and plant modernization plans, with the active involvement of the public and civil society in decision-making.



6. CHEMICALS

6.1. Overview and assessment of condition

Limited progress was achieved during the reporting period in fulfilling the planned obligations in the area of chemicals management. The regulatory framework is largely aligned with the EU acquis, but the implementation of regulations, limited institutional capacities, and insufficient intersectoral coordination remain key challenges. Since most of the measures with continuous deadlines are still in the implementation phase, progress in this area can be assessed as gradual, with a need to accelerate the implementation of measures that have been partially or fully carried out. In addition, greater attention and resources must be devoted to measures that have not yet been initiated, in order to ensure faster and more effective progress in the coming period.

Despite the fact that numerous activities were implemented during the reporting period, the dominance of a project-oriented approach highlights good international cooperation, but also reveals weaknesses in domestic institutional and strategic capacities for sustainable chemicals management. Reliance on donor support carries the risk of interruptions once projects are completed, while the lack of mechanisms for monitoring and integrating results into the regular work of institutions limits long-term impact. It is necessary to implement the following: intensify efforts to establish an effective system of chemicals management through further alignment with EU legislation in the field of chemicals and related areas; strengthen institutional capacities; establish a register of chemicals and biocidal products; establish a Poison Control Centre; improve inspection control and enforcement of regulations; improve monitoring of POPs and PAHs in water, air, and soil; identify all sites contaminated with PCBs; improve access to information; ensure protection against chemical risks; modernise industrial technologies; strengthen education and raising public awareness; and enhance international cooperation and the implementation of relevant conventions.

6.2. Legal and strategic framework

In 2024, based on the Law on Chemicals, the Rulebook on the detailed content of prior notification for the export of chemicals ("Official Gazette of Montenegro", nos. 61/17, 116/20, 50/23, and 15/25) was adopted, transposing the amendments to Annex I of the PIC Regulation.

Based on the Law on Biocidal Products, the following acts were adopted:

- Rulebook on the lists of active substances permitted for use in biocidal products and low-risk biocidal products ("Official Gazette of Montenegro", nos. 16/19 and 107/24),
- Rulebook on the program of active substances for evaluation ("Official Gazette of Montenegro", no. 90/24),
- Regulation on the amount of costs in the procedure for issuing authorization for placing biocidal products on the market and use ("Official Gazette of Montenegro", no. 21/25), partially transposing Regulation (EU) No. 564/2013 on fees payable to the European Chemicals Agency under Regulation (EU) No. 528/2012,

- Rulebook on the manner of carrying out inspections, the documentation submitted with the application, the application form, the number and size of samples, the manner of notification of detained shipments, and the content of the report on the import of biocidal products or active substances ("Official Gazette of Montenegro", no. 27/25).

According to the Work Program of the Ministry of Ecology, Sustainable Development, and Northern Development for 2025, amendments to the *Regulation on prohibited or permitted uses, production, and placing on the market of chemicals that pose an unacceptable risk to human health and the environment* are planned for the fourth quarter, in order to align with the amendments to Annex XVII of REACH and Annex I of the POPs Regulation. This regulation will apply to suppliers, importers, and distributors of chemicals. Although Montenegro does not have chemical producers, most chemicals are imported from the EU, where these restrictions are already in force, and safer alternatives are used.

To continue further alignment with the *Prior Informed Consent (PIC) Regulation* for the export and import of hazardous chemicals, the adoption of the following is planned: *Rulebook on amendments to the Rulebook on the detailed content of prior notification for the export of chemicals* (Q2 2025) and the *Rulebook on the list of hazardous chemicals and products whose export is prohibited* (Q3 2025).

By adopting the *Regulation on the amount of costs for issuing authorizations for placing biocidal products on the market and use* (planned for Q3 2025), key goals will be achieved: regulating costs, alignment with EU standards, improving quality control, and ensuring better protection of health and the environment. The Environmental Protection Agency will receive clear guidelines for fee collection, which increases efficiency and ensures more stable financing. Companies will have greater transparency regarding expected costs when placing biocidal products on the market, enabling better business planning, while consumers will be protected from illegal or low-quality products.

The Ministry of Ecology, Sustainable Development, and Northern Development, within the framework of the GEF7 project, is conducting activities for drafting the Law on Amendments to the Law on Chemicals. In April 2025, it published a notice extending the public call for hiring a consultant to further align with EU legislation (REACH, CLP, PIC, POPs, VOC, detergents, testing methodologies, and good laboratory practice). Adoption of the amendments to the Law on Chemicals is planned under the current PPCG for Q2 2027.

The Report on the implementation of the Action Plan for the National Chemicals Management Strategy 2024–2025, for the year 2024, is scheduled under the Work Program of the Ministry of Ecology, Sustainable Development, and Northern Development for Q2 2025.

Development of educational material on persistent organic pollutants (POPs), intended for the Roma population, is planned for the second quarter of 2025, in line with the Ministry's Work Program. This activity is important because, according to the findings from the updated National Implementation Plan of the Stockholm Convention, the Roma population has been identified as a vulnerable group with an increased risk of exposure to POPs, which can cause serious health consequences. The aim of the education is to raise awareness of the risks and preventive measures, thereby contributing to health protection and reducing exposure. The activity is financed through the project "Reducing Pollution from Chemicals and Waste in Mediterranean Hot Spots."

The Spatial Plan of Montenegro provides for the adoption of a List of POPs substances, the method and procedure for POPs waste management, and the limit values of POPs concentrations related to the treatment and disposal of waste containing or contaminated with POPs substances, scheduled for the fourth quarter of 2025. Meanwhile, the Rulebook on the detailed content of reports on mercury sources and the method of keeping records on mercury storage is planned only for the first quarter of 2026.

Without centralized data (a Registry) on the types, quantities, and uses of chemicals available on the market, it is difficult to assess risks, carry out inspections, respond promptly to hazards, and make informed decisions on chemicals management. In line with Activity 7.3 of the Action Plan, it is necessary to establish an electronic form for reporting chemicals and biocidal products, in accordance with the applicable rulebooks, in order to enable online registration and simplify the procedure for all obliged entities. In addition, clear guidelines and information sheets for users should be prepared. It is also crucial to technically link all competent institutions (the Ministry of Ecology, the Ministry of Health, inspection bodies, the Customs Administration, the future Poison Control Centre, etc.) with the Registry, in order to ensure more efficient data exchange, strengthen cooperation, oversight, and emergency response.

The absence of a functional Chemicals and Biocides Registry is the result of limited institutional, organizational, financial, and technical capacities. However, with the support of a new IPA project and applications submitted to Swedish agencies, conditions have been created for concrete steps towards its establishment. The Environmental Protection Agency is negotiating with a domestic IT company that developed the Waste Registry, and upgrading this system would allow for the creation of the Chemicals Registry. The new deadline for establishing the Registry is the fourth quarter of 2025. Once established, it will be integrated into the Environmental Protection Information System managed by the Agency, enabling centralized data management, better analysis, reporting, and institutional cooperation. Public availability of the Registry on the Agency's website will increase transparency, raise public awareness, and support research and innovation, in line with the laws on chemicals and the environment.

The Ministry of Health, with expert support from the World Health Organization, has carried out a capacity assessment and prepared a study for the establishment of the Poison Control Centre, which will operate within the Clinical Centre of Montenegro in Podgorica, thereby laying the foundation for further development of this project. For continued implementation, it will be necessary to secure funding based on a project proposal to be submitted to the WHO and other donors, with part of the resources to be provided from the state budget.

Between 1st January and 30th June 2024, in line with the provisions of the Law on Chemicals ("Official Gazette of Montenegro," No. 51/17), the Environmental Protection Agency conducted a total of 382 procedures, of which the following were issued: 328 permits for the free circulation (import) of hazardous chemicals (216 permits for the import of chemicals, 100 permits for the import of oils and lubricants, while 12 requests were rejected as incomplete submissions) and 54 PIC consents (consent procedures based on prior notification).

Based on the Law on Biocidal Products ("Official Gazette of Montenegro," No. 54/16, 34/24), the Environmental Protection Agency received a total of 286 applications, of which the following were issued: 264 decisions on inclusion in the Provisional List of Biocidal Products, 11 decisions for conducting

activities related to trade, use, and storage of biocides, while 11 applications were rejected due to incomplete documentation.

In accordance with the provisions of the Law on Chemicals ("Official Gazette of Montenegro," No. 51/17, 84/24), the Environmental Protection Agency carried out a total of 576 procedures during the reporting period, of which the following were issued: 505 permits for the free circulation (import) of hazardous chemicals (372 permits for the import of chemicals, 119 permits for the import of oils and lubricants, while 14 requests were rejected as incomplete submissions) and 71 PIC consents (2 consent procedures based on prior notification and 69 import notifications). In line with the Law on Chemicals ("Official Gazette of Montenegro," No. 51/17), 32 reports on imported chemicals were submitted on the basis of issued decisions on the free circulation of hazardous chemicals, and 31 companies were registered into the national Register of Chemicals.

For the purpose of improving the work of the National Help-Desk and ensuring more efficient performance of tasks related to the management of chemicals and biocidal products, the Agency's website, Help-Desk section (link: <https://epa.org.me/help-desk/>), provides informative material and documentation that applicants are required to submit in order to obtain permits (decisions) within the Agency's competence related to chemicals and biocidal products. During the reporting period, 75 inquiries were received at the email address help-desk@epa.org.me, all of which were responded to in the shortest possible timeframe.

The Final Report on implementation of the National Implementation Plan of the Stockholm Convention for the period 2019–2023 is planned for the fourth quarter of 2025.

Between 1st January and 30th June 2024, sanitary inspectors of the Administration for Inspection Affairs carried out 636 inspections of shipments of chemicals and biocidal products (2,238,481 kg), with all shipments approved for import. The inspections covered permits, classification, packaging, labelling, and safety data sheets. Based on 3,285 applications concerning general-use items and cosmetics, over 13 million kg of goods were inspected and 36 samples were taken for laboratory analysis. Within the RAPEX monitoring system, 51 facility inspections were carried out, along with 3 inspections based on regional notifications – no dangerous products were found. In the case of the withdrawn TRUST USB headphones from Serbia, it was determined that none of the 72 units in stock belonged to the disputed series, and the distributor notified all customers.

As part of proactive market surveillance in Montenegro, 22 types of hazardous plastic toys and slime products (1,426 items) posing a serious health risk due to excessive levels of phthalates and boron were identified. Out of 35 samples taken for laboratory testing, 22 were deemed unsafe. Inspectors issued 24 misdemeanour fines totalling €12,480. The supervised entities voluntarily withdrew the products from the market and destroyed them, while also conducting recall procedures and informing consumers through the media and posted notices in retail outlets.

Montenegro regularly fulfils its obligations under the Minamata Convention, actively participates in its activities, and has a representative on the Committee for Implementation and Compliance. However, the implementation of measures is hampered by limited financial and technical resources, with most activities carried out with donor support, highlighting insufficient institutional independence. Low public awareness of mercury-related risks further reduces the effectiveness of measures, making stronger communication with citizens and the professional community necessary. In 2024, activities were initiated for the gradual phase-out of mercury-containing devices in the health sector (including dental

amalgam) and the development of an inventory of mercury-containing products, which provides the basis for further planning of mercury elimination.

During the reporting period, no information was available on the progress of the *National Implementation Plan of the Minamata Convention on Mercury and its accompanying Action Plan for 2025–2026*, although their adoption was planned for the second quarter of 2025. The lack of transparency makes it difficult to monitor the fulfilment of obligations. Funding for the preparation of the plan has been secured through the project “Strengthening the Synergies between the BRS and Minamata Conventions”, with objectives including the reduction of mercury waste and emissions, increased data reporting by businesses, and elimination of high-mercury-content products. Around €100,000 from the state budget and an additional €1,500,000 from international sources (IPA, TAIEX, GEF, SIP) have been allocated for implementation of the Action Plan.

Between March and August 2024, Montenegro issued 16 permits under the PIC (Prior Informed Consent) procedure for the import and export of hazardous chemicals, while data after August have not been made publicly available. The Environmental Protection Agency submitted the annual report to the Secretariat of the Rotterdam Convention, including notifications on final regulatory measures for banned/restricted chemicals, among which was a notification for the chemical Aldrin. These activities confirm the importance of a functional national infrastructure for managing pesticides and industrial chemicals in the country. In 2025, additional support is planned through applications to the TAIEX office and the Convention Secretariat to strengthen capacities for implementing the PIC procedure.

Within the project “Reducing Pollution from Chemicals and Waste in Mediterranean Hotspots”, export of 77 tons of PCB was planned for 2024. For 2025, a workshop on new POPs and a report on the presence of PFOS with recommendations are foreseen. For further progress, it is necessary to update the PCB inventory, secure financing, and implement disposal through export or decontamination, thereby reducing risks and fulfilling obligations under the Stockholm Convention.

Asbestos management remains a serious challenge in Montenegro, despite the alignment of legislation with EU standards. The lack of a comprehensive register of asbestos-containing products and an occupational disease register makes it difficult to assess risks and implement preventive measures. Although the import and use of asbestos are banned, many products containing asbestos are still present, while the country lacks facilities for its safe disposal. Asbestos waste is currently collected and temporarily stored by the licensed operator Hemosan LLC and then exported to Germany, in line with the Basel Convention. So far, three permits have been issued for the export of asbestos waste, confirming the need for a systemic solution, including the establishment of a register, the construction of infrastructure for safe disposal, and monitoring the health consequences of exposure. The construction industry has been identified as the sector with the highest risk of asbestos exposure, but other sectors are not spared. Car mechanics, car electricians, and shipyard workers often come into contact with old equipment and materials that may contain asbestos. In this regard, it is crucial to introduce and enforce strict occupational safety measures, which would significantly reduce the risk of occupational exposure.

During the reporting period, activities were carried out aimed at preventing asbestos emissions into the air and discharges into water, as well as ensuring the safe handling and disposal of construction, insulation, and other asbestos-containing materials. Operators continuously implemented measures that included compliance with limit values for pollutant emissions from stationary sources, adequate packaging, removal, and processing of asbestos-containing waste in line with waste management

regulations, as well as the application of best available techniques to reduce harmful impacts on the environment and human health.

In Montenegro, it is estimated that there are around 614 km of asbestos-cement water supply pipes that need to be replaced, with projected costs of €200 million. Although replacement is planned, activities have not been carried out yet. The problem is further complicated by the inadequate system for disposing of construction waste containing asbestos. The Ministry, in cooperation with the Eco-Fund and PROCON, has initiated the development of a Feasibility Study, financed from EU pre-accession funds. The most favourable option identified is leaving the pipes in place while excluding them from the system. Depending on terrain conditions, additional measures may be applied to reduce risks to health and the environment.

The National Asbestos Exposure Profile of Montenegro and the Action Plan for 2025–2026¹⁰ was adopted by the Government in January 2025. The Plan includes new measures to improve asbestos risk management, such as amendments to legislation, better waste management, education, and strengthened health surveillance. Amendments to the regulation on medical examinations of employees exposed to asbestos, as well as additions to the regulation on occupational diseases, are necessary to include malignant diseases such as mesothelioma and lung cancer. The Institute of Public Health is expected to establish a Register of Occupational Diseases, while the establishment of a Register of Major Asbestos Waste Holders and the identification of high-risk disposal sites are also recommended. Training and systematic medical examinations for workers are planned, along with the need to strengthen cross-sectoral cooperation – particularly between environmental, health, and labour inspection authorities. Successful implementation requires adequate financing and professional capacity to effectively mitigate asbestos-related risks and ensure the protection of citizens' health and the environment.

In Montenegro, trainings on REACH (Registration, Evaluation and Authorisation of Chemicals), CLP (Classification, Labelling and Packaging) and BPR (Biocidal Products Regulation) are conducted continuously through state programs and international projects, with the aim of strengthening the capacities of competent institutions and industry (Activities 7.23–7.26 AP). Although trainings are implemented with the support of TAIEX and ECHA, it is recommended to intensify them in order to strengthen the control over chemicals and biocides. It is necessary to increase human resources, ensure stable funding, regularly align the content with EU regulations, and establish a formal national training program. Involving universities in accredited trainings would contribute to the long-term sustainability of the system.

To strengthen control over chemicals and biocides, it is necessary to improve inspection activities in several areas: control of imports of mercury-containing products, supervision of VOC products (paints, varnishes), detergents and biocides on the market, as well as planning inspections in line with EU regulations (REACH, BPR), with special focus on products such as cosmetics, medicines and medical devices. In cooperation with ECHA, the document “REACH-ENFORCE-7” was translated and delivered to inspections. A TAIEX study visit to Croatia is also planned, aimed at exchange of experience and strengthening the capacities of competent authorities.

¹⁰ The National Asbestos Exposure Profile of Montenegro with the 2025–2026 Action Plan (January 2025).

6.3. Key recommendations

- Continue improving the legislative framework through further harmonization with new EU regulations and directives in the field of chemicals, while simultaneously strengthening the administrative and technical capacities necessary for their effective implementation.
- Establish a comprehensive Register of Chemicals in line with EU requirements, enabling effective monitoring, management, and control of chemicals.
- Establish a Register of Biocidal Products that are authorized and placed on the market, to ensure transparency, product safety monitoring, and compliance with the BPR regulation.
- The Ministry of Health should accelerate the process of establishing a Poison Control Centre.
- Establish and expand a continuous monitoring program for Persistent Organic Pollutants (POPs) and Polycyclic Aromatic Hydrocarbons (PAHs) in soil, water, and air.
- Carry out identification and assessment of all sites contaminated with Polychlorinated Biphenyls (PCBs), and develop remediation plans in line with international recommendations.
- It is recommended to establish formalized mechanisms of intersectoral cooperation between key institutions, including the health, environment, education, agriculture, interior affairs, and customs sectors, through the development of joint protocols, data exchange, and coordinated planning of activities, to ensure effective and harmonized chemicals management in line with EU standards and international obligations.
- It is recommended to fully transpose Directive 2010/63/EU in order to align national regulations with EU standards in the field of toxicological testing of chemicals, including the REACH regulation, and to promote the principles of replacement, reduction, and refinement (3Rs) in the use of animals in research.
- Establish mechanisms for monitoring asbestos exposure and create a Register of occupational diseases related to asbestos.
- Strengthen the capacities of customs officers through continuous training for the implementation of the Rotterdam Convention and the detection of illegal trade in hazardous chemicals.
- It is recommended to strengthen inspection capacities through improved oversight of chemicals and biocidal products, the development of guidelines and checklists, as well as continuous cooperation with the European Chemicals Agency (ECHA) and the implementation of TAIEX activities.
- It is recommended to establish a formal and continuous training program for the implementation of REACH, CLP, and BPR regulations, along with strengthening inter-institutional cooperation and support from international partners, in order to build the capacities of competent authorities and industry in line with EU standards.
- Conduct a comprehensive public awareness campaign on the risks and safe handling of chemicals, including asbestos fibres and asbestos-containing waste, with special education for vulnerable groups and sectors.



7. NOISE

7.1. Overview and assessment of condition

Based on the achieved results, **no progress** was made in the field of noise during the reporting period, which points to serious challenges in implementing the planned measures. Although certain activities had been initiated earlier, there were no new or additional steps in this reporting period, whereby implementation was reduced to partial execution of the existing measures. This situation reflects stagnation and highlights the need for urgent strengthening of institutional efforts to ensure more effective implementation in this area. During the reporting period, there were no activities related to the development of strategic noise maps for the three main roads, strengthening of administrative capacities, particularly at the local level, raising public awareness about environmental noise protection, or organizing trainings.

7.2. Legal and strategic framework

Plans for further improvements in this area include development of noise maps and noise management action plans, particularly for agglomerations and main roads. These steps are crucial for improving environmental quality and reducing the negative effects of noise on public health.

According to the 2025 Work Program of the Ministry of Ecology, Sustainable Development and Northern Development, adoption of the Draft Law on Environmental Noise Protection is planned for the fourth quarter, with expert support from UNOPS. The new law will further align national legislation with the EU acquis and clearly delineate the responsibilities of state and local inspections - environmental inspection at the state level, and communal inspection at the local level. In line with this, local government bodies have been reorganized so that the communal police is in charge of maintaining communal order and oversight, while inspection duties have been transferred to communal inspectors.

During this reporting period, no Strategic Noise Map for a main road was developed, indicating continued delays in meeting obligations in this area. In 2024, two tenders were announced for preparation of maps, but no bids were received, further slowing the process. A new deadline for preparation of strategic noise maps has been set for the first quarter of 2026. Funding for this activity is planned through a technical support project under IPA III, which also covers the noise sub-area, while an alternative option is financing from the budget of the Environmental Protection Agency. The estimated cost of preparing the maps is around EUR 40,000. These challenges point to the need for a more proactive approach, better promotion of public calls, and ensuring the financial and technical sustainability of the process.

To raise public awareness of the harmful effects of noise on human health and the environment, as well as to improve knowledge of noise management and control, the Ministry of Ecology, Sustainable Development and Northern Development, in cooperation with UNOPS, implemented a project under the “Knowledge for Reform in the Western Balkans” program supported by the Government of the Kingdom of Norway. In this context, a Guide to Environmental Noise Management was prepared, and educational workshops were organised in December 2024 with the aim of raising awareness and encouraging citizens, institutions, and the professional community to actively participate in addressing this issue.

It is necessary to launch activities for preparation of noise management action plans for agglomerations and main roads, which is a key precondition for effective noise management in line with the requirements of the EU Directive. Public awareness campaigns and provision of software solutions for entering and displaying noise level data are also of great significance, as these activities would improve public

information and strengthen the role of the Environmental Protection Agency in collecting and processing relevant information. However, implementation of all these activities has been postponed until the fourth quarter of 2026.

Under the Law on Environmental Noise Protection ("Official Gazette of Montenegro", No. 28/11, 28/12, 01/14), the Environmental Protection Agency received two (2) requests, resulting in one (1) decision on the preparation of strategic maps and noise level calculations, and one (1) decision rejecting the request.

7.3. Key recommendations

- Adopt the Law on Environmental Noise Protection and accompanying regulations.
- Ensure stable and long-term financial resources for the continuous monitoring of environmental noise.
- Develop and adopt strategic noise maps for at least two main road routes.
- Develop and implement action plans for noise management, covering all key noise sources and defining concrete measures to reduce its negative impact on health and the environment.
- Establish a centralized database on noise levels, enabling integration and analysis of data from various sources (cities, roads, industry) as a basis for planning noise reduction measures.
- Set up a system for online public reporting on current noise levels in real time, with interactive maps and publicly accessible analyses.
- Develop standards and protocols for noise measurement in the marine environment, particularly in the context of increasing maritime traffic and its impact on biodiversity.
- Strengthen the capacities of local governments through training, technical support, and improved equipment for noise measurement and analysis.
- Intensify public awareness campaigns on the harmful effects of noise on health and quality of life, especially in urban areas, near schools, hospitals, and protected natural areas.



8. CLIMATE CHANGE

8.1. Overview and assessment of condition

It may be said that **limited progress** has been achieved in the area of climate change when it comes to meeting obligations. Although certain ongoing activities are underway, a large number of measures with defined deadlines have not been implemented, pointing to delays in the timely fulfilment of commitments and in reaching climate objectives.

Implementation of climate change policies and legislation in Montenegro faces significant challenges and postponements, slowing down the achievement of international obligations and the country's strategic goals. Delays in adopting the key Climate Change Law, the National Adaptation Plan, as well as the National Climate and Energy Plan, highlight weaknesses in coordination and strategic planning within the competent institutions, which can directly impact European integration and jeopardize the achievement of ambitious targets defined by the Paris Agreement. It is also necessary to accelerate the development and adoption of the Low-Carbon Development Strategy, which will outline steps and timelines for achieving climate neutrality by 2050, with the goal of reducing GHG emissions. The update of the Nationally Determined Contribution (NDC), with an ambitious target of reducing GHG emissions by 60% by 2035, represents a positive step in Montenegro's climate policy, but its realization depends on speeding up institutional processes, strengthening administrative capacities, and securing adequate human and financial resources. Further alignment with the EU ETS Directive 2003/87/EC and its amendments is directly conditioned by the adoption of the Law on Protection Against the Adverse Impacts of Climate Change. Work is underway on establishing a functional Monitoring, Reporting and Verification (MRV) system for emissions, which should be in place by the end of the year to ensure transparency and reliability of emission data - an essential prerequisite for effective climate policy implementation and the fulfilment of international commitments. The Government adopted the Fourth National Communication and the First Biennial Transparency Report of Montenegro to the United Nations Framework Convention on Climate Change (FNC/IBTR).

8.2. Legal and strategic framework

Implemented activities under the Government's 2024 Work Programme in the area of climate change referred to the adoption of:

- Decision on the establishment of a Commission for conducting auctions for the allocation of emission credits;
- Decision amending the Decision on the establishment of a Commission for conducting public auctions for the allocation of emission credits;
- Decision amending the Decision on the establishment of a Commission for conducting auctions for the allocation of emission credits;
- Plan for the implementation of the Kigali Amendment for 2024–2029;
- Decision on the allocation of funds collected through the implementation of auctions for the allocation of emission credits for 2023 (“Official Gazette of Montenegro”, 068/24).

The postponement of adoption of the Climate Change Law until the second quarter of 2025 represents a serious obstacle to meeting Montenegro's international climate obligations and slows down the European integration process in the area of climate policy. It is recommended that the competent

authorities urgently accelerate the legislative process through improved inter-institutional coordination, precise planning of activities, efficient resource allocation, and transparent communication with the public. The draft law regulates competences, obligations, and mechanisms for mitigation and adaptation to climate change, ozone layer protection, as well as monitoring of greenhouse gas emissions. The aim is to achieve climate neutrality by 2050, in line with the Paris Agreement. The adoption of the law will significantly contribute to speeding up the European integration process and alignment with EU legislation, particularly under Chapter 27.

The Ministry of Ecology, Sustainable Development and Northern Development, in cooperation with UNDP and with the support of the Green Climate Fund, finalized the preparation of the Climate Change Adaptation Plan for the period 2025–2035, with an Action Plan for 2025–2027. The Plan identifies four priority sectors: agriculture, water resources, health, and tourism, for which risk and vulnerability assessments were carried out and concrete adaptation measures defined. The document foresees strengthening institutional and technical capacities, improving the database, and mobilizing resources, thereby increasing Montenegro's long-term resilience to climate change. Work is underway to prepare materials for its adoption by the Government (initially foreseen for the first quarter of 2025).

In February 2025, the Government adopted the *“Fourth National Communication and the First Biennial Transparency Report of Montenegro to the United Nations Framework Convention on Climate Change (FNC/BTR)”*. This combined Report not only improves the efficiency of Montenegro's reporting process to the UNFCCC but also enhances the quality of climate data and strengthens Montenegro's role in global climate action. The Report contains updated data on the GHG emissions inventory for 2016, the results of the new inventories for 2022, as well as an overview of measures formulated, adopted, and implemented to reduce emissions.

The establishment of the framework for the application of the EU ETS Directive in Montenegro, including the Monitoring, Reporting and Verification (MRV) system for emissions, is being carried out through the “Capacity-Building Initiative for Transparency (CBIT)” project. The adoption of the Law on Protection Against the Adverse Impacts of Climate Change and Ozone Layer Protection will enable full legal harmonisation with EU legislation, ensuring through by-laws the establishment of the MRV System for monitoring, reporting, verification, and accreditation (MRVA) by December 2025. Additionally, through the project “Strengthening the Transparency Framework for Montenegro's Nationally Determined Contribution and Adaptation Activities” – CBIT, special emphasis is placed on establishing the MRV-E portal for monitoring, reporting, verification, and evaluation, which will centralize expertise and be coordinated by the Ministry of Ecology, Sustainable Development and Northern Development. Project activities began in January 2022, with completion planned for August 2025.

Action 10.4 of the Action Plan, concerning the preparation of national operators for participation in the EU ETS system, cannot be implemented without the adoption of a new *Regulation on activities that emit greenhouse gases requiring emission permits*. Although the Government adopted a decision back in July 2021 to establish a working group for the drafting of amendments to this Regulation, no publicly available information on the progress of this process has been published since, hampering further alignment with EU ETS requirements.

Montenegro, in cooperation with the World Bank, is currently implementing the “Carbon Pricing Readiness Support Plan” project, within which the development of the *Low-Carbon Development Strategy* is planned. The adoption of this Strategy, expected in the first quarter of 2026, represents a key document for achieving climate neutrality and for the development of a national emissions trading system. As part of the project, analyses of the impact of a carbon tax on the energy sector, forestry, and the economy have been prepared, as well as an assessment for the introduction of the Carbon Border Adjustment Mechanism (CBAM). Additionally, a Decarbonisation Communication Strategy and a Compliance Analysis of national legislation with the EU acquis have been developed, while the preparation of a Roadmap for the alignment of the national ETS system with the EU ETS is planned.

The establishment of the climate-energy framework until 2030 and its integration into all relevant sectoral policies and strategies (Action 10.7. of the AP) will be achieved through the adoption of the *National Energy and Climate Plan* by the end of 2025. The Ministry of Energy is coordinating activities for the finalisation of Montenegro’s National Energy and Climate Plan for the period up to 2030 (NECP), with the technical support of a consulting team engaged by the German Agency for International Cooperation (GIZ). Parallel to the development of the NECP, activities are also being carried out on the preparation of the Strategic Environmental Assessment for the NECP. A draft of the NECP was prepared and submitted to the Energy Community in early December 2024. After receiving comments from the Energy Community Secretariat, work will proceed on the final draft of the document and a public consultation process will be organised. The NECP is one of the most important documents in the field of energy and climate change and a key instrument for implementing the energy transition and tackling the negative effects of climate change.

The updated Nationally Determined Contribution (NDC), adopted by the Government of Montenegro in February 2025, sets ambitious targets for reducing greenhouse gas emissions – 55% by 2030 and 60% by 2035 – representing a significant step forward compared to previous commitments. These targets clearly demonstrate political will for an accelerated green transformation through improved energy efficiency, greater use of renewable energy sources, infrastructure modernisation, and the protection of natural carbon sinks. However, their realisation requires stronger institutional and investment efforts, enhanced administrative capacities, support from international partners, and the creation of a favourable environment for the development of green technologies and sustainable sectoral practices. Accelerated implementation of these measures is crucial for ensuring climate neutrality and for Montenegro’s contribution to global efforts in combating climate change.

The Report on implementation of the National Climate Change Strategy until 2030 for the period September 2022 – September 2024 is planned for adoption only in the third quarter of 2025, which represents a significant delay compared to the end of the reporting period. The lack of up-to-date information on the implementation of the strategy hinders transparency and accountability in climate policy management, which is particularly concerning in the context of protecting human health and the environment. It is recommended to urgently update the report and strengthen institutional capacities to ensure timely and effective fulfilment of the obligations under the National Climate Change Strategy.

In the period March–August 2024, within the CBIT and FNC/BTR projects, seven officials participated in 13 trainings through the CBIT GSP platform, covering key topics in the field of climate change and reporting transparency. The topics included reporting under the ETF, climate finance, adaptation, GHG

emissions inventories, the gender component, and the use of common tabular formats (CTF). These trainings significantly contributed to strengthening administrative capacities for fulfilling international climate obligations, ensuring transparency, and effectively implementing national climate policies.

Based on the Law on Protection against the Adverse Impacts of Climate Change ("Official Gazette of Montenegro", No. 073/19), the Environmental Protection Agency conducted thirty-six (36) administrative procedures, issuing: seventeen (17) permits for the import of ozone-depleting substances and alternative substances, ten (10) permits for performing the activity of installation, maintenance and/or repair as well as decommissioning of equipment and products containing ozone-depleting substances or alternative substances, six (6) decisions for determining the import quota of HFC substances in 2025, one (1) permit for greenhouse gas emissions, and two (2) decisions rejecting requests for issuing permits for performing the activity of installation, maintenance and/or repair as well as decommissioning of equipment and products containing ozone-depleting substances or alternative substances.

To achieve ambitious climate goals, Montenegro must prioritise strengthening administrative capacities and inter-institutional cooperation. It is recommended to systematically organise trainings for officials from all relevant sectors, focusing on the implementation of climate policies, energy efficiency, emissions reduction, and environmental protection. In parallel, it is necessary to employ additional expert staff responsible for the implementation, monitoring, and reporting on the progress of climate measures. These steps are crucial for improving coordination and the effective realisation of national climate policies.

8.3. Key recommendations

- Adopt the Climate Change Law and develop the corresponding by-laws.
- Accelerate adoption of the National Energy and Climate Plan with a mandatory Strategic Environmental Assessment (SEA), as well as broad public consultations to ensure transparency and inclusiveness.
- Establish a national MRV-E system as a mechanism for support and information exchange on climate change mitigation, climate change adaptation, and climate finance and support.
- After adopting the National Adaptation Plan (NAP), encourage development of local adaptation plans focused on vulnerable sectors.
- Define responsibilities within the national system for collecting and processing data, including clear mechanisms for data submission and reporting.
- To significantly reduce dependence on fossil fuels and improve energy security, establish a clearly defined energy transition plan that increases the share of sustainable renewable energy sources, electrifies consumption, develops district heating, promotes electrification in transport, and directs investment toward energy efficient infrastructure to accelerate decarbonisation and meet climate targets.
- Invest more quickly and substantially in the most efficient heating systems, especially heat pumps linked to sustainable renewable sources (solar, geothermal, wind, and waste heat), integrating seasonal energy storage and implementing energy efficiency measures, giving priority to mature projects that can obtain grants (Western Balkans Investment Framework, IPA III, bilateral donations) and concessional loans from international financial institutions (EBRD, EIB, KfW, etc.).

- Increase investment in energy efficiency and green transition projects, while facilitating access to green finance (grants, non-refundable funds, concessional loans, etc.).
- Run awareness and education campaigns at all levels, focusing on reducing the negative impacts of climate change and preparing to cope with their effects in Montenegro.



9. CIVIL PROTECTION

9.1. Overview and assessment of condition

The Action Plan for fulfilling the final benchmarks in Negotiation Chapter 27 defined nine specific obligations related to civil protection. Thanks to dedicated work and a responsible approach, the Directorate for Protection and Rescue (Ministry of Interior) fully implemented all nine obligations within its mandate, which enabled the provisional closure of this sub-area within the European Union integration process. In other words, the key objectives were achieved, and the activities foreseen for this phase of reform were carried out.

However, although no specific final benchmark was defined for the field of civil protection, two particular requirements were set:

- Improving inter-institutional cooperation, especially between the Ministry of Interior and other relevant institutions, with a focus on more effective disaster risk management – particularly in the areas of floods and industrial accidents.
- Connecting with European emergency systems, in line with the Agreement on Accession to the Union Civil Protection Mechanism, which includes establishing the Secure Trans-European Services for Telematics between Administrations (sTESTA) and integration with the Common Emergency Communication and Information System (CECIS).

It is for all these reasons, although civil protection is formally provisionally closed within this report, that there is a clear need for further improvements and establishment of long-term capacities which will allow for a faster and more effective response to crisis situations in the future.

9.2. Legal and strategic framework

The Ministry of Interior (MoI) – Directorate for Protection and Rescue, in line with the Government of Montenegro's Work Program and the Ministry's Work Program, prepared and adopted the following documents and regulations during the reporting period:

- Rulebook on Standard Operating Procedures ("Official Gazette of Montenegro", No. 36/24);
- Rulebook on the Program and Manner of Taking the Exam and the License Form for Drafting Protection and Rescue Plans of Business Entities, Other Legal Entities, and Entrepreneurs ("Official Gazette of Montenegro", No. 64/24).

At the proposal of the Ministry of Interior – Directorate for Protection and Rescue, the Government of Montenegro adopted the Disaster Risk Reduction Strategy for the period 2025–2030 and the accompanying Action Plan 2025-2026 in December 2024. This document represents the second national strategic framework in the field of disaster risk management and was prepared with the support of the European Commission – Directorate-General for European Civil Protection and Humanitarian Aid Operations (DG ECHO), through a Track 1 risk management grant. The Strategy is aligned with international standards and frameworks, including the Sendai Framework for Disaster Risk Reduction, the Paris Agreement, and the 2030 Agenda for Sustainable Development. It focuses on strengthening the resilience of communities and institutions, enhancing risk management capacities, and improving intersectoral coordination. The European Commission also required Montenegro to develop a

communication plan to ensure that the public is adequately informed about all steps taken in disaster risk reduction.

The Directorate for Protection and Rescue of the Ministry of Interior, in cooperation with relevant institutions, achieved significant progress in strengthening inter-institutional cooperation in the field of disaster risk management, with a special emphasis on floods and industrial accidents. As a result of these activities, national protection and rescue plans covering key risks were developed and adopted, clearly defining coordination and cooperation mechanisms in crisis situations. These plans cover: earthquakes, fires, floods, industrial accidents, chemical and biological risks, landslides and rockfalls, as well as radiological and nuclear accidents. This approach ensures that all relevant stakeholders are adequately prepared for an effective response in emergencies, thereby enhancing the protection of lives, property, and the environment in Montenegro.

The second requirement – connecting Montenegro with European emergency systems in accordance with the Agreement on Participation in the Union Civil Protection Mechanism – included key technical steps toward integration into European emergency platforms. Within this process, the Secure Trans-European Services for Telematics between Administrations (sTESTA) was established, and access to the Common Emergency Communication and Information System (CECIS) was secured. Technical infrastructure was significantly upgraded: in December 2021, sTESTA equipment was installed in the premises of the Police Directorate, enabling secure data exchange in emergencies; in December 2023, the 112 Operational Communication Centre was connected to the sTESTA platform, thereby enhancing rapid and effective crisis response; and in February 2024, Montenegro was fully integrated with the CECIS and CECIS 2.0 systems, marking a key step towards full membership in the European emergency information exchange system. These technical upgrades have significantly improved coordination and efficiency in emergency response.

9.3. Key recommendations

- It is necessary that disaster risk reduction becomes a priority in national and local policies, with adequate budgetary funds secured for the implementation of activities in this area.
- Strengthening fire prevention and detection through the establishment of a more efficient real-time fire detection system, including satellite systems and drones that could monitor fires in hard-to-access areas.
- Establish a fire index forecasting system at specific locations, as well as an advanced system for fire behaviour simulation, fire intensity prediction, and fire index calculation.
- Establish a video surveillance system and devices for mapping burned areas in order to collect information and determine measures for the rehabilitation of affected areas.
- Establish an efficient system for flood prevention and response.
- Strengthen intersectoral cooperation with a clear division of responsibilities. Establish a body responsible for coordinating activities, ensure continuous financing of prevention, monitoring, and disaster response activities, and improve working conditions and training of staff.
- Conduct an analysis of the equipment of local Protection Services.

- Work on increasing the number of volunteer firefighting associations and consider their establishment as branch units of the Protection Service; their training and equipment are also important.
- Equip all Protection and Rescue Services with the TETRA system.
- Strengthen and enhance administrative and technical capacities for conducting inspection supervision in the field of protection and rescue.
- Develop communication strategies for informing the public in case of emergencies, along with the preparation of educational materials.
- Organize campaigns and workshops to raise citizens' awareness of the risks of natural disasters, particularly fires, earthquakes, and floods, including training the population in basic self-help techniques in the event of an accident and how to act before, during, and after disasters.

10. LITERATURE

1. Annex I to the European Commission Report on Montenegro 2025, covering the period 1 September 2024 – 31st March 2025.
2. Report on implementation of the Action Plan for fulfilling the closing benchmarks in Chapter 27 – Environment and Climate Change, for the reporting period March – August 2024.
3. Report on implementation of obligations from Montenegro's Accession Programme to the European Union 2024–2027, for 2024.
4. Annex II to the European Commission Report on Montenegro 2024, covering the period 1 April – 1 September 2024.
5. Programme of Work of the Government of Montenegro for 2025.
6. Montenegro's Accession Programme to the European Union 2024–2027.
7. Mid-Term Programme of Work of the Government of Montenegro 2024–2027.
8. Report on work and condition in administrative areas of the Ministry of Ecology, Sustainable Development and Northern Region Development, including bodies under its supervision, for the period January – December 2024.
9. Report on work and condition in administrative areas of the Ministry of Agriculture, Forestry and Water Management and administrative bodies for 2024.
10. Programme of Work of the Ministry of Ecology, Sustainable Development and Northern Region Development for 2025.
11. Work Report of the Environmental Protection Agency for 2024.
12. Draft State Waste Management Plan 2024–2028.
13. 4th Environmental Performance Review of Montenegro.
14. Communal Wastewater Management Plan in Montenegro (2020–2035).
15. Disaster Risk Reduction Strategy 2025–2030, with Action Plan 2025–2026.
16. Information on the activities related to the implementation of the Thermal Power Complex project in Pljevlja.
17. Final Report on Implementation of the Action Plan for the National Implementation Plan of the Minamata Convention 2019–2023.
18. Work Report of the Prosecutorial Council and the State Prosecution Office for 2024.
19. Information on the condition of the environment for 2023.
20. Efficiency of the mechanism for regulation, monitoring and reporting on air quality – State Audit Institution.
21. Second State Audit Institution Report on the implementation of recommendations given in the performance audit “Efficiency of Wastewater Management System” – March 2024.
22. National Profile on Asbestos Exposure of Montenegro with Action Plan 2025–2026.
23. Condition of Water Quality in Montenegro for 2023.