



*Centar za građansko obrazovanje
Centre for Civic Education*



British Embassy
Podgorica

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?



Podgorica, 2015.

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2014 Annual report

Podgorica, 2015.

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO? 2014 ANNUAL REPORT

Publisher:

Centre for Civic Education (CCE)



Centar za građansko obrazovanje
Centre for Civic Education

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This publication is a part of the project “Equal chances for all media“, implemented by the Centre for Civic Education (CCE), with support of the Embassy of the United Kingdom in Montenegro.



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INTRODUCTION

The project *“Equal chances for all media”* aims to contribute to the creation of clear oversight mechanisms for the public finances and for the allocation of state aid to the media, as required by the European Union regulations and the international standards and best practices.

The more specific objective of this project is to raise the awareness among interested public about responsible management of the public budget, and analyse the relationship between the state institutions and the media in Montenegro as reflected in the financial allocations of public funds to the media in payment for specific services or through other forms of support. The public sector analysed in this study is defined by the Law on the Budget of Montenegro, and encompasses public institutions, municipalities (local self-government units), independent regulatory bodies, agencies and enterprises in which the state or the municipalities hold a controlling stake, the judiciary (courts and the prosecution), and others.

The project builds on the previous work of the Centre for Civic Education (CCE) in this field, which produced annual reports for 2011, 2012, and 2013.¹ These studies have raised the visibility of the problem of media financing in the Montenegrin public discourse, and became a reference for important international reports. Our findings highlighted countless shady areas in the public financing of the media in Montenegro, and stressed the need for better regulation in this area. They also highlighted the continuing attempts of the public bodies to exercise influence over media through selective and opaque financing, undermining the market competition, reinforcing unequal opportunities and thereby creating indirect pressure on editorial policies. The lack of transparency in financing as well as the lack of adequate criteria for the allocation of funds, alongside the incomplete legal framework, additionally undermines the already alarming state of the Montenegrin media.

Considering that public administration and local self-government bodies spent **EUR 2 642 070.83**² in 2011 on advertising in a market that is altogether worth **EUR 9 - 9.5 million**³, it is obvious that the state is a major, if not the largest customer for advertising services, capable of significantly influencing the revenues and the financial sustainability of individual media houses. In 2012 public spending on the media services decreased by nearly almost EUR 1 million to **EUR 852 059.00**⁴ according to the CCE estimates, although this amount excludes the spending by local self-governments. In 2013, public administration and local self-governments bodies together

1 <http://cgo-cce.org/en/programi/demokratija/mediji-i-demokratija/#.V8Sk-UuKjFI>

2 <http://media.cgo-cce.org/2015/12/cgo-cce-how-much-and-to-whom-do-the-citizens-in-mne-pay-for-adv.pdf>,
<http://media.cgo-cce.org/2015/12/cgo-cce-how-much-to-which-media-and-related-agencies-did-municipalities-in-mne-pay-for-their-services.pdf>

3 <https://www.irex.org/sites/default/files/2015-msi-montenegro.pdf>

4 <http://media.cgo-cce.org/2015/12/cgo-cce-how-much-and-to-whom-do-the-citizens-in-mne-pay-for-adv-2012.pdf>

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spent EUR 2 196 739.00. This makes it clear that there was no reduction in the amount of public funds spent on advertising and other media services. On the contrary, if we bear in mind that the above amount includes only 67.6% of public sector entities from whom we could gather the data, the real expenditure is likely to be much higher. At the same time, our findings show a continued practice of opaque spending of public funds, without well defined rules and procedures.

CCE's findings drew the attention of the key international organisations. Among other, the European Commission's 2015 Progress Report on Montenegro expresses: *"concerns about transparency and non-discrimination in state advertising... The precarious economic situation of journalists puts them at risk of editorial interference and possible self-censorship. The fact that many media outlets are not financially sustainable has a negative impact on the quality of reporting and professionalism."*⁵ Similar concerns were already expressed in the 2013 Progress Report, which found that *"Concerns persist also regarding possible state aid and advertising funding allocated to print media in 2012, which were not in line with public procurement rules and could jeopardise competitiveness on the media market."*⁶ The 2015 Resolution on Montenegro of the European Parliament similarly warns that⁷ Montenegro should *"adopt a clear legislative framework, which will establish rules related to media ownership and financing."* The international non-governmental organisation Reporters without borders ranks Montenegro 114th out of 180 countries on its World Press Freedom Index for 2015, which combines assessment on categories such as violence against media, pluralism, media independence, self-censorship, legislative framework, transparency and infrastructure. The only country in the region that was ranked worse than Montenegro is Macedonia, which came 117th. SEEMO Report on state of media in Montenegro for 2014⁸ cited CCE's findings, as did the last three reports of the US State Department on the state of human rights in Montenegro. Freedom House's report "Nations in transit 2015", lowered Montenegro's rating on independence of the media from 4.25 to 4.50 on 1-7 scale (where 1 stands for best and 7 for the worst level of independence). Last but not least, CCE's prior work on this problem led the renowned Paris-based international organisations World Association of Newspapers and News publishers and the Centre for international media assistance to choose CCE as the partner for their first report "Eroding freedoms: media and soft censorship in Montenegro"⁹

In the interest of continuous monitoring of this area, CCE conducted a new study that compiles data for 2014 and provides the updated, comprehensive overview of the allocation of public funds to media in 2014, along with comparison to the previous years. The study is accompanied by specific recommendations on the ways to secure transparency and determine criteria for the allocation of public funds to the Montenegrin media that would be in line with the *acquis communautaire* on the freedom of expression and independence of the media, competition, state aid, and public procurement.

Without a clear mechanism for the allocation of state aid to the media, these funds have the potential to create severe distortions of the media market, through discrimination and in violation of the EU competitiveness policy. This is all the more troubling when it is being done with public funds. The citizens, as tax payers, have the right to know how their money is spent, and whether the way in which the state allocates the public funds interferes with the impartial reporting of the performance of public institutions, or obstructs the development of media pluralism.

This report warns of the existence of a mechanism used to control and exert pressure on the media, and provides recommendations on the ways to end bad practices that deprives Montenegrin citizens of their right to free and independent media and thereby of objective, accurate reporting on the activities of the government, political parties, institutions, as well as other issues of public importance.

5 http://ec.europa.eu/enlargement/pdf/key_documents/2015/20151110_report_montenegro.pdf

6 http://ec.europa.eu/enlargement/pdf/key_documents/2013/package/mn_rapport_2013.pdf

7 <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-%2F%2FEP%2F%2FTEXT%2BMOTION%2BB8-2015-0211%2B0%2BDOC%2BXML%2BV0%2F%2FEN&language=EN>

8 <http://www.seemo.org/Montenegro-2014-Media-Report.html>

9 <http://media.cgo-cce.org/2015/11/cgo-cce-eroding-freedoms.pdf>

METHODOLOGICAL NOTES

From May to December 2015, Centre for Civic Education (CCE) collected information on the amounts allocated to various media services by public sector entities. The research has been conducted via requests for access to information as specified by the Law on free access to information, and concerned all agreements for the provision of services, specialised services or other contracts with the media, PR agencies, production houses and agencies for public opinion research. Parallel to its main objective, the research also tested implementation of Law on free access to information by the entities from which information was requested, as well as by the Agency for the protection of personal data and free access to information which is in charge of processing complaints against public bodies that fail to deliver requested information. The information we collected served as a basis for assessment of the implementation of the Law, including its provisions on the protection by court and enforcement of sanctions specified by the Law. The results of this assessment, conducted over a six-month period in 2015, are given in Chapter 4.

The report starts off with a description of the context in which the Montenegrin media operate. It presents a short overview of the legal and institutional framework, as well as additional information on the sector as detailed in the official documents of the national regulatory bodies, reports of the international and national non-governmental organisations, and media archives. The chapter also contains information on the financing of the Montenegrin public broadcaster RTCG out of the state budget, as well as the details on the institutional, legal and financial framework for the operation of local public broadcasters.

The information collected and analysed in this manner yields a comprehensive overview of the public financing of media, both public and private, and thus maps the extent of the influence by public sector bodies on the media market. Accordingly, the report provides conclusions and recommendations for the improvement of the current state of affairs.

MEDIA IN MONTENEGRO

GENERAL OVERVIEW

Media scene in Montenegro is pluralistic, with a large number of media active in a small market of 647 073 citizens¹⁰. According to the Agency for electronic media, in 2015 Montenegro had 21 TV channels, 55 radio stations, five daily papers and one weekly paper. There is also one news agency, MINA, which is privately owned. Despite their increasing popularity, there is no complete official list of news websites and electronic magazines.¹¹ According to IREX, which cites media agency Direct as a source, the overall market for media advertising in Montenegro is estimated at **EUR 9-9.5 million**¹².

The legal and institutional framework is complete and largely aligned with the international recommendations. It guarantees the right to free expression, freedom and independence of the media. Despite the existence of an adequate regulatory framework, media and the journalists frequently encounter serious limitations of their rights in their everyday work.

Previous studies have shown a steady deterioration of the freedom of the media in the last few years, and the majority of journalists are dissatisfied with the state of media freedom in the country. According to the mid-term report on the implementation of recommendations received during the second round of the Universal Periodic Review (UPR), that was prepared by the Government of Montenegro in June 2015, in the period May 2014 - May 2015 the Police department documented 58 cases of assaults on journalists or media property. Out of these, 44 cases had been closed: in 38 cases the attackers were tried, in 6 cases the prosecutor found no grounds for prosecution, and 14 cases are still ongoing/unresolved¹³.

During 2014, there were 10 new cases of attacks on journalists or media property. Nine cases were prosecuted, with the police officers apprehending the suspects and handing them over to the judiciary, whereas in one case the prosecutor in charge found no grounds for prosecution ex officio, nor elements of misdemeanour (threats via Facebook).

In addition to direct attacks, media enterprises and their employees are also exposed to other forms of pressure. The most visible are the financial pressures, which are a form of soft censorship or control. They constitute an attempt to manipulate the media and influence their editorial policy by selective and opaque financing, and by tilting the playing field and creating unfair competition on the media market¹⁴.

¹⁰ <http://www.monstat.org/cg/novosti.php?id=257>

¹¹ www.ardcg.org.

¹² <https://www.irex.org/sites/default/files/2015-msi-montenegro.pdf>

¹³ <http://gamn.org/upr/files/upr-srednjerozni-izvjestaj.pdf>

¹⁴ "Eroding freedoms: media and soft censorship in Montenegro", <http://media.cgo-cce.org/2015/11/cgo-cce-eroding-freedoms.pdf>

LEGAL AND INSTITUTIONAL FRAMEWORK

Montenegro has a series of legal and institutional guarantees of the freedom of expression and media rights. The Constitution, the Law on media and the Law on electronic media guarantee the freedom of expression, freedom to establish a media enterprise and editorial independence of the broadcasters from the state. A set of media laws – the Law on media, the Law on broadcast and the Law on public broadcasting services Radio Montenegro and TV Montenegro – was adopted in 2002, and those were the first laws in Montenegro to be aligned with the European standards. They laid down the ground for media pluralism, for the transformation of state-owned media, and for establishment of independent regulatory agencies in this area.

In 2014, a number of steps were taken to amend the existing laws. The Law on media was not affected in any significant way, but the *Law on broadcasting was amended on several occasions*. The *Law on public broadcasting services of Montenegro* from 2008¹⁵ is still in force, but is currently undergoing amendments..

The *Law on electronic media*, adopted in July 2010, regulates the rights, obligations and responsibilities of the legal and natural persons who produce and provide audio-visual media services (hereinafter: AVM service) and electronic publication via electronic communication networks. It also defines the competencies, status and financing of the Agency for electronic media, limits media concentration, fosters media pluralism and regulates other issues of importance for the provision of AVM services, in line with international conventions and standards. Independent regulatory body for AVM is the Agency for electronic media. Its executive bodies are the Council and Director. Members of the Council are appointed by the Parliament of Montenegro, upon nomination by the representatives of broadcasters, Montenegrin P.E.N and non-governmental organisations, while the director is appointed via public competition, which substantially reinforces the legal basis for independence of the regulator. The Ministry of Culture recently called for amendments to the of Law on electronic media, to complete the alignment of the Law with the 2010 EC Directive on audiovisual media services¹⁶ and implement the rules on state aid to public broadcasting services in line with the Announcement of the Commission for implementation of state aid rules for public broadcasting services (2009/C 257/01).

The *Law on public broadcasting services of Montenegro* regulates the status of Radio and Television Montenegro (RTCG), which is founded by the state of Montenegro. The Law sets the rules and obligations of RTCG, and guarantees independence of the programme from the founder. Article 13 of Law stipulates that RTCG decides independently on its programme outline, as well as on the forms of production and broadcast, the content and broadcast of information on the current affairs and organisation of other activities.

RTCG'S REVENUES FROM THE PUBLIC BUDGET OF MONTENEGRO IN 2014

The financing of RTCG is regulated by Article 15 of the Law on public broadcasting services of Montenegro, which states that RTCG is funded from: the general revenue of the budget of Montenegro to the amount of around 1.2% of the current budget; the production and broadcast of advertising content; the production and sales of audiovisual services; programme endorsements; organisation of concerts and other events; the budget of Montenegro; other sources, as defined by Law. In practice, this model proved to be dysfunctional, due to the lack of economic sustainability of the public service. RTCG has been operating with losses and it is obvious that the current allocations from the state budget are insufficient for the regular functioning of this broadcaster. At the same time, there are frequent complaints about RTCG's failure to live up to the principle of independence and adequately represent the plurality of opinions in the Montenegrin society, as mandated by its mission.

¹⁵ http://www.ardcg.org/index.php?option=com_docman&task=cat_view&gid=48&Itemid=26

¹⁶ Directive 2010/13/EC on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services

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Furthermore, according to the Statute of RTCG, this public enterprise is obliged to publish financial plans, reports and annual final accounts on its web site.

The *Financial report for 2014* showed the overall budget in the amount of **EUR 13 040 581**, EUR 8 082 440 of which came from the state budget of Montenegro. In addition to this, RTCG lists as extraordinary revenue EUR 2 400 000. The latter refers to obligations assumed by RTCG, in line with the Law on the budget of Montenegro for 2014 and the Agreement between RTCG and the Ministry of Culture and Ministry of Finances on debt takeover¹⁷. This brings the total transfers from the public budget to the public broadcaster to **EUR 10 482 440**, which is an increase compared to 2013, when **EUR 9 848 449** from the state budget was spent on the financing of the public broadcaster. Public funds make up more than 80% of the total revenue of RTCG.

Report of the State Audit Institution¹⁸ on the draft Law on the final account of the Budget of Montenegro for 2014 provides a detailed overview of RTCG's liabilities that were taken over by the state. According to this Report, the Government took over the payment of RTCG's debts in the amount of EUR 2 400 000 through the Agreement on the debt takeover¹⁹ and the Conclusion of the Government of Montenegro²⁰, whereby the state assumes the obligation to cover unpaid taxes and contributions on the salaries of RTCG's employees.

Moreover, in 2013 the Government of Montenegro took over the payment of RTCG's debts worth **EUR 2 396 724.05**, which included a **EUR 1 100 000** in liabilities towards the EUROPEAN Broadcasting Union, tax debt worth **EUR 900 000.00**, and debt to Elektroprivreda of Montenegro Nikšić worth **EUR 400 000.00**²¹.

The proposed amendments to the Law on public broadcasting services of Montenegro lay out a new model for the financing of RTCG from the state Budget, according to which the state would in the future transfer 0.3% of the GDP per year²² to fund the basic activities of RTCG. This would increase the public funding to RTCG from the current average of EUR 7 to 8 million to **EUR 12 700 000**²³, which is the amount projected by the RTCG's financial plan for 2015²⁴.

Regarding competition in the media market, the above clearly suggests that RTCG is privileged compared to the commercial media, especially as regards the allocation of public funds for advertising services and advertising of public sector bodies. Our findings show that public sector bodies have spent considerable amounts for such services by the public broadcaster, and this is also reflected in the editorial policy of RTCG, especially in its news programme.

LOCAL PUBLIC BROADCASTERS IN MONTENEGRO

The Law on electronic media offers the possibility to local self-governments to establish local public broadcasters, in order to provide information on issues of public interests on local level. The Law on local self-government²⁵ stipulates that local self-government unit "provides and regulates the conditions to keep the local population informed".

The State of Montenegro established one national broadcasting service (RTCG), while 14 local self-governments established 17 local public broadcasters: radios Andrijevica, Berane, Budva, Danilovgrad, Kotor, Pljevlja, Tivat, Bar, Bijelo Polje, Cetinje, Herceg Novi, Nikšić, Rožaje and Ulcinj, and televisions Nikšić, Budva and Pljevlja.

17 <http://www.rtcg.me/rtcg/poslovanje.html>

18 <http://www.dri.co.me/1/doc/Izvjestaj%20o%20reviziji%20predloga%20zakona%20o%20zavrsnom%20racunu%20budzeta%20Crne%20Gore%20za%202014%20godinu.pdf>

19 Agreement no. 01-6761-14 from 26.12.2014

20 Conclusion no. 08- 2995/2 from 25.12.2014

21 http://www.dri.co.me/1/index.php?option=com_content&view=article&id=96&Itemid=128&lang=sr

22 Draft Law on amendments to the Law on Public Broadcasting Services of Montenegro, available at: <http://www.gov.me/biblioteka/predlozi-zakona>

23 Draft Law on the budget of Montenegro for 2015, available at: <http://www.gov.me/biblioteka/predlozi-zakona>

24 Financial plan of RTCG for 2015, <http://www.rtcg.me/sw4i/download/files/article/FinansijskiPlan2015.pdf?id=474>

25 <http://www.uom.co.me/?p=374>

Draft Law on amendments to the Law on electronic media stipulates that, in addition to the public service, a broadcaster can also provide commercial services. It also proposed one significant novelty – a clear division in accounting to delineate public from commercial services. More precisely, the local public broadcasters will not be allowed to use funds from the budget of Montenegro, or from the budget of local self-governments, to finance commercial activities (cross-subsidization), a solution that had already been incorporated into the law with regard to the national public broadcaster. However, these amendments have still not been adopted in Parliament of Montenegro.

The total amount of money allocated to the financing of local public broadcasters by 14 local self-governments, as detailed in their budget decisions for 2014, was **EUR 2 599 000**.

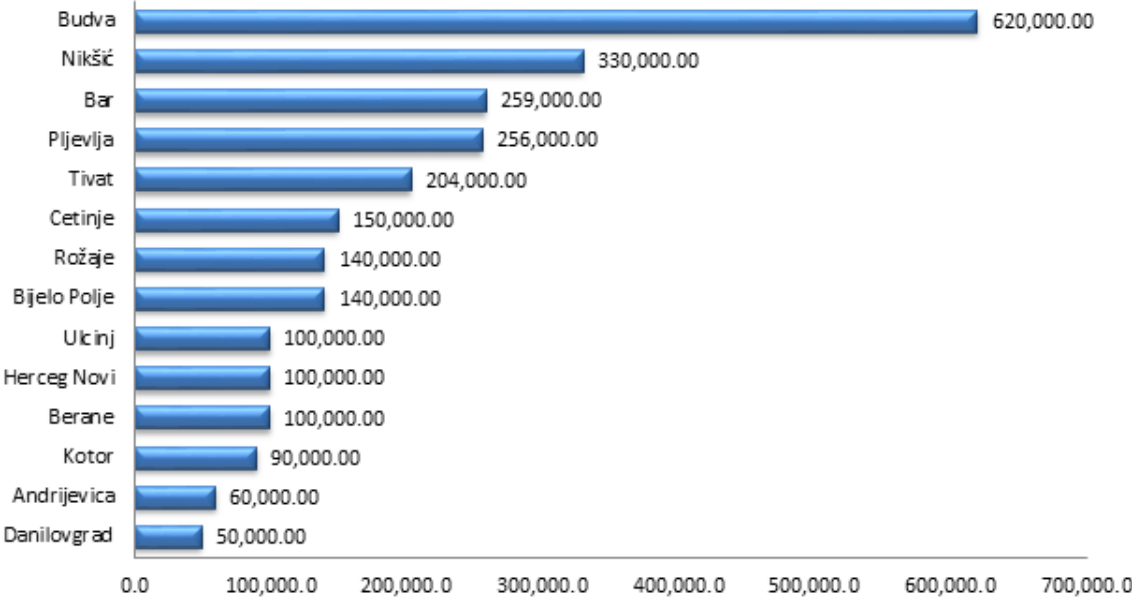


Figure 1: Planned budgets of the local public broadcasters for 2014.

A review of the final accounts of these municipalities shows the average rate of realisation of these funds to be 90%.

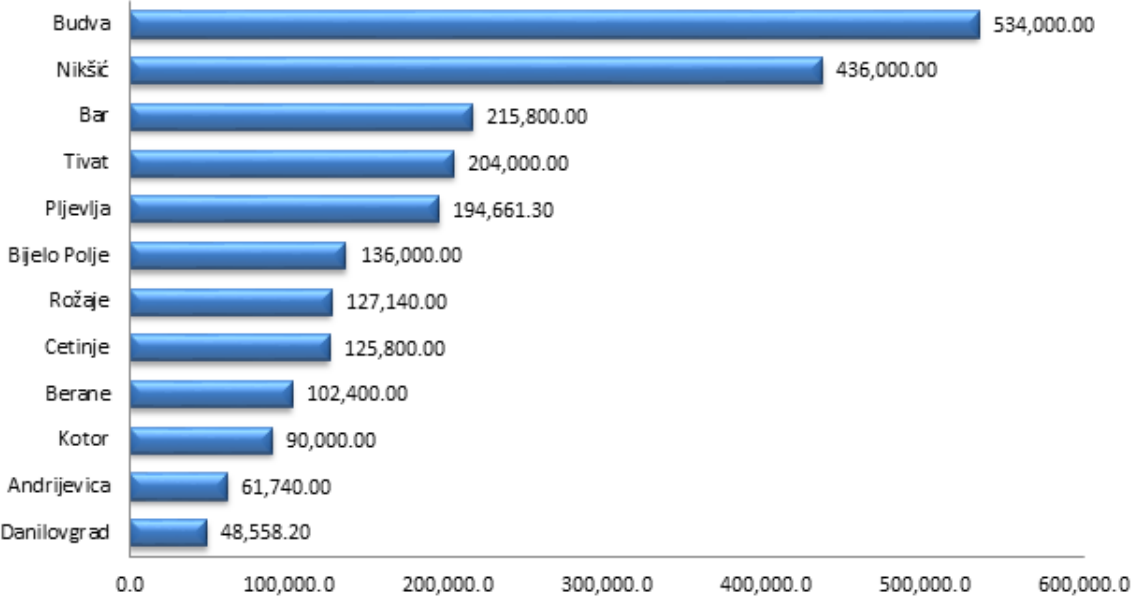


Figure 2: Amounts spent on local public broadcasters in 2014

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Information on the spending on public broadcasters by the municipalities of Herceg Novi and Ulcinj are not available. No information is available on their websites either, nor has it been published in any other format.

Given that significant amounts of public funding are allocated to the local public services, which are also able to raise revenues from commercial activities and compete with the commercial broadcasters in the open market, these resources should be carefully monitored. Like RTCG, local public services are privileged over other participants in the local media markets, not only because of direct access to the public funds, but also because they receive a disproportionate share of payments for advertising services from the public sector, which constitutes an additional form of revenue from the public coffers.

Financial reports of the local public broadcasters are not publically available and cannot be found on the official websites of local broadcasters, or on the websites of local self-governments.

The financing of local public services with the taxpayers' money should strictly comply with the rules of transparency, openness and measurable spending criteria. The question of the extent of influence of local government officials on the editorial policy of these media remains to be clarified.

INDEPENDENCE OF THE MEDIA AND SOFT CENSORSHIP

Despite the existing media pluralism the number and variety of media outlets as well as the deep polarisation within the media sector do not allow for economic or political independence of the media from the state. Moreover, although the restrictions laid down in the Constitution and media laws ensure that there are no visible mechanisms of direct censorship and control of the media by the state, we found evidence of a different form of interference, the so-called soft censorship.

As detailed in the report “Eroding freedoms: media and soft censorship in Montenegro”²⁶, soft censorship is exercised primarily through politicised, discretionary and opaque allocation of public funds and state aid to the media. Lack of transparency, criteria and impartial procedures for the allocation of public funds to the media leads to serious distortions of the market, advantaging some outlets and undermining the survival of others. The funding is directly correlated to the particular media’s positive or critical reporting on the government’s activities.

The report, written by the Centre for Civic Education (CCE), World Association of Newspapers and News publishers (WAN-IFRA) and Centre for International media assistance (CIMA) provides evidence of attempts by public institutions in Montenegro to manipulate the media and influence their editorial policy through selective and opaque financing, which severely undermines competition and hinders development of a sustainable media market.

The findings of the report show that the public financing of media in Montenegro is unregulated, uncontrolled and opaque. Authorities allocate the public funds in a biased manner, exerting indirect pressure on the media and thus undermining the market competition and obstructing development of a free, independent, and impartial media. Montenegrin legal framework does not contain specific regulations on the allocation of public funds to the media. There is no single institution that would be in charge of monitoring the distribution of these funds. This leaves ample room for interference by authorities into the work of media in Montenegro, via opaque and selective allocation of public financial resources. Information on advertising expenditure and other forms of spending on the media by public sector bodies is limited and often completely absent. The use of public funds in a selective manner, often influenced by political allegiances of particular media outlets, also contributes to the polarisation of the media scene, thereby undermining the adherence of the journalists to the professional code of conduct and preventing establishment of a single self-regulation body for the Montenegrin media. The report also found resistance on the part of authorities to provide the necessary data for research on media financing, as well as evidence that media outlets that report positively on the activities of the government are likely to be “rewarded” by advertising revenue and public funds, whereas the critically oriented media is “punished” by withdrawal of these resource. At the same time, lack of reliable data on the size of the audience of individual media outlets in Montenegro makes it difficult to estimate impartially the returns on this type of spending.

²⁶ <http://media.cgo-cce.org/2015/11/cgo-cce-eroding-freedoms.pdf>

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On the basis of our research and insight into the current state of affairs, we formulated the following recommendations to improve the present situation with regard to the media financing: 1) allocate financial resources from the public funds according to the principles of transparency, accompanied by rigorous implementation of public procurement rules; 2) ensure that the spending on advertising by public sector bodies is based on impartial criteria of cost-effectiveness of the service proportional to the audience of individual media outlets, as well as the levels of public trust; 3) establish clear mechanisms of control of financing from public funds and allocation of state aid to the media. Public funds must be available to all media, under clearly defined criteria, via public competition or tender, and under the same conditions for all interested media outlets; 4) publish information on all funds allocated to the media by public authorities on the websites of public sector bodies in order to ensure transparency of public spending and make data on the public financing of the media and its potential abuses available for independent analysis; 5) establish a single self-regulation body that would promote adherence to the journalists' code of conduct, and thus foster the integrity and credibility of the media and help protect media independence; 6) gather independent and reliable information on the size of the audience of individual media outlets to establish a basis for fair and impartial allocation of resources for advertising by public sector bodies.

IMPLEMENTATION OF THE LAW ON FREE ACCESS TO INFORMATION AND CONDUCT OF THE AGENCY FOR PROTECTION OF PERSONAL DATA AND FREE ACCESS TO INFORMATION

Data collection for the study “*Equal chances for all media in Montenegro*” predominantly relied on mechanisms provided by the Law on Free Access to Information. The research included 342 public sector bodies, of which 226 responded, while 166 or 34% did not provide requested information.

Public sector organs that failed to provide requested information, thereby directly violating the provisions of the Law on Free Access to Information, can be classified into two groups.

The first group consists of the bodies that have opted for the principle of administrative silence. Despite months of efforts by the CCE’s research team, which included repeat requests for information and direct communication with the responsible officials and higher management, the requested data were not provided. On the “*black list*” of these **non-transparent bodies** are: the Ministry of Economy, Ministry of Labour and Social Affairs and the Ministry of Transport and Maritime Affairs, Capital City Podgorica, municipalities of Bar, Ulcinj and Plav, Agency for Environmental Protection, Agency for Foreign Investment Promotion, Institute of Public Health, National Parks of Montenegro, Montenegrin Airports, Plantation “13 jul”, Railway Infrastructure of Montenegro, and numerous other public bodies and institutions whose budgets are small and whose contribution to the country’s advertising market was judged to be minimal.

In *the second group* are those bodies that rejected our request as unfounded. This is difficult to justify, given that the majority of public institutions we approached considered our request justified and provided the necessary information. The refusal to provide information was especially widespread among public institutions and enterprises. This suggests that even after many years of implementation of the Law on Free Access to Information, numerous trainings for the responsible public officials and establishment of special units within these institutions, different actors within the public sector adhere to different interpretations and practices in the implementation of this Law.

In both cases, it should be noted that it is *unacceptable that institutions financed by the taxpayers’ money should refuse to give account of the manner in which they spend this money, and that such practices are bound to raise suspicions about the ways these funds are being allocated, their recipients and their purpose.*

Moreover, even the institutions that agreed to provide the information often failed to do so in a timely manner, exceeding the legal deadline of 15 days. Out of 226 public sector bodies that responded to

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our requests for information, only 140 did so within the legal deadline of 15 days. The average waiting period to receive information was *90 days*, and a few bodies submitted their responses just before the data collection ended, i.e. *after no less than 210 days*.

In order to obtain information from the authorities that failed to comply with the legal obligation to respond to our requests, the CCE filed complaints against them before the Agency. All complaints were promptly and positively resolved in CCE's favour. However, even that was not enough to ensure access to the necessary information.

For example, the Agency's decision instructed the following ministries and local governments to submit the requested information - Ministry of Economy, Ministry of Transport and Maritime Affairs, Ministry of Labour and Social Affairs, as well as municipalities of Bar, Ulcinj and Plav. The information was, however, never delivered, and repeated calls by our researchers failed to secure access to the requested data. The question thus remains: what is it that these authorities are hiding, at the cost of violating the law?

Bearing in mind the mild penalties envisaged by the Law on Free Access to Information, which prescribes a fine of 500 euro to 20 000 euro for the failure to observe its provisions, it is clear that those public bodies that opt for administrative silence consider it more "profitable" to hide certain information from the public eye.

It is also paradoxical that these bodies are paying the fines for violating the laws from the public coffers, i.e. with the money of the same citizens of Montenegro from whom they are withholding information!

It should also be noted that public sector bodies that have submitted information have not done so in a uniform manner, nor was the quality of information provided even across the institution, all of which significantly extended the time CCE to spend on researching and analysing the data.

Out of 342 public sector bodies we approached with requests for access to information, **226 or 66%** answered positively. This constitutes a slight decline compared to the previous year's survey, when 67% of public sector bodies responded positively to the submitted requests

PUBLIC SPENDING IN THE MEDIA SECTOR IN MONTENEGRO IN 2014

The aim of this research is to make available information on investments into Montenegrin media that come from the budget funded by the taxpayers. It also makes recommendations to prevent, or at least minimize, various forms of latent control of the media by public authorities through selective allocation of the public funds, and thereby prevent adverse effects on the media freedom.

According to the plan of the internal organization of the public sector²⁷, as outlined in the Public Administration Reform Strategy for 2011-2016, the public sector consists of:

Ministries
+ Administrative bodies
+ Public institutions at the national level
+ Other bodies
= CENTRAL GOVERNMENT
Agencies with public powers (regulators and independent bodies)
+ Units of local self-government (local government bodies and public institutions under municipal ownership)
= GENERAL GOVERNMENT
+ Judiciary (courts, prosecutions and processing bodies)
+ State Audit Institution
+ Auditing body
+ Protector of Human Rights and Freedoms
+ President of Montenegro
+ Public enterprises (local and national)
+ Javna preduzeća (lokalna i državna)
= PUBLIC SECTOR

The study conducted by the CCE 342²⁸ public sector bodies, as follows:

1. Public bodies²⁹

- ✓ General Secretariat of the Government and 16 ministries,
- ✓ 22 administrative organs within ministries,
- ✓ 6 independent administrative organs,
- ✓ 2 secretariats,
- ✓ 13 bureaus,
- ✓ 5 directorates,
- ✓ 1 agency.

²⁷ Plan of the internal organization of the public sector, Ministry of Interior of Montenegro, Podgorica, 2013.

²⁸ Detailed list is available in Appendix 1.

²⁹ <http://www.gov.me/organizacija>

2. Municipalities (units of local self-government)

- ✓ 23 municipalities and 2 urban municipalities (Tuzi and Golubovci)

3. Independent bodies³⁰

- ✓ 17 agencies
- ✓ 7 funds

4. Public institutions and enterprises in which the state or municipalities hold majority ownership

- ✓ 219 public institutions and enterprises in which the state or municipalities hold majority ownership

5. Parliament of Montenegro

6. Judiciary (courts and prosecutions)

7. Protector of Human Rights and Freedoms

8. President of Montenegro

Although it is officially a body within the Ministry of Finance, the *Commission for Allocation of the Part of Revenue from Games of Chance* was treated as a separate subject of research. The reason we decided to analyse the Commission independently is that the Law on Electronic Media mandates allocation of a part of funds from this source for media financing in order to encourage media pluralism. As the money for this purpose comes from the Budget of Montenegro, inclusion of the Commission's funds that are partly distributed to the media on project basis was necessary in order to get a more complete picture of the public funding to the sector.

The research has also mapped **120** subjects, individuals and legal entities, that received money from public sources in 2014 in payment of services such as advertising, promotion or other specialised services in this field. Compared to the previous year, 2013, the number of identified subjects is reduced by nine. The subjects were divided into the following categories:

1. Printed media;
2. Television;
3. Radio;
4. Websites and news agencies;
5. Marketing agencies and production houses;
6. Others (individual or legal entities that cannot be grouped into any of the abovementioned categories).

According to data derived from the documents collected by the CCE, the total amount of funds that were spent by these bodies in 2014 on the media (printed, electronic and radio), websites and news agencies, marketing agencies and production houses, was [EUR 2 125 791.78](#).

Bearing in mind that the above amount represents expenditures of **66% of public sector bodies** identified by this research, it can be reasonably assumed that the total amount would be nearly twice as large. This is supported by the fact that the *Capital City Podgorica*, as one of the bodies that regularly opts to refuse the data, is composed of 38 bodies (4 professional services, 4 special services, 7 secretariats, 1 administration, 1 directorate and 20 public services). For four years already all CCE's efforts to gather the necessary data on this issue from the Capital City have remained fruitless. Furthermore, despite all the efforts of the research team, no information could be obtained from the Ministry of Economy, Ministry of Transport and Maritime Affairs, Ministry of Labour and Social Affairs, or the municipalities of Bar, Ulcinj and Plav. It can thus be safely assumed that the amount of public spending by ministries and local self-governments, as well as by all public sector bodies, would be significantly increased with the inclusion of these entities.

³⁰ Montenegro does not possess a unified legal framework on the system and position of organizations that exercise public powers. The absence of a systemic law regulating agencies and other organizations that can exercise public powers results in tremendous diversity in their status and functioning, as well as in insufficient control over the legality and effectiveness of their work. The most common organizational forms of exercising the public powers are *agencies, commissions, funds, bureaus and others*.

Furthermore, adding together all public funds, i.e. taxpayers' money, that the state invested into public and commercial broadcasters during 2014: **EUR 10 482 440** for the Public Service RTCG, **EUR 2 599 000** for local public services, and **EUR 2 125 791.78** for marketing services and advertising in the media, or through other forms of contracts, we can conclude that the state has spent a minimum of **EUR 15 207 231** of public money on the media in this year.

GENERAL OVERVIEW THE ALLOCATION OF FUNDS BY CATEGORY OF SERVICE PROVIDERS

A total of **EUR 2 125 791.78** was spent in the following way: **EUR 213 570.82 or 10.1%** for the printed media; **EUR 294 907.34 or 13.9%** for TV channels; **EUR 511 097.34 or 24%** for radio stations; **EUR 169 209.45 or 7.96%** for websites and news agencies; and **EUR 902 229.99 or 42.4%** for marketing agencies and production houses. Another **8 413.10 or 0.4%** was spent on the international and regional media, and another **EUR 26 363.93 or 1.24%** in the category "other".

Note: Due to the small share they represent in the total amount of spending on media (less than 1%), international and regional media are excluded from the graphic representation of annual allocations.

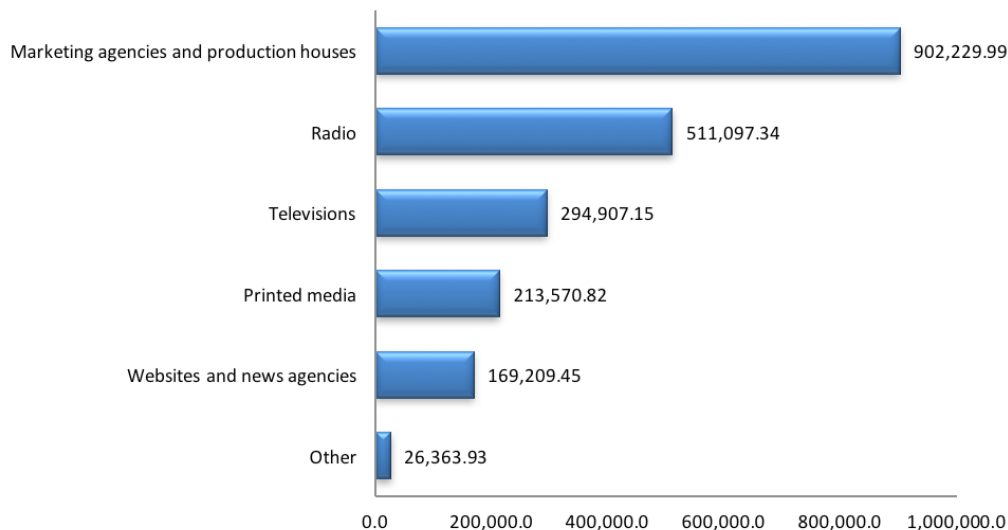


Figure 3: Overview of total spending by category, in EUR

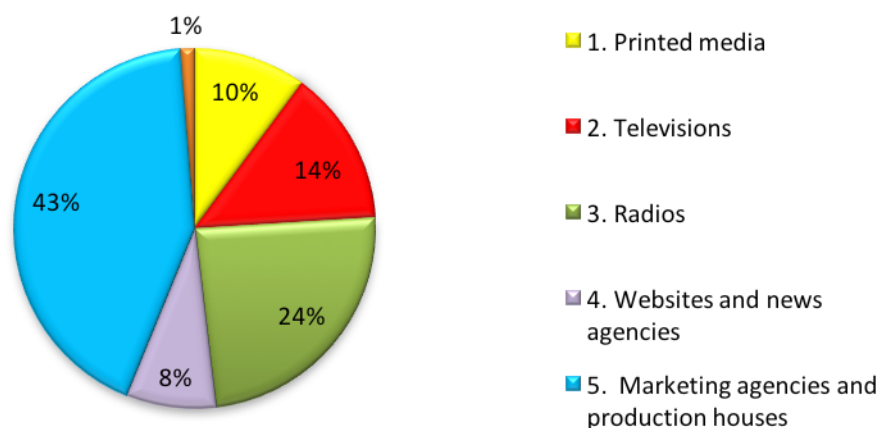


Figure 4: Overview of total spending by category of the media, in %

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

Overall, out of the total of 120 subjects that have, in various forms and on various grounds, been engaged to provide media services to public sector bodies, we should single out those who received the highest amount of funds from all public sources.

Note: Includes all subjects that received over EUR 10 000 from public sources in 2014

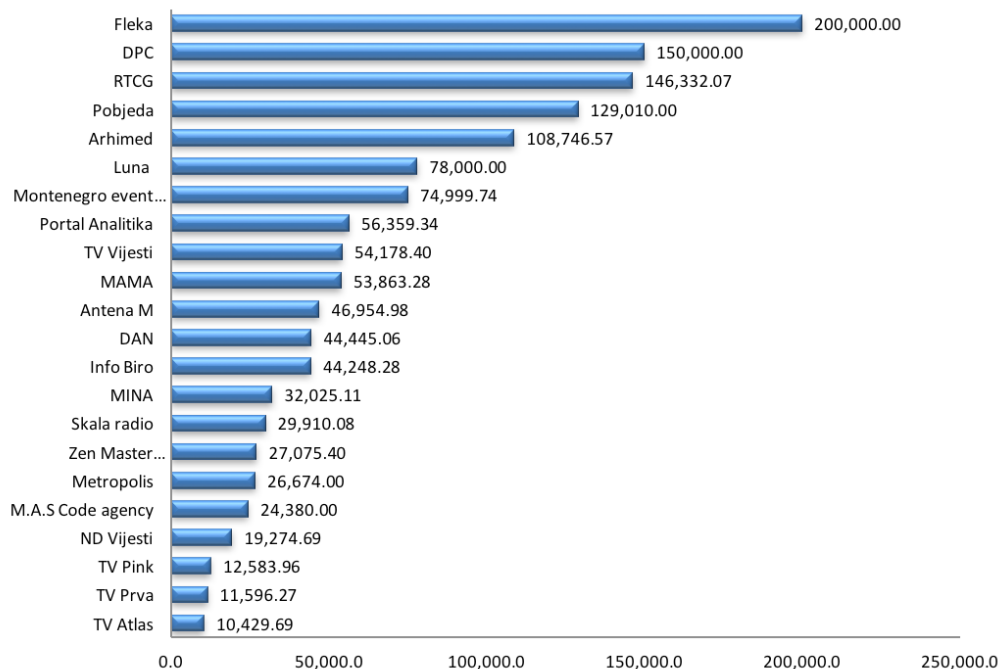


Figure 5: Overview of the largest individual beneficiaries, in EUR

In addition to those subjects that received the largest individual amounts from all public sector bodies for the services provided, subjects that received the most funding as public broadcasters at the local level, from the budgets of municipalities in which they operate were: *Radio Herceg Novi* - EUR 230 866.43, *Radio Berane* - EUR 102 400 and *Radio Andrijevica* EUR 61 740.

To avoid confusion and to ensure consistent methodology, public broadcasters that received money on grounds of support to public services were not included in the figure of largest individual beneficiaries, which therefore only includes the outlets that received funds from the public bodies through contract for various forms of services.

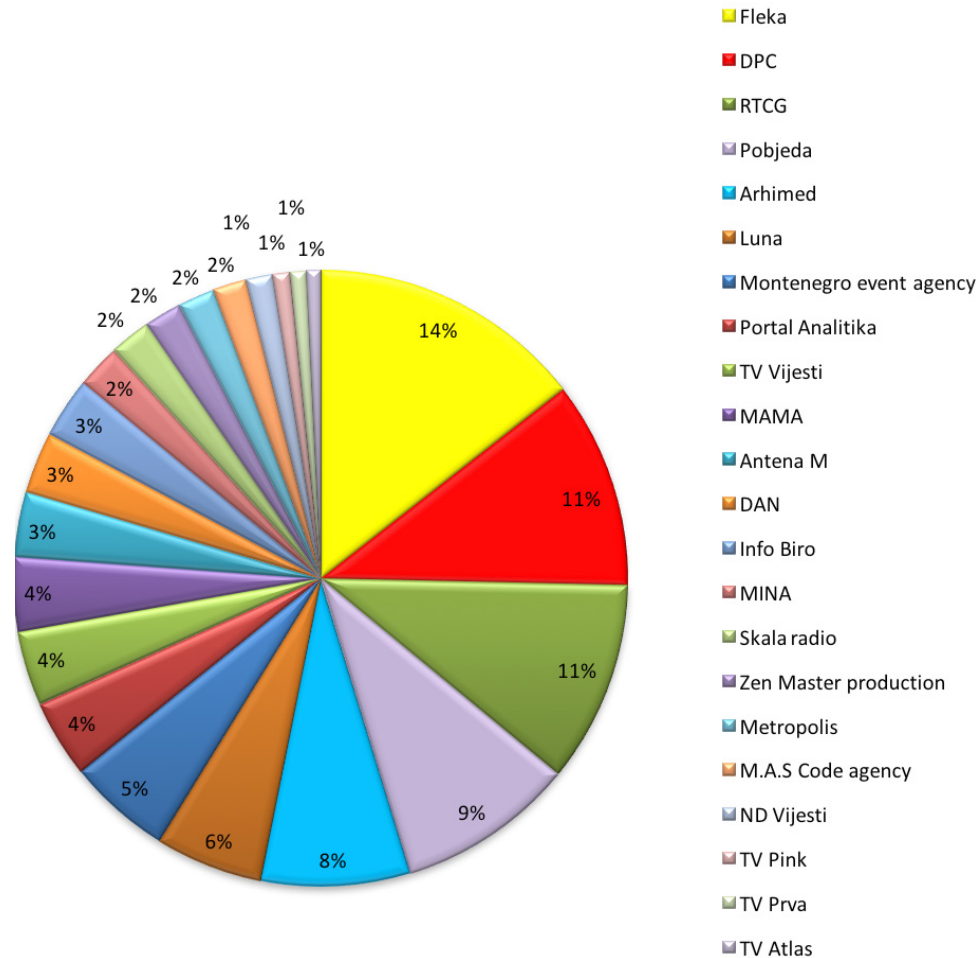


Figure 6: Overview of the largest individual beneficiaries, in %

A more detailed analysis of the collected data offers insight into the sources from which these entities received the largest amount of funding. Company “Fleka” earned EUR 200 000 from the public sector contracts, all of it from the Ministry of Sustainable Development and Tourism. The basis of payment is provision of services for on-line promotional campaign, design and content upload to the Ministry’s website, lease of advertising space on the Internet for the promotion of tourism and promotion via social networks.

“Fleka” was selected as the best bidder via public call. The same ministry also paid EUR 150 000 to DPC, the second highest beneficiary of public spending on media advertising in 2014. Among TV stations, public broadcaster RTCG earned the highest amount - EUR 146 332.07, from various public sector bodies. The highest revenue, EUR 44 280, came from the Centres for Social Work of Montenegro³¹, EUR 29 371.15 from the Employment Agency of Montenegro, and EUR 13100 from the Montenegrin Energy Enterprise EPCG. Payments from other bodies all fell below EUR 10 000.

Among the printed media in Montenegro, «Pobjeda» once again earned the most from advertising - EUR 129 010. Revenues came from the majority of the public sector bodies, but in the most part from ministries and local self-governments. All other entities listed in figures 5 and 6 received payments from multiple public sector bodies. A detailed overview is presented in separate tables below.

31 Centres: Nikšić, Plužine and Šavnik; Berane, Petnjica and Andrijevića; Bar and Ulcinj; Herceg Novi, Kotor, Tivat and Budva; Plav. Individual payments ranged from 3750 to 5000 and 8570 euro.

GENERAL OVERVIEW OF THE ALLOCATION OF FUNDS BY PUBLIC SECTOR BODIES

The largest amount of funds spent on the media by public sector bodies came from the ministries and other public administration bodies - **EUR 829 859.37 or 39%** of the total. The second largest spender category were local self-governments, with **EUR 629 724.14 or 29.7%**, followed by public institutions and enterprises in which the state or municipalities hold a majority ownership (hereinafter referred to as public institutions and public enterprises), with **EUR 512 228.00 or 24%**, the Parliament of Montenegro (**EUR 87 056 or 4.1%**), and agencies **EUR 66 922.50 or 3.1%**. The judiciary (courts, prosecution) had no spending in this category, and the Protector of Human Rights and Freedoms failed to respond to our request for information.

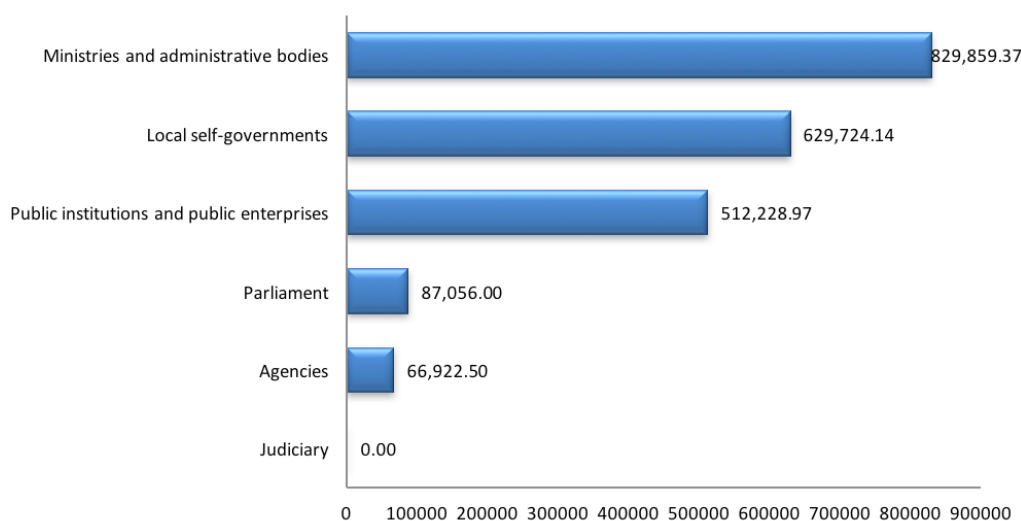


Figure 7: Top spenders on media and media services, in EUR

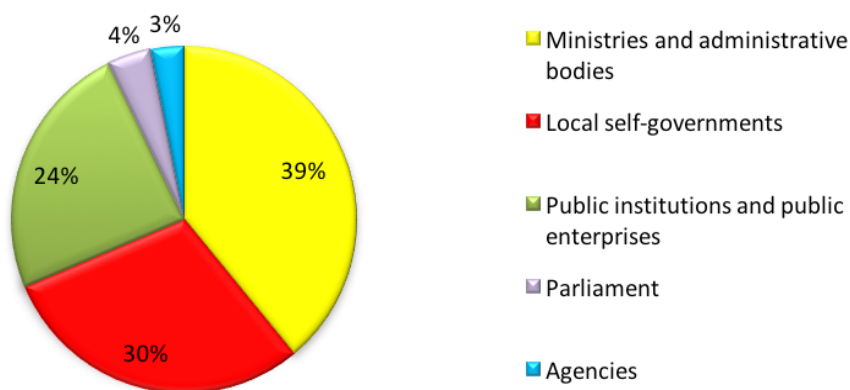


Figure 8: Top spenders on media and media services, in %

It is clear that ministries, together with the administrative bodies attached to them, are the biggest spenders in this sector, with a total of **EUR 829 859.37** in 2014. A comparison with the findings of CCE's research in 2011, 2012 and 2013 shows a steady trend of elevated spending in this area. Bearing in mind the professed commitment of the authorities to reductions in public spending in this period, it is notable that the decision makers found no need to subject this sector to a saving policy.

DETAILED OVERVIEW OF THE ALLOCATION OF FUNDS BY SERVICE PROVIDERS

Marketing agencies and production houses account for the largest share of funds spent on marketing and other media services by public sector institutions. This suggests growing centralization of resources allocated for the media services through marketing and other service contracts compared to 2011, 2012 and 2013. It also makes it more difficult to track down the transfers to individual media outlets and connected bodies. Centralization and concentration of funds towards marketing agencies and production houses offers additional space to public sector bodies to direct funds non-transparently to those media outlets that they deem most appropriate, without a clear procedure. There is no legal possibility to further investigate such cases nor to find out how these funds are further distributed to the media.

To acquire a more complete insight into the tendencies of allocation of public funding to the media by public sector bodies, we analysed the collected data by category of service provided and compared the results for 2014 with those derived from the CCE's research in 2011³², 2012³³ and 2013³⁴.

A total of **EUR 2 125 791.78** was spent on media and media services by the public sector in 2014, out of which **EUR 213 570.82 or 10.1%** on the printed media, **EUR 294 907.34 or 13.9%** on TV channels, **EUR 511 097.34 or 24%** on radio stations, **EUR 169 209.45 or 7.96%** on websites and information services and **EUR 902 229.99 or 42.4%** on marketing agencies and production houses. Another **EUR 8 413.10 or 0.4%** was spent on the regional and international media, and **EUR 26 363.93 or 1.24%** was allocated to "other" entities.

PRINTED MEDIA

The total amount spent for the printed media was **EUR 213 570.82**. The distribution by recipient entity is presented below³⁵.

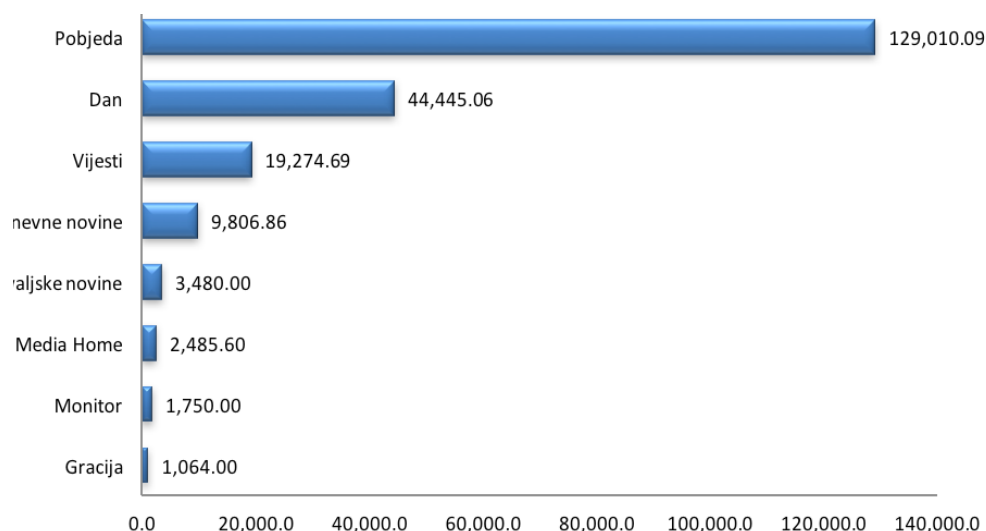


Figure 9: Overview of payments to printed media, EUR

32 <http://media.cgo-cce.org/2013/09/cgo-izdavastvo-koliko-i-kome-poreski-obveznici-u-crnoj-goric-placaju-za-reklamiranje-2011.pdf> i <http://media.cgo-cce.org/2013/09/cgo-izdavastvo-koliko-kojim-medijima-i-srodnim-agencijama-opstine-u-crnoj-gori-placaju-za-usluge-2011.pdf>

33 <http://media.cgo-cce.org/2015/12/cgo-cce-how-much-and-to-whom-do-the-citizens-in-mne-pay-for-adv-2012.pdf>

34 <http://media.cgo-cce.org/2015/10/cgo-cce-equal-chances-for-all-media-in-Montenegro.pdf>

35 Note: the study only took into account those outlets that received at least 1 000 EUR in the course of the year.

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

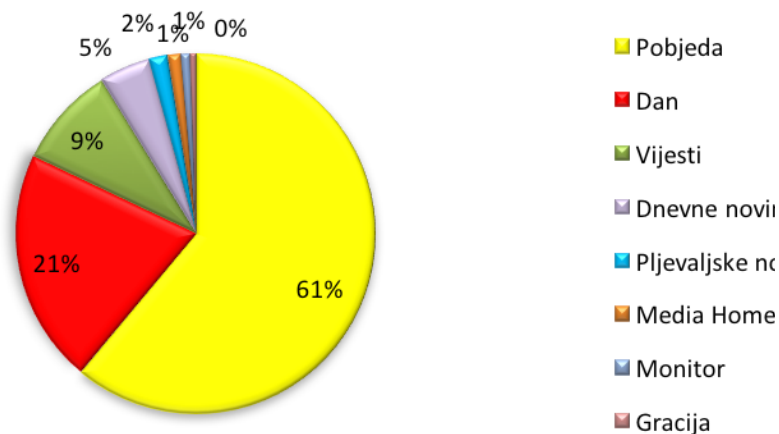


Figure 10: Overview of payments to printed media, % of the total

TELEVISIONS

The total amount spent on TV channels was **EUR 294 907.15**. The distribution by recipient entity is presented below³⁶.

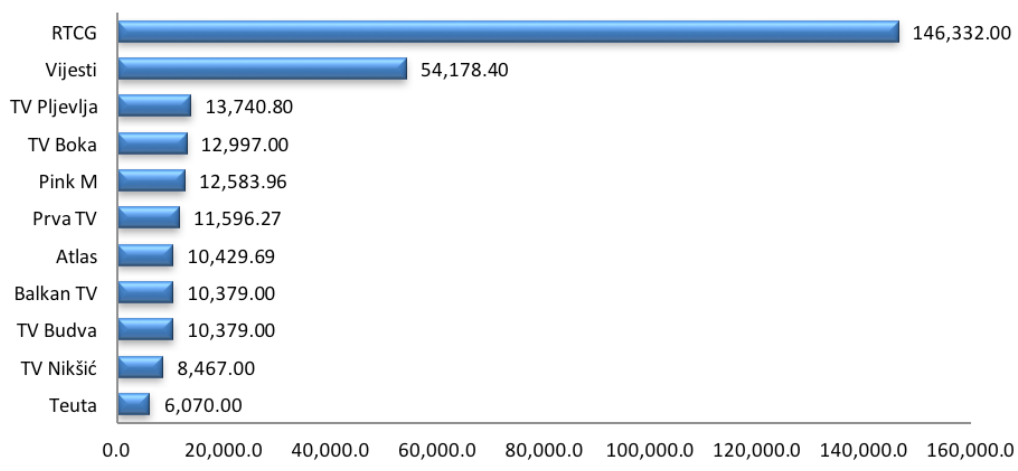


Figure 11: Overview of payments to TVs, EUR

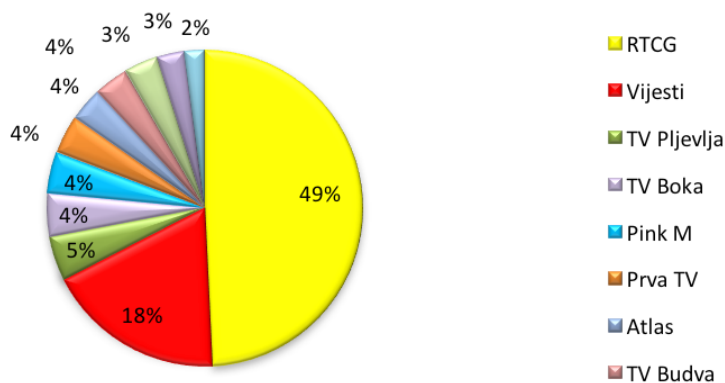


Figure 12: Overview of payments to TVs, % of the total

³⁶ Note: the study only took into account those outlets that received at least 1 000 EUR in the course of the year.

RADIO STATIONS

The total amount spent on radio stations was **EUR 511 097.34**. The distribution by recipient entity is presented below³⁷.

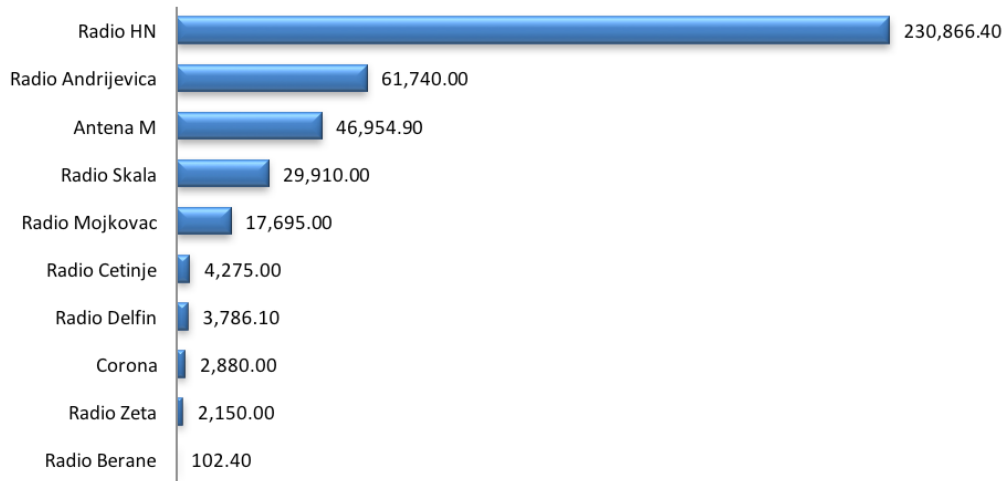


Figure 13: Overview of payments to radio stations, EUR

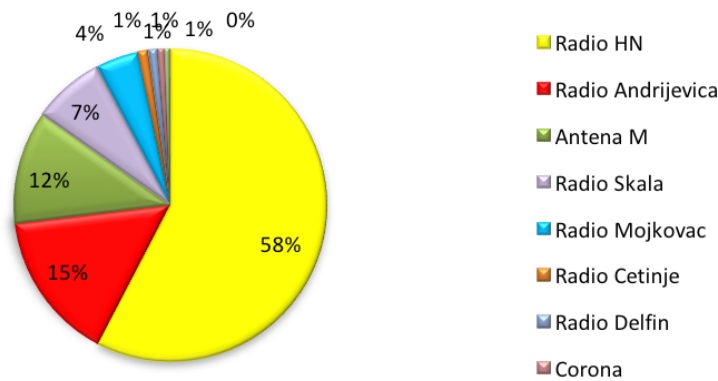


Figure 14: Overview of payments to radio stations, % of the total

It should be noted that the amounts shown above also budgetary allocations by individual municipalities to the local public broadcasters. Chapter 6 contains separate information on the support to local public broadcasters by the municipalities that submitted this information (Herceg Novi, Berane and Andrijevica). Other municipalities did not send us separate information about budgetary support to the public broadcasters, although they were all requested to do so.

In the interest of accuracy, the chapter on local public services includes information on both the planned and the executed amounts from the local budgets for the financing of local public services in 2014.

The exception is the municipality of Herceg Novi, whose response to our request for information stated that Radio Herceg Novi received a transfer from the municipal budget amounting to EUR 230 886.40 EUR, as “funds allocated by the Budget of Municipality of Herceg Novi to the Public Broadcasting Service Radio Herceg Novi for 2014, including arrears for 2013”. As the final budget statement for 2014 had not been published by the time of the conclusion of this report, it was not possible to verify the information.

³⁷ Note: the study only took into account those outlets that received at least 1 000 EUR in the course of the year.

WEBSITES AND NEWS AGENCIES

The total amount spent on websites and news agencies is **EUR 169 209.45**. The distribution by recipient entity is presented below³⁸.

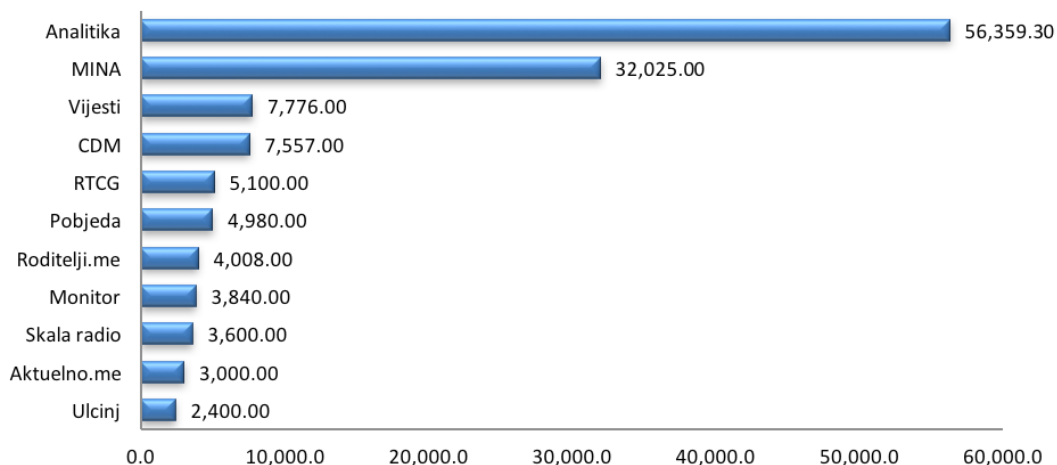


Figure 15: Overview of payments to websites and news agencies, EUR

All websites from this list received payments from the Montenegrin Energy Enterprise, and these funds accounted for the entirety of public funding received by Vijesti, RTCG, Skala radio website, Pobjeda, Monitor, Roditelji.me, Aktuelno.me, Ulcinj. Other websites received payments from multiple public sector bodies.

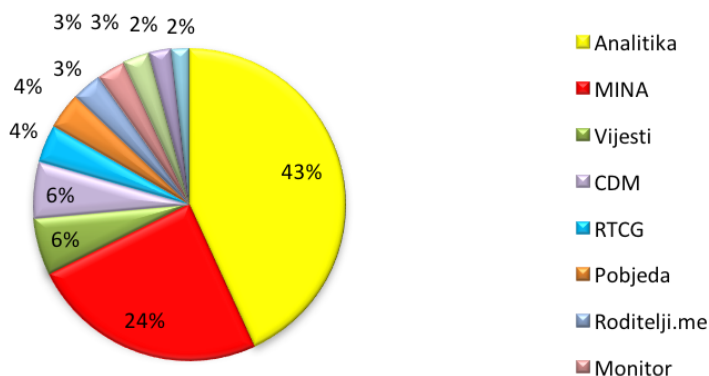


Figure 16: Overview of payments to websites and news agencies, % of the total

³⁸ Note: the study only took into account those outlets that received at least 1 000 EUR in the course of the year.

MARKETING AGENCIES AND PRODUCTION HOUSES

A total of **EUR 169 209,45** was spent on marketing agencies and production houses. The distribution by recipient entity is presented below³⁹:

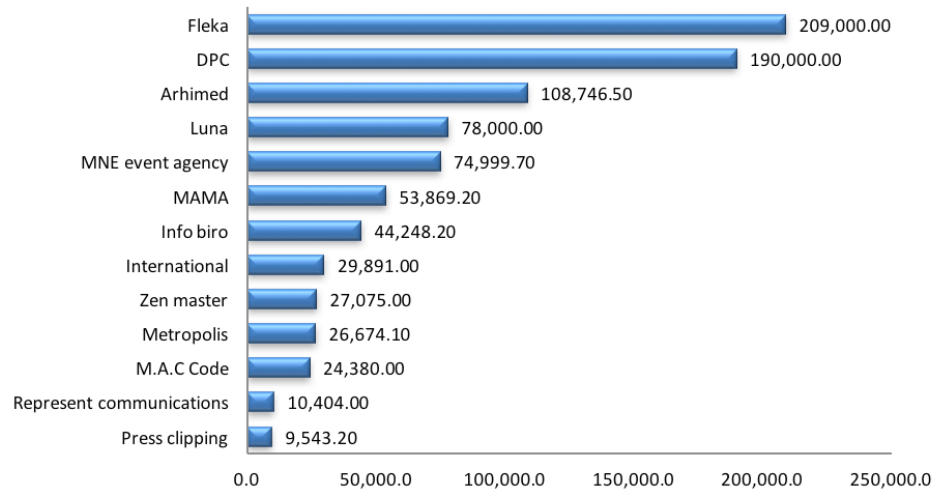


Figure 17: Overview of payments to marketing agencies and production houses, EUR

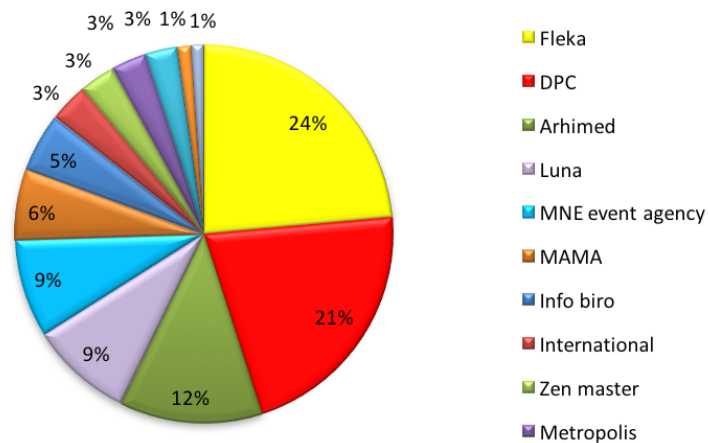


Figure 18: Payments to marketing agencies and production houses, % of the total

³⁹ Note: the study only took into account those outlets that received at least 5 000 EUR in the course of the year.

OTHER

The category “other” accounted for **EUR 26 363.93** of public funding for media and media services in 2014, and included payments to the following entities:⁴⁰

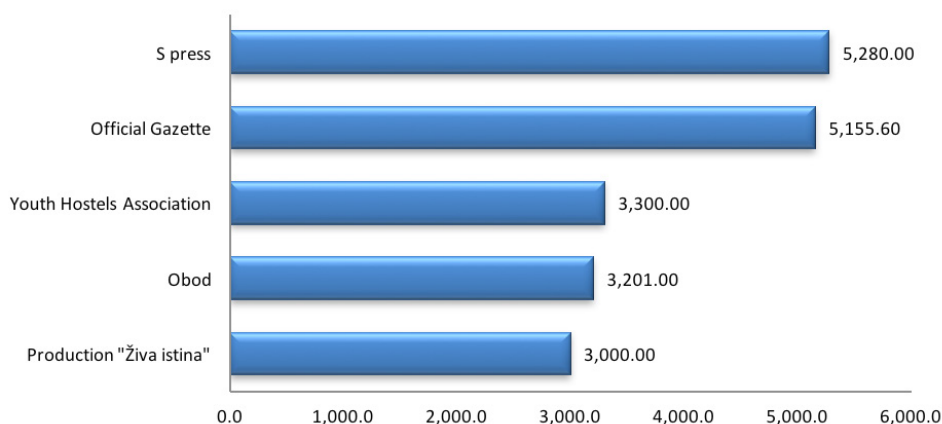


Figure 19: Overview of payments to other entities, EUR

DETAILED OVERVIEW OF THE ALLOCATION OF FUNDS BY PUBLIC SECTOR BODIES

The following is a detailed analysis of the collected data by the size of spending by individual public sector bodies, and not by their position and importance within the political system.

MINISTRIES

As already noted, the ministries and the administrative bodies within them spent the largest amount of money on media and media services in 2014 - **EUR 829 859.37, or 39%** of the total. Of this amount, the ministries alone spent **EUR 680 184.50**. The largest single spender was the Ministry of Sustainable Development and Tourism, with EUR 491 690.63, while according to the submitted information the Ministry of Health and Ministry of Agriculture and Rural Development did not have any expenditures on media services in 2014. The Ministry of Economy, Ministry of Transport and Maritime Affairs and the Ministry of Labour and Social Affairs failed to provide the requested information, even after the Agency instructed them to do so.

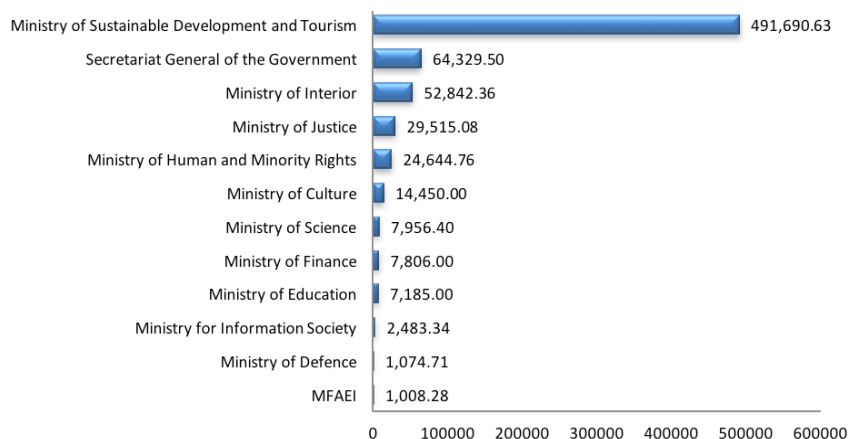


Figure 20: Expenditure on media by ministry, EUR

40 Note: includes only those outlets that received over EUR 1 000 in the course of the year.

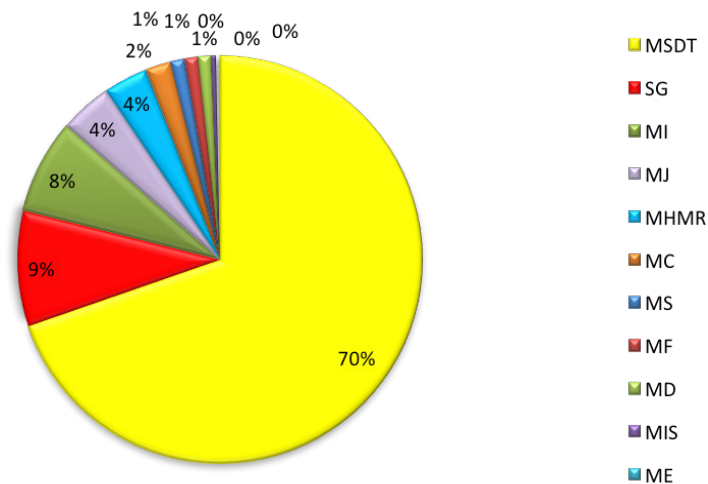


Figure 21: Expenditure on media by ministry, % of the total

Considering the major processes of international integration currently under way in the country, which are being led by the Ministry of Defence and the Ministry of Foreign Affairs and European Integration, and for which there are existing communication strategies whose purpose is to educate the citizens of Montenegro about the benefits of these processes, as well as the fact that activities envisaged by these strategies frequently involve media advertising and campaigns, it is surprising that these two ministries reported such a low level of spending on the media. If we trust their information, we must ask where the money came from for the campaigns conducted in the course of 2014, whose value obviously exceeded the EUR 1 008.28 and EUR 1 074.71 reported respectively by the two ministries.

Out of the total amount spent on the media, the ministries covered by this study spent **EUR 16 858.50 or 2.5%** on printed media; **EUR 5 106.53 or 0.7%** on TVs; **EUR 8 951.98 or 1.3%** on radio stations; **EUR 28 246.62 or 4.1%** on websites and news agencies; **EUR 611 106 or 89.9%** on marketing agencies and production houses; and **EUR 10.095.00 or 1.5%** on “other”.

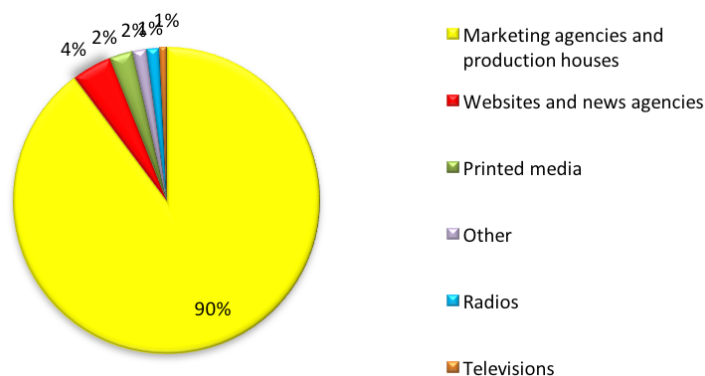


Figure 22: Payments per category of media, % of the total

There is a noticeable trend of centralisation of government spending, against which the Centre for Civic Education (CCE) has already warned in its previous reports. The reallocation of the funding from individual outlets to marketing agencies dealing with the purchase of media space, which is clearly visible in the above example, undermines the principle of transparency as it makes it impossible to monitor final distribution of money to the media.

Out of the overall amount of funding spent by the ministries on media, the printed media received **EUR 16 858.50**.

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

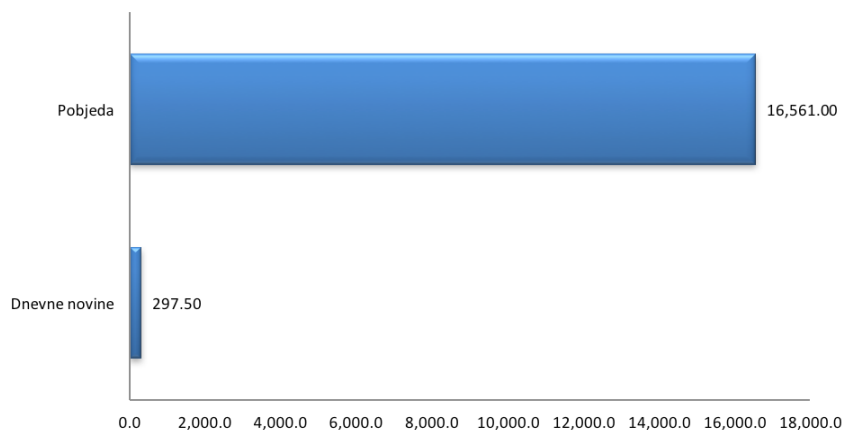


Figure 23: Payments to printed media by ministries, in EUR

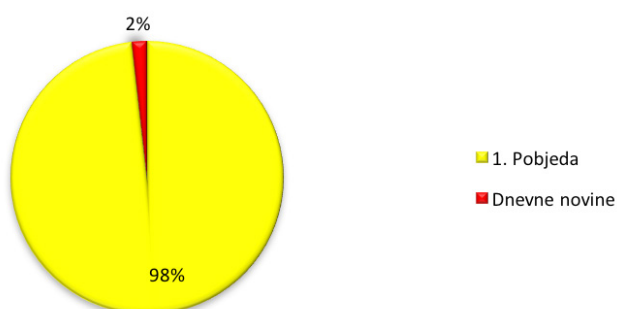


Figure 24: Payments to printed media by ministries, % of the total

This amount, nearly all of which was paid to the newspaper Pobjeda, came from several ministries: Ministry of Interior, Ministry of Finance, Ministry of Education and Sports, Ministry of Science, Ministry of Sustainable Development and Tourism and the Ministry of Human and Minority Rights.

The national televisions received a total of EUR 5 106.50 from the ministries.

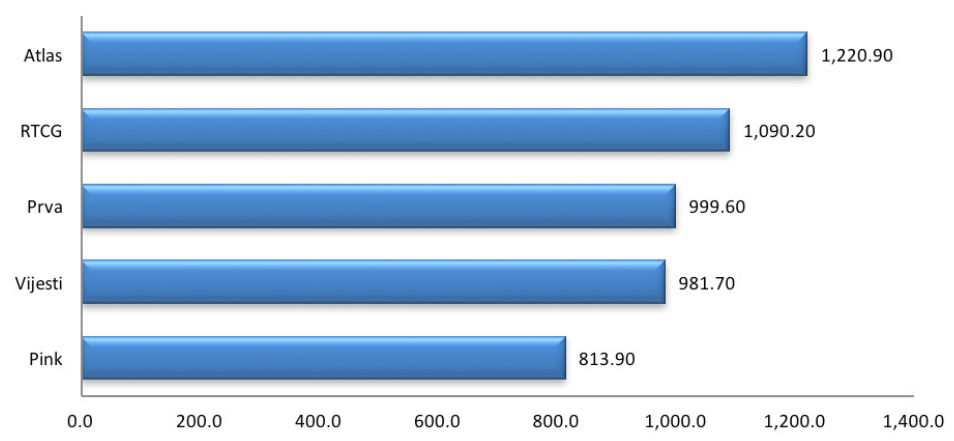


Figure 25: Payments to TVs by ministries, in EUR

All payments to the TVs came from the Ministry of Justice

The total amount of funds spent on radio stations was EUR 8 951.98.

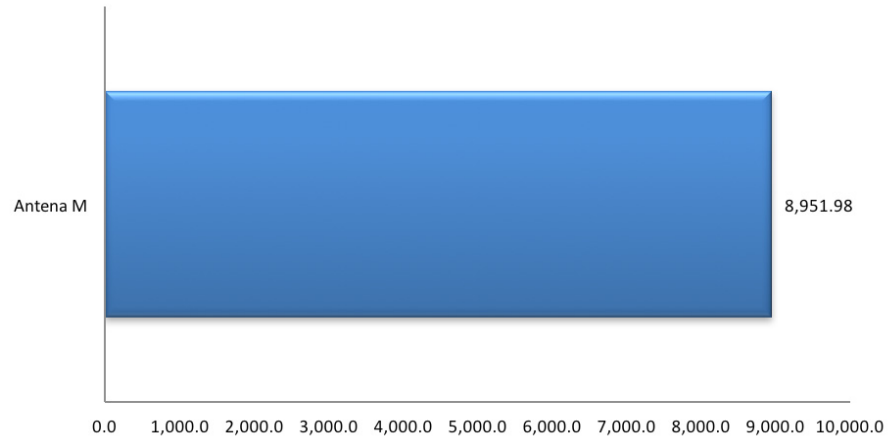


Figure 26: payments to radio stations by ministries, in EUR

The total amount of public spending on radio stations by the ministries went to radio Antena M. The money came from two ministries: the Ministry of Justice and the Ministry of Sustainable Development and Tourism.

Websites and news agencies earned EUR 28 246.62 from services to the ministries in 2014.

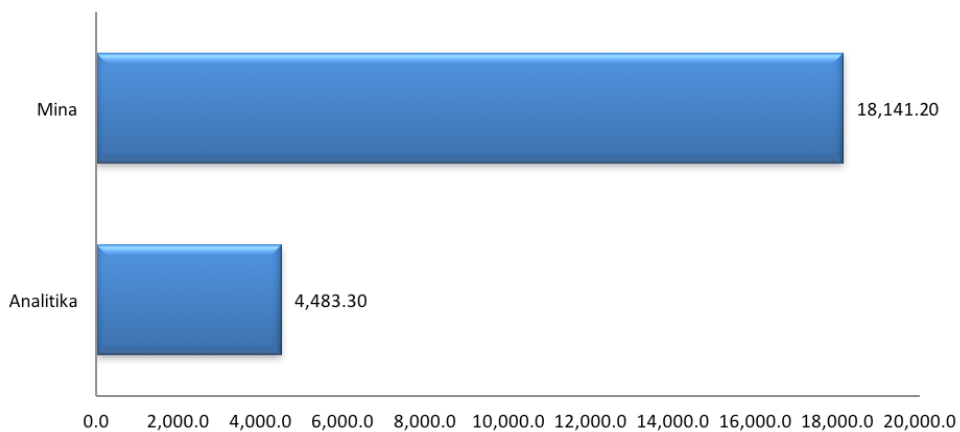


Figure 27: Payments to websites and news agencies by ministries, in EUR

Meanwhile, a total of EUR 611 106.72 was spent on marketing agencies and production houses

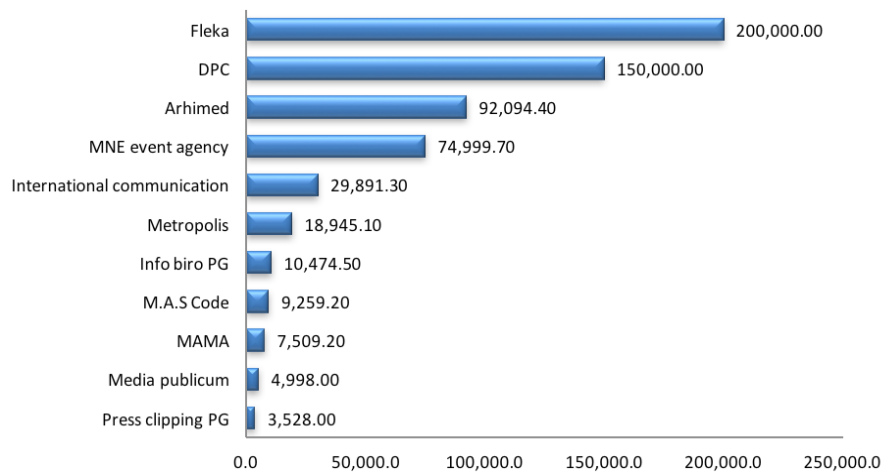


Figure 28: Payments to marketing agencies and production houses by ministries, in EUR

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

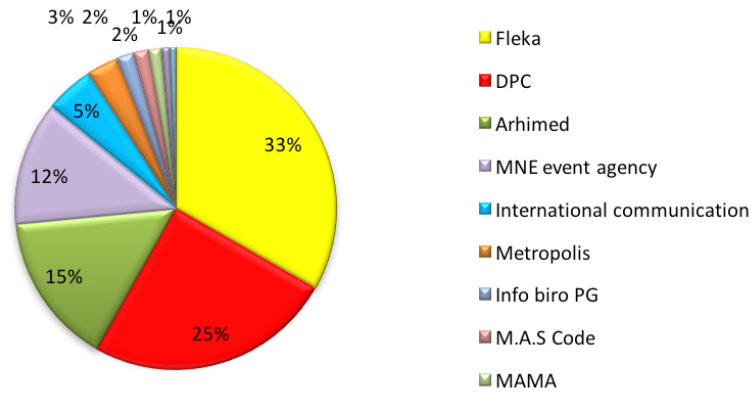


Figure 29: Payments to marketing agencies and production houses by ministries, % of the total

The category “Other” includes individuals or legal entities that could not be classified under any of the above categories, according to information received by CCE or according to publicly available information. For example, out of the EUR 10 095.71 spent by the ministries in this category, EUR 5 280 went to the company S press PG, while another EUR 3 300 was paid to the Youth Hostels Association.

Given the importance of the Government and the ministries as executive authorities and makers of public policies, and in this particular research also the largest consumers in the system, it is necessary to present the detailed cost structure of each of these bodies.

The **Secretariat General of the Government of Montenegro** spent EUR 64 329.50 on media services in 2014.

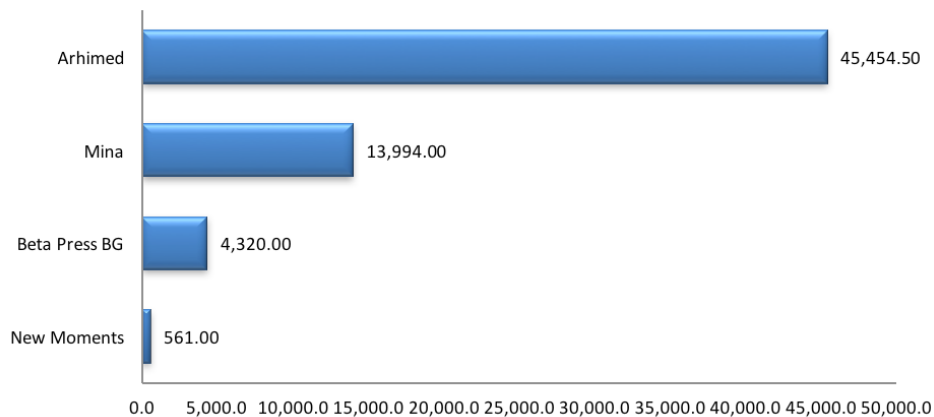


Figure 30: Expenditure of the General Secretariat of the Government of Montenegro, in EUR

As in the previous years, **Ministry of Sustainable Development and Tourism** was the top spender on media services among all government bodies, with the total expenditure of EUR 471 690.63.

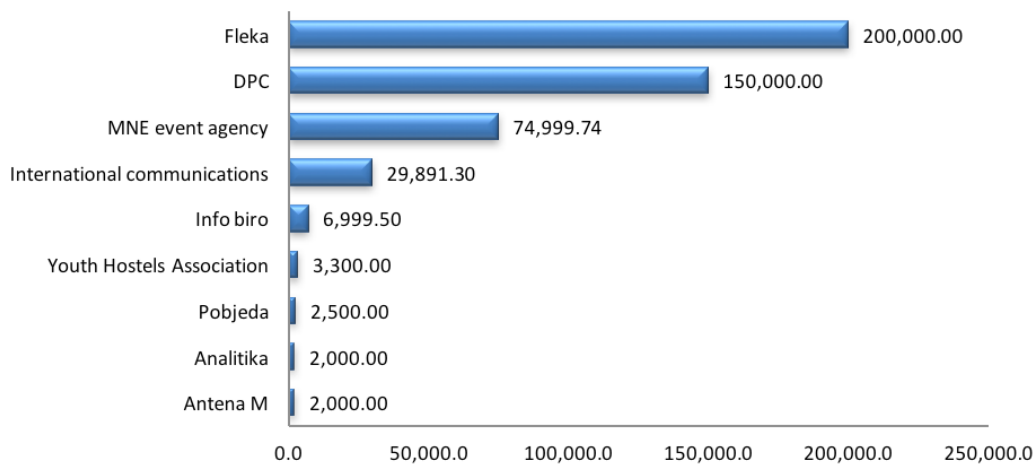


Figure 31: Structure of expenditure by Ministry of Sustainable Development and Tourism, in EUR

The Ministry of Interior spent a total of EUR 52 842.36.

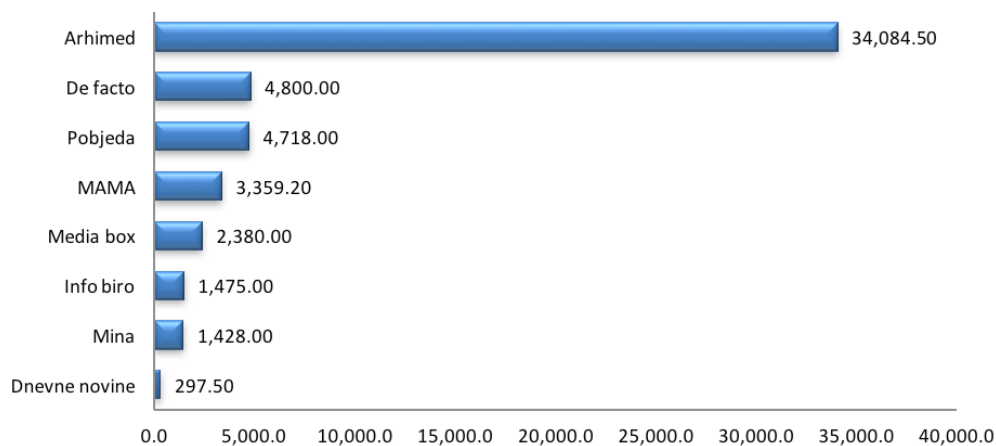


Figure 32: Structure of expenditure by Ministry of Interior, in EUR

The total spending by the Ministry of Justice was EUR 29 515.08.

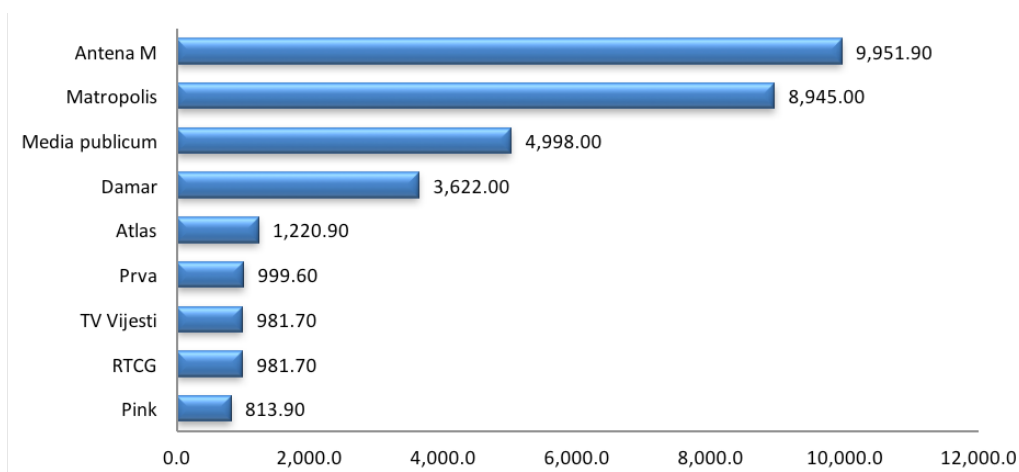


Figure 33: Structure of expenditure by Ministry of Justice, in EUR

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

The total expenditure by the **Ministry for Human and Minority Rights** was EUR 24 644.76.

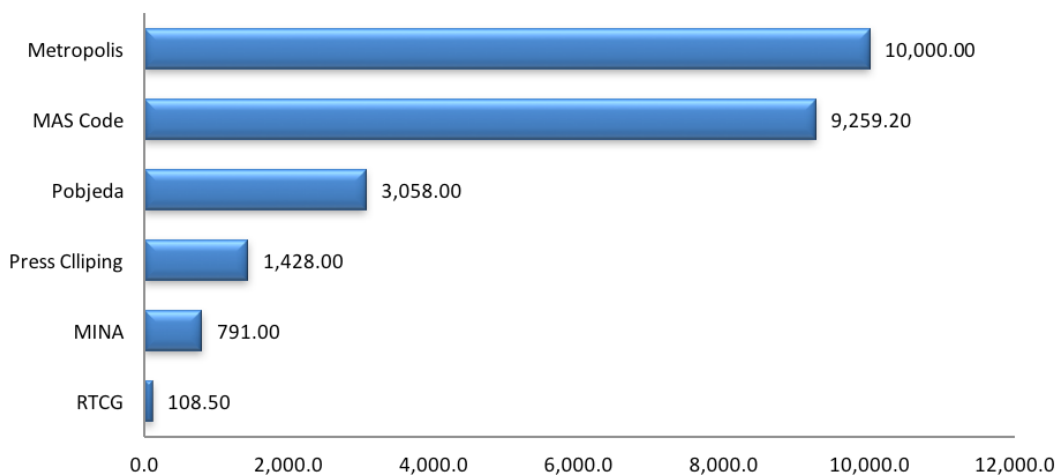


Figure 34: Structure of expenditure by Ministry of Human and Minority Rights, in EUR

The total expenditure by **Ministry of Culture** in 2014 was EUR 14 450.00

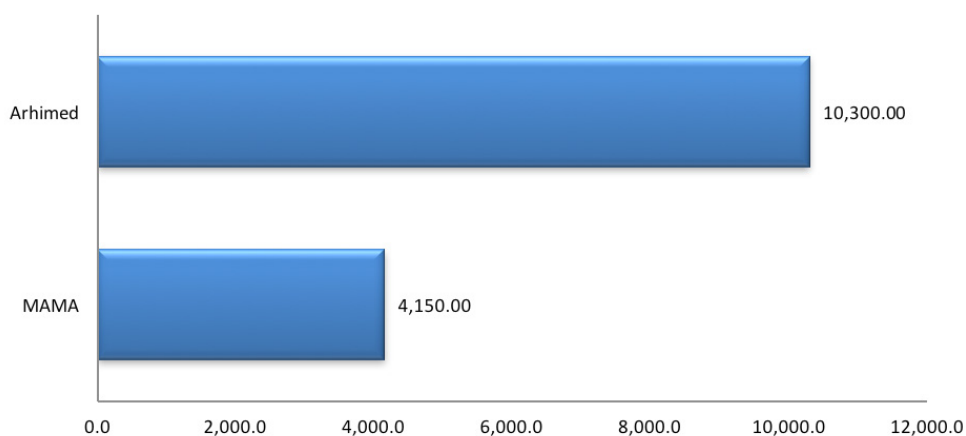


Figure 35: Structure of expenditure by Ministry of Culture, in EUR

The total amount spent by the **Ministry of Science** was EUR 7 956.40.

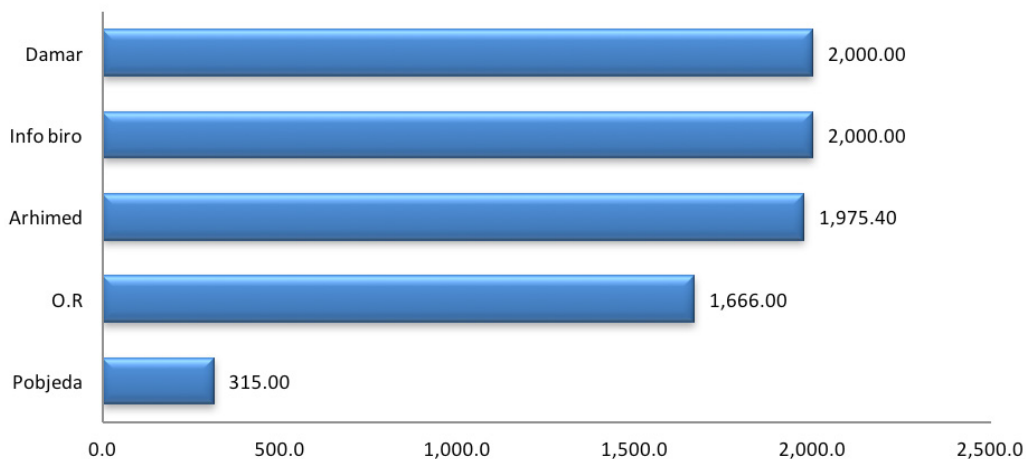


Figure 36: Structure of expenditure by Ministry of Science, in EUR

During 2014, **Ministry of Finance** paid EUR 7 806 for media services.

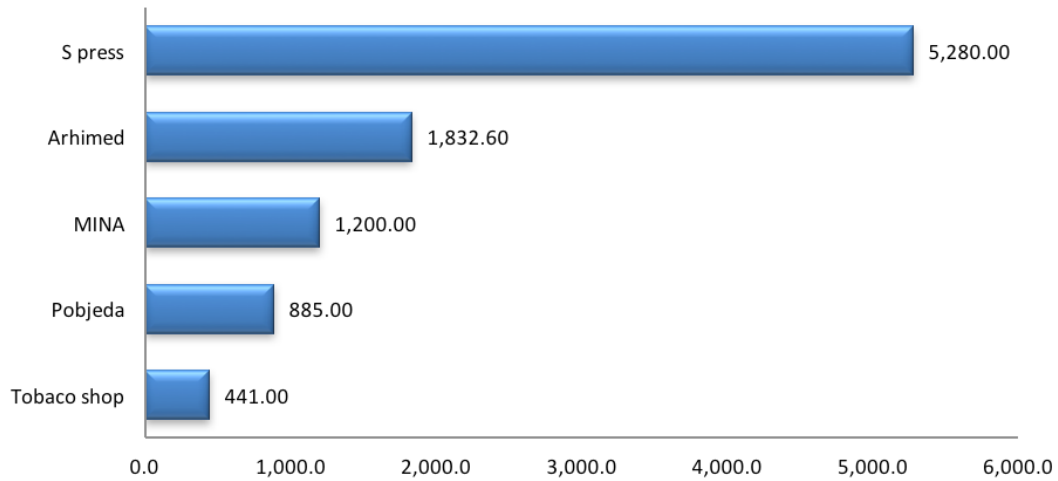


Figure 37: Structure of expenditure by Ministry of Finance, in EUR

The total amount spent on the media, news agencies and websites, marketing agencies and production houses by the **Ministry of Education and Sports** was EUR 7 185.

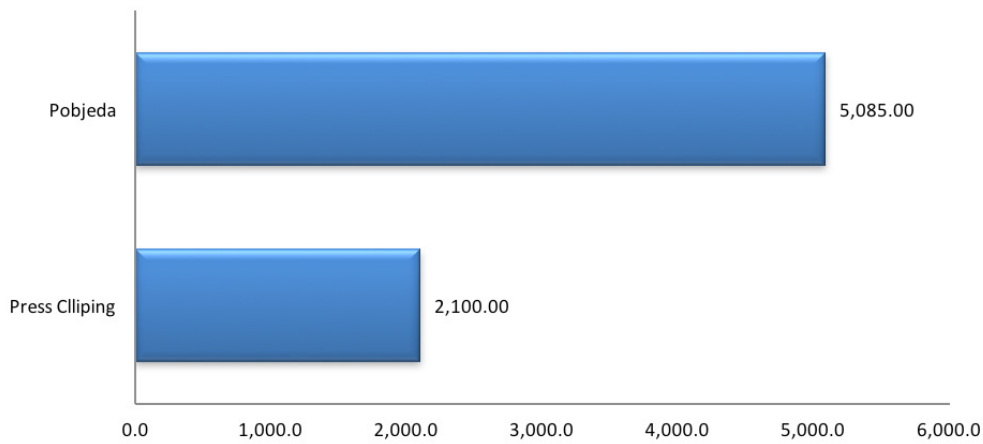


Figure 38: Structure of expenditure by Ministry of Education and Sports, in EUR

The total amount spent by the **Ministry for Information Society and Telecommunications (MIST)** was EUR 2 483.34.

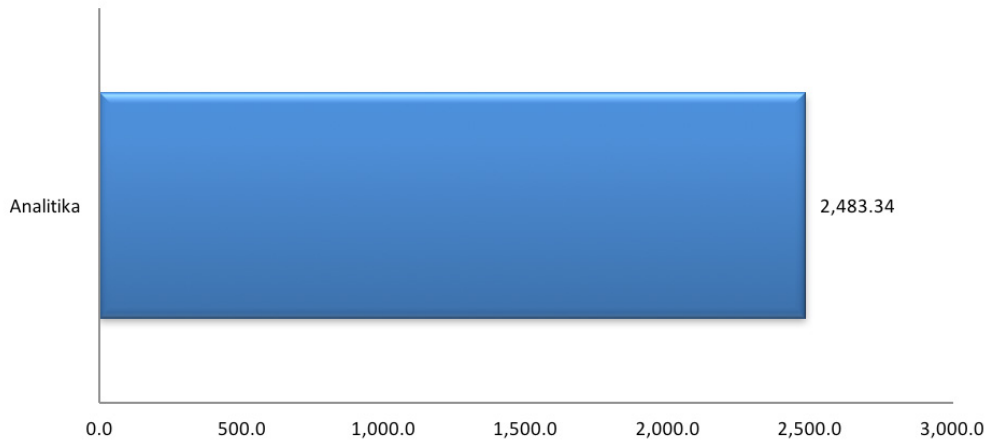


Figure 39: Structure of expenditure by MIST, in EUR

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

Ministry of Foreign Affairs and European Integration (MFAEI) spent only as allocated only EUR 1008.28 on media in 2014.

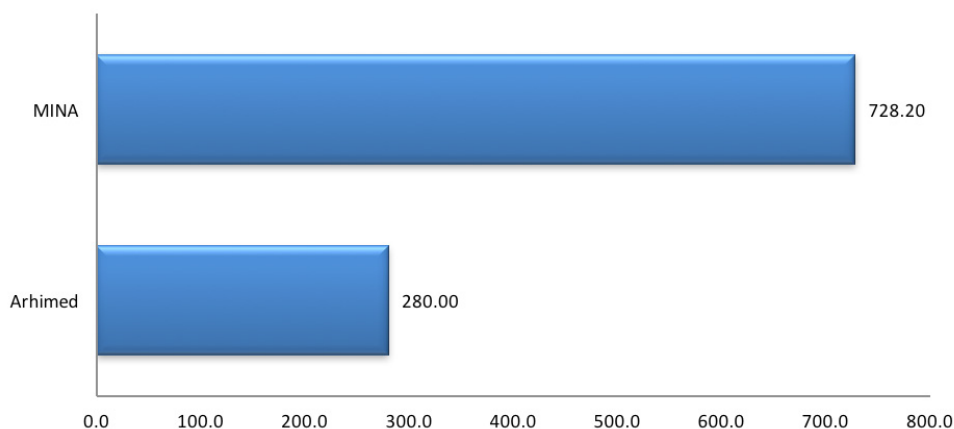


Figure 40: Structure of expenditure by MFAEI, in EUR

According to the data received by CCE, the Ministry of Health and Ministry of Agriculture and Rural Development had no spending on media services in 2014. Ministry of Economy, Ministry of Transport and Maritime Affairs and Ministry of Labour and Social Affairs failed to deliver the requested information even after the positive ruling by the Agency for implementation of the Law on Free Access to Information.

ADMINISTRATIVE BODIES⁴¹

The study included 60 administrative bodies, both those belonging to the ministries and independent administrative bodies. The majority (50 of them) responded positively to requests for information, and 9 administrative bodies did not provide the requested data. One exception is the Public Procurement Administration which referred our researchers to the website which was supposed to contain all the requested information, but the information was not available there. We repeatedly contacted the Public Procurement Administration to report missing data and request that it be provided in an adequate format but did not receive a reply. 13 out of 60 administrative bodies surveyed in this study reported some spending on media in 2014.

The administrative bodies spent a total of **EUR 136 864.60** in 2014 on media services. Out of this amount, **EUR 36 039** allocated to the media by the Commission for Allocation of Revenue from Games of Chance through project financing will be analysed separately. The Commission acts within the Ministry of Finance, but it also allocates significant resources to media through specific projects.

The remaining **EUR 100 825.61** were spent in the following manner: **EUR 27 385.75 or 27.1%** was spent on the printed media; **EUR 37 701.15 or 37.4%** on TVs; **EUR 417.69 or 0.4%** on radio stations; **EUR 6 961 or 6.9%** on websites and news agencies; and **EUR 28 360.02 or 28.1%** on marketing agencies and production houses.

⁴¹ Due to clarity of given graphical data, in the same place were processed administrative bodies within composition of ministries and independent administrative bodies.

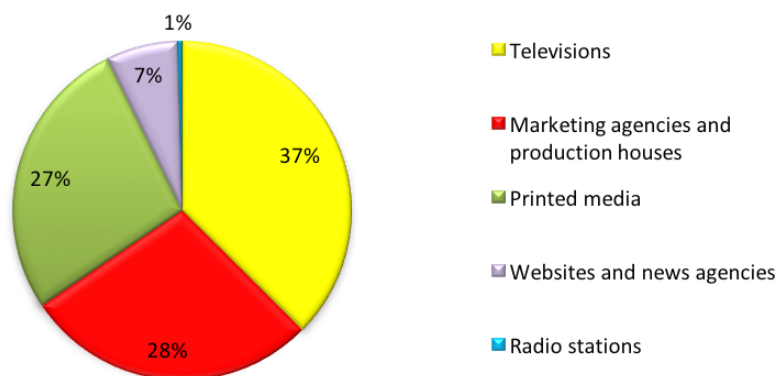


Figure 41: Spending by administrative bodies by media category, % of the total

The structure of entities receiving the money from administrative bodies is presented below in a single table. Due to the small overall number of outlets receiving the funding from this source, we did not divide them into categories.

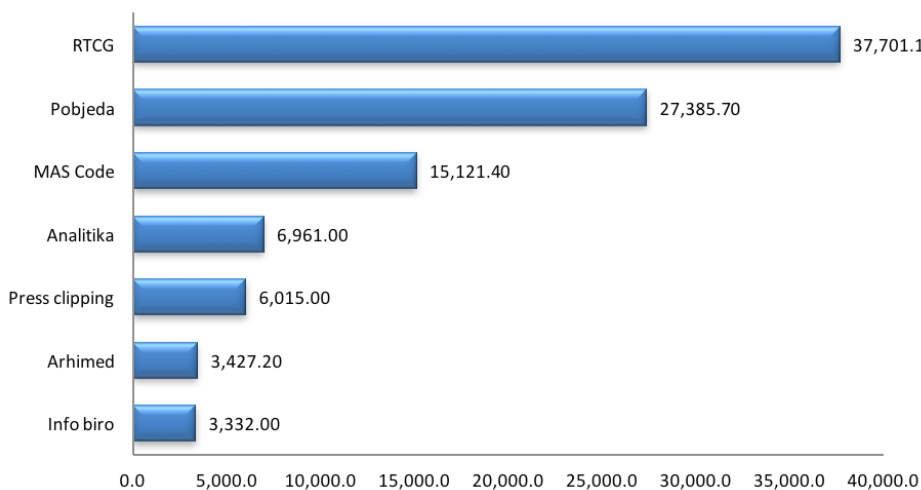


Figure 42: Outlets that received payments from administrative bodies, in EUR

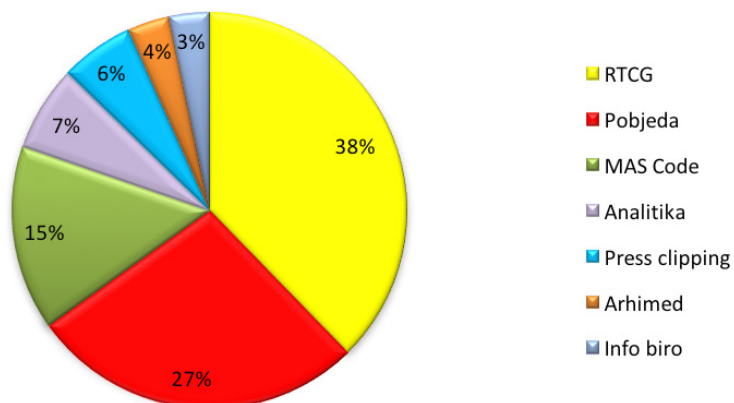


Figure 43: Outlets that received payments from administrative bodies, in % of the total

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

Of the total amount paid for media services by 13 administrative bodies that submitted the requested data, more than 70% came from the **Employment Agency (EUR 49 974.84)** and the **Deposit Protection Fund, (EUR 22 856.49)**, which is why the following figures only take into account the payments from these two bodies.

It should also be noted that the entire amount spent by administrative bodies on the printed media, TV and websites and news agencies was spent on only three outlets: Pobjeda, RTCG and website Analitika. **Pobjeda** received **EUR 27 385.75**, out of which over 90% came from the Employment Agency of Montenegro. **RTCG** got **EUR 37 701.15**, most of it once again from the Employment Agency and the Deposit Protection Fund. Website **Analitika** got **EUR 6 961** from the Customs Administration and the Administration for Inspection Affairs. No other providers of media services were contracted.

EMPLOYMENT AGENCY OF MONTENEGRO

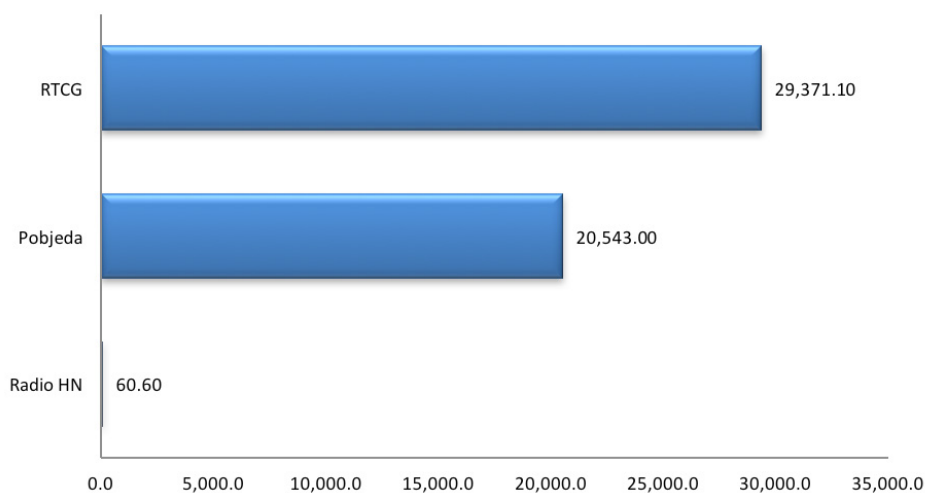


Figure 44: Structure of expenditure by the Employment Agency of Montenegro by media outlet, in EUR

DEPOSIT PROTECTION FUND OF MONTENEGRO

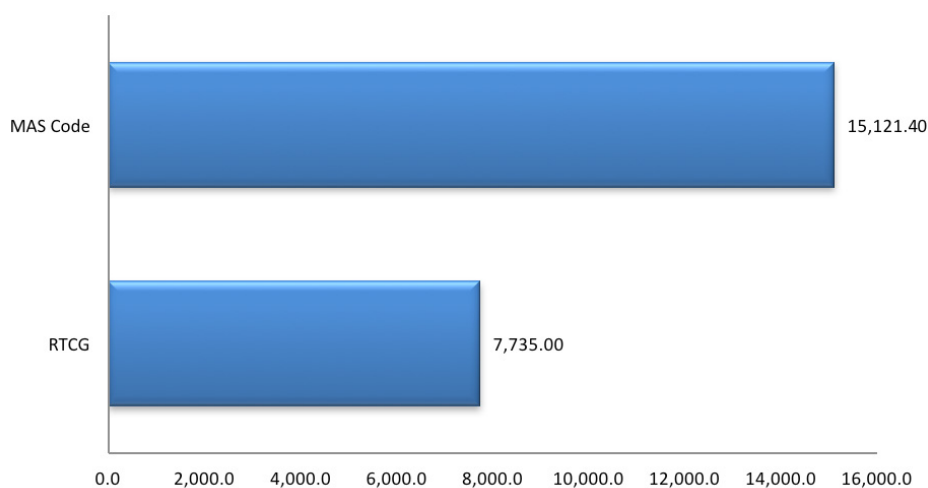


Figure 45: Structure of expenditure by the Deposit Protection Fund of Montenegro by media outlet, in EUR

THE COMMISSION FOR ALLOCATION OF PART OF REVENUE FROM THE GAMES OF CHANCE

As noted in the introduction, a separate analysis was conducted for the **Commission for Allocation of Part of Revenue from the Games of Chance**, which is not an independent body but operates

within the Ministry of Finance, but has allocated significant resources to media via project financing. The total amount allocated by the Commission through approved projects in 2014 was **EUR 36 039**.

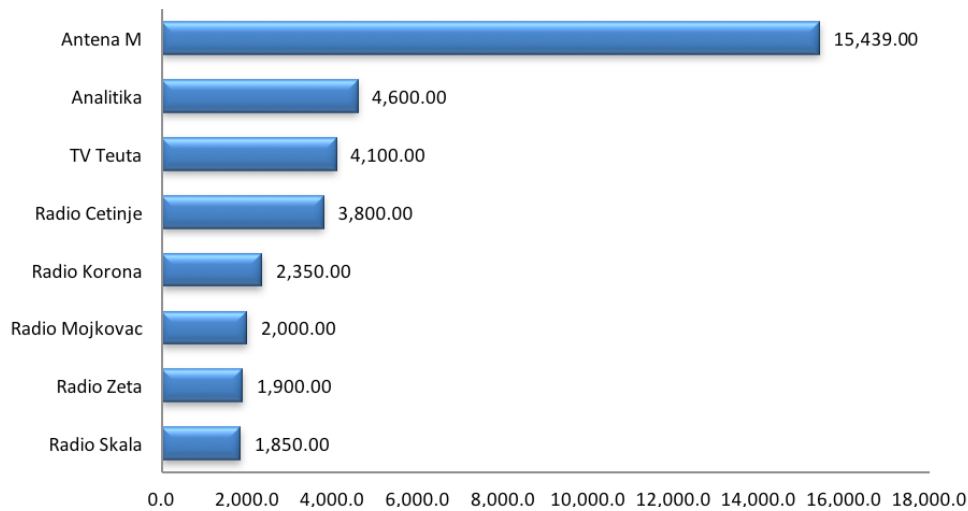


Figure 46: Media outlets supported by the Commission, in EUR

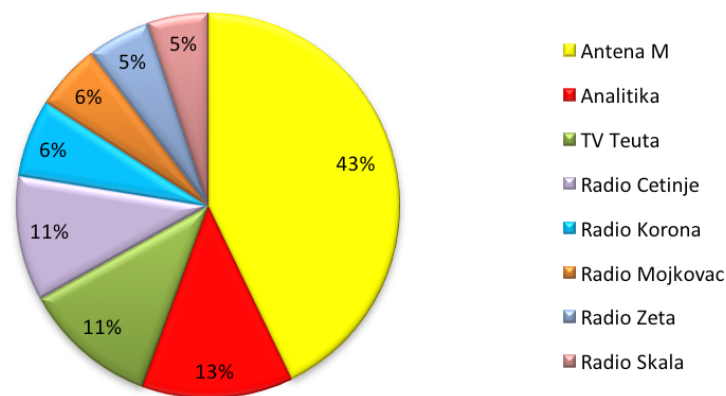


Figure 47: Media supported by the Commission through project financing, % of the total

LOCAL SELF-GOVERNMENTS

A significant amount of resources was also allocated to the media from the budgets of local self-governments. The total amount spent by this level of government was **EUR 629 724.14**. Out of 23 municipalities in Montenegro, 19 responded to our requests for information and delivered the required data. The detail and quality of information we received varied considerably among the municipalities, suggesting that different local governments interpret the Law on free access to information in different ways. **Capital city Podgorica, Bar, Ulcinj and Plav refused to submit the information requested, even after the Agency's decision in CCE's favour.**

According to the information received, municipalities of Gusinje, Petnjica, Rožaje, and Šavnik *did not have any expenses for media services* in 2014.

The total spending on media and media services by the municipalities includes the funding of local public broadcasters. However, since few municipalities provided detailed information that would allow us to distinguish such funding from spending on specific media services, we decided to include only those funds that were clearly indicated in the received documents.

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

At the same time, in the interest of accuracy, a separate chapter analyses total annual funds paid to the local public broadcasters by the municipalities based on the information collected from the closing financial report of the municipalities for 2014.

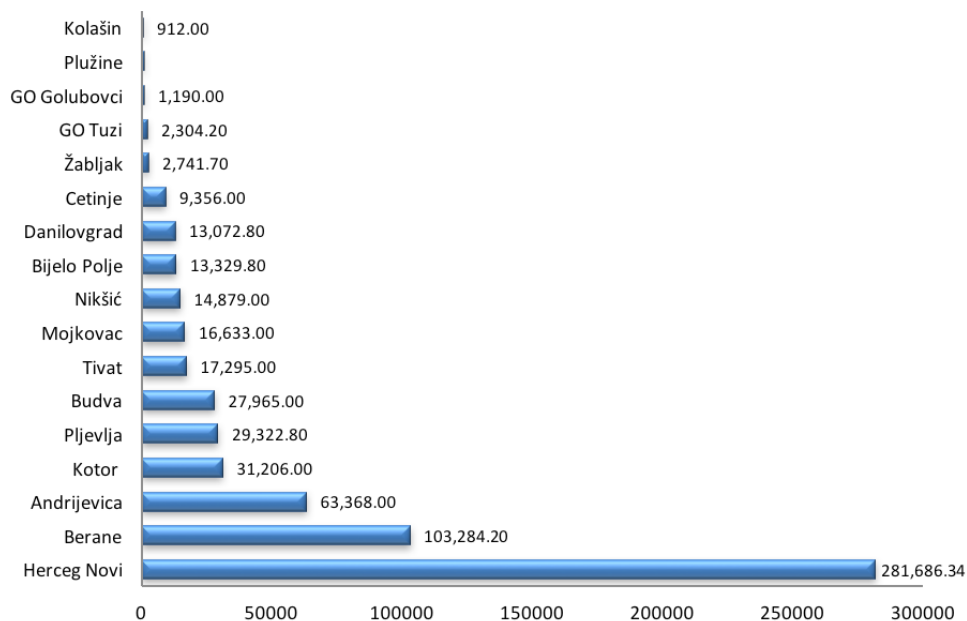


Figure 48: Funding for the media by municipality, in EUR

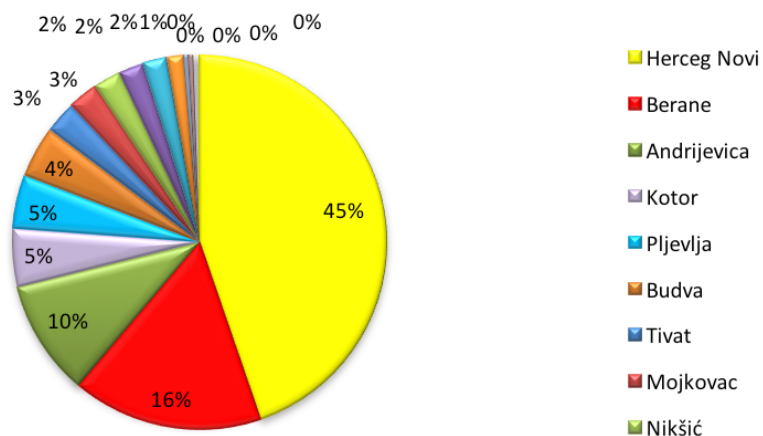


Figure 49: Funding for the media by municipality, % of the total

Out of the total amount spent by municipalities on media services, **EUR 40 445.84 or 6.4%** was spent on the print media, **EUR 76 530.07 or 12.2%** on TV, **EUR 424 916.82 or 67.6%** on radio stations, **EUR 13 247 or 2.1%** on websites and news agencies, **EUR 61 997.19 or 9.8%** on marketing agencies and production houses, and **EUR 12 587.22 or 1.9%** on “other”.

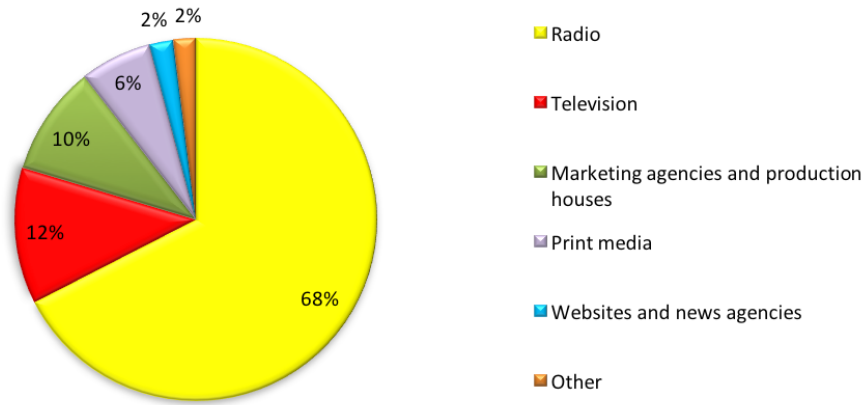


Figure 50: Spending by municipalities by media type, % of the total

As already noted, the total spending by local self-governments on print media was **EUR 40 445.84** for print media.

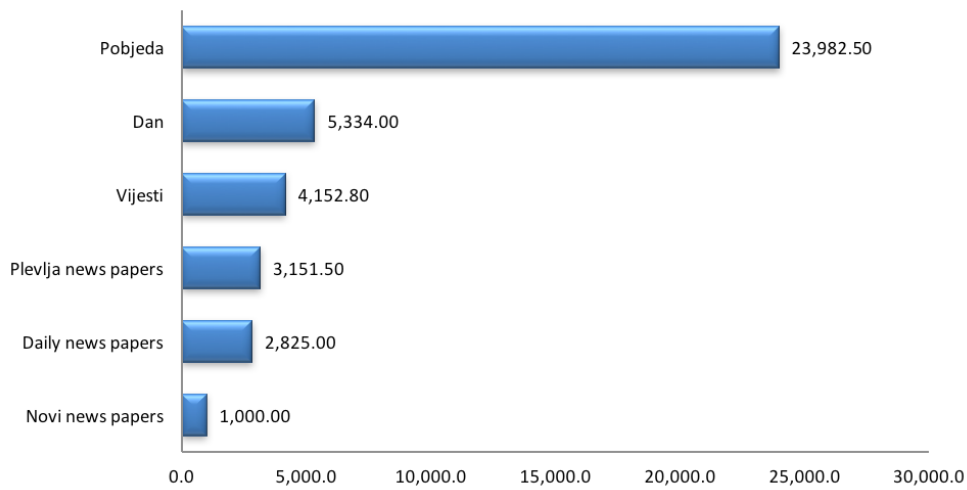


Figure 51: Municipal spending on print media by outlet, in EUR

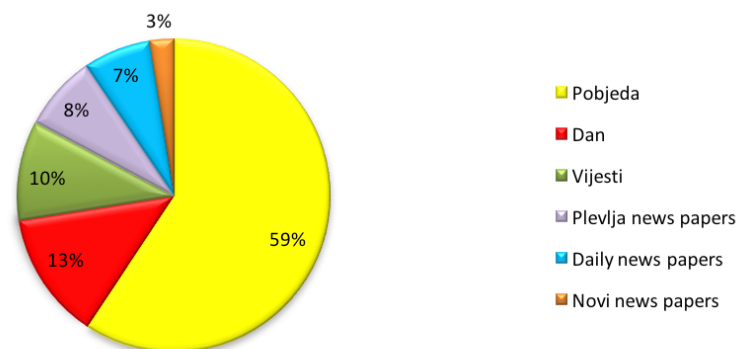


Figure 52: Municipal spending on print media by outlet, % of the total

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

The total amount spent by local self-governments on TV stations was **EUR 76 530.07 EUR**.

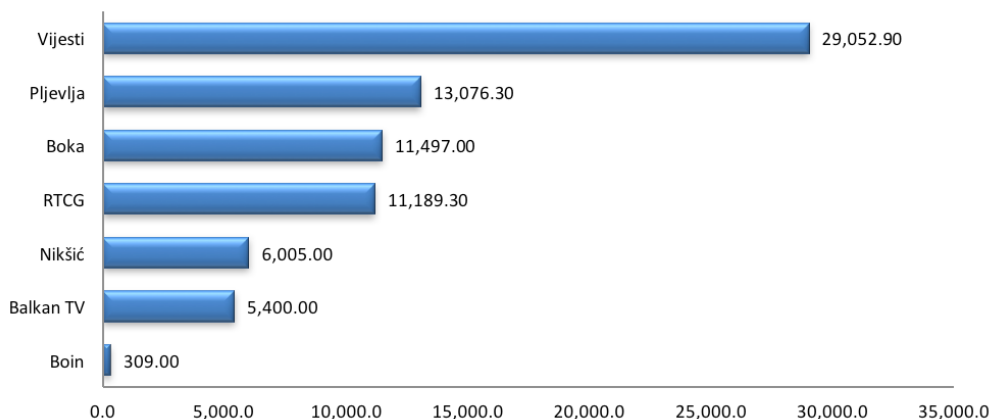


Figure 53: Municipal spending on TV stations by outlet, in EUR

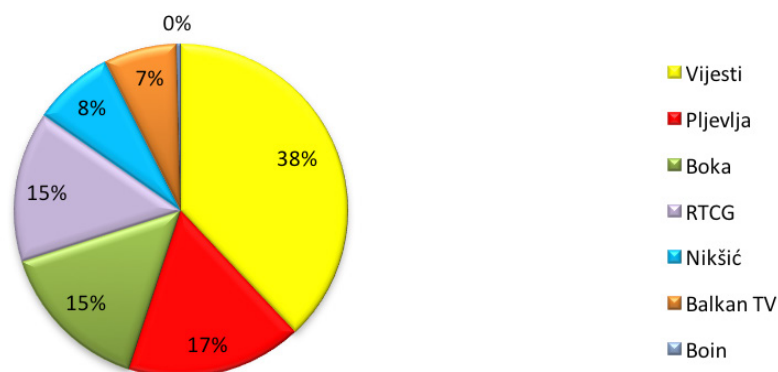


Figure 54: Municipal spending on TV stations by outlet, % of the total

In the interest of obtaining a clearer picture of municipal spending on the media, it should be noted that the local TVs predominantly received funding from the municipalities in which they are located. TV Pljevlja, for instance, received all of the funding from this source from its home municipality, as did TV Nikšić.

The amounts spent on TV Vijesti came from the municipal budgets of Budva, Kotor and Tivat, whereas the amount received by RTCG came from the budgets of Bijelo Polje, Budva, Danilovgrad and Tivat.

The total spending on radio stations by local self-governments in 2014 was **EUR 424 916.82 EUR**.

The following is the overview of radio stations that received funding from municipalities in this year.

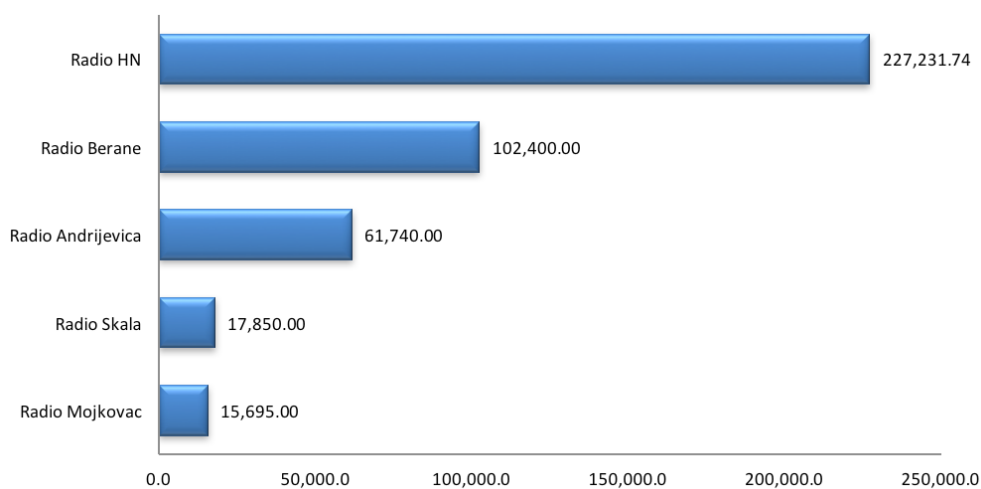


Figure 55: Municipal spending on radio stations by outlet, in EUR

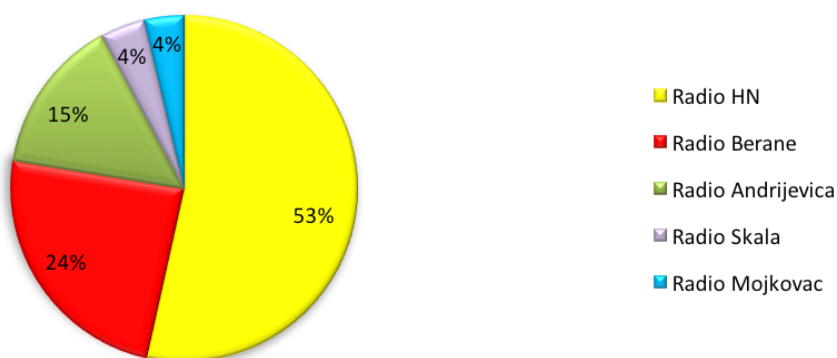


Figure 56: Municipal spending on radio stations by outlet, % of the total

Local radio stations received funding from the municipalities on whose territory they operate. The extent of support varies considerably, and it is difficult to discern the criteria by which the municipalities decide on the amount of necessary funding. In addition to public broadcasters, some commercial radios also received support from the municipal coffers (e.g. municipality of Kotor allocated some of the funding to radio Skala). It should be noted that the documents submitted by municipalities clearly indicate that these are not the projected, but transferred resources. As the information we received contained no proof of payment, we could not verify these figures. However, as these are official communications of local self-governments, we accepted the information as true and accurate, and included them as such in our analysis.

Nevertheless, we also included an overview of the differences between the amounts projected by municipal authorities for support to local public broadcasters and the amounts that were eventually transferred to them.

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

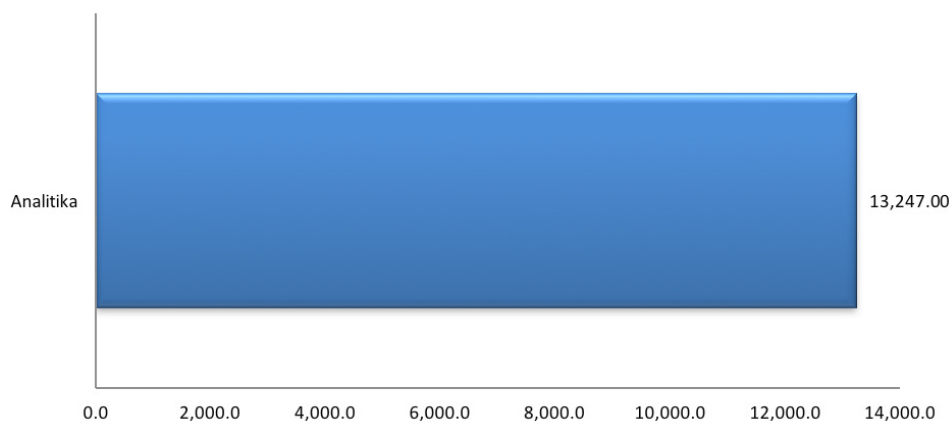


Figure 57: Municipal transfers to websites and news agencies, in EUR

As in 2013, the only spending by municipalities on websites and news agencies was towards website Analitika. No other website or news agency received funding from the municipal budgets. Portal Analitika received payments from Bijelo Polje, Budva, Danilograd, Mojkovac and Tivat.

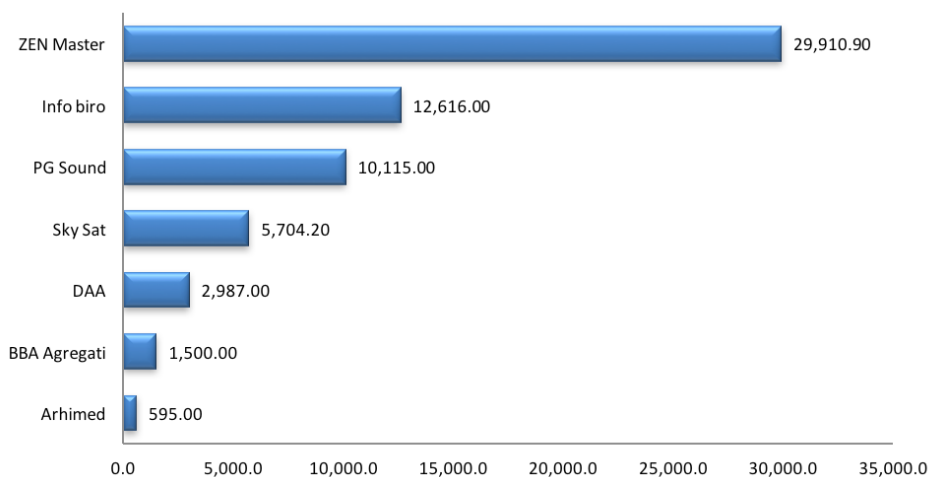


Figure 58: Municipal transfers to marketing agencies and production houses

Marketing agencies and production houses earned a total of EUR 61 997.19 from the Montenegrin municipalities. The largest amount was spent by the municipality of Herceg Novi, almost half of the total, or EUR 32 615.19, making it the largest consumer of media services in this category. Other municipalities allocated considerably lower amounts.

The category “other”, which includes individuals or legal entities that could not be classified under any of the above categories according to the information received by CCE or according to publically available information, accounted for a total of EUR 12 578.22 of municipal spending on media services. A large share of this money was spent by the municipality of Herceg Novi: EUR 5 131. 62 on the services provided by the Official Gazette of Montenegro, and EUR 3 402 for other official presses. The old royal capital Cetinje also paid EUR 3 201 to the publishing house Obod. Other amounts in this category are too small to be listed separately.

PUBLIC INSTITUTIONS AND PUBLIC ENTERPRISE

This category encompasses institutions and business companies where the state or municipalities have the controlling stake. The research conducted by CCE included 214 such subjects⁴². Out of these, 119 or 55.6%, provided the information we requested in line with the Law on free access to information. Another 95 public institutions and companies did not provide the response in spite of all the efforts by the CCE's research team, which repeatedly tried to contact each institution during the nine-month period of data collection, unfortunately without success.

Only those institutions and enterprises that submitted the requested information and had expenditures on media services in 2014 have been included in the below analysis. There are 54 such public institutions and companies, and their total spending on the services by media, marketing agencies, PR agencies, agencies for public opinion research and production houses under various contracts was **EUR 512 228.97**.

Given that nearly half of the public institutions and companies in Montenegro did not submit the requested information, despite the legal requirement, and that these include companies such as Plantations "13 Jul", Montefarm, CNP CG, Markets LLC, PE National Parks of Montenegro, Montenegrin Airports, Railway infrastructure of Montenegro, the coastal management service and many other, all of which have been identified as major consumers in the media sector, it can be reasonably assumed that the real spending by these entities is much higher than presented here. Unfortunately, these institutions chose to withhold the requested information, in direct violation of the Law on the free access to information.

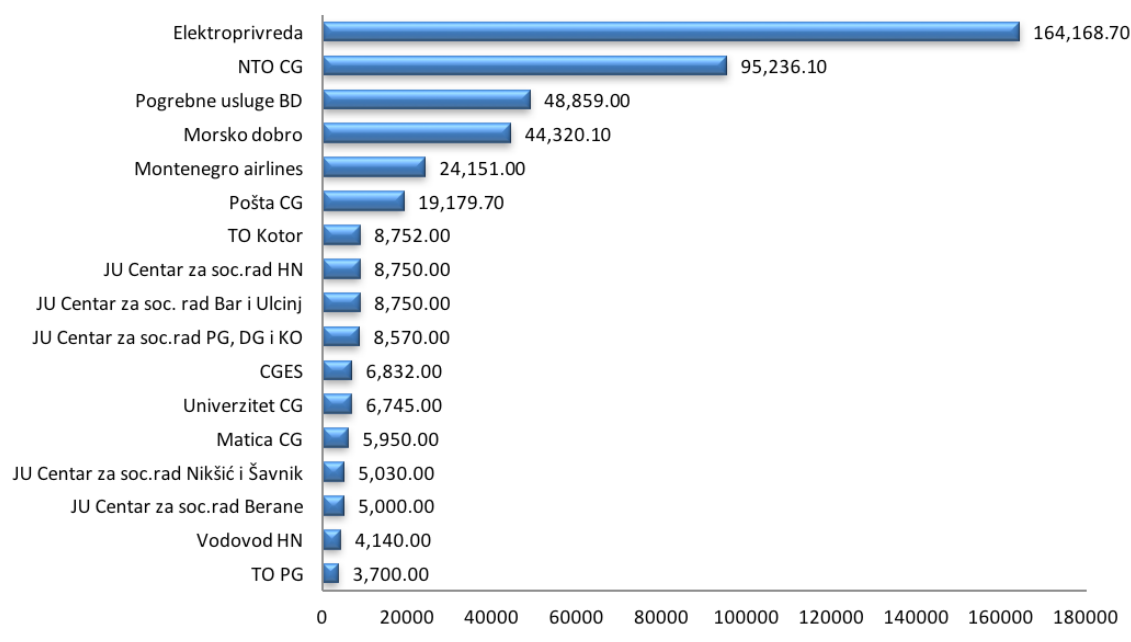


Figure 59: Spending on media by public institutions and enterprises⁴³

Out of the total amount spent by the public institutions and enterprises for which the data was available, **EUR 100 720.37 or 19.7%** was spent on the print media, **EUR 154 341.58 or 30.1%** on TVs, **EUR 43 591.85 or 8.5%** on radio stations, **EUR 93 982 or 18.3%** on websites and news agencies, **EUR 12 119.07 or 21.9%** on marketing agencies and production houses, and **EUR 3 681 or 0.7%** on "other" service providers.

⁴² The full list of public institutions and enterprises included in the analysis, as well as of those that refused to submit the information can be found in the Annex.

⁴³ Due to the large number of subject, the figure only includes those public institutions and enterprises whose spending in the course of 2014 exceeded EUR 3000.

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

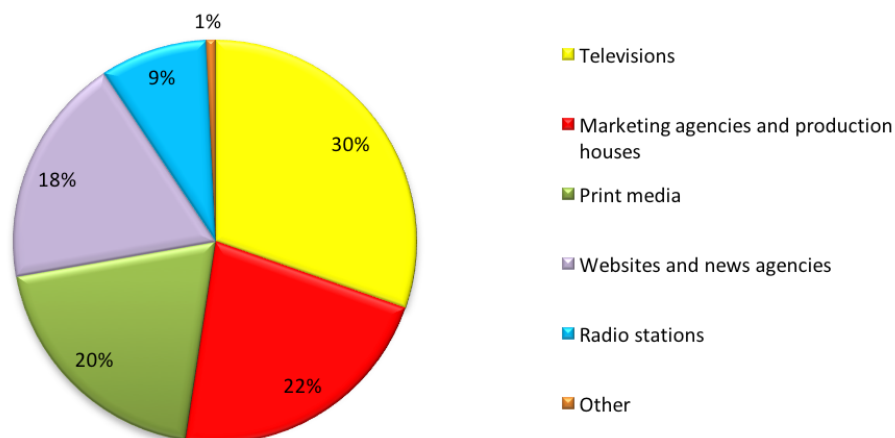


Figure 60: Structure of spending by public institutions and companies

Total amount of resources spent on the print media was EUR 100 720.37.

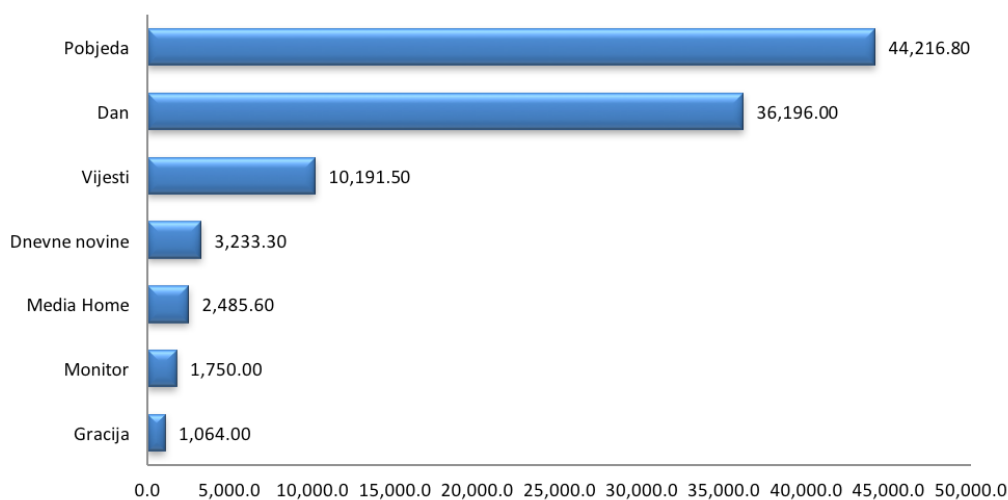


Figure 61⁴⁴: Overview of the print media that received payments from the public institutions and enterprises, in EUR

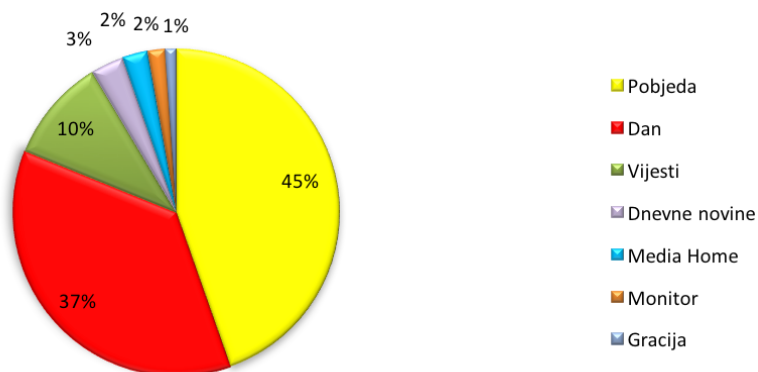


Figure 62: Overview of the print media that received payments from the public institutions and enterprises, % of the total

⁴⁴ Due to the large number of subject, the figure only includes those public institutions and enterprises whose spending in the course of 2014 exceeded EUR 1000.

Due to significant variation in the amount of funding, it should be noted that «Dan» and «Pobjeda» received the largest amount of income from PE Funeral Services Budva: «Dan» EUR 29 030.12, and «Pobjeda» EUR 19 245.70. Meanwhile, «Vijesti» only received EUR 585 from the same source. Pobjeda received payments from a number of entities: EUR 4.172 from Montenegro Airlines, EUR 6 764.32 from Elektroprivreda, EUR 2 666 from the Post Office, EUR 4.865 from the University of Montenegro, EUR 1 614.80 from the PE Sports facilities Podgorica, and EUR 1 040 from Montecargo. Payments from other sources were under EUR 1000, and will not be listed individually.

As for the daily Dan, the second largest source of revenues from among the public institutions and enterprises was Elektroprivreda Montenegro with EUR 3 064, and University of Montenegro, with EUR 916.50. All other payments were significantly lower. Vijesti received most of its revenues from this branch of the public sector from Elektroprivreda (EUR 7 524), University of Montenegro (EUR 963) and Waters and Sewers Herceg Novi (EUR 951.64). Payments from other sources were significantly lower and will not be listed individually.

Elektroprivreda Montenegro spent the most on the print media, and made payments towards all newspapers on our list. DN, Monitor, Gracija and Media Home received all of their revenues from this branch of the public sector from this one client.

The total amount spent by public institutions and enterprises on TV stations was **EUR 154 341.58**.

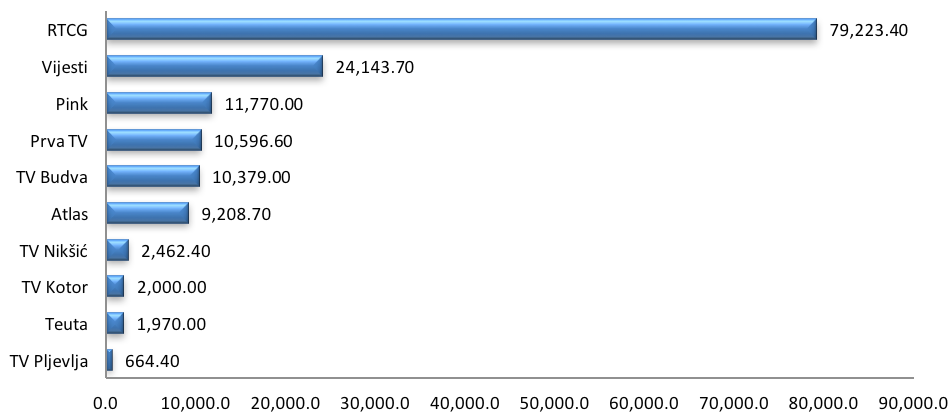


Figure 63: Overview of the TV stations that received payments from the public institutions and enterprises, in EUR

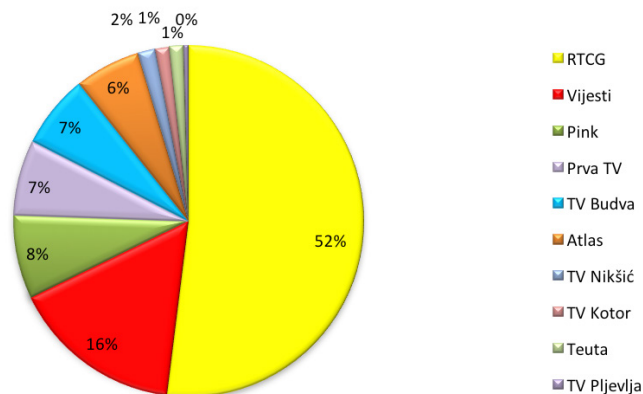


Figure 64: Overview of the TV stations that received payments from the public institutions and enterprises, % of the total

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

The majority funding spent on TVs, more than 30%, came from Elektroprivreda: EUR 48 880.21. The allocation of spending is quite balanced, and all TVs received some amount from this source. By contrast, local centres for social work, which were major consumers of TV services in 2014, concentrated all of their funds on RTCG. The total amount allocated by them was **EUR 49 460**, which made up more than 60% of all RTCG's revenues for services to the public sector bodies. The amounts spent by individual Centres varied from EUR 8.750 (Podgorica, Danilovgrad and Kolašin, Herceg Novi and Bar and Ulcinj) to EUR 5 000 (Nikšić, Plužine and Šavnik, Berane, Andrijevića and Petnjica and Tivat and Budva) and EUR 3 570 (Plav), with public institution Ljubović contributing another EUR 5 000. Other local centres for social work did not submit the requested information. In addition to these, RTCG also received payments from Montenegro airlines (EUR 6 608), Elektroprivreda (EUR 13 100), PE Coastal area (EUR 5 000), TO Bar (EUR 4 073) and PI Centre for vocational education (EUR 1 062.07).

TV Vijesti received a total of EUR 24 143.70 from the following public enterprises and institutions: Montenegro airlines - EUR 10 069.00, Elektroprivreda Montenegro - EUR 9 160; PE Coastal area - EUR 3 750; and PI Centre for culture Tivat - EUR 1 344.70.

Prva TV, Pink M and Atlas TV received their income from Elektroprivreda Montenegro and PE Coastal area. The situation is similar in the case of RTV Nikšić, TV Budva and TV Teuta, except that RTV Nikšić received almost all of its income from Elektroprivreda, TV Budva received payments from PE Coastal area, and TV Teuta received payments from both subjects. The total amount received by TV Kotor came from TO Kotor.

Radio stations received **EUR 43 591.85** from public enterprises and institutions in 2014.

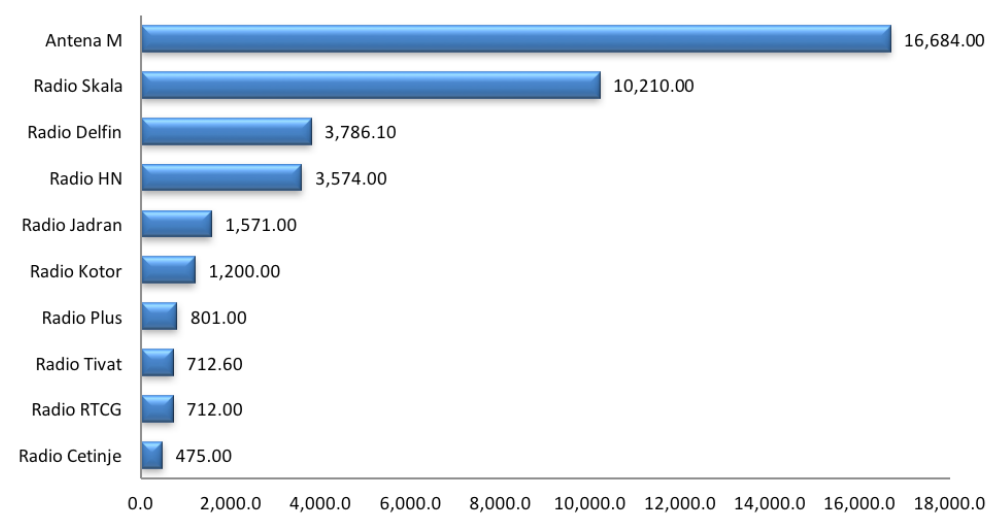


Figure 65: Overview of the radio stations that received payments from the public institutions and enterprises, in EUR

The difference between total amount and the sum of amounts displayed in the table above appears because we did not plot radio stations which received less than 300 euro.

As in case of the TV stations, Elektroprivreda Montenegro was responsible for the majority of payments to the radio stations. Antena M received EUR 11 400, while other radio stations received less than EUR 1 000. Antena M also received payments from PE Coastal area (EUR 4 284) and the Port of Kotor (EUR 1 000). Radio Skala received EUR 3 510 from PE Coastal area, EUR 4 300 from TO Kotor and EUR 2 400 from the Maritime museum. Other radio stations received lesser amounts from several different public institutions and enterprises.

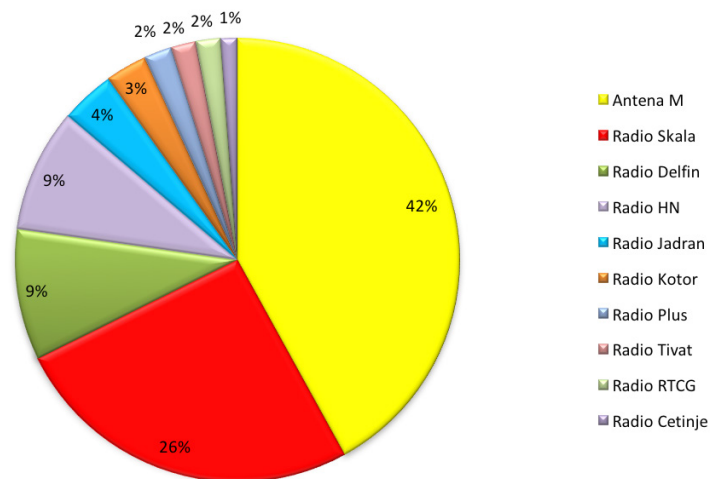


Figure 66: Overview of the radio stations that received payments from the public institutions and enterprises, % of the total

The total amount spent on websites and news agencies by public institutions and enterprises in 2014 was **EUR 93 982**.

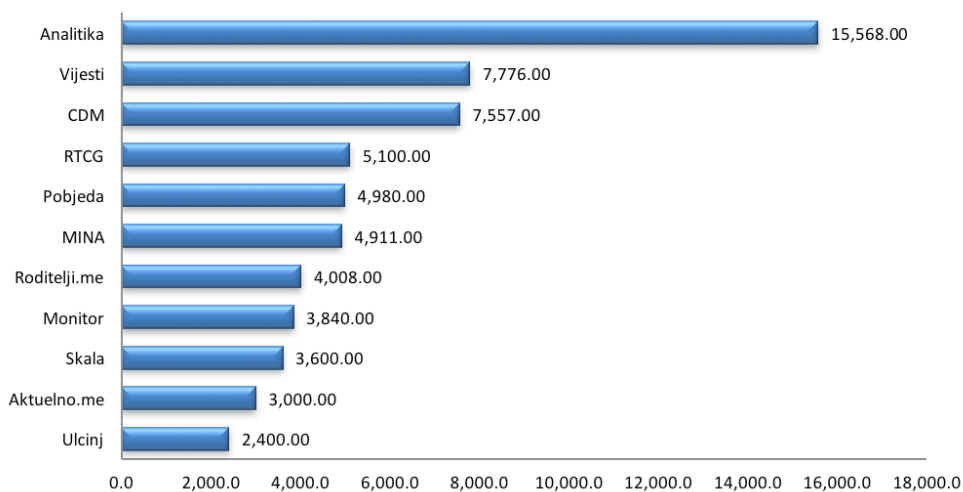


Figure 67: Overview of the websites and news agencies that received payments from the public institutions and enterprises, in EUR⁴⁵

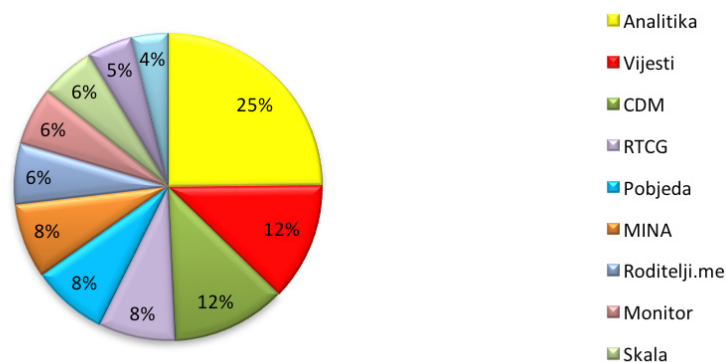


Figure 68: Overview of the websites and news agencies that received payments from the public institutions and enterprises, % of the total

⁴⁵ The study only included entities that received over EUR 2 000 in 2014.

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

The majority of payments for media services to the Montenegrin websites came from Elektroprivreda Montenegro, a total of EUR 65 534 or 70% of all payments made by public institutions and enterprises. The main beneficiary was Analitika, which received the largest portion of transfers from Elektroprivreda Montenegro (EUR 8 760), followed by PE Coastal area (EUR 2 000), the Post Office (EUR 3 750) and Monteput (EUR 1 000). Elektroprivreda Montenegro was also responsible for the entire amount received from the public institutions and enterprises by the website Vijesti, as well as by the websites of RTCG and CdM, Pobjeda, Roditelji, Skala radio website, website Monitor, website Ulcinj. MINA also received payments from Montenegro Airlines. The remainder was made up of significantly smaller payments by other public institutions and companies.

The total amount spent on the marketing agencies and production houses by public institutions and companies in 2014 was **EUR 112 119.07**. The overview below includes only those outlets that received more than EUR 1 000.

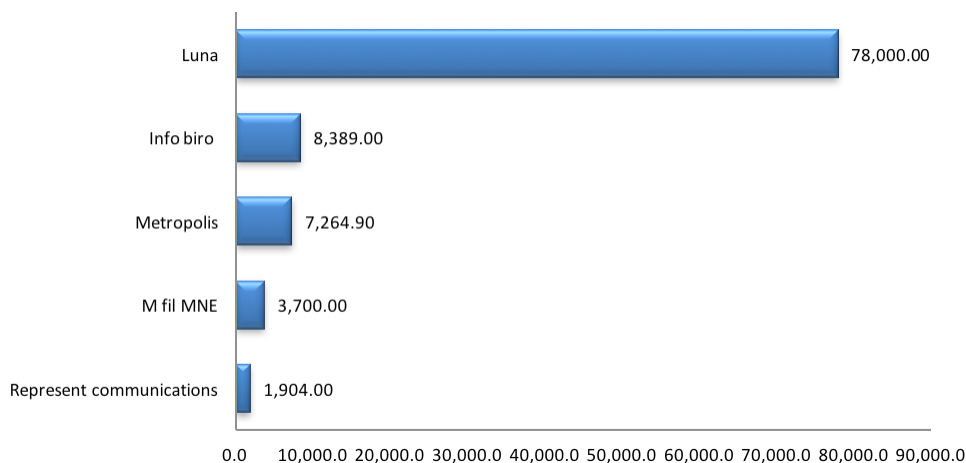


Figure 69: Overview of marketing agencies and production houses that received payments from the public institutions and enterprises, in EUR

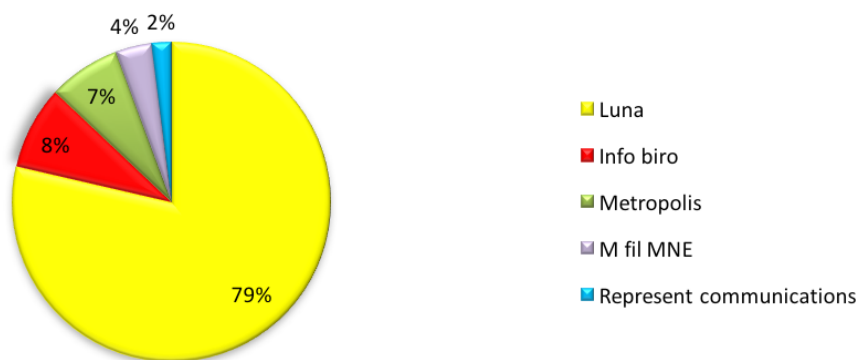


Figure 70: Overview of the marketing agencies and production houses that received payments from the public institutions and enterprises, % of the total

The largest share, over 70% of total amount spent on the marketing agencies and production houses came from the National Tourist Organisation of Montenegro and was paid to the agency Luna from Serbia. The Post Office was a major consumer in 2014, with EUR 12 526.77 paid to Montepano, Info bureau and agency Represent communication Montenegro. Info bureau also received EUR 3 700 from PE Coastal area, and EUR 1 666 from the Railways of Montenegro. Other amounts were under 1000 EUR, and they were deposited to various natural and legal persons by several public institutions and companies.

EUR 3 681 was spent by the public institutions and enterprises in the category “other”. The largest part of this amount was a contribution to the production of TV show “Živa istina” by Elektroprivreda Montenegro.

PARLIAMENT OF MONTENEGRO

The Parliament of Montenegro spent a total of **EUR 87 056** on media services in 2014. Out of this, **EUR 14 612.36 or 16.8%** was spent on the print media, **EUR 12 129 or 13.9%** on TVs, **EUR 2 389.83 or 2.7%** on websites and news agencies, and **EUR 57 924.79 or 66.5%** on marketing agencies and production houses. There were no expenses for radio stations.

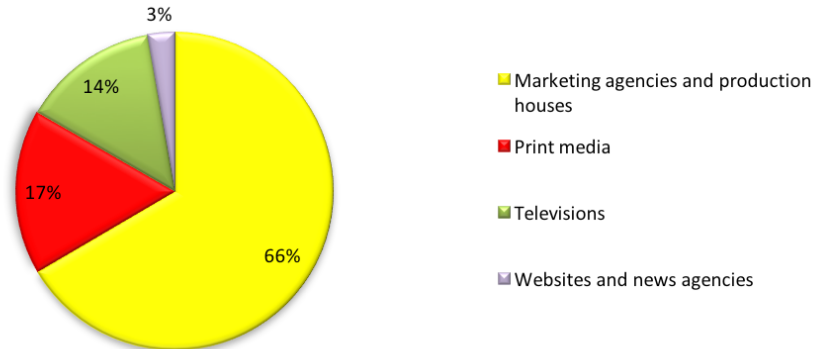


Figure 71: Spending on media services by the Parliament of Montenegro per category, % of the total

Due to the small overall number of outlets receiving the funding from this source, they are all shown together in the figure below.

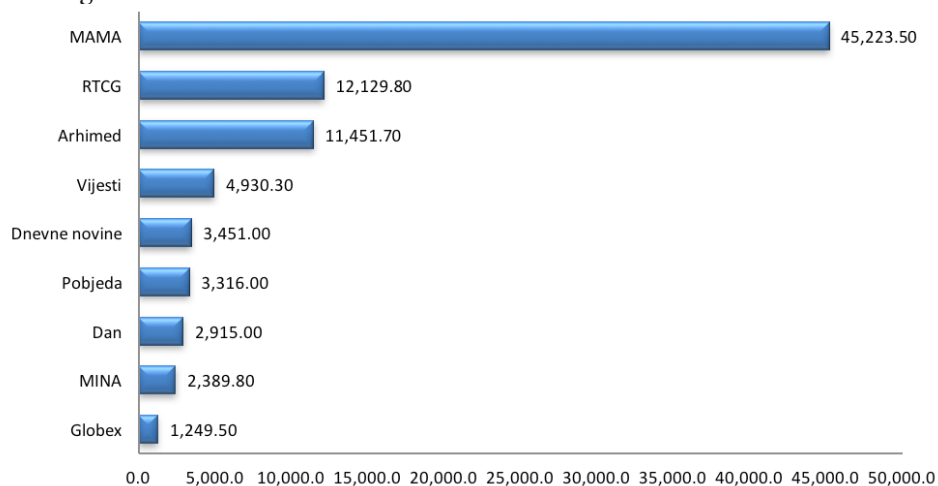


Figure 72: Overview of outlets that received payments from the Parliament of Montenegro, in EUR

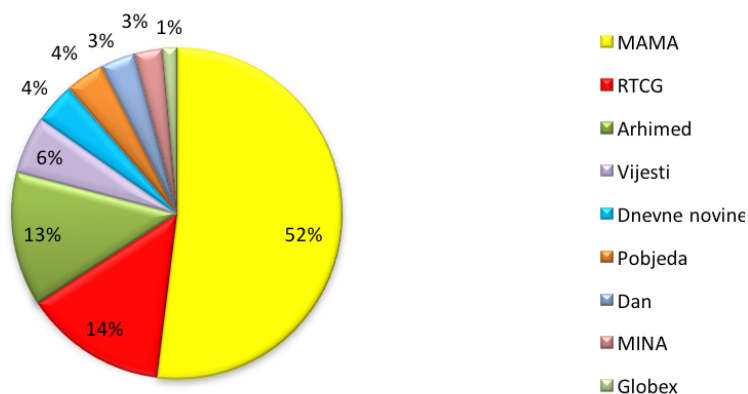


Figure 73: Overview of outlets that received payments from the Parliament of Montenegro, % of the total

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

AGENCIES

There is no public data on the number of agencies that exist in Montenegro. The CCE addressed its requests for information to 17 agencies, out of which 14 responded positively and submitted the requested information requested, and 9 had expenses within categories of interest to the research, amounting to a total of **EUR 66 922.50**.

Out of this amount, **EUR 13 548 or 20.2%** was spent on print media, **EUR 4,998 or 7.5%** on TVs, **EUR 5 880 or 8.8%** on radio stations, **EUR 16 213 or 24.2%** on websites and news agencies, and **EUR 26 283.50 or 39.2%** on marketing agencies and production houses.

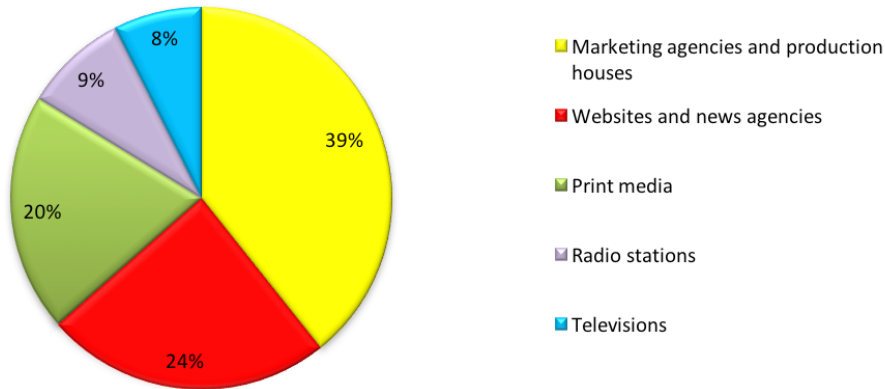


Figure 74: Spending on media services by independent agencies by category of media, % of the total

Due to the small overall number of outlets receiving the funding from this source, they are all shown together in the figure below.

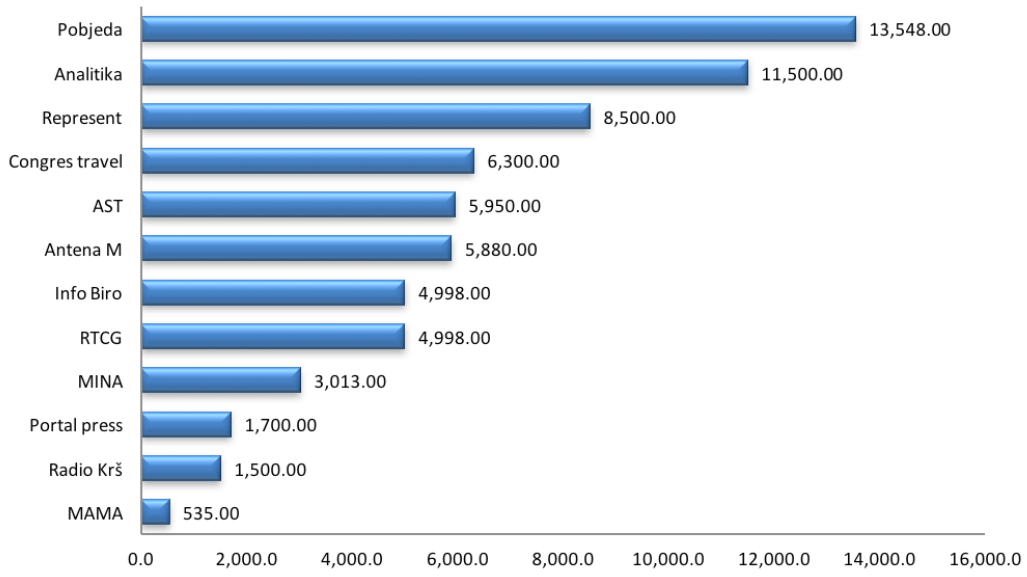


Figure 75: Overview of outlets that received payments independent agencies, in EUR

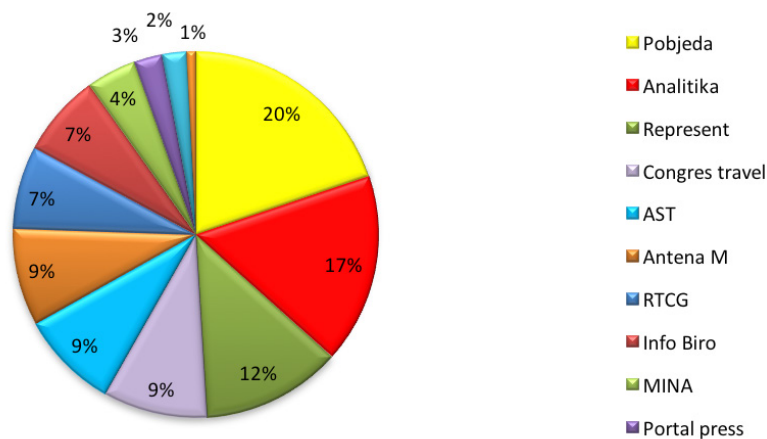


Figure 76: Overview of outlets that received payments from independent agencies, % of the total

PRESIDENT OF MONTENEGRO

President of Montenegro submitted the requested information in a timely manner. It reported the total expense for media services in 2014 to be EUR 8 008.70, out of which EUR 3 570 was spent on MINA and EUR 4 438.70 on Info bureau.

JUDICIARY (COURTS AND PROSECUTIONS)

The bodies belonging to judiciary reported submitted their responses within the legally prescribed deadline, and reported no expenses in this area.

OMBUDSMAN

The Ombudsman did not respond to our request for information, thus no information is available on this institution for 2014.

CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

- The financing of media in Montenegro from the public sources is unregulated, uncontrolled and opaque. There has been no progress on this front in comparison to the previous years.
- The authorities exercise undue influence on the media market, via opaque and selective allocation of public funding through various channels. Combined with an already challenging economic situation and the reduced spending on advertising by private companies, the growing share of public funds and the lack of clear criteria for their distribution contributes to the spread of soft censorship in Montenegro⁴⁶.
- Montenegrin institutions are still not publishing proactively information on the amount of public funding they spend on advertising, marketing or other forms of media financing, and many of them are ready to violate the Law on the free access to information in order to conceal such information.
- Local self-governments follow this bad practice of the state administration. Information on the funds allocated to local public services by local self-governments is not publicly available, nor can it be found on the official websites of local self-governments or their beneficiaries, despite the legal obligation to publish it.
- The legal framework does not recognise the link between the spending on media services by the public sector and the potential danger to the freedom of media and their economic stability, nor does it perceive the decisions on advertising as a potential form of discrimination and interference with editorial policies.
- The Law state aid does not contain specific criteria for the allocation of state aid to the media. The amount of funding available to this sector, together with the incomplete legal framework, has the potential to create severe distortions in the media market and jeopardise the survival of some media outlets, while privileging others.
- The identified tendency to centralise budget allocations for advertising and other media services and redirect them from individual media outlets to marketing agencies that specialise in the lease of media space aggravates the task of monitoring the allocation of public funds to the media.

RECOMMENDATIONS

- The state of Montenegro should establish clear mechanisms for the control of public financing and allocation of state aid to media in order to ensure full application of the principle of transparency and openness of the public sector, and protect pluralism and freedom of the media.
- All beneficiaries of the public funding should proactively publish on their websites information on all forms of spending on the media in Montenegro, to ensure complete transparency regarding the allocation of these funds.
- The spending of the taxpayers' money on local public services should be subject to strict rules of transparency, openness and measurable distribution criteria. Financial reports of local public broadcasters as beneficiaries of those funds should be publically available and published on the official websites of the broadcasters or of the local self-governments.

⁴⁶ For more detail see the report of the Centre for Civic Education, WAN-IFRA and CIMA "Eroding freedoms: Media and soft censorship in Montenegro".

- State aid should be available to all media, according to clearly defined criteria. The current practice of allocation of multi-million amounts in state aid to the state-owned media at both the national level and the local level has to be terminated to ensure full implementation of the Competition Law.
- The practice of flaunting the law in order to conceal information funding given to particular media must be stopped, and the management of public bodies that practice this approach rigorously sanctioned.
- The current legal framework regulating the media sector ought to be improved in order to prevent the rise of soft censorship: a new, more sophisticated, but powerful form of interference with the media critical of the government's actions.
- Service contracts between the public sector bodies and the marketing agencies should be accompanied by publicly available details on the allocation of these funds, i.e. about the further distribution of these funds to individual media outlets.

APPENDIX

Public sector bodies covered by the research

MINISTRIES

- General Secretariat of the Government
- Ministry of Justice
- Ministry of Interior Affairs
- Ministry of Defence
- Ministry of Finance
- Commission for the allocation of part of revenue from games of chance
- Ministry of Foreign Affairs and European Integration
- Ministry of Education and Sports
- Ministry of Science
- The Ministry of Culture
- The Ministry for Information Society and Telecommunications
- Ministry of Economy
- The Ministry of Transport and Maritime
- Ministry of Agriculture and Rural Development
- Ministry of Sustainable Development and Tourism
- Ministry of Health
- The Ministry for Human and Minority Rights
- Ministry of Labour and Social Affairs
- Cabinet minister without portfolio

ADMINISTRATIVE BODIES

- Administration for Anticorruption Initiative
- Institute for the Enforcement of Criminal Sanctions
- Police (spending is included in the budget of the Ministry of Interior)
- Tax Administration
- Customs Administration
- Administration for the Games of Chance
- Property Administration
- Real Property Management
- Directorate for Diaspora
- Department for the Protection of Cultural Property
- Directorate for development of small and medium-sized enterprises (information received as part of the documentation submitted by the Ministry of Economy)
- Port Authority
- Maritime Safety
- Directorate of Traffic
- Directorate for Railways

- Phytosanitary Administration
- Veterinary Administration
- Forest Administration
- Water Administration
- Directorate of Public Works
- Directorate for Refugees
- Human Resources Administration
- Directorate for the prevention of money laundering and financing of terrorism
- Public Procurement Office
- Agency for the Protection of Competition
- Directorate for Inspection Affairs
- Directorate for Youth and Sports
- Secretariat for Legislation
- Secretariat for development projects
- Statistical Office MONSTAT
- Department of Hydrometeorology and Seismology
- Department of Education
- Office of Intellectual Property
- Department of Metrology
- Labour Fund of Montenegro
- Investment and Development Fund
- Pension Fund
- Fund for the protection and realisation of minority rights
- Deposit Protection Fund
- Health Insurance Fund
- State Archives
- Directorate for Protection of Classified Information
- Agency for Environmental Protection

LOCAL SELF-GOVERNMENTS

- Andrijevica
- Bar
- Berane
- Bijelo Polje
- Budva
- Danilovgrad
- Žabljak
- Kolašin
- Kotor
- Mojkovac
- Nikšić
- Petnjica
- Plav

- Plužine
- Pljevlja
- Podgorica
- Gradska opština Tuzi
- Gradska opština Golubovci
- Rožaje
- Tivat
- Ulcinj
- Herceg Novi
- Cetinje
- Šavnik

PARLIAMENT

JUDICIARY

- Supreme State Prosecutor
- Supreme Court
- Constitutional Court
- Administrative Court
- Court Council

OMBUDSMAN

AGENCIES

- Civil Aviation Agency
- Agency for Electronic Communications and Postal Services
- Agency for Electronic Media
- Agency for the management of the city port Herceg Novi
- Real Estate Agency Bar
- Agency for Construction and Development Herceg Novi
- Agency for the construction and development Podgorica
- Agency for Medicines and Medical Devices CALIMS
- Agency for National Security
- Insurance Supervision Agency
- Agency for design and planning Nikšić
- Agency for the promotion of foreign investment, MIPA
- Housing Agency
- Agency for the protection of personal data and the free access to information
- Centre for Toxicological tests
- The Energy Regulatory Agency
- Central Depository Agency
- Tobacco Agency

PUBLIC COMPANIES AND INSTITUTIONS

- Pharmacy CG Montefarm
- The Institute for Standardization
- Montenegro Airlines
- Library for the Blind of Montenegro
- Institute of Public Health
- Montenegro Red Cross
- National Theatre CNP CG
- Examination Centre of Montenegro
- Montenegrin Heritage
- Markets LLC
- Centre for Social Work Podgorica, Danilovgrad and Kolašin
- PI Centre for preservation and development of minority cultures Montenegro
- PI Komanski most
- PI Ljubović
- PI Montenegrin Film
- National Museum of Montenegro
- National Library of Montenegro
- PI Resource Centre for Children and Youth Montenegro
- National Tourism Organisation of Montenegro
- Regional Diving Centre
- PI Student dormitories Podgorica
- Putevi LLC Podgorica
- Parking Service BP
- Parking service
- Čistoća LLC Podgorica
- Music Centre of Montenegro
- PE National Parks of Montenegro
- PEW Montenegrin coast
- Airports of Montenegro
- PE Coastal area
- Centre for Mediation
- Contemporary Art Centre
- Plantations “13” July
- Elektroprivreda Montenegro
- Business Montenegro LLC
- Možura LLC
- Post Office
- Railway infrastructure of Montenegro
- PI Centre for Culture – Berane
- Centre for social work Plav
- PI Centre for Social Work Rožaje
- PI Centre for Social Work Bijelo Polje and Mojkovac

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- Utilities Lim LLC
- Municipal Red Cross organisation
- Zeta energy Danilovgrad
- PE Breeding and protection and hunting of wild animals Danilovgrad
- Kastel Montenegro Pljevlja
- Centre for Conservation and Archaeology
- Directorate of Traffic Danilovgrad
- PE “Utilities” - Danilovgrad
- PE Čistoća Herceg Novi
- PE Parking Service, Herceg Novi
- Public utility Herceg Novi
- Veterinary Diagnostic Laboratory Podgorica
- PI Daily centre for children with disabilities and developmental difficulties Herceg Novi
- PI City Library and Reading Room Herceg Novi
- PI Culture Herceg fest Herceg Novi
- Agency for the Protection and Development of Orjen - Herceg Novi
- Tourist organization of Herceg Novi
- Water and Sewerage Ltd. Herceg Novi
- PE “Water and Sewerage” -Danilovgrad
- PE Public Water Supply “Bistrica” Bijelo Polje
- Institute of Biology seaside Kotor
- PI Centre for Social Work in Herceg Novi
- PI Centre for Social Work Kotor, Tivat and Budva
- Centre for Information systems UCG
- PI Art Colony of Danilovgrad
- PI Centre for Culture Andrijevića
- Radio Television of Montenegro
- Water Supply and Sewage Cetinje
- PIC for housing - communal activities -Andrijevića
- Tourist organization of Budva
- Coastal Budva
- PE Utility services Ulcinj
- PI Day care centre Sirena
- Pension Fund LLC Ulcinj
- Agency for Construction and Development of Ulcinj
- Montenegrin Fund for Solidarity Housing Development LLC
- Montenegrin operator of the electricity market - LLC Podgorica
- Montenegrin Transmission System - AD Podgorica
- PI Centre for Social Work Bar and Ulcinj
- Tourist Organization of Bar
- Ulcinj Riviera - AD Ulcinj
- Tourist organization of Cetinje
- Tourist organization of Bijelo Polje
- University of Montenegro

- Broadcasting Centre of Montenegro - LLC Podgorica
- Railway Transport of Montenegro
- Maintenance of railway vehicles -AD Podgorica
- Montenegro bonus Cetinje -LLC
- Montecargo -AD Podgorica
- Monteput -LLC Podgorica
- Centre for Culture and Sports Mihailo Lalić -Andrijevica
- Utilities Berane
- Municipal public institution “Museums” - Kotor
- Port of Kotor - Kotor AD
- Tourist organization of Kotor
- “Water and Sewerage” - Kotor
- PI “Anderva” -Nikšić
- Centre for Culture - Nikšić
- Centre for Culture - Plužine
- PE Cultural Centre - Ulcinj
- PE “Water Supply and Sewerage” -Berane
- PI Day care centre for children with special needs - Nikšić
- PI Day care centre for children with disabilities Nikšić
- Institute of Marine Biology Kotor
- Public Water Supply and Sewerage - Nikšić
- PI Health Centre
- PPI Eco bajka - Pljevlja
- Clinical Centre of Montenegro
- Physicians of Montenegro
- Institute for textbooks and teaching aids
- Montenegrin Academy of Sciences and Arts
- Centre for Social Work Cetinje
- Centre for Culture Rožaje
- PUC “Gradac” -Mojkovac
- Tourism Organization of Žabljak
- JP for housing and utility services Žabljak
- Tourist organization of Mojkovac
- Centre for Culture “Nenad Rakočević”
- Cultural Centre Žabljak
- PI Water and Sewerage Rožaje
- PI Royal Theatre Zeta house Cetinje
- PI Heritage Museum “Ganic tower” Rožaje
- Public Utilities Podgorica
- PE Green Podgorica
- PI “City Theatre” - Budva
- PE municipal housing public company -Budva
- “Water and Sewerage” -Budva
- PE “Funeral Services” -Budva

EQUAL CHANCES FOR ALL MEDIA IN MONTENEGRO?

- Utilities Tivat
- JP “Sports Centre” -Cetinje
- Water and Sewerage Kotor
- Directorate for Planning and construction of Kotor
- PUC Kotor
- PEC Berane
- Centre for Social Work Berane, Andrijevica and Petnjica
- PE maintenance of local roads - Pljevlja
- PI day centre for children and youth with disabilities and developmental difficulties - Pljevlja
- PE Water and sewage - Bar
- PE Utility services - Bar
- New Tobacco Plant Podgorica
- Funeral services Podgorica
- “Fruits of Montenegro” Podgorica - AD
- Centre for Social Work Pljevlja and Žabljak
- Project Consulting
- Water and Sewage - Ulcinj
- Tourist organization - Rožaje
- PE Cleanliness - Pljevlja
- PI Anderva Niksic
- Utilities Kotor LLC
- Innovation and Enterprise Centre
- PE Sports facilities Podgorica
- Maritime Museum of Montenegro
- Tourist organization Plav
- PE for housing activity Plav
- Centre for Culture Plav
- PE Sports and Recreation Centre Bar
- JP Centre for Culture Ulcinj
- Technopolis Nikšić
- Tourist Organization Plužine
- Agency for housing and commercial fund Pljevlja
- PE “Water Supply and Sewerage” - Cetinje
- “Water and Sewerage” - Tivat
- Centre for Culture -Tivat
- PE “Heating” -Pljevlja
- PE Cultural Centre Bar
- LLC “Academy of Knowledge” -Budva
- PE “Mediterranean advertisements” -Budva
- Sports centre Igalo LLC
- Sports centre Nikšić
- JP Bus station Nikšić
- PI “Museums, Gallery, and Library” - Budva
- Parking services Budva

- PE “Municipal services” - Šavnik (maintenance and construction of Šavnik)
- Foundation “Kotor Festival of Children’s Theatre” -Kotor
- Memorial home Red Commune
- PI Waters - Pljevlja
- PI Daily Centre Pljevlja
- PI Centre for Vocational Education
- Utilities Nikšić
- Utilities Cetinje
- Centre for Education and Training “1. jun” Podgorica
- PI Daily Centre Lipa
- Diaspora Centre
- Water Supply and Sewage Nikšić
- Centre for Social Work Plužine, Nikšić and Šavnik
- Water Supply and Sewage Berane
- PI Nikšić theatre
- PI for child recreation Lovćen, Bečić and Cetinje
- PI National Library and Reading Room “Njegoš” - Cetinje
- PI Natural History Museum of Montenegro
- DOO Eco Village “Exhibition” -Andrijevića
- Centre for Culture Kolašin
- Water and sewage Kolašin
- Tourist organization Kolašin
- Communal Kolašin
- Chamber of Engineers of Montenegro
- Cultural Centre - Danilovgrad
- Utilities - Ulcinj
- Sports centre - Rožaje
- Utilities - Rožaje
- Library of Budva
- JU Sports Hall Tivat
- University library
- Tourist organization of Podgorica
- Budva Holding
- PE Regional water management, coast of Budva
- JP sport centre Budva
- Sports and recreation centre Mediterranean - Budva
- Tourist organization of Danilovgrad

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