

FOURTH ESTATE CONSCIENCE

- self-regulation of media in Montenegro -



Centar za građansko obrazovanje
Centre for Civic Education



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MEDIA SELF-REGULATION IN THE NET OF MONTENEGRIN DIVISIONS

All media and journalists in Montenegro have unique code of ethics, adopted in 2002 and amended in 2015, but there is no single self-regulatory body at the level of the entire media community that takes care of respect of ethics.

Part of the media, local and national, has founded the Media Council for Self-Regulation (MCSR) in 2012, and in the same year, a group of local print media established their own self-regulatory council. One private television with national coverage (*TV Vijesti*), two daily newspapers (*Vijesti and Dan*) and one weekly (*Monitor*) opted for ombudsmen as a form of self-regulation. The National Public Media Service RTCG, which is a member of the MCSR, also has its Commission for applications and complaints of listeners and viewers, as a body of the RTCG Council.

In last years, a tendency of violation of professional standards and ethics has been noticeable in Montenegro.

ALPHABET OF JOURNALISM DOES EXIST

The introduction of the currently valid Code of Conduct of Montenegrin Journalists¹ states that journalist '*serves public interest*' and that his/her duty is to defend '*freedom and the right to collect and announce information without being disturbed as well as to give free comments and critics*'.

It is also stated that '*credibility of journalists and journalist profession generally rests on professional honesty, integrity and knowledge*' and noted that a journalist '*should be sharp observer of those who have social, political and economic power when reporting about them in the public interest*'.

Basic principles of the Code are as follows:

1. *Duty of a journalist is to respect the truth and persistently search for it, having in mind a right of the public to be informed and human need for justice and humanity.*

¹ https://www.mminstitute.org/files/Kodeks_novinara.pdf



2. *The facts should be sacred for a journalist, and it is his/her duty to put them in the right context and prevent their misuse, whether it is a text, picture or a tone. Rumours and assumptions should be clearly marked as such. It is a duty to clearly separate news from a comment.*
3. *It is a duty of a journalist to complete an incomplete and correct incorrect information, especially the one that can cause any harm and at the same time to make sure that the correction is pointed out in the adequate manner.*
4. *One's race, religion, nationality, sexual orientation, family status, physical and mental condition or illness, as well as political affiliation, will be mentioned by a journalist only if that is necessary for the information.*
5. *In order to collect information in any form, a journalist should use professionally honourable and legally allowed methods. Any violation of this rule is allowed only in cases when those methods are not sufficient, and information that is to be obtained of the great importance for the public.*
6. *It is a right and duty of a journalist to protect confidential information sources, but also always to check motives of the confidential source before one is promised anonymity and protection.*
7. *A journalist is obliged to be very careful when dealing with private life of people. A right to private life is disproportional to the importance of a public function that an individual performs, but in those cases, it is necessary to respect human dignity as well.*
8. *A journalist is obliged to protect integrity of adolescent persons, as well as members of marginalised and vulnerable groups.*
9. *When reporting on investigation and court procedures, a journalist has to respect the assumption that everyone is innocent until is proved differently and should by no means pre-adjudicate the outcome of a court procedure.*
10. *A journalist should not seek or accept privileges of any kind that could limit or bring into suspicion his autonomy and impartiality, and affect the editorial freedom.*
11. *It is a duty of a journalist to maintain solidarity in relation with his colleagues in the extent that would not prevent him to properly perform professional task, or to make him violate basic principles of the journalist Codex.*

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DIFFERENT VIEWS ON REALITY

Background

Until 1990, all journalists in Montenegro were organized into one and unique association of journalists, which was member of the Alliance of Journalists of Yugoslavia. This association has had its Code of Conduct and commission that dealt with problems of violation of professional ethics. This association has disintegrated at the beginning of 1990, and for more than a decade the issues of professional ethics were marginalised. They will again come into the focus of the entire media community only in 2001, and within the Montenegrin Media Institute (MMI), an umbrella media organisation founded by then relevant journalists and media organisations in Montenegro and relevant public and commercial media at the national and local level.

The Working Group, with the support of international experts, completed the text of the Code in several months, and it was signed on 21 May 2002 by the representatives of the Association of Journalists of Montenegro, the Association of Professional Journalists of Montenegro, the Association of Young Journalists of Montenegro, the Independent Union of Journalists of Montenegro, the Association of Independent Print Media of Montenegro (MONT PRESS) and the Association of Independent Electronic Media of Montenegro (AIEM).

The Code of Conduct was partially amended in 2015. That was done with the OSCE financial and expert support. In the new text of the Code, besides the change into gender-sensitive language, one general principle was omitted, and its content was used for some sort of introduction, while the guidelines for some of the other 11 basic principles were amended and specified. Later on (in 2018), the Working Group, also with the OSCE financial and expert support, prepared additional guidelines as well, intended solely to online media. These guidelines are not the integral part of the Code so far.

A (not) very promising beginning

Under the auspices of the MMI, and with the international expert support, almost a year after the adoption of the Code, the project of encompassing the process of self-regulation was continued. Transitional self-regulation phase was contained in form of someone monitoring the media and periodically reporting on violations of journalist ethics (during few years this was performed by journalists Senko Čabarkapa and Branko Vojičić).



After this transitional solution, the Journalists' Self-Regulatory Authority (JSRA) was registered as non-governmental association founded by journalists' and media associations that adopted the Code and four media (daily newspapers *Vijesti* and *Pobjeda*, weekly *Monitor* and *Atlas TV*). The JSRA had its Council for Monitoring and Complaints. Its first report was published in March 2006 and the last one in January 2010. This self-regulatory body suspended its work in March 2010 following the stepping down of the representatives of *Vijesti* and *Monitor* from its Council. Direct reason for this was disagreement about deciding and interpreting one provision of Principle 2 of the Code², which stipulates that the journalist works in the spirit of the idea to be critical observer of those powerful in society. It referred to the manner of how the interview with controversial businessman Stanko Subotić Cane³ was conducted, which was broadcasted on private *TV IN*⁴.

Although it formally suspended work, the website of the JSRA has still been updated occasionally for certain period of time.

From its establishment to the end of work, the JSRA was financed exclusively from foreign donations.

Renewal without unity

The renewal of self-regulatory practice on new basis was encouraged by the OSCE Mission to Montenegro, as well as European Union Delegation to Montenegro, but also then President of Montenegro Filip Vujanović personally. Instead of renewal of one unique self-regulatory body, during 2012 and at the beginning of 2013, several self-regulatory bodies were formed.

In March 2012, representatives of 18 print, electronic and Internet media have founded the Media Council for Self-Regulation (MCSR). Later on, several more media have joined this collective self-regulatory body, but some have also ceased to exist. The MCSR has become also member of the Alliance of Independent Press Councils of Europe.

Furthermore, in April 2012, the Self-Regulatory Local Press Council (SRLPC) was formed as well, and it was joined by 11 print media, out of which the majority was

2 In the valid version of the Code this principle was put into introductory part

3 https://www.slobodnaevropa.org/a/stanko_subotic_intervju_tv_in_novinarsko_samoregulatorno_tijelo/1993722.html

4 *TV IN* was closed down in 2012

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published occasionally. Subsequently, the SRLPC was joined by several local media, amongst which were electronic ones, as well.

At the end of May 2012, dailies *Vijesti* and *Dan*, and weekly *Monitor*, which were not members of the MCSR, have founded the Press Council. This body, however, has never get to function, and its founders have later opted for ombudsmen.

Thus, the daily *Vijesti*, in November 2013, has appointed its columnist in that time, Ms Božena Jelušić, professor of literature and media literacy from Budva, to the duty of ombudswoman. In February 2014, daily *Dan* published that it has opted for stand-alone model of self-regulation and that it elected experienced journalist and its associate Mr Ilija Jovičević to the position of ombudsman. Weekly *Monitor* has, in June 2014, decided that the new ombudswoman of daily *Vijesti*, Ms Paula Petričević, professor of philosophy and publicist from Kotor, will be also the protector of their audience against unethical journalist practice.

Television *Vijesti* has earlier (in January 2013) appointed its editor Ms Aida Ramusović to the position of ombudswoman. After a bit longer than a year of work, ombudswoman Ms Ramusović has left that duty, and *TV Vijesti* have only in 2017 acquired new ombudswoman, as part of project implemented in partnership of this media and one non-governmental organisation⁵. Duty of ombudswoman was delegated to Ms Slavica Striković, civic activist and women's rights defender, and she performed it from May 2017 to May 2018, i.e. during the project implementation.

FOURTH ESTATE CONSCIENCE THROUGH PRACTICAL EXAMS

Media Council for Self-Regulation (MCSR), since its establishment until the beginning of 2015, has practiced monitoring of part of media, mainly print ones, and portals, and periodical reporting on examples of violation of the Code, as well as its decisions upon complaints. Since its establishment, its head was Mr Ranko Vujović, former Coordinator of the Union of Independent Electronic Media (UIEM) and President of the Council of the Agency for Electronic Media, the independent regulator.

⁵ Project 'Credible and professional media in the service of EU integration' has been conducted by TV *Vijesti* and NGO MANS, with financial support of the EU Delegation to Montenegro, <http://www.vijesti.me/vijesti/ombudsman-tv-vijesti-pisite-ako-mislite-da-su-prekrseni-standardi-936864>



The manner of work of the MCSR is regulated by the Statute, and deciding upon complaints is specified by the Rulebook on work of Commission for Complaints.

The MCSR has its website⁶ where it has been publishing reports on media monitoring, and later on, also decisions upon complaints. The MCSR has published 15 reports in total⁷, first one in May 2012, and the last one in February 2015, when this self-regulatory body has ceased to monitor the media and report upon it, but it has continued to decide upon objections and complaints.

In 2018, the MCSR has, as per publicly available data, decided upon only one complaint⁸, and it was the one from 2017. This refers to the complaint submitted by the President of the Municipality of Kolašin, concerning reporting of newspaper *Dnevne novine*. Commission for Monitoring and Complaints of the CSR has acknowledged arguments of the applicant, assessing that the journalist 'has omitted to check the accuracy of information which she found out unofficially' and thus violated the principle 1 of the Code of Conduct of Montenegrin Journalists.

The public is not familiar with information on number of complaints that the MCSR received in 2018 and whether there were any actions in following up with these complaints. During 2018, the Centre for Civic Education (CCE) has submitted 28 complaints concerning articles or features publicised by newspapers *Pobjeda* and *Dnevne novine*, portals *Analitika* and *Pink M*, as well as televisions *Pink M* and *A1*. Complaints are submitted dominantly from March to June 2018. In few cases, the head of MCRS, Mr Ranko Vujović, has contacted CCE's representatives for the purpose of mediation with particular media in relation to concrete complaint, but the CCE has rejected all mediations requesting the clear standpoint of the MCRS. However, not upon any of 28 CCE's complaints to reporting of MCSR's members did this body pass final decision, although these were often flagrant violations of the Code. Additionally, Mr Ranko Vujović has given also his personal contribution to the campaign that these media have led against the CCE with his statements to some of these media in articles/features that were part of this campaign, thereby bringing into question also his own neutrality as the head of the MCSR.

Self-Regulatory Local Press Council (SRLPC) has, in the first year of its existence, published report in which it was stated that there were no examples of violation of journalistic ethics in media which are its members. This is, also, the only report that SRLPC has published. This self-regulatory body does not have its website and the public is neither familiar with its further work, nor with the fact whether there ever were any complaints upon which it has conducted.

⁶ <http://www.medijskisavjet.me/index.php/mne/>

⁷ <http://www.medijskisavjet.me/index.php/mne/dokumenti>

⁸ <http://www.medijskisavjet.me/index.php/mne/zalbe-i-postupci/88-odluka-po-zalbi-zeljke-vuksanovic-protiv-dnevnih-novina-08-11-2017>

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Ombudsmen are, since the beginning of their work, deciding upon complaints and sometimes even on their own initiative, and they inform the public via media which the complaints pertain to. On portal *Vijesti*, which is also the online edition of daily *Vijesti*, there is a special section dedicated to work of ombudsman, but it is empty since the latest re-design of portal, as officially explained due to reasons of technical nature.⁹ Such section exists also on Internet edition of daily *Dan*¹⁰. Both daily newspapers, as well as the weekly *Monitor*, publish pronouncements of decisions in print editions, as it is envisaged by rulebooks on work of ombudsman, which are almost identical. First ombudswoman of TV *Vijesti* has been publishing also reports on her work, which have contained decisions upon complaints. This practice was not continued later.

Ombudswoman of daily *Vijesti* and weekly *Monitor* has in 2018 received 16 complaints and all were related to articles in *Vijesti*. As per words of ombudswoman Ms Paula Petričević, there are no complaints on reporting of *Monitor* for two years already. Ombudswoman has fully accepted one complaint and four partially, while four were dismissed, and three were rejected because they did not fulfil conditions prescribed by the Rulebook on work of ombudsman. Decision upon one complaint was not resolved until the end of 2018, and three were resolved by mediation.

The largest number of complaints in 2018 have been submitted by citizens, in comparison to previous year (2017), when all five complaints were submitted by lawyer Ana Đukanović, sister of current President of Montenegro, Milo Đukanović. Two of her complaints were dismissed by ombudswoman, whereas three were partially accepted.

Ombudsman of daily *Dan* has received four complaints in 2018¹¹, out of which he has rejected three because as these were not in line with criteria prescribed by the Rulebook. In the complaints which ombudsman accepted, change of headline of the article in electronic edition was requested so that no damage 'that is not possible to compensate' would be inflicted upon the applicant. In print edition of the paper, the article was published with headline formulated in such manner as to reader could think that 'Nimont' from Bar has some relations to murder of Maltese journalist Ms Daphne Caruana Galizia.

Ombudsman of TV *Vijesti*, in the period from May 2017 until May 2018, has received only one complaint, which she rejected because it did not fulfil conditions prescribed by the Rulebook. Lack of larger number of complaints can be interpreted also by the fact that viewers of TV *Vijesti* have not been properly informed that they have possibility to do so.

⁹ <https://www.vijesti.me/ombudsman>

¹⁰ <https://www.dan.co.me/ombudsman/index.php?nivo=2>

¹¹ <https://www.dan.co.me/ombudsman/index.php?nivo=2>



LIMITATIONS AND WEAKNESSES OF SELF-REGULATION IN MONTENEGRO

From the beginning of its work, the MCSR has sought to present itself as self-regulatory body with jurisdiction extending to the entire media community in Montenegro, although several leading media have not been its members and have refused the possibility to become ones.

In this context, the MCSR has been conducting also the monitoring of media which were neither its founders nor members and has been deciding also upon complaints that concerned media which are neither its members, nor have acknowledged its jurisdiction. That resulted with violations of envisaged procedures in the case of complaints and ignorance the decisions of this body.

In reports on self-regulatory practice which, from 2012 until 2014, were published by non-governmental organisation Human Rights Action (HRA), it was noted that the MCSR has been significantly more critically oriented towards media which are not its members than towards those who are, and that a part of smaller media which are its members have been omitted from regular monitoring, and that the electronic media which are its members have not been encompassed by monitoring at all¹².

The MCSR has given up from the practice of media monitoring after February 2015, justifying it by lack of funds. Also, after numerous objections of the expert public, in 2017 it has ceased with the practice of deciding upon complaints concerning media which are not members of the MCSR and who practice different forms of self-regulation.

Long-term insisting of the MCSR to be the only and unique guardian of journalistic ethics has additionally deepened mistrust within the media community. This mistrust has for long time been a reason for absence of any form of cooperation between self-regulatory bodies. That cooperation was exerted solely with moderation of external actors, specifically the OSCE and the Council of Europe, thanks to whose support the Code was amended and guidelines concerning online media were adopted.

In the beginning, the MCSR did not have a rulebook regulating procedure for deciding upon complaints, and even when it has been passed, this procedure was not sufficiently specified. Also, procedure of mediation between damaged party and media which the complaint refers to has not been regulated, although the basic objective of mediation should be conciliation of confronted parties and resolving the

¹² http://www.hracion.org/wp-content/uploads/HRA_Monitoring_2012-14.pdf

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issue by publishing correction, apology and similar, so that the dispute does not end up on court.

In rulebooks that regulate work of ombudsmen, the procedure of deciding upon complaints is clearly and precisely described.

Problem of continuous funding of self-regulatory bodies has been solved only with ombudsmen, because they are directly paid by media who engage them. The exception was the second ombudswoman of TV Vijesti, who was engaged for a year within the project which was financially supported by the European Union.

Statutes of the MCSR and SRLPC envisage that these associations, in addition to membership fee (50 EUR per month as per member), are financed also from the state budget, voluntary contributions, gifts, donations and from other sources, which are in accordance with the law. The financing from membership fee was rendered absent from practice, thus the MCSR provided money from foreign donations and state budget, which the SRLPC was not successful in. Thereby, the MCSR is the only self-regulatory mechanism in Montenegro which was receiving funding by the Government of Montenegro, i.e. the Ministry of Culture, 67 000 EUR for the period from 2012 to 2014¹³, although the Explanation of draft of new Media Law states plurality when it comes to support to self-regulatory bodies, which is not correct.¹⁴ Considering that financing from budget and donations was rendered absent for last two years, the MCSR decided in mid-2018 to stop the work of Commission for Monitoring and Complaints¹⁵. It was never even explained why the media which have founded the MCSR and which still recognize it as its self-regulator are not paying the membership fee which the Statute of the MCSR is obliging them to.

REGULATORS IN SELF-REGULATORY ENCLAVE

Within the Agency for Electronic Media (AEM), which is independent regulatory organ for the area of audio-visual media services (AVM), there is Sector for monitoring,

¹³ http://www.hracion.org/wp-content/uploads/HRA_Monitoring_2012-14.pdf

¹⁴ 'By recognizing the importance of self-regulation for professional and journalism founded on ethical principles, the Government of Montenegro has, during 2011-2014, accepted the request of self-regulatory bodies and implemented three-year programme of transparent and independent financing of work of these bodies', Explanation of draft Media Law <http://www.mku.gov.me/rubrike/JavneRasprave/195252/J-A-V-N-I-P-O-Z-I-V-za-sprovođenje-javne-rasprave-o-Nacrtu-zakona-o-medijima.html>

¹⁵ <https://www.dan.co.me/?nivo=3&rubrika=Drustvo&clanak=661622&datum=2018-09-05>



which monitors whether any of the electronic media is violating the Rulebook on Programme Standards in Electronic Media. It can launch the issue of responsibility on their own initiative, but also acts upon objections of natural persons and legal entities to violation of prescribed programme standards.

AEM decides also upon objections of natural persons and legal entities in relation to work of AVM services providers and these complaints often in entirety or partially are related to ethical aspects of some of programme contents. This brings the AEM into position to, by its decisions, enter the space of self-regulation, that does not belong to it, but the legal norms force it to deal with issues which are of ethical nature.

The AEM has pronounced the total of 89 warning measures to broadcasters in 2018, which is less than one year before, but more than in 2015 and 2016. The AEM has passed 108 warning measures in 2017, 63 in 2016, and only 28 in 2015.

In overall sum, as per number of warnings, the record holder is TV Pink M, a broadcaster which has been punished with the total of 39 warnings in last four years, out of which seven in 2018¹⁶, and 15 for 2016 and 2017 each. Far behind it, in terms of number of warnings, within the same period, is the national public broadcaster RTCG with the total of 14 warnings, of which almost equal number was pronounced in 2017 (seven) and in 2018 (six). By one warning less than that, TV Vijesti was punished (13), and by three warnings less TV Prva (11), in the same period.

Commission for Applications and Complaints of listeners and viewers of Radio-Television of Montenegro (RTCG), the national public broadcaster, is also a regulatory body mandatory by the valid Law on Public Broadcasting Services Radio of Montenegro and Television of Montenegro. This Commission is the part of the Council of RTCG, whose members it is actually comprised of. It monitors the respect of Programme principles and professional standards of RTCG, adopted by the Council RTCG, and its opinions and recommendations are adopted or rejected by the Council of RTCG. Public is informed about its decisions via 'Newsletter' publicised on RTCG portal¹⁷. Thus, for the period 2015-2018, Commission for Applications and Complaints of listeners and viewers of RTCG has received 110 complaints, i.e. 32 in 2015, 39 in 2016, 18 in 2017, and 21 in 2018¹⁸. In 2018, the Commission has received 21 complaints, and the Council has, on its recommendation, accepted 11 and rejected 10. During the term of office of Ms

16 In the other half of 2018, TV Pink M with national frequency in Montenegro has changed ownership structure and become NOVA M

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

18 Data from RTCG website indicate that the last session of this Commission in 2018 was in October.

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Andrijana Kadija at the position of Director General of RTCG in 2017, there were 50% less complaints in comparison to 2016 and 2015, and the number of grounded complaints was for 50% less than compared to previous two years. In 2018, this Commission has received seven complaints while Ms Kadija was governing the public service RTCG (out of which four were rejected, three accepted whereby two of three were related to one car TV show and hidden marketing, and one was submitted by the ruling DPS). The number of complaints after her dismissal has increased for 100%.

These commissions exists also in some local public broadcasting services.

New legal solutions, which are in the procedure, envisage that instead of Commission for Applications and Complaints, ombudsman exists in RTCG.

As in the case of the AEM, thus the Council of RTCG too occasionally enters into the space that belongs exclusively to self-regulation. Namely, the Rulebook on Programme Principles and Professional Standards¹⁹, adopted at the end of 2017, treats also those professional standards related to journalistic ethics, which are given in the unique Code of Conduct of Montenegrin Journalists, which is accepted by the RTCG as well. Since the RTCG is one of the founders of the external self-regulatory body (MCSR), in whose jurisdiction is the care of ethics of journalistic work, thus it leads to overlapping and deciding in cases of those applications and complaints related to ethical professional standards.

It is the same case when it comes to the Agency for Electronic Media (AEM), whose director and Council decide upon complaints related to violations of ethical journalistic standards, as obliged by Rulebook on Programme Standards in Electronic Media²⁰, which contains also these standards.

HOW TO REACH THE FUNCTIONAL MEDIA SELF-REGULATION?

There are multiple self-regulatory bodies in Montenegro and no indications that one unique would be established soon. This should neither be insisted upon nor should it be seen as insurmountable shortcoming. It is more important to strengthen functionality, transparency and professionalism of existing self-regulatory bodies

¹⁹ <http://www.rtcg.me/rtcg/dokumenti/regulativa.html>

²⁰ <http://aemcg.org/wp-content/uploads/2018/05/Pravilnik-o-programskim-standardima-u-elektronskim-medijima.pdf>



than to attempt to artificially reduce them to one formal one whose decisions part of media would not accept.

In addition to equal chances for existing self-regulators, their cooperation should be encouraged about the smallest common denominators – refining of the Code, promotion of media literacy, importance of journalistic ethics in equalization of criteria during assessing non-ethical practice. This would contribute to trust of the public into self-regulatory bodies and would strengthen their credibility and authority, and could, in time, crystalize certain common positions within media community as per issues of defence and improvement of ethical and professional standards.

All media, not only those which have ombudsmen, must ensure permanent sources of income for effective functioning of self-regulatory bodies as envisaged by their founding acts, guarding thereby the independence of these bodies. Investing of the media themselves in self-regulatory mechanisms and their promotion is a mirror of dedication of these media to ethical standards.

It is not acceptable for state to prescribe the legally mandatory media self-regulation, nor to favour some of the self-regulatory models and practices via financial support or in any other manner. The state can only, in adequate manner, without interfering into interior issues of media and journalistic community, encourage media to develop self-regulation of their own accord. Everything else, and especially discretionally funding, within Montenegrin social and political reality would represent dangerous entry of government into one forbidden zone and collapse of the concept of media self-regulation.

Regulation and self-regulation must be clearly separated. Thus, the Agency for Electronic Media should, by new legal solutions, be liberated from the obligation to, by deciding upon complaints, interfere into issues that should be in explicit jurisdiction of self-regulatory bodies. It is necessary to ponder on good comparative experiences of collaboration of regulators and self-regulators and apply those which can give proper response in Montenegrin context.

