



Centar za građansko obrazovanje
Centre for Civic Education



Equal chances for all media in Montenegro

Report for 2018 and 2019



Kingdom of the Netherlands

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The Balkan Trust
for Democracy

A PROJECT OF THE GERMAN MARSHALL FUND



Norwegian Embassy
Belgrade

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Podgorica, 2021

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02 Methodological remarks

This research of various forms of money transfers from public funds to the media was conducted from the beginning of July 2020 to the end of March 2021 and included 605 public bodies, organizations, institutions and companies. The research team of CCE tried to include all public bodies, at the local and national level, that are bound by the Law on Free Access to Information, along with some that are not bound by it, but that receive a significant part of their funds from public funds.

Monitoring the flow of money from public funds to the media is part of CCE's multi-year efforts to contribute to the establishment of an environment that provides equal chances for all media. Based on the findings of CCE, as well as formulated proposals, the new Law on Media¹ has settled this issue solidly, and CCE will monitor the application of those provisions in the coming period.

The report includes data collected based on responses to *requests for free access to information*, as well as from available documents of competent authorities for the period from 1 January 2018 to 31 December 2019. It is about the transfer of public funds by public bodies, or those who are significant budget beneficiaries, to the media and related entities for the provision of various services, as well as on other grounds.

During the collection and processing of data, all public bodies were given the opportunity to supplement the data or clarify their decisions, which were of importance to the researchers, although, unfortunately, most of the bodies did not take advantage of this.

This report also contains data on state aid granted to broadcasters during 2018 and 2019, with a brief comparative overview for 2017, which was collected on the basis of data from the annual reports of the Agency for Protection of Competition, more precisely the Sector for State Aid Control.

In addition, CCE research team worked on the processing of data related to the financing of the public service media Radio Television of Montenegro (RTCG), through their annual financial plans, financial reports and allocations from the Budget of Montenegro, which rounded off the entire financing structure of RTCG, as well as how much is allocated for RTCG on an annual level from the Budget and how much they earn from advertising and marketing.

The report makes certain conclusions and recommendations, in order to further contribute to the necessary changes in the system and in order for this area to be regulated on the right foundations, thus reducing the scope for influence of any authorities on the editorial policies of the media, and consequently on other streams as well.

¹ "Official Gazette of the Republic of Montenegro" no. 82/2020

03 How media in Montenegro gets financed from public funds?

State aid to the media

State aid in Montenegro, regardless of the area in which subject operates, is regulated by the Law on State Aid Control², and the Agency for Protection of Competition of Montenegro is competent for its supervision.

Article 2 of this Law defines state aid as *financial aid granted directly or indirectly through state budget, by a decision on the municipalities' budgets of the Government of Montenegro, decision of the competent municipal body, including European Union funds and other public funds which is allocated to beneficiaries who perform economic activity, which puts them in an advantageous position relative to other market participants. Financial support that is not provided to business organizations under the same conditions, is either provided selectively to companies according to its size, place of business or place of registration, or is intended for one company. This type of financial support jeopardizes competition and affects trade between Montenegro and other countries contrary to ratified international treaties.*

The Agency for Protection of Competition decides on the compliance of state aid with the Law within 60 days of the submission of a proper application for state aid. Permitted forms of state aid in Montenegro are precisely prescribed³.

The Decree on more detailed criteria, conditions and manner for granting state aid⁴ concretizes and regulates in more detail the state aid to public broadcasting services. Article 43 of this Decree prescribes the following conditions for state aid to public service broadcasters: *the broadcasting of radio and television programmes meets the interests of the public at the national and local level and takes care of the national representation of information, cultural, educational, sports and entertainment programmes, if the provision of public service is entrusted on the basis of an act (administrative) or contract, by broadcasting a radio or television programme of importance to the citizens of Montenegro, if an independent body has been designated to monitor the provision of the public service and if funding is provided in one of the following manners: the public service of radio and television broadcasting is financed only through public funds, in any form, or - the public service of radio and television broadcasting is financed by various combinations of public funds and the sale of advertising space or programmes.*

According to the 2018 Annual Report of the Agency for Protection of Competition on State Aid granted in Montenegro, the total amount of state aid to the media sector in 2018 was EUR 609,324.67.⁵

² "Official Gazette of the Republic of Montenegro" no. 012/18

³ Law on State Aid Control, Article 8, State aid may be granted as: 1) subsidy or subsidized interest rate on loans; 2) fiscal relief (tax, contribution and other public revenues); 3) state or municipal guarantee; 4) cession of profits and / or dividends of the state or municipality to the beneficiary of state aid; 5) debt write-off to the state, municipality or legal entity that manages and disposes of public revenues and state property; 6) real estate sale by the state or municipality at a price lower than the market price or purchase at a price higher than the market price; 7) use of state property free of charge or with a fee lower than the market; and 8) other aid in accordance with the law.

⁴ Decree on more detailed criteria, conditions and manner for granting state aid, "Official Gazette of the Republic of Montenegro" no. 27/2010, 34/2011 and 16/2014

⁵ Agency for Protection of Competition, Annual report on granted state aid in Montenegro in 2018, http://www.azk.me/dp/images/docs/GI_2018_FINAL.pdf

Specifically, through state aid categorized as services of *general economic interest*, the Ministry of Culture allocated the amount of EUR 151,700.00 to support the development of media pluralism in 2018. Also, within the same category - services of general economic interest - the Agency for Electronic Media (AEM) stands as a provider of state aid, which grants aid to commercial radio broadcasters in the amount of EUR 264,280.00. Services of general economic interest are services that are classified by the authorities at the national, regional or local community level as those of general interest and which the state is obliged to provide.



In addition, in 2018, the media sector was financed within state aid through *small amounts of state aid (de minimis aid)*. It is aid granted to business companies undertaking over a 3-year fiscal period not exceeding EUR 200,000.00. As part of this type of aid, in 2018, the Ministry of Economy allocated the amount of EUR 193,344.67 to the Broadcast Centre (RDC). This support is based on Government resolution no. 07-522 adopted on 17 March 2017, by which the Government obliged the Ministry of Finance and the Ministry of Economy to provide allocation of a total of EUR 1,597,092.72 within predefined annual amounts to the Broadcast Centre for the period from 2017 to 2021. This amount represents 36 monthly invoices of all broadcasters, provided that the amount of individual aid per broadcaster is limited to a maximum amount up to EUR 200,000.00. Each tranche of budget payment, starting from 2018, is conditioned by obtaining a confirmation of the RDC that the broadcasters have settled the regular obligations from previous years (starting from 2017) on this basis. The amount allocated to broadcasters that have properly fulfilled their contractual obligations is calculated as a subscription, which ensures equal treatment on the market. It was explained that the aid was established due to the tough business conditions of all radio and TV broadcasters on the Montenegrin media scene, as pointed out by RDC, which resulted in outstanding liabilities of commercial and local broadcasters arising from services provided by RDC.

According to the *2019 Annual Report of the Agency for Protection of Competition on State Aid granted in Montenegro*, the total amount of state aid to the media sector in 2019 amounted to EUR 553,028.76.⁶

Through the category of state aid - services of general economic interest, the Ministry of Culture allocated the amount of EUR 169,150.00 to support the development of media pluralism.



⁶ Agency for Protection of Competition, 2019 Annual Report on State Aid granted in Montenegro http://www.azzk.me/dp/images/docs/Godisnji_izvjestaj_2019.pdf

In respect to the category of *small amounts of state aid (de minimis aid)*, the Ministry of Economy paid the Broadcasting Centre EUR 383,878.76, also on the basis of the above-mentioned Government resolution No. 07-522.

Hence, in these two years, media received EUR 1,162,353.43 of state aid, which is only part of the transfers from public bodies.



Financing of the Public Broadcasting Service RTCG

Radio-Television of Montenegro (RTCG) is a National Public Broadcaster, and as such receives separate and direct allocations from the Budget of Montenegro.

In 2017, RTCG had a total planned revenue of EUR 13,051,000.00, of which EUR 11,511,000.00 was allocated from the Budget of Montenegro, while the projected expenditures for that year amounted to EUR 13,051,433.00.

According to the 2017 Financial statement of RTCG, the **total revenue generated by RTCG in 2017 amounted to EUR 12,935,482.00**, or 0.9% less than in the Financial Plan. The total regular public (budget) revenues of RTCG in 2017 amounted to EUR 11,511,000.00, which was in the line of planned revenues from that source.

Total expenditures in 2017 were EUR 12,922,496.00, or EUR 128,947.00 less than those in the Plan, and significantly less compared to the previous year when total expenditures amounted to EUR 15,481,904.00.

In 2018, the Public Broadcasting Service RTCG had a total planned revenue of EUR 19,977,200.00, of which EUR 12,577,200.00 is from the Budget of Montenegro. The total projected expenditures were EUR 19,947,200.00, of which EUR 6,000,000.00 was spent on digitalization.

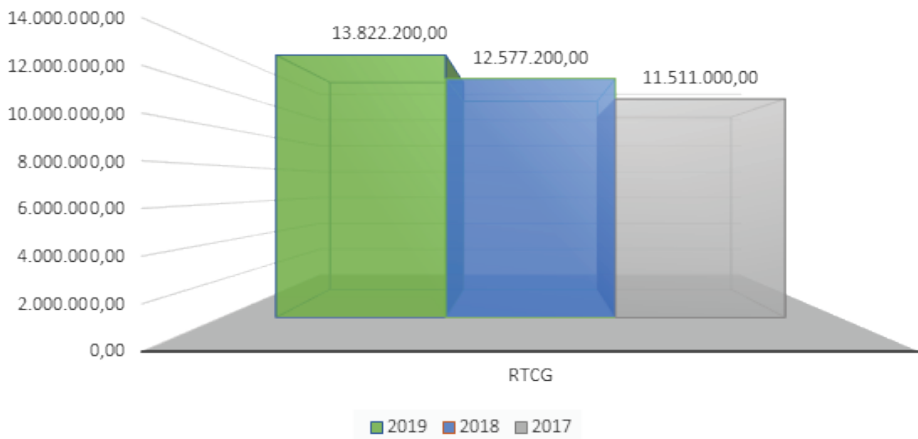


Chart 1. Review of allocations from the Budget of Montenegro for RTCG during 2017, 2018 and 2019

According to the 2018 Financial statement of RTCG, the total revenue was EUR 13,974,080.00. Budget of Montenegro allocated EUR 12,577,200.00, which is an increase in comparison with 2017 when EUR 11,511,000.00 was paid from the Budget. Commercial revenues were EUR 1,174,752.00, which is less than planned (EUR 1,300,000.00), but also less in comparison with the revenues on this basis from 2017 (then they were EUR 1,212,610.00). When it comes to other revenues, the total amount is EUR 182,639.00 and is much higher than planned for that year (EUR 100,000.00), but also significantly lower compared to 2017, when revenues on this basis amounted to EUR 211,872.00.⁷

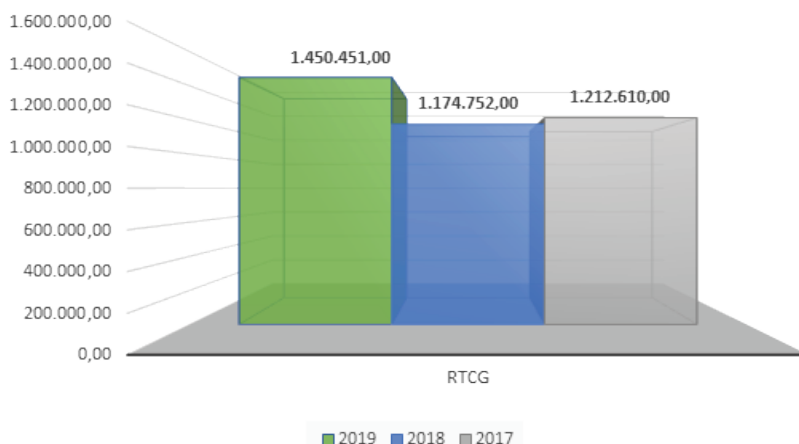


Chart 2. Review of RTCG's commercial revenues in 2017, 2018 and 2019

In 2019, the Public Broadcasting Service RTCG had a total planned revenue of EUR 21,252,200.00, of which EUR 13,822,200.00 is from the Budget of Montenegro. The total projected expenditures for this year were EUR 21,202,200.00, of which EUR 5,450,000.00 was spent on digitalization.

The 2019 Financial statement of RTCG indicates that the generated **total income amounted to EUR 16,398,361.00**, which is an increase of EUR 2,424,281.00 in comparison with the previous year. The amount allocated from the Budget of Montenegro was EUR 13,822,200.00, which is also an increase in comparison with the previous year.

Commercial revenues exceeded the planed ones, so on this basis, revenues in 2019 amounted to EUR 1,450,451.00. Revenues in the item that includes other revenues during that year amounted to EUR 177,742.00 and were significantly lower than planned (EUR 870,000.00).

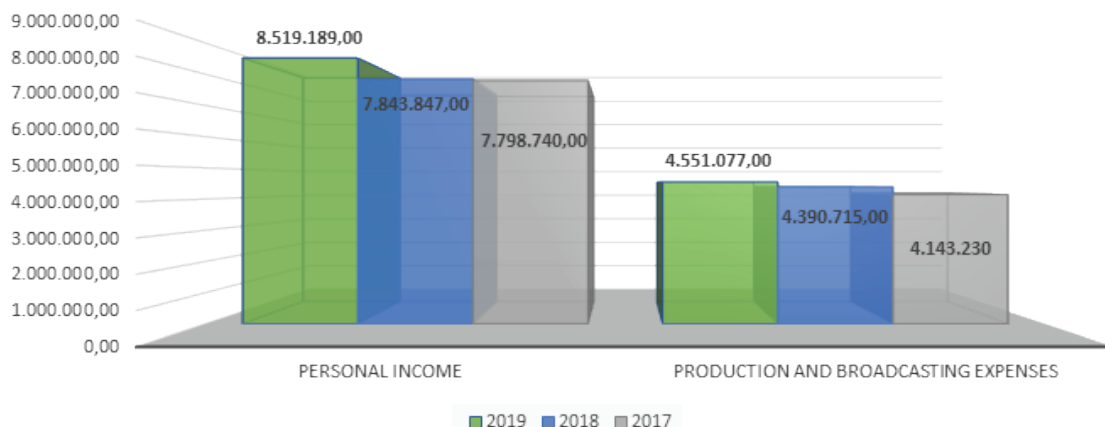


Chart 3. Review of RTCG expenditures in 2017, 2018 and 2019

⁷ These revenues include revenues from donations for the show "Mechanism", donations from the Ministry of Culture for the "TV archive", revenues from the purchase of apartments, revenues from the enforcement of damages, etc.

When it comes to RTCG expenditures, during 2017, the personal income expenses prevailed, in the amount of EUR 7,798,740.00 and exceeded the planned ones by EUR 143,740.00. Furthermore, concerning the size of the expenditures, expenses of production and broadcasting in the amount of EUR 4,143,230.00 follow, which is less than the planned EUR 4,360,383.00.

In 2018, EUR 7,843,847.00 was spent on the personal income of RTCG employees, which is less than the planned EUR 8,190,000.00. Production and broadcasting expenses amounted to EUR 4,390,715.00, which is also less than the planned EUR 4,660,200.00.

In 2019, the largest part of expenditures is personal income in the amount of EUR 8,519,189.00, which is significantly higher than in previous years, and even slightly higher than the planned EUR 8,497,000.00. This is followed by production and broadcasting expenses – EUR 4,551,077.00, which are lower than the planned EUR 5,173,800.00.

Radio-Television of Montenegro (RTCG) has had revenue growth over these three years, both from the Budget of Montenegro, from which revenues between 2017 and 2018 increased by 20%, and commercial revenues for the same period which increased by 19.61%. However, expenditures also increased by 9.24% for personal income and 9.84% for production and broadcasting expenses. In addition, based on the collected data, RTCG received EUR 252,125.20 for 2018 and 2019 from public bodies, organizations, institutions, enterprises and others for marketing and advertising.

Transfers from public bodies to the media and for media services

• General cross-section

According to the records of the Agency for Electronic Media (AEM), six channels of the national service of Radio-Television of Montenegro, five local public TV broadcasters, 16 local public radio broadcasters, 14 commercial TV broadcasters, 36 commercial radio broadcasters, two non-profit radios operate in Montenegro. The Media Law stipulates the obligation of the competent Ministry to keep Media Record of active media, which must go through the application procedure for entry in the Record, but there is still no publicly available list of all media in Montenegro on the Ministry's website.

Out of **605 bodies** requested for free access to information – **520 bodies, organizations, institutions and enterprises** responded to CCE researchers, i.e. **85.95%**, while **14.05%** did not submit the requested data. Although some progress has been recorded compared to previous years, the fact that the vast majority of authorities have not developed a sense of responsibility in terms of consistent compliance with the Law on Free Access to Information remains.

Amongst 81 bodies that ignored the request of CCE researchers, thus violating the provisions of the Law on Free Access to Information, the so-called the *principle of administration silence* is predominant. The Cabinet of the President of Montenegro and the Ministry of Economy, which, despite numerous urgencies and even complaints to the Agency, did not submit responses to our request by the day the research was ended, stand out for their non-transparency.

The data were subsequently submitted by the Ministry of Health and the Ministry of Transport and Maritime Affairs, the National Library of Montenegro and Vodovod (water system) LLC Podgorica, which did so a few days after the end of data processing, which is why the researchers made an additional effort to subsequently include these data, in order to get the most credible cross-section of these expenses.

The «black list» of non-transparent bodies, in addition to the mentioned Ministry of Economy and the President of Montenegro, also includes the Centre for Training in Judiciary and State Prosecution Service, the University of Montenegro, Public Institution Museums and Galleries of Budva, Mediterranean sports center, Čistoća Podgorica, Montecargo, Coal Mine Pljevlja, numerous public bodies whose budgets are smaller and which have not been identified as significant investors in this area.

For the first time since CCE conducted this research, ie 2013, the responses submitted Capital City Podgorica and the public company 'Plantaže'. Additionally, the positive practice developed by the Capital City Podgorica is noted, which represents a special system of monitoring and reporting on ongoing cases and notifying the parties about the stage of the case, and if the notification is submitted by e-mail - there is an access code.

Although the responses were submitted by over 80% of bodies and organizations, the promptness of submitting responses varied. As a rule, bodies that did not have expenses were the first to respond, on average within seven days. Schools and kindergartens, as well as the judiciary, were the fastest and most efficient in that respect. However, the general average for obtaining responses for all bodies was almost 25 days. Thus, independent institutions and public institutions responded in an average of 12 days, the Parliament in 16 days, public enterprises in 30 days, while the Secretariat-General of the Government, ministries and bodies within the Government responded in slightly more than 40 days, and local self-governments in over 50 days.

The CCE sent 26 complaints to the Agency for Personal Data Protection and Free Access to Information (AZLP), and a long period of time for resolving individual complaints is noted. Out of 26 complaints, 10 were upheld, six complaints were not resolved by the end of this study, while the CCE withdrew the complaints in 10 cases, as the authorities, in the meantime, submitted the data. The average time from sending a complaint to resolving it is over 200 days.

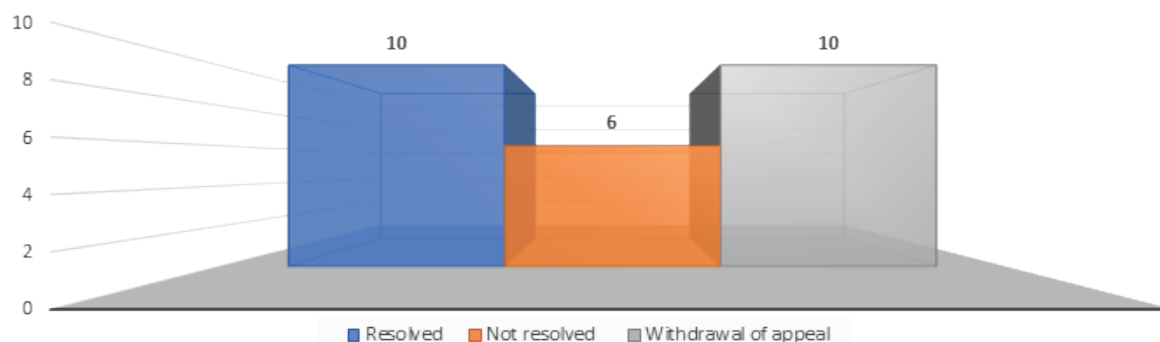


Chart 4. Review of the operation of Agency for Personal Data Protection and Free Access to Information

The complaint filed against the administration silence of the President of Montenegro was upheld, but the Cabinet of the President never acted on it. Out of 13 complaints related to government bodies, the CCE withdrew complaints in four cases, i.e. against the *Secretariat-General of the Government*, the *Ministry of Sports and Youth*, the *Ministry of Defence* and the *Real Estate Directorate*, which comprise the four bodies. Complaints against six ministries were upheld - the *Ministry of Finance*, the *Ministry of Sustainable Development and Tourism*, the *Ministry of Education*, the *Ministry of Transport*, the *Ministry of Health* and the *Ministry of Economy*, while the complaints against the *Ministry of Agriculture and Rural Development*, the *Minister without Portfolio* and the *Directorate for protection of classified information* were not resolved.

CCE withdrew complaints to the AZLP in the case of six local governments (Berane, Bijelo Polje, Herceg Novi, Kotor, Plav, Ulcinj), and the Agency upheld the complaint related to the administration silence in the case of Herceg Novi, which submitted the required documentation, but later the withdrawal was sought. In the case of Budva, the complaint remains unresolved, while in addition to Herceg Novi, the appeal was upheld in the case of the municipality of Plav. The Capital City Podgorica submitted information, but the AZLP did not complete the procedure.

In the case of public enterprises, the CCE withdrew complaints in the case of the Airport of Montenegro,

complaints against 'Plantaže' and the Electric Transmission System of Montenegro were upheld, and the procedure in the complaint against the Port of Kotor was not ended.

The practice of the AZLP is interesting as in several cases it required the CCE to submit complaints signed, stamped and scanned. After a continuous communication with the Agency, it was clarified that if the complaint is in the body of the e-mail, not attached as a separate document, and if it is sent from an official account, it would be considered a valid complaint. However, one in two complaints not sent in this form was considered irregular in a number of cases, and the CCE received a series of requests by the ALZP referring to the editing a submission. Inconsistent interpretations lead to legal uncertainty and complicate the procedure for anyone who wants the Agency to legally resolve its case, and there is no doubt that the AZLP does not have a uniform practice, as proved by the documentation of the CCE.

A total of **306 bodies** had expenses in 2018 or 2019 or during both years. The total expenses of these bodies during 2018 and 2019 is **EUR 5,259,201.00**, i.e. **EUR 2,606,494.00 for 2019 and EUR 2,652,706.00 in 2018**. **This does not include state aid or funds from the budget for the public service RTCG.**

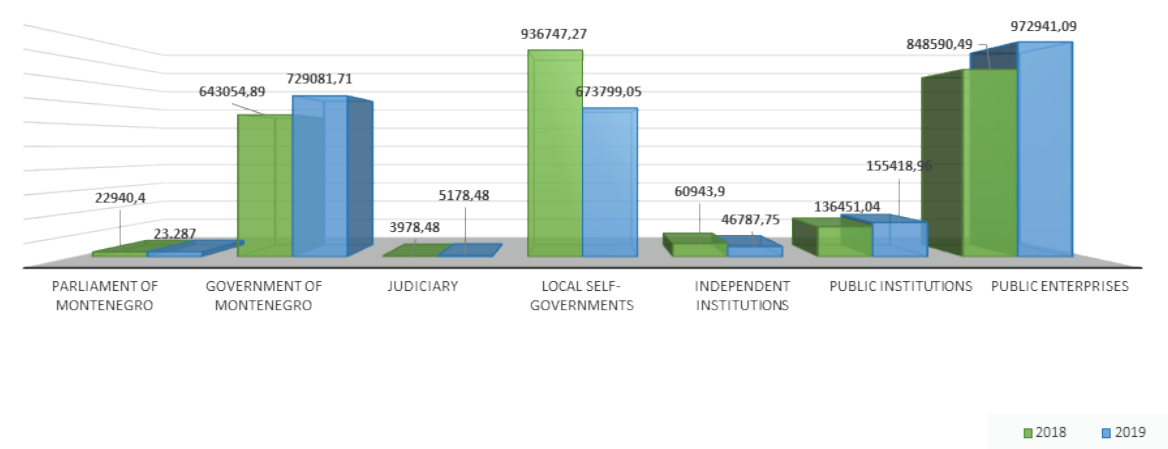


Chart 5. Review of the funds allocated for the media in 2018 and 2019 by authorities

The largest consumers during 2019 were public enterprises spending EUR 972,941.10, followed by Government bodies that spent EUR 729,081.70. The least funds were spent by the judiciary, i.e. EUR 5,178.48.

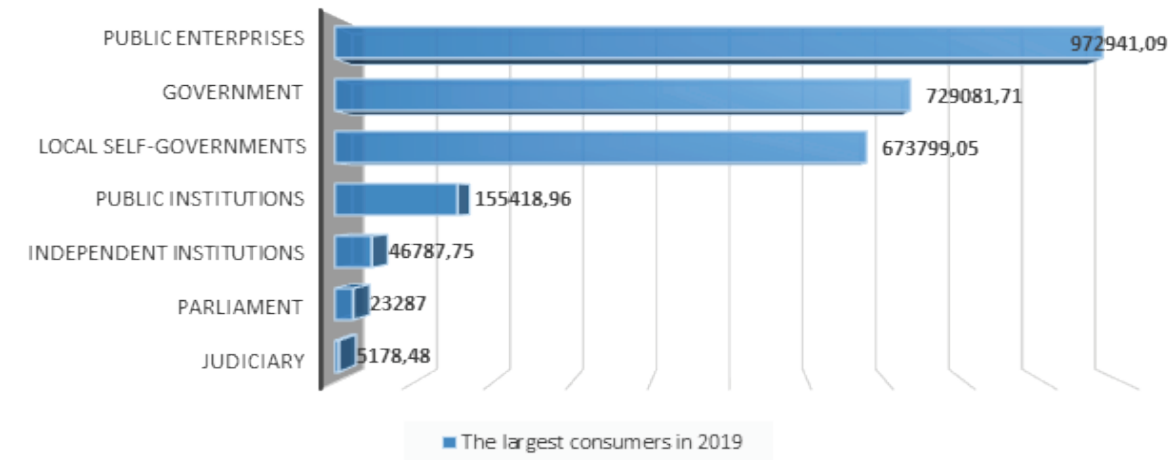


Chart 6. Comparative review of consumers from public sector in 2019

In 2018, according to the collected data, the largest consumers were local governments spending EUR 936,747.27.

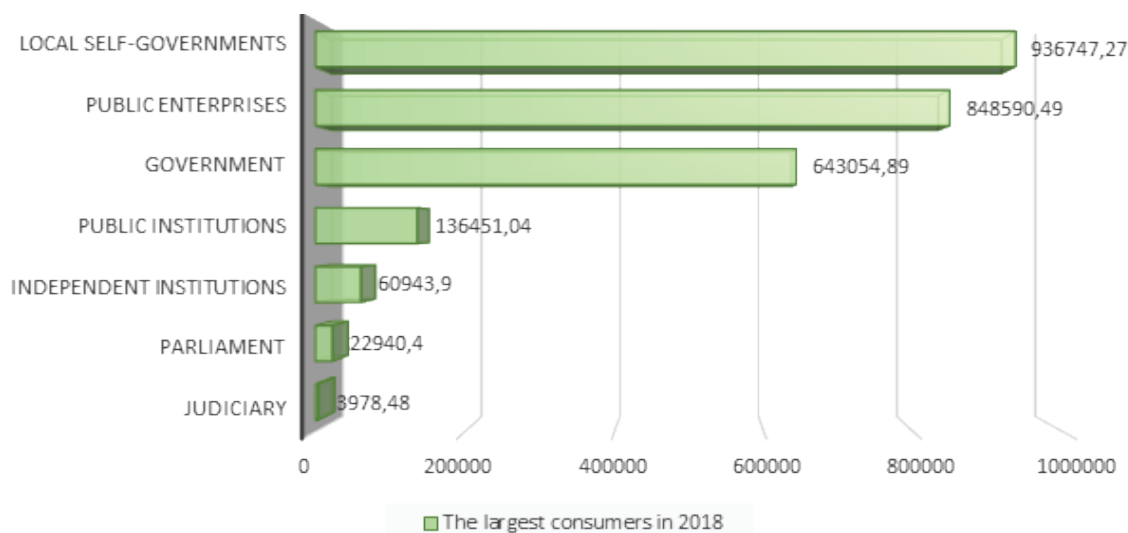
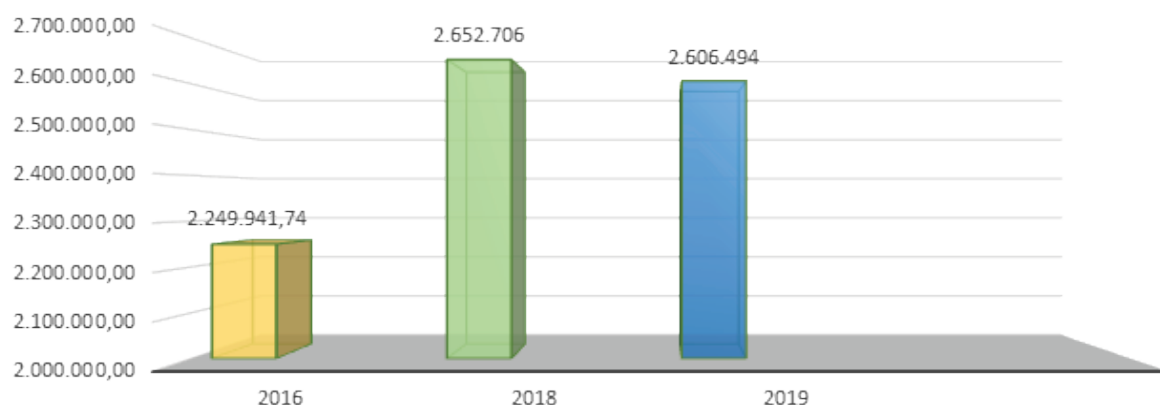


Chart 7. Comparative review of consumers from public sector in 2018

A comparison of data from 2019 and 2018 with the expenses of the authorities in 2016 indicates certain variations. It should also be noted that 334 bodies⁸ were included in the research in 2016, which is a slightly more than half of the current number, which in 2018 and 2019 was 605.



Graph 8. Review of expenses of public bodies by media and media services in 2016, 2018 and 2019ⁱ

- **How and how much public bodies spent on media and media services in 2018 and 2019**
 - **Cabinet of the President of Montenegro, Parliament and Government bodies**

Until the day the research was completed, and after several months of attempts, the CCE did not receive a response to the request submitted to the **Cabinet of the President of Montenegro**. It should be noted that the Cabinet of Milo Đukanović did not comply with the decision of the Agency for Personal Data Protection and Free Access to Information (AZLP), which decided positively on the complaint of the CCE. In previous researches, when the other president, Filip Vujanović, held that position, the CCE regularly got the requested data.

When it comes to the **Parliament of Montenegro**, the situation differs considerably. This authority

⁸ Centre for Civic Education (CCE), Equal Chances for all Media in Montenegro 2017, p. 24

submitted a response one day late, i.e. within 16 days from the day of sending the request, submitting data for both requested years in the total amount of **EUR 46,227.40**. By year, **EUR 22,940.40** refers to **2018** and **EUR 23,287.00** to **2019**. Those amounts were paid to the daily Dan, as well as to the Infomont and Arhimed services.

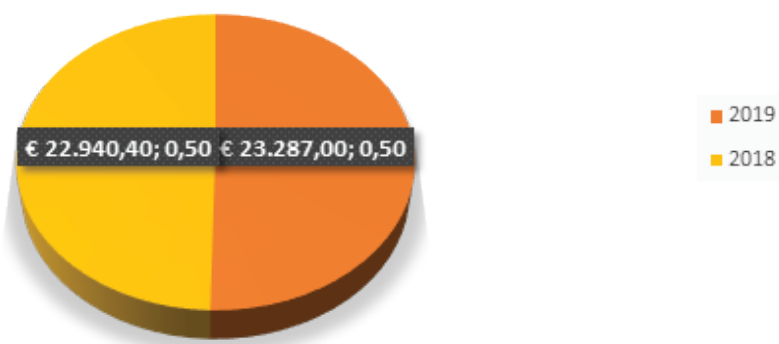


Chart 9. Overview of expenses of the Parliament of Montenegro in 2018 and 2019 for media and media services

The expenses that the Parliament of Montenegro had on the basis of transfers to the media, for media and related services were consistent, more precisely, they slightly increased in 2019 by EUR 346.60 (1.5%) compared to 2018. The Parliament allocated the most funds to the agencies, more precisely EUR 28,241.40 or 63.67% of the total costs are on this basis.

The next category covered by this research is the **Government** bodies, which include the Secretariat-General of the Government, 19 ministries and 51 bodies, including agencies, administrations, institutes, funds, etc. Until the day the research was terminated, no response had arrived from the Ministry of Economy. Due to the reorganization of the public administration that caused merger of certain ministries, despite efforts and complaints to AZLP, as well as numerous urgent requests and calls, the CCE research team failed to obtain the requested answers. Therefore, the total amount of expenses of all authorities, which submitted data, for both years amounts to **EUR 1,372,136.60**, which by year amounted to **EUR 729,081.71 in 2019** and **EUR 643,054.89 in 2018**.

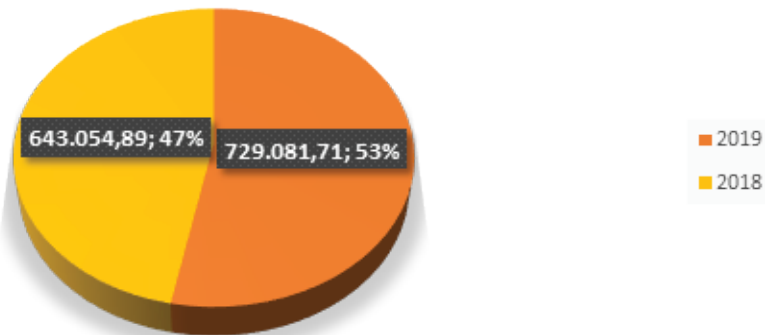


Chart 10. Overview of expenses of the bodies of the Government of Montenegro for media and media services in 2018 and 2019

The ministries spent **EUR 912,160.90** in 2018 and 2019, with the note that the **Ministry of Sustainable Development and Tourism** took the lead with **EUR 359,383.10** spent in those two years. In both years, the **Ministry of Sports and Youth** and the **Minister without Portfolio** were at the bottom of the list, noting that the Ministry of Sports and Youth had **EUR 1,089.00** in expenses in 2019, while in 2018 they had no expenses on this basis.

In 2019, the largest consumer on this basis was the **Ministry of Sustainable Development and Tourism - EUR 179,031.07**, followed by the **Ministry of Education - EUR 86,205.74** and the **Ministry**

of Culture - EUR 79,800.00, while all other ministries, which submitted data, had lower costs - from EUR 1,089.00 which was spent by the **Ministry of Sports and Youth** to **EUR 32,130.00** that spent the **Ministry of Agriculture and Rural Development**.

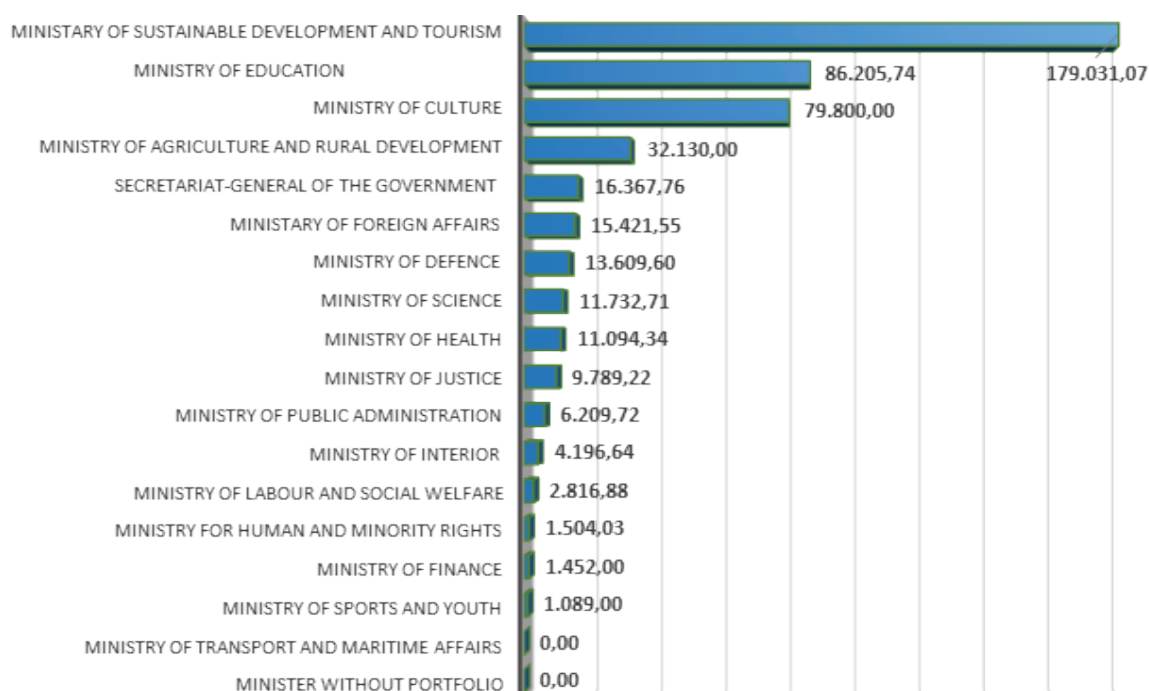


Chart 11. Overview of expenses of the ministries of Montenegro for media and media services in 2019

During 2018, the largest consumer again was the **Ministry of Sustainable Development and Tourism** with **EUR 180,351.98** spent, followed by the **Ministry of Culture** with **EUR 94,500.00**, while the Ministry of Education in 2018 had significantly less expenses compared to 2019, or more precisely – EUR 55,638.30 less, which means that there was a 182.01% increase of over 180% of costs on that basis in 2019 in comparison to 2018.

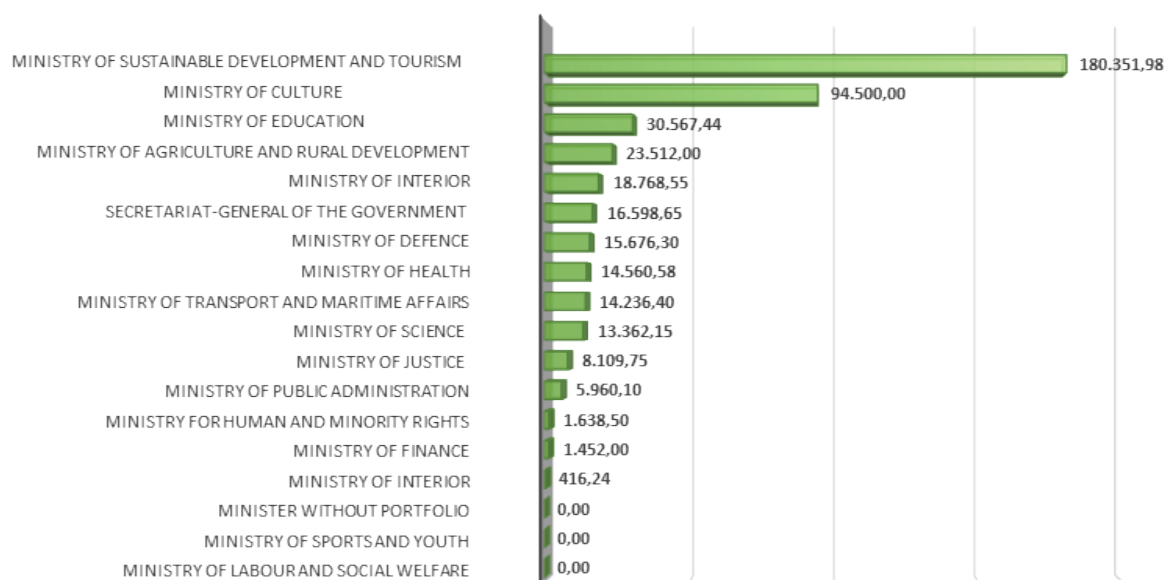


Chart 12. Overview of expenses of the ministries of Montenegro for media and media services in 2018

A comparative overview of the available data indicates that these expenses of the ministries do not vary much during 2018 and 2019, with the exception of the Ministry of Education, as well as the Ministry of the Interior, which had only EUR 416.24 of expenses in 2018, and EUR 4,196,64 in 2019, which is 10 times more.

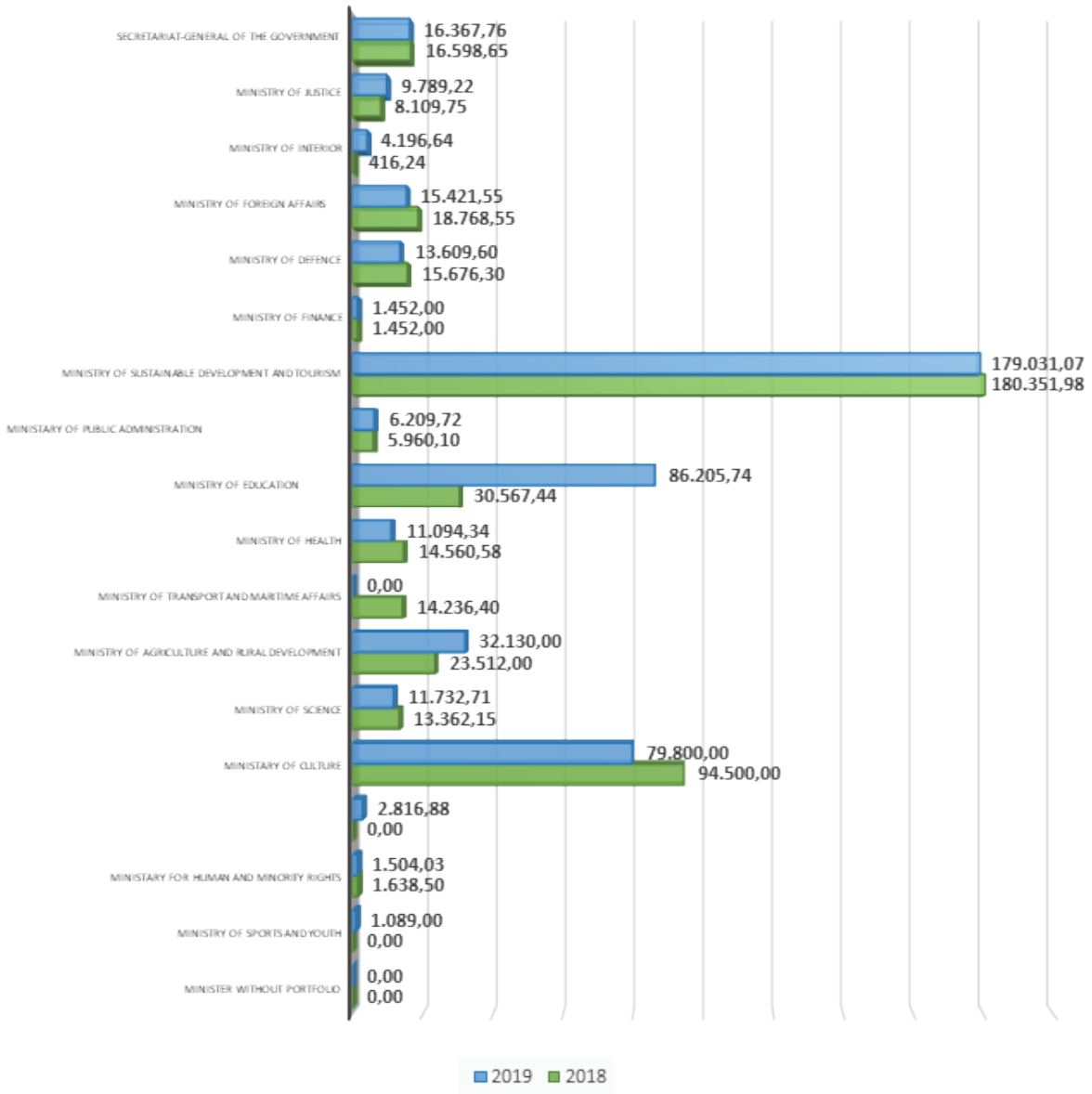


Chart 13. Comparative overview of expenses of the ministries of Montenegro for media and media services in 2018 and 2019

In 2018 and 2019, **administrations spent EUR 111,687.93, bureau EUR 64,937.38, agencies EUR 53,996.11**, commissions had no expenses, **funds had EUR 221,958.32** of expenses, institutes **EUR 7,395.96** while the Secretariat for Legislation, the Social Council of Montenegro, the State Archives and the Directorate for Personal data protection did not have this type of expenses for the media and media services.

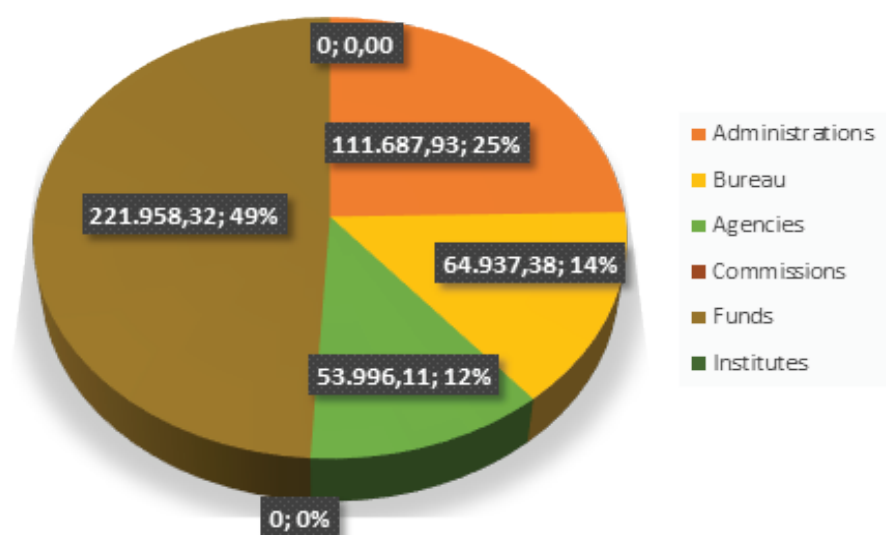


Chart 14. Summary of expenses of other administrative bodies for media and media services in 2018 and 2019

The costs of all other bodies - **51** of them (20 administrations, 8 bureau, 6 agencies, 3 commissions, 8 funds, 2 institutes, the Secretariat for Legislation, the Social Council of Montenegro, the State Archives and the Directorate for Personal data protection) amounted to **EUR 459,975.70**, and they are lower by 49.57% than the costs of all ministries, which submitted answers on the same basis (**EUR 912,160.90**).

When it is broken down into 2018 and 2019, the picture is a slightly different. Namely, in 2019, other authorities spent **EUR 256,631.50** on media and media services, and in 2018, that amounted to **EUR 203,344.30**. At the same time, administrations and bureau had more than double the growth of these expenses in 2019, while the funds spent about EUR 3,000.00 less compared to 2019.

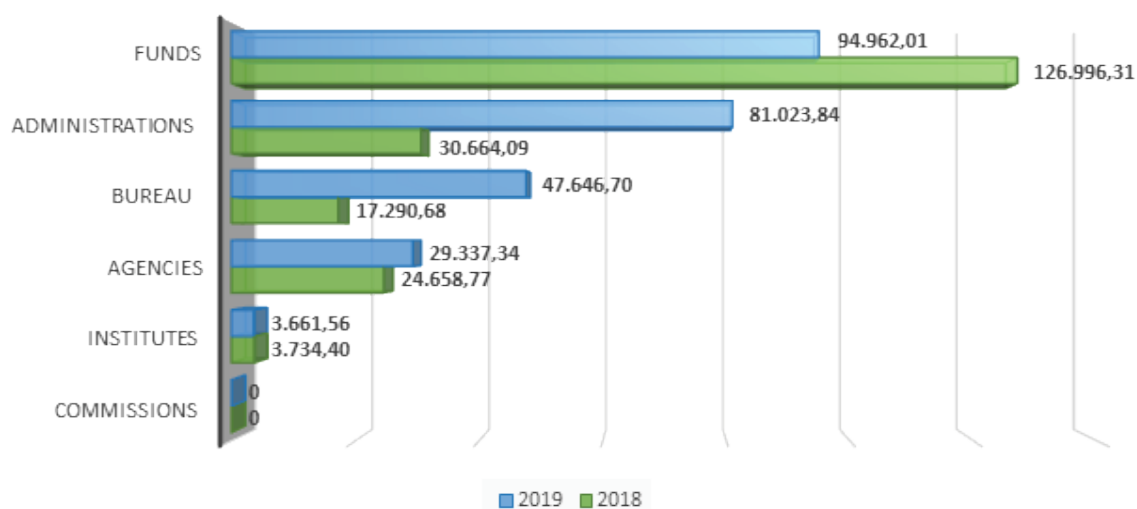
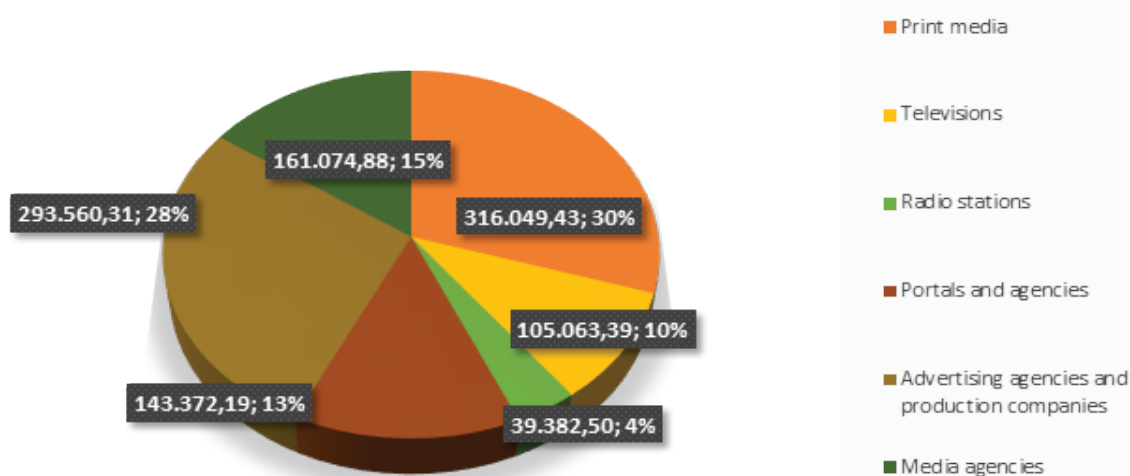


Chart 15. Comparative overview of expenses of other bodies for media and media services in 2018 and 2019

When it comes to the beneficiaries of funds for media services among public bodies, for both of these years that were the focus of the research, **EUR 348,551.00** were allocated to **20 print media**, **EUR 103,248.00** to **five televisions**, **EUR 99,245.00** to **eight radio stations**, **EUR 78,095.00** to **six portals**; **EUR 596,944.00** was spent on **24 advertising agencies, production companies and media agencies** and **EUR 146,053.38** on **24 other services** in 2018 and 2019.



Graph 16. Overview of funds that beneficiaries received from public administration bodies in 2018 and 2019

When it is broken down into these two years, the amount of expenditures is heterogeneous. More precisely, print media had a difference of EUR 13,768.00 between 2019 and 2018 - in favour of increased costs in 2019. That difference is much greater in the case of televisions, reflected in EUR 75,294.40 spent in 2019. When it comes to portals and agencies, the difference in spending is EUR 8,015.20 more in 2019. This increase in costs is also visible in the case of marketing agencies, production companies and media agencies, where the difference between 2018 and 2019 is EUR 9,030.00. In the category of other users, a difference of EUR 20,631.40 spent in 2019 compared to 2018 was recorded. Only radio stations got less revenue in 2019 compared to 2018 than Government bodies, because EUR 14,174.50 more were spent in 2018 compared to 2019.

Type of beneficiary	2018	2019
Print media	181.160,00	167.392,00
Televisions	13.977,50	89.270,9
Radio	56.709,50	42.535,00
Portals and agencies	35.040,00	43.055,20
Advertising agencies, production companies and media agencies	293.457,00	302.487,00
Other	62.711,00	83.342,4

Graph 17. Overview of funds that beneficiaries received from public administration bodies for media and related services in 2018 and 2019

○ Judicial bodies

Within **nine** judicial **bodies**, to which requests for free access to information were sent, which includes the **Centre for Training in Judiciary and State Prosecution**, the only body that did not provide an answer to the sent request, despite several urgent requests, is the Centre itself. In general, these are bodies that are very small consumers in this area.

The **Supreme State Prosecution Office** (VDT) was the only one with expenses, in the total amount of **EUR 9,156.96**, i.e. **EUR 5,178.48 in 2019 and EUR 3,978.48 in 2018**.

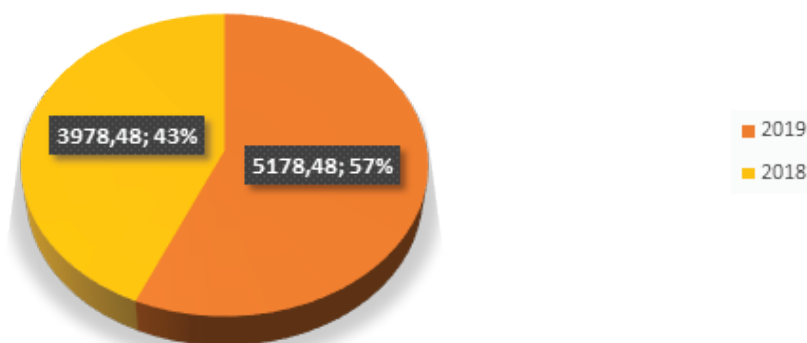


Chart 18. Overview of costs of judicial bodies for media and related services in 2018 and 2019

The number of beneficiaries of these funds is also limited. It is only **Press clipping LLC**, and one natural person, **Danilo Perišić**, who got EUR 1,200.00 in 2019 for recording a show about the prosecution.

○ Local self-governments

The total cost of all local self-governments in Montenegro amounts to **EUR 1,610,546.32**, with the note that, for the first time since this research was conducted, they all submitted answers to the sent inquiries. The Capital City of Podgorica has broken years of silence on inquiries related to their financing of the media through advertising and the procurement of other types of services from that area.

During these two years, local self-governments allocated **EUR 673,799.05 in 2019** and **EUR 936,747.27 in 2018** for the costs of advertising and marketing. All 25 local self-governments submitted data, but three municipalities had no expenses - Gusinje, Kolašin and Rožaje.

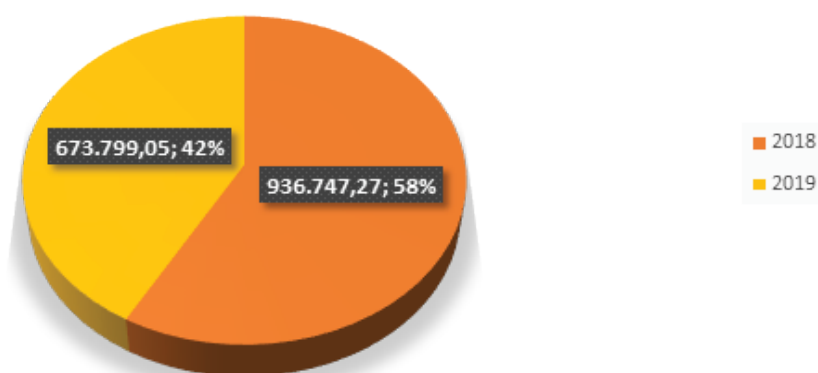


Chart 19. Comparative overview of the total costs of local self-governments for media and media services in 2018 and 2019

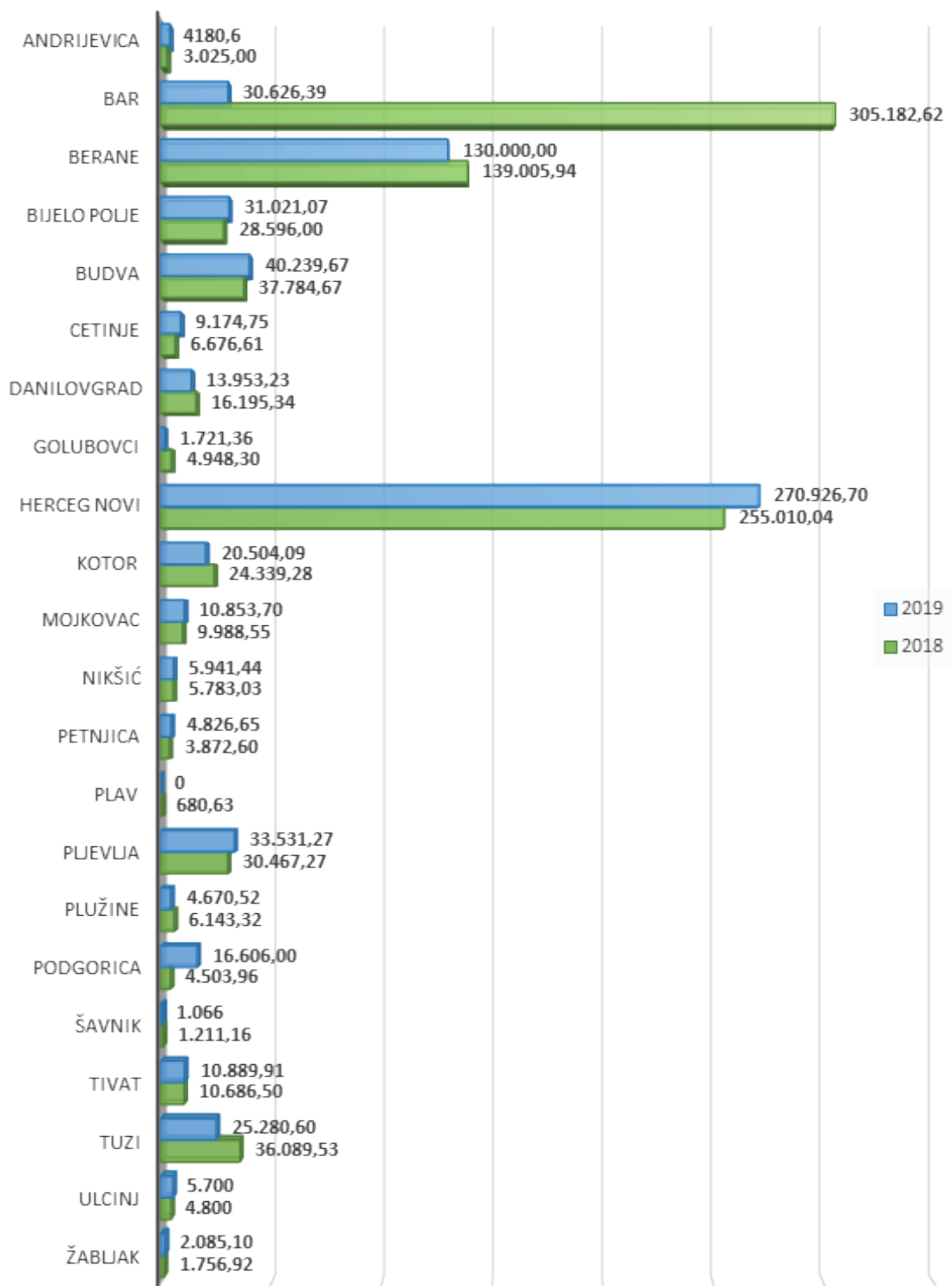


Chart 20. Comparative overview of local self-governments expenses for media and media services in 2018 and 2019

In 2018, of the local self-governments, the **municipality of Bar** spent the most funds, i.e. **EUR 305,182.62**, and in 2019, the **municipality of Herceg Novi** had the most expenses, **EUR 270,926.70**. In other municipalities, except Bar, there are very small differences in costs in these two years, which are in range of several thousand, while in the municipality of Bar the difference is EUR 274,556.23 compared to 2018.

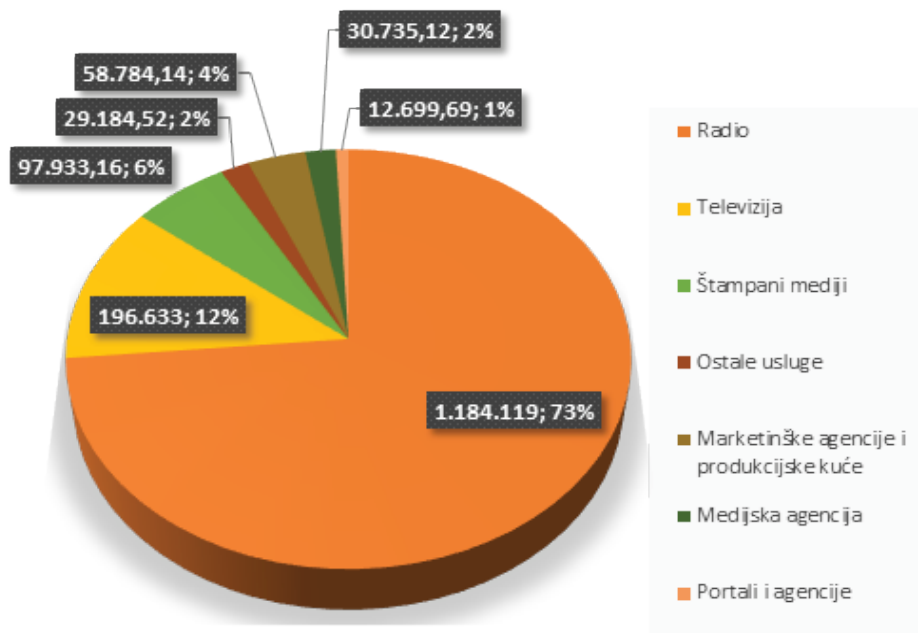


Chart 21. Overview of beneficiaries revenue from local self-governments for media and related services in 2018 and 2019

The largest beneficiaries from local self-governments were radio stations, so **14 radio stations**, namely local radio broadcasters, generated **EUR 1,145,018.00** or **73%** of total funds. Followed by **six television stations** that earned **EUR 235,734.00 (15%)**, then by **five printed media** with **EUR 97,933.16 (6%)**. They are further followed by **13 marketing agencies, production houses and media agencies**, which earned **EUR 86,229.40**. In the monitored years, the remaining **3%** went to **six portals and agencies** that earned **EUR 12,699.69**, **one regional media** which earned **EUR 457.9**, and **24 other service providers** with **EUR 32,474.40**.

More precisely, during 2018, radio stations generated **EUR 699,553.2**, and TV stations **EUR 132,351.00**. In 2019, **EUR 445,464.5** were allocated for radio stations, and **EUR 103,383.00** for TV stations. The least funds went to the media outside of Montenegro (EUR 459.90 from the municipality of Plužine in 2018, for Politika, a newspaper and a magazine). A big difference is also noticeable between the revenue of marketing agencies and production houses, which had an increase in revenues for 175.05%.

○ Independent institutions

Of **25 independent institutions** to which requests for free access to information were sent, only three did not respond - **the University of Montenegro and the Medical Chamber**, and the Chamber of Commerce stated that it is not bound by the Law on Free Access to Information.

Ten independent institutions responded that they had no expenses based on the requests addressed to them. These are: Agency for Personal Data Protection and Free Access to Information, State Election Commission, Auditing Body, Accreditation Body of Montenegro, Institute of Accountants and Auditors of Montenegro, Chamber of Public Executors, Association of Court Experts, Chamber of Notaries, Bar Association and Matica Crnogorska.

The other 12 bodies had a total of **EUR 107,731.70** expenditure on this basis.

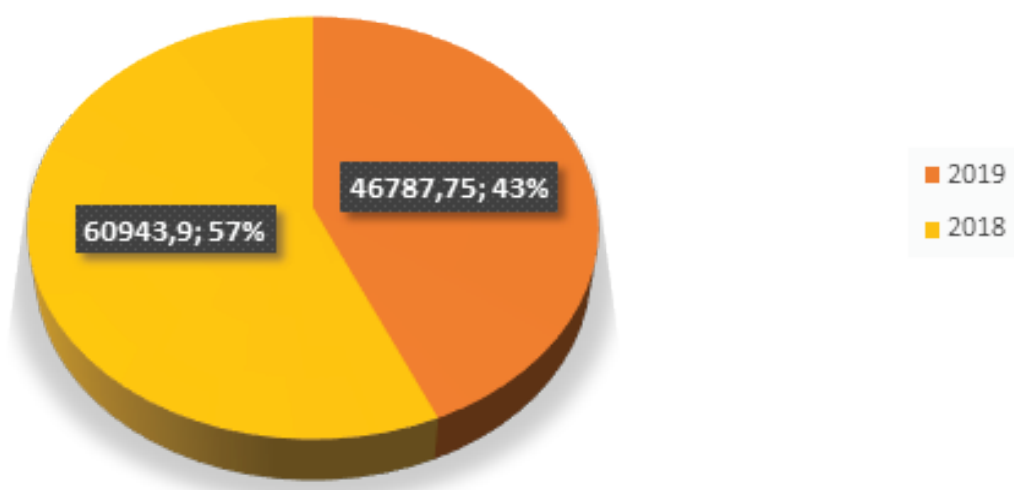


Chart 22. Comparative overview of the costs of independent institutions in 2018 and 2019

The researchers noted that slightly more funds were spent in 2018 than in 2019, more precisely EUR 14,156.10 less in 2019.

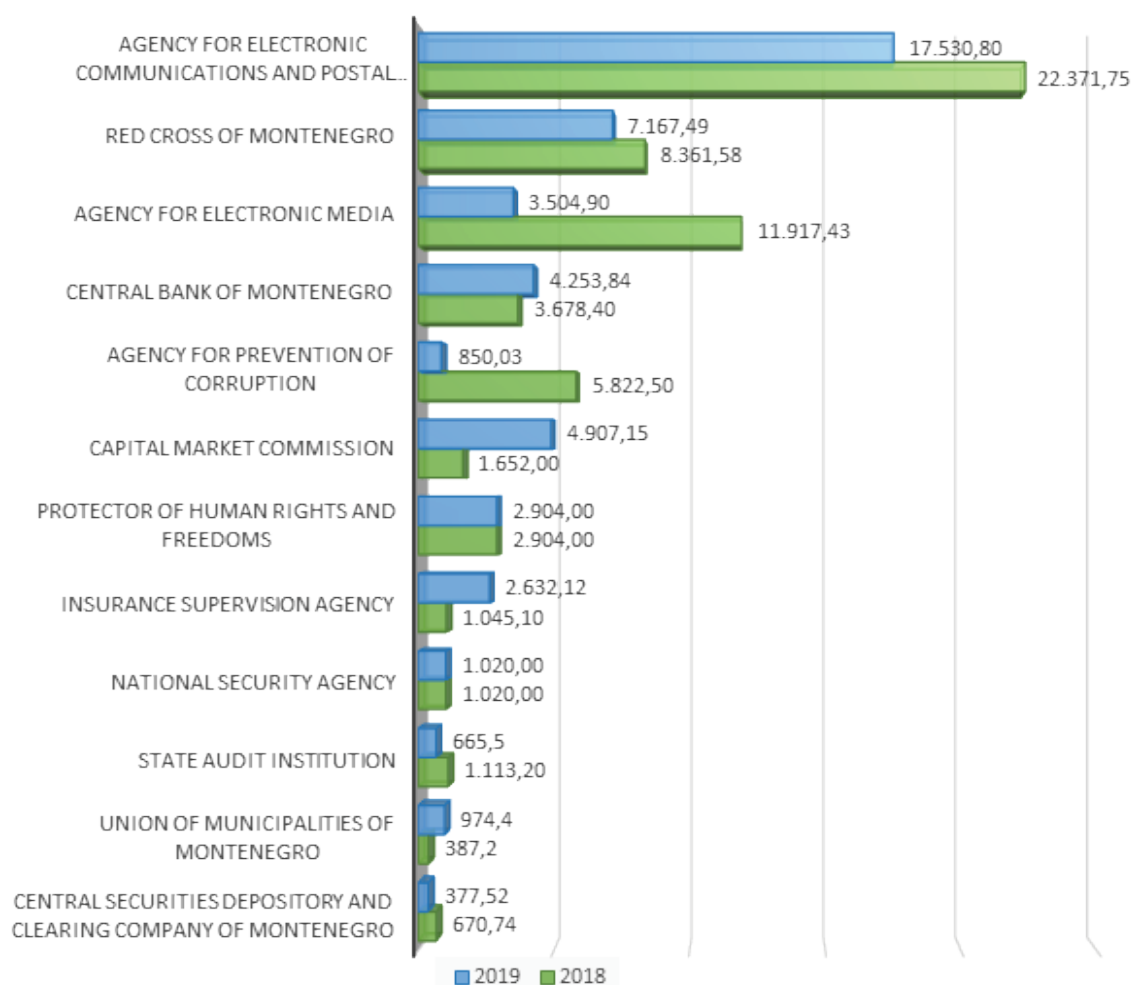


Chart 23. Overview of expenses of independent institutions on media, media and related services in 2018 and 2019

According to available information, the Agency for Electronic Communications and Postal Services had the most expenses, spending EUR 17,530.80 in 2019, or EUR 22,371.75 in 2018. In 2019, the Red Cross of Montenegro followed in terms of expenses with EUR 7,167.49, while in 2018 was the Agency for Electronic Media with EUR 11,917.43.

The Central Securities Depository and Clearing Company had the least funds, with EUR 377.52 in 2019, and the Union of Municipalities, EUR 387.2 in 2018.

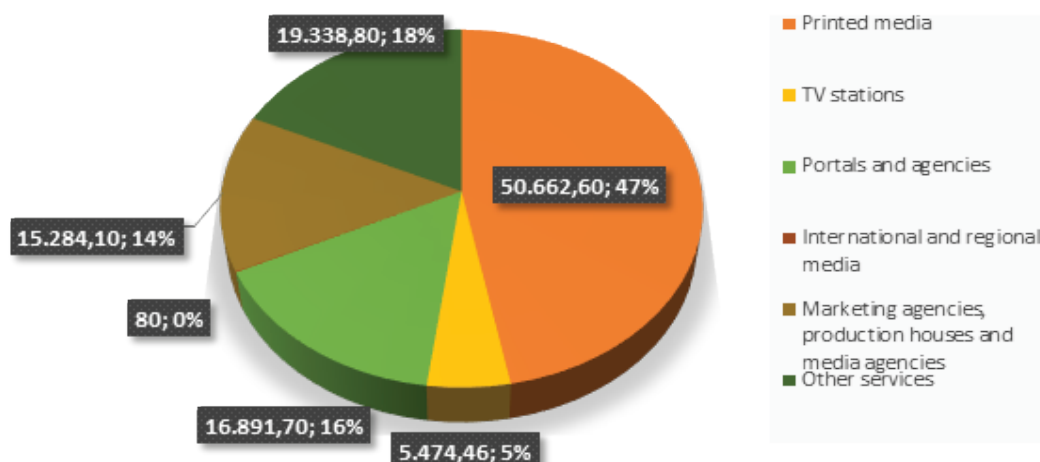


Chart 24. Comparative overview of beneficiaries in 2018 and 2019

Data indicate that five printed media received EUR 50,662.60 in 2018 and 2019. Followed by other beneficiaries that revenue EUR 19,338.8, then by portals and agencies with EUR 16,891.70, and marketing agencies, production houses and media agencies with EUR 15,284.10. The lowest revenue from independent institutions were noted within two television stations, EUR 5,474.46, followed by international and regional media, i.e. Voice of Media (radio station from Croatia) with EUR 80 in 2018.

○ Public Institutions

In the category of public institutions, requests for free access to information were sent to the addresses of a total of **338 authorities**, who spent **EUR 291,869.96** on media, media and related services. It should be emphasized that 56 authorities did not submit an answer (16%), 205 authorities had no expenses (61%), and the remaining 77 had expenses (23%).

Looking at it by year, public institutions spent **EUR 155,418.96** in **2019**, and **EUR 136,451.00** in **2018**. The analyzed consumption of public institutions increased by 13.9% in 2019 compared to 2018.

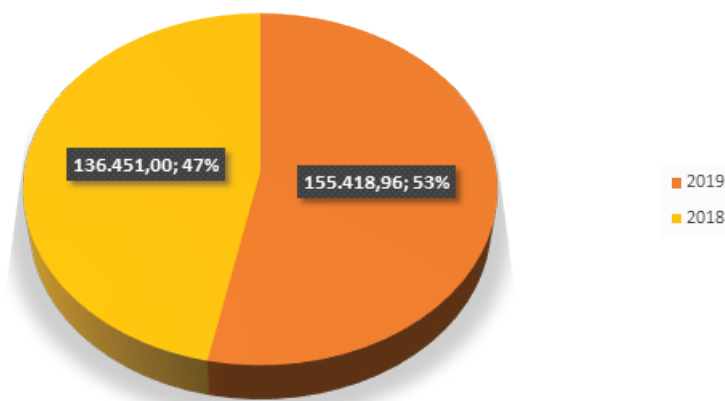


Chart 25. Overview of expenses of public institutions in 2018 and 2019

○ Associations

Out of 25 associations at the national level, 11 had no expenses on media and related services, six stated that they were not bound by the Law on Free Access to Information, and four reported that they had expenses. Those costs totaled **EUR 47,440.18** for both monitored years, and they were slightly higher in 2019 (EUR 26,387.56) compared to 2018 (EUR 21,052.56).

Comparatively speaking, the largest spender on this basis in 2019 is the Volleyball Federation of Montenegro with EUR 14,309.82 and EUR 10,700.00 in 2018, followed by the Water Polo and Swimming Association with EUR 8,280.29 in 2019, i.e. EUR 10,352.90 in 2018. Among consumers in this category, the Table Tennis Federation expeditured the least amount of funds. A frequent practice of compensation was noted as a way of settling leauge obligations with RTCG, with which most of those who had expenses cooperate.

○ Other public institutions

The remaining **313 authorities** include all other authorities of local self-governments, educational institutions, etc. the total expense of these authorities for media and related services in 2018 and 2019 was **EUR 244,429.78**, of which educational institutions had only 4.27% of the expenditure. More precisely, of the 223 educational institutions to which the request was sent, 132 had no expenses, while 32 did not submit a response to the request. The total cost of all educational institutions, which submitted data was **EUR 10,445.11**, where the costs in 2019 were **EUR 5,047.98**, and in 2018 that amount was **EUR 5,397.13**, which indicates the uniformity of these costs by year.

Other authorities had **EUR 233,984.67** expenses for media and related services, and that amount refers to 90 institutions (of which 21 did not submit information), which spent EUR 104,000.97 in 2018, i.e. in 2019 EUR 123,983.70, so a significant growth is noted in these two years.

The largest spender among public institutions was the **Montenegrin National Theater**, which spent EUR 52,589.29 on advertising in 2019, and EUR 42,694.55 in 2018, i.e. EUR 95,283.84 for both years. National Library of Montenegro follows with EUR 14,987.06 in 2019 and EUR 14,853.05 in 2018. Elementary school "Rifat Burdžović Tršo" from Bijelo Polje is the institution that had the least expenses of those who provided the data – EUR 28.

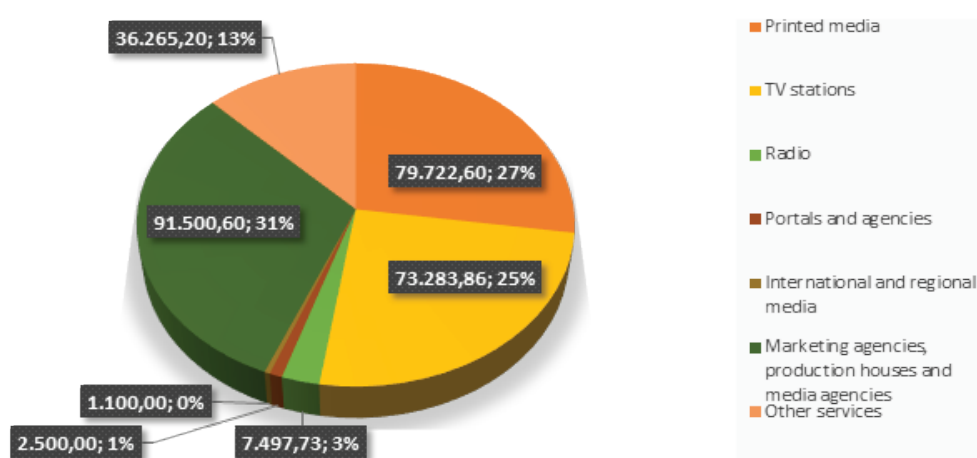


Chart 26. Overview of funds that beneficiaries generated in 2018 and 2019

Najviše sredstava, tj. 31% javne ustanove potrošile su na **marketinške agencije, produkcijske kuće i medijske agencije kojima je uplaćeno 91.500,60 eura**. Na drugom mjestu su štampani mediji sa prihodom od **79.722,60 eura**, dok su četiri televizije prihodovale **73.283,86 eura**. Pružaoci ostalih

usluga su imali prihod od **36.265,20 eura**, a najmanje sredstava je otišlo na portale i agencije, radio, međunarodne i regionalne medije.

Preciznije, najviše sredstava u **2018. godini** je potrošeno na **marketinške agencije, produkcijske kuće i medijske agencije** - 38.569,70 eura. Najmanje sredstava u toj godini je izdvojeno za kategoriju međunarodnih i regionalnih medije - 300,00 eura. Najviše novca je potrošeno na **marketinške agencije, produkcijske kuće i medijske agencije** - 52.931,00 eura, dok je 700,00 eura bio najmanji trošak za dva portala i agencije.

o Public companies

Public companies had the most expenses for advertising – **EUR 1,821,531.58**, or by years **EUR 848,590.49 in 2018 and EUR 972,941.09 in 2019**. For the purposes of this research, CCE received a response from Plantaže for the first time, which is a positive change compared to previous years, when these data were hidden under the pretext of trade secrets.

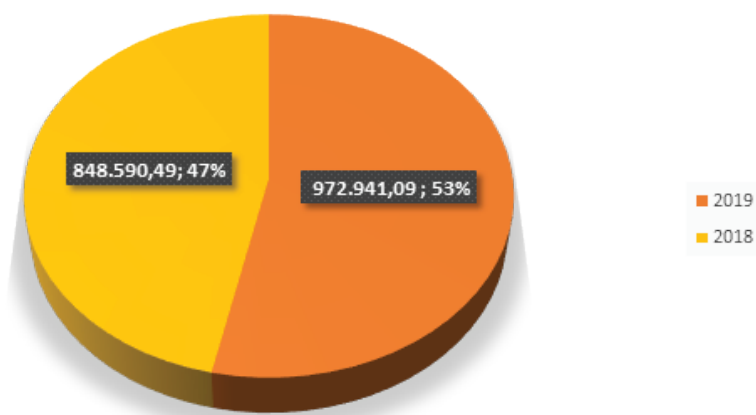


Chart 27. Overview of advertising expenses of public companies in 2018 and 2019

The largest spenders among public companies were Montenegrin Electric Enterprise with **EUR 259,885.83 in 2018** for advertising, and **EUR 250,546.94** expenditure for the same purposes in **2019**, while **Plantaže** is in second place with **EUR 179,322.10** in 2019 and **EUR 157,039.31** in 2018 of expenses on this basis, according to the documentation submitted by these companies to CCE. In third place is the Tourist Organization of Herceg Novi, which spent EUR 100,663.81 on advertising in 2019, and EUR 65,231.92 in 2018. In the fourth place is the Public Company for the Management of Marine Assets, which spent EUR 67,798.14 in 2019 and EUR 66,919.16 in 2018. In fifth place is JP Funeral services Budva with EUR 43,235.09 of expenses in 2019 and EUR 53,832.48 in 2018.

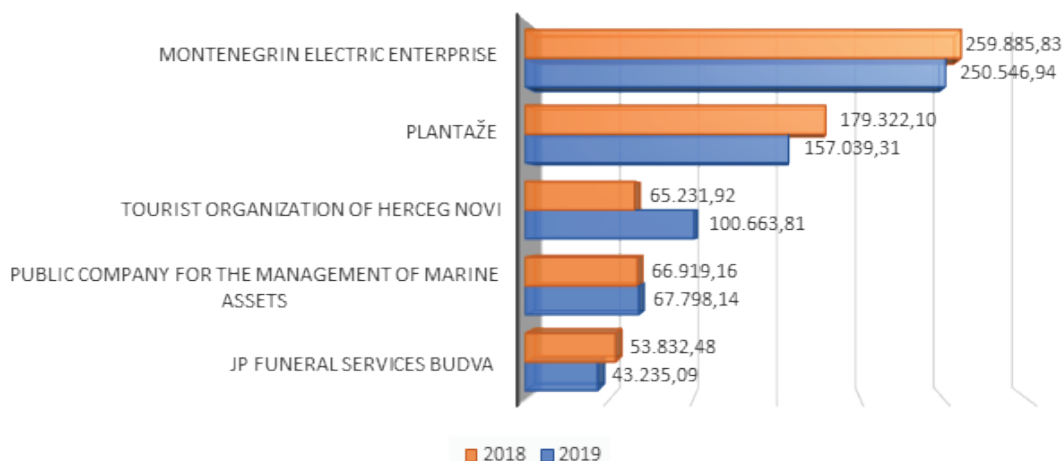


Chart 28. Overview of the five largest advertising spenders among public companies in 2018 and 2019

When it comes to the beneficiaries of these funds, public companies spent the most on marketing agencies, production houses and media agencies - **EUR 578,454.15** (35%). **In second place are printed media with EUR 397,107.16** (24%), **followed by TV stations with EUR 325,187.32** (20%). The rest was distributed between radio stations, web portals and agencies, international and regional media, as well as other beneficiaries who generated a total of EUR 515,782.95.

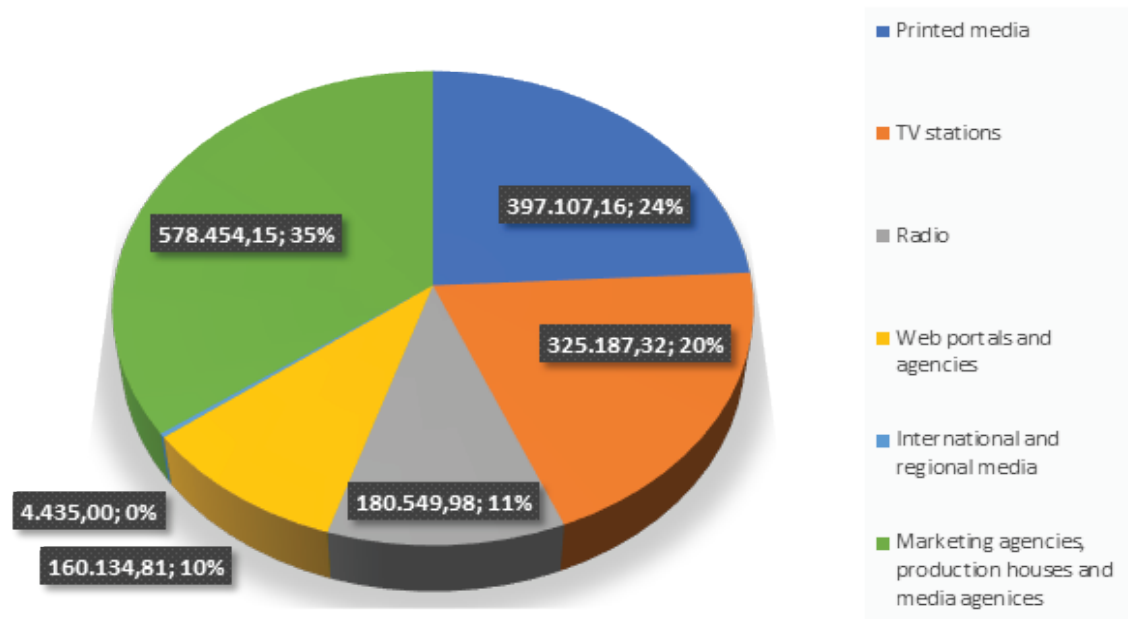


Chart 29. Overview of funds generated by beneficiaries through advertising in 2018 and 2019

Thus, in **2018**, the biggest beneficiaries were **marketing agencies, production houses and media agencies with EUR 226,657.00** of revenue, as well as **in 2019**, when the revenue increased to EUR 351,797.00. In second place in 2018 were print media with EUR 213,706.00, and in third place 16 TV stations with 140,282.00 in 2018, i.e. 184,905.00 in 2019 International and regional media had the least revenue, only EUR 4,435.00 in 2019.

04 Which media received the most funds from public funds?

During 2019 and 2018, the five printed media that received the most funds from public funds are: **Pobjeda – EUR 274,742.9, EUR, Dan – EUR 212,383.6, Dnevne Novine – EUR 153,610.90, Vijesti – EUR 110,681.3 and Komuna – EUR 50,300.00.**

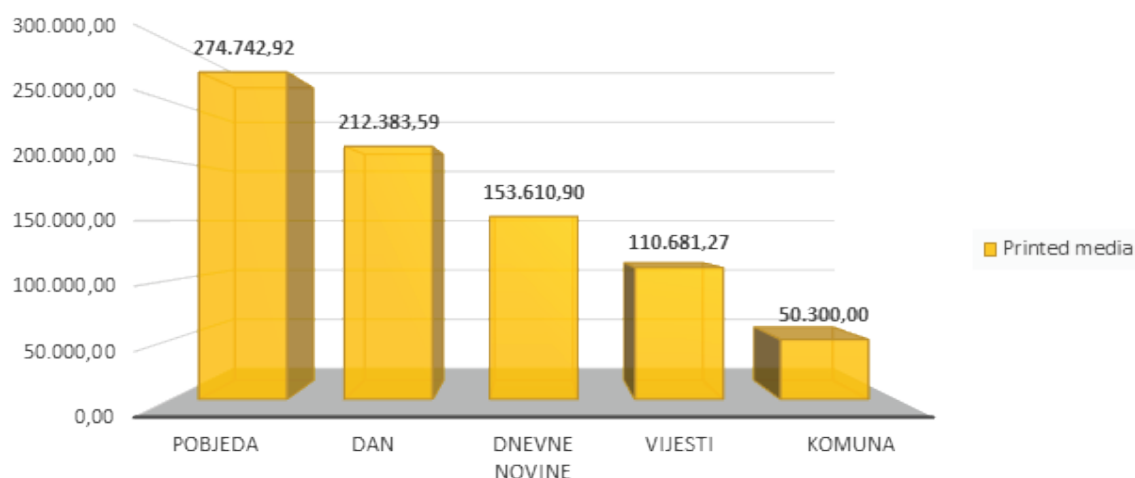


Chart 30. Comparative overview of funds received by print media from public funds in 2018 and 2019

The arrangement of printed media remains the same as in the previously monitored period.

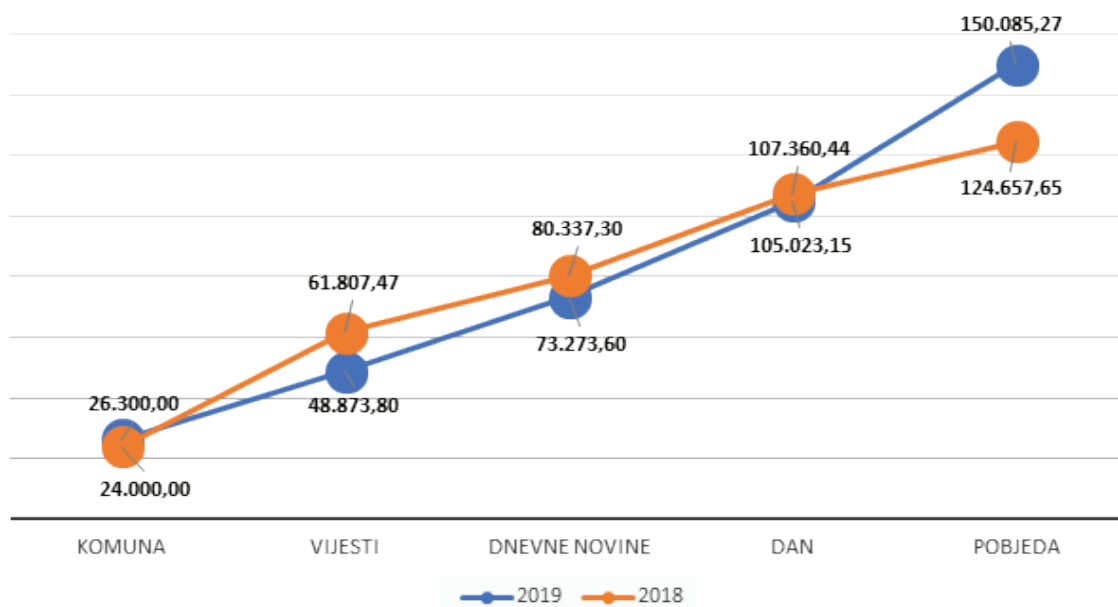


Chart 31. Trends in funds received by print media from public funds in 2018 and 2019

In the case of **TV stations**, the biggest beneficiaries of the public funds are: **RTCG – EUR 252.125,20**, **TV Vijesti – EUR 179.759,10**, **TV Boin – EUR 73.297,85**, **RTV Pljevlja – EUR 44.429,02**, **Prva TV – EUR 22.465,12** and **TV Sun – EUR 20.600,00**.

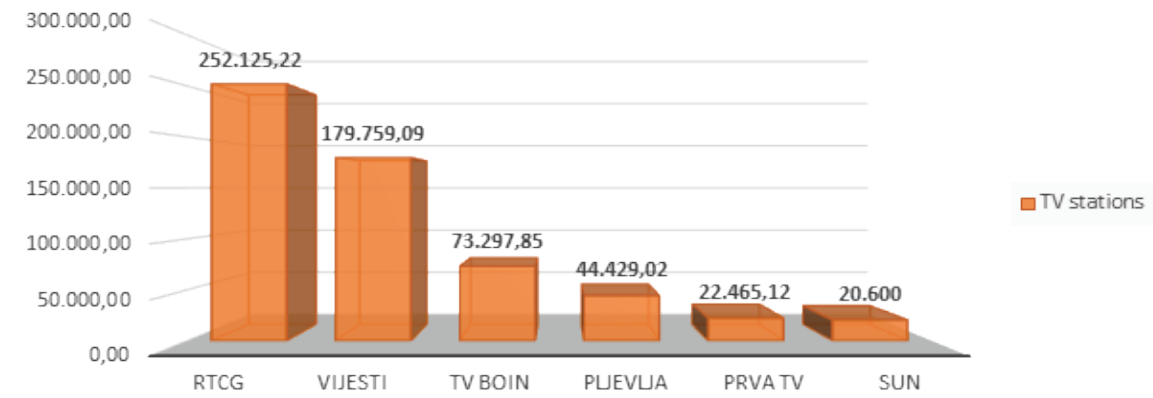


Chart 32. Comparative overview of the funds received by television stations from public funds in 2018 and 2019

Compared to the period from 2013 to 2016, RTCG and TV Vijesti kept the first places, while Prva TV fell to fifth place instead of the fourth place it had in the earlier period.

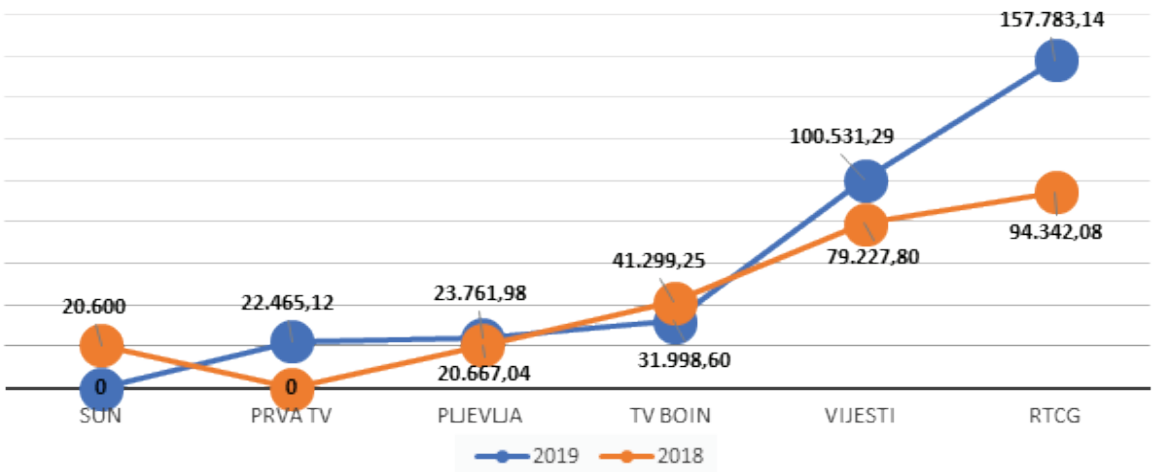


Chart 33. Trends in funds received by TV stations from public funds in 2018 and 2019

In the case of **radio broadcasters**, according to the data available to CCE, the most funds in 2018 and 2019 were received by **Radio Herceg Novi – EUR 489.996,10**, **Radio Bar – EUR 336.673,50**, **Radio Berane – EUR 269.555,90**, **Radio Antena M – EUR 62.311,20** and **Radio Dux EUR 58.047,00**.

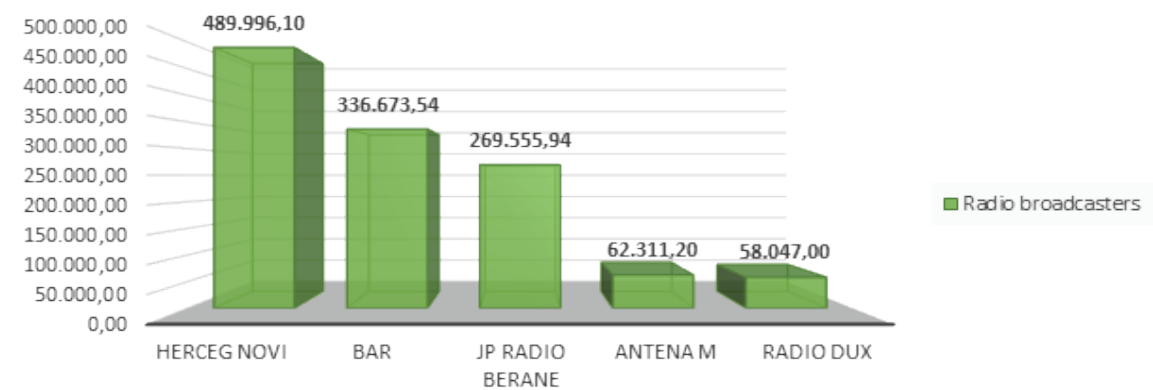


Chart 34. Comparative overview of funds received from public funds for radio broadcasters in 2018 and 2019

Radio Herceg Novi, Radio Berane, Antena M and Radio Dux had similar revenues during both years, while the biggest discrepancy in these years is recorded at Radio Bar, which in 2019 had a drop of over EUR 250,000.00.

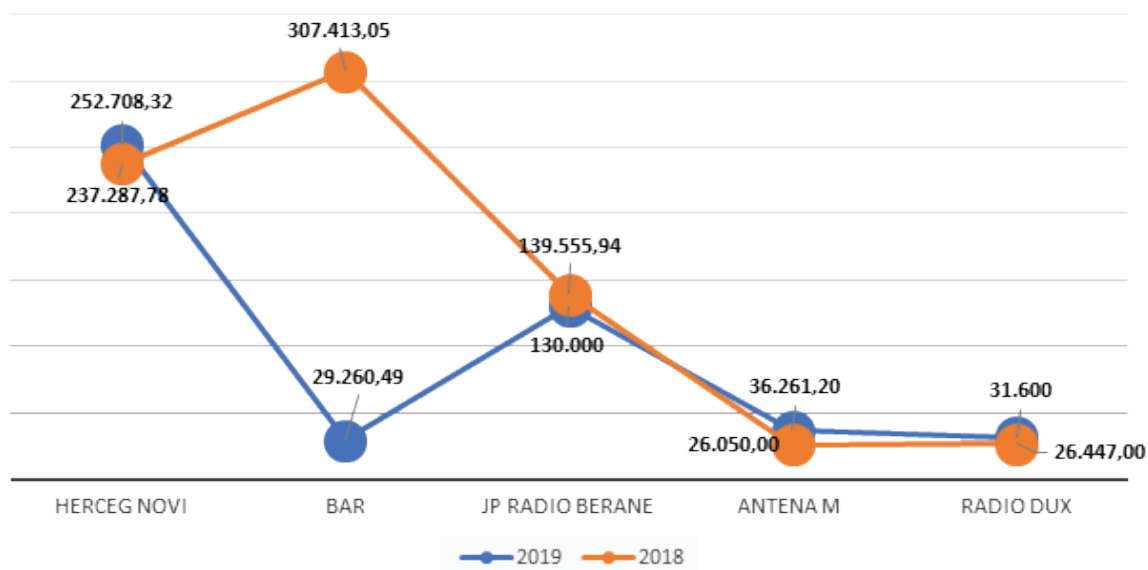


Chart 35. Trends in funds received by radio broadcasters from public funds in 2018 and 2019

Web portals are also beneficiaries of part of the funds from public funds in 2019 and 2018. More precisely, **Portal Analitika – EUR 60.707,68, Cafe Del Montenegro – EUR 29.910,21, Portal Vijesti – EUR 17.424,00, Standard media – EUR 8.139,00, Bokanews – EUR 6.428,00 and UI info – EUR 4.778,00.**

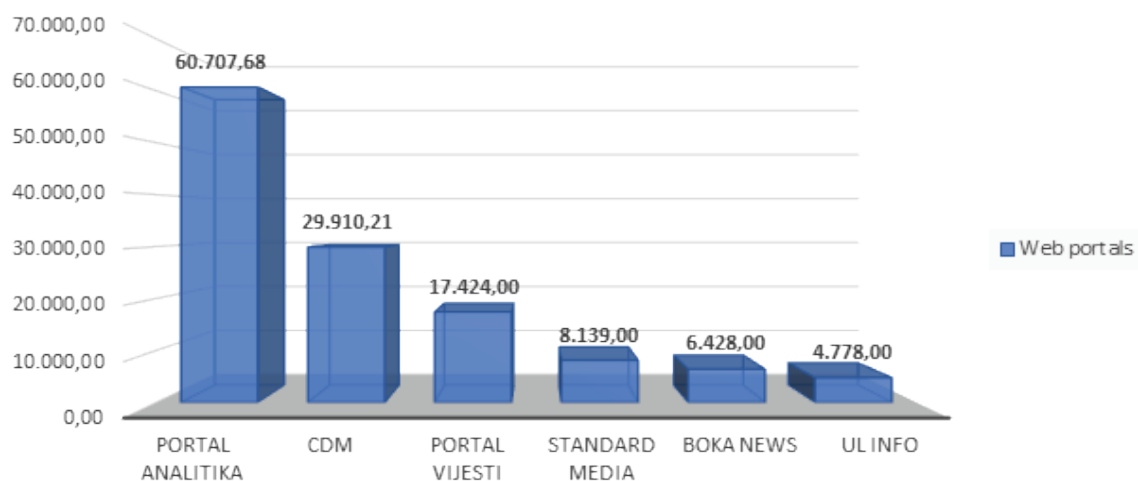


Chart 36. Comparative overview of funds that portals received from public funds in 2018 and 2019

Portal Analitika received the most funds, followed by Cafe Del Montenegro, while the web portal UI Info is at the bottom, which is similar to the previous monitored period.

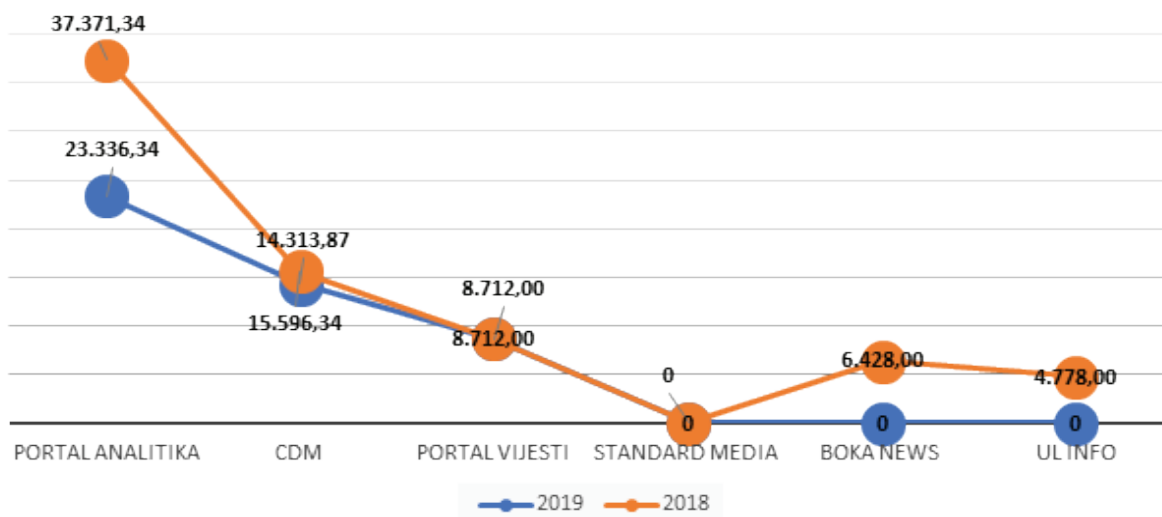


Chart 37. Trends in funds that portals received from public funds in 2018 and 2019

Marketing agencies, production houses and media agencies that received the most funds from public funds are **DPC – EUR 197,169.10, Arhimed LLC – EUR 168,942.61, Infobiro – EUR 134,103.69, NS Group – EUR 106,039.10, Represent communications – EUR 57,379.56 and Media Solution – EUR 37,945.80.**

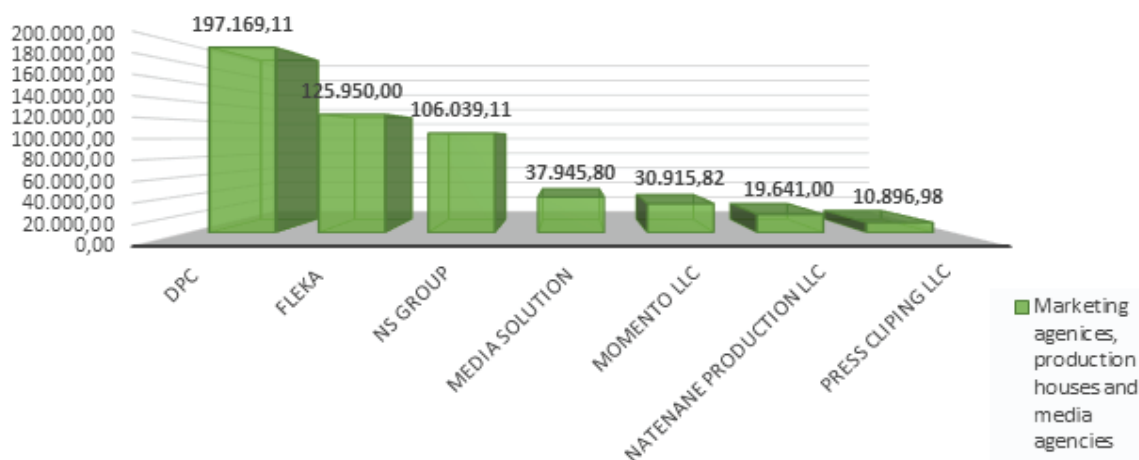


Chart 38. Comparative overview of funds generated by marketing agencies, production houses and media agencies in 2018 and 2019

DPC generated the most revenue from marketing agencies by year, noting that their revenue was much higher in 2019 than in 2018.

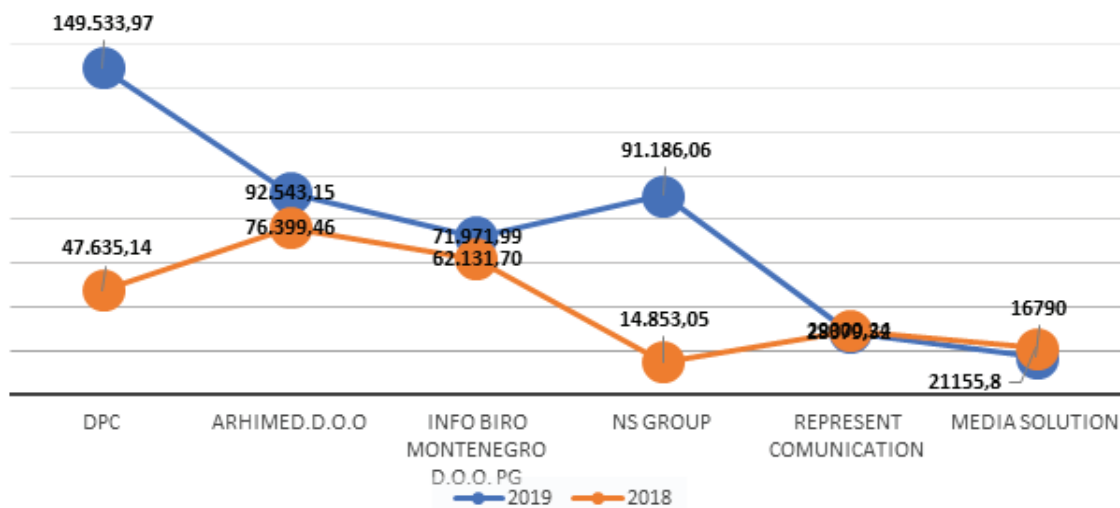


Chart 39. Trends in funds received by marketing agencies, production houses and media agencies in 2018 and 2019

International and regional media also received the smallest share of revenue. This refers to **Meersicht travel & Lifestyle LLC** with **EUR 4,235.00** of revenue, **Euromanager** – **EUR 3,025.00**, **B 92** – **EUR 1,100.00**, **Bobar radio, Bjeljina** – **EUR 1,080.00**, **RTV BN** – **EUR 850.00**, **Portal Foton Dubrovnik** – **EUR 600.00**.

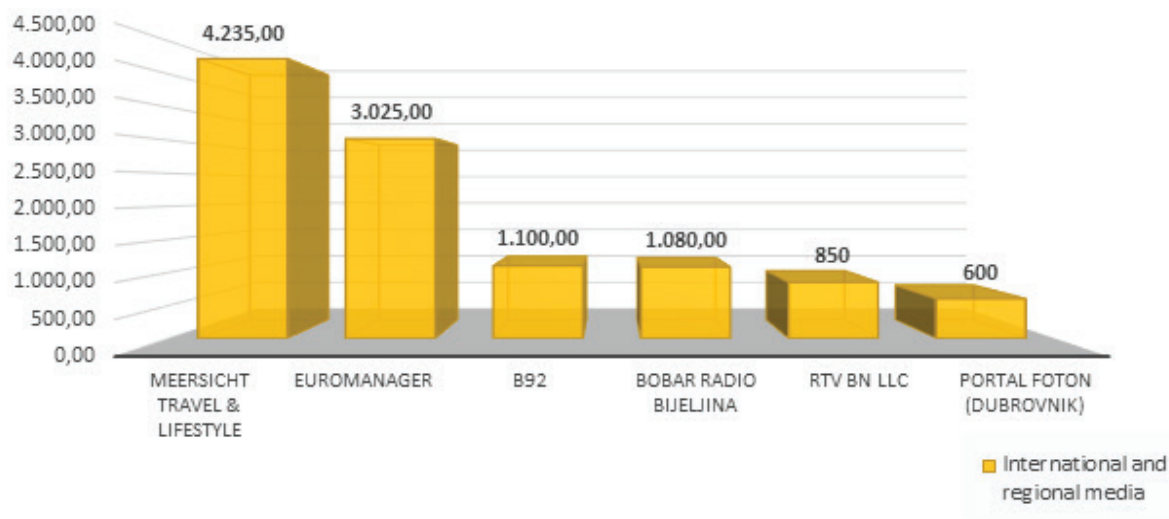


Chart 40. Comparative overview of funds received by international and regional media in 2018 and 2019

The largest beneficiaries of these funds, for the provision of other related services, by **legal and physical persons** that do not fall into any of the aforementioned categories were: **Global Soft Montenegro** with **EUR 31,489**, **PC Official Gazette** with **EUR 16,063.49**, **Alen Pelinković** with **EUR 11,200.00**, **Porto Podi** with **EUR 10,000.00** and **Obodsko Slovo** with **EUR 9,000.00**.

05 Conclusions and recommendations

- In 2018 and 2019, 306 public bodies spent EUR 5,259,201.00 on media, media and production services. To that should be added the total amount of State aid to the media sector during these two years, which was EUR 1,162,353.43. Also, EUR 12,577,200.00 in 2018 and EUR 13,822,200.00 in 2019 were allocated for RTCG through direct budget allocation;
- The so-called soft censorship, which is carried out through non-transparent and discretionary monetary transactions of public bodies towards the media, is one of the major problems in the complex media sector, as it violates media markets, but also correlates these benefits with the editorial policies of the media, and consequently affects the quality of media reporting;
- The new Law on Media, which solidly regulates the transparency of media financing by public bodies, and to which efforts of CCE also contributed, has yet to put into practice the rules that will affect the change in the situation in this area, and CCE will carefully monitor its implementation;
- RTCG has a privileged position on the market as a direct budget beneficiary, but also a parallel beneficiary of other funds of public bodies for advertising. However, the invested funds still do not indicate that this media is being transformed into genuine public service;
- There is some progress in respecting the Law on Free Access to Information by public administration bodies, although this still requires the effort of the CCE research team through additional calls, emergencies and complaints. The Agency for Personal Data Protection and Free Access to Information continues to be a slow and ineffective institution;
- Strong party influence on companies in which the state has a stake often affects the way public funds are allocated for media and media services. Therefore, it is necessary to establish control mechanisms for investments in the media by these subjects, some of which do not provide information about that part of the business, creating suspicions that the procedures for allocating that money were not carried out in the best interest of the company or the public interest..

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Annex 1: List of public bodies that were the subject of the research

PRESIDENT OF THE STATE

1. President of Montenegro

PARLIAMENT

2. Parliament of Montenegro

GOVERNMENT

3. General Secretariat of the Government of Montenegro
4. Ministry of Justice
5. Ministry of Internal Affairs
6. Ministry of Foreign Affairs
7. Ministry of Defense
8. Ministry of Finance
9. Ministry of Sustainable Development and Tourism
10. Ministry of Public Administration
11. Ministry of Education
12. Ministry of Health
13. Ministry of Transport and Maritime Affairs
14. Ministry of Economy
15. Ministry of Agriculture and Rural Development
16. Ministry of Science
17. Ministry of Culture
18. Ministry of Labour and Social Welfare
19. Ministry of Human and Minority Rights
20. Ministry of Sports and Youth
21. Minister without Portfolio

ADMINISTRATIONS

22. Tax Administration
23. Montenegro Customs
24. Administration for Games of Chance
25. Real Estate Administration Office
26. Land Registry Administration Office
27. Statistical Office of Montenegro
28. Police Directorate
29. Diaspora Administration
30. Human Resources Management

- 31.** Administration for Inspection Affairs
- 32.** Administration for Maritime Safety and Port Management
- 33.** Traffic Administration
- 34.** Railway Authority
- 35.** Hydrocarbons Administration
- 36.** Directorate for Foodsafety, Veterinary and Phytosanitary Affairs
- 37.** Forest Management
- 38.** Water Management
- 39.** Public Administration
- 40.** Administration for the Execution of Criminal Sanctions
- 41.** Cultural Heritage Protection and Management

INSTITUTIONS

- 42.** Institute for Hydrometeorology and Seismology
- 43.** Employment Agency of Montenegro
- 44.** Geological Survey of Montenegro
- 45.** Institute for Textbooks and Teaching Aids
- 46.** Institute for Social and Child Protection
- 47.** Metrology Institute
- 48.** Institute for Emergency Medical Assistance
- 49.** Institute for Education

AGENCIES

- 50.** Agency for Protection of Nature and Environment
- 51.** Investment Agency
- 52.** Civil Aviation Agency
- 53.** Agency for Protection of Competition
- 54.** Agency for Medicines and Medical Devices
- 55.** Agency for Peaceful Resolution of Labor Disputes

COMMISSIONS

- 56.** Commission for Control of Public Procurement Procedures
- 57.** Commission for Concessions
- 58.** Commission for Investigation of Accident

FUNDS

- 59.** Labor Fund
- 60.** Fund PIO
- 61.** Investment and development fund
- 62.** Deposit Protection Fund
- 63.** Compensation Fund
- 64.** Fund for the Protection and Realization of Minority Rights
- 65.** Health Insurance Fund
- 66.** Montenegrin Fund for Solidarity Housing Construction

INSTITUTIONS

- 67.** Institute for Standardization of Montenegro
- 68.** Public Health Institution

OTHER

- 69.** Secretariat for Legislation
- 70.** Social Council of Montenegro
- 71.** State Archives
- 72.** Data Protection Directive

JUDICIARY

- 73.** Supreme Court
- 74.** Administrative court
- 75.** Constitutional Court
- 76.** State Prosecutor's Office
- 77.** The High Misdemeanour Court
- 78.** Misdemeanor Court in Podgorica with departments (DG, NK, CT)
- 79.** Misdemeanor Court in Budva with departments (UL, BR, KO, HN)
- 80.** Misdemeanor Court in Bijelom Polju with departments (BA, ŽB, PI, PLj, RO, KO, MK)
- 81.** Centre for Training in Judiciary and State Prosecution

MUNICIPALITIES

- 82.** Andrijevisa Municipality
- 83.** Bar Municipality
- 84.** Berane Municipality
- 85.** Bijelo Polje Municipality
- 86.** Budva Municipality
- 87.** Old Royal Capital Cetinje
- 88.** Danilovgrad Municipality
- 89.** Gusinje Municipality
- 90.** Herceg Novi Municipality
- 91.** Kolašin Municipality
- 92.** Kotor Municipality
- 93.** Mojkovac Municipality
- 94.** Nikšić Municipality
- 95.** Petnjica Municipality
- 96.** Plav Municipality
- 97.** Pljevlja Municipality
- 98.** Plužine Municipality
- 99.** Capital City Podgorica
- 100.** Golubovci - urban municipality within CC Podgorica
- 101.** Šavnik Municipality
- 102.** Tivat Municipality

- 103.** Rožaje Municipality
- 104.** Tuzi Municipality
- 105.** Ulcinj Municipality
- 106.** Žabljak Municipality

INDEPENDENT INSTITUTIONS

- 107.** State Audit Institution
- 108.** Audit Authority
- 109.** Central Bank of Montenegro
- 110.** University of Montenegro
- 111.** State Election Commission
- 112.** Red Cross of Montenegro
- 113.** Matica crnogorska
- 114.** Accreditation Body of Montenegro
- 115.** Union of Municipalities of Montenegro
- 116.** National Security Agency (ANB)
- 117.** Agency for Electronic Communications and Postal Services
- 118.** Agency for Electronic Media (AEM)
- 119.** Insurance Supervision Agency
- 120.** Agency for Prevention of Corruption (ASK)
- 121.** Central Securities Depository and Clearing Company
- 122.** Agency for Personal Data Protection and Free Access to Information
- 123.** Capital Market Commission
- 124.** Protector of Human Rights and Freedoms
- 125.** Bar Association
- 126.** Notary Chamber
- 127.** Chamber of Economy
- 128.** Association of Court Experts (NGO)
- 129.** Chamber of Public Executors
- 130.** Medical Chamber
- 131.** Institute of Accountants and Auditors of Montenegro

PUBLIC INSTITUTIONS

- 132.** Montenegrin Olympic Committee
- 133.** Paralympic Committee of Montenegro
- 134.** Water Polo and Swimming Federation of Montenegro
- 135.** Basketball Federation of Montenegro
- 136.** Volleyball Federation of Montenegro
- 137.** Handball Federation of Montenegro
- 138.** Football Association of Montenegro
- 139.** Athletic Federation of Montenegro
- 140.** Boxing Association of Montenegro
- 141.** Montenegrin Sailing Federation
- 142.** Karate Federation of Montenegro

- 143.** Tennis Federation of Montenegro
- 144.** Gymnastics Federation of Montenegro
- 145.** Shooting Federation of Montenegro
- 146.** Montenegro Table Tennis Federation
- 147.** Boggling Association of Montenegro
- 148.** Kickboxing Federation of Montenegro
- 149.** Montenegro Chess Federation
- 150.** Bodybuilding and Fitness Association of Montenegro
- 151.** Montenegrin Kendo Association
- 152.** Mountaineering Association of Montenegro
- 153.** Association for Sport Fishing in the Sea of Montenegro
- 154.** Union of Sports Fishing Organizations of Montenegro
- 155.** Students Sports Association of Montenegro
- 156.** Judo Federation of Montenegro
- 157.** PI Cultural and Sports Center - Andrijevića
- 158.** PI Day center for children and youth with disabilities and difficulties in development Berane
- 159.** Polim Museum Berane
- 160.** PI Cultural Center Berane
- 161.** PI Cultural Center Bijelo Polje
- 162.** PI Center for Sports and Recreation Bijelo Polje
- 163.** PI Center for Support for Children and Families Bijelo Polje
- 164.** PI Day Center Tisa – Bijelo Polje
- 165.** PI Ratković's Poetry Evenings - Bijelo Polje
- 166.** PI Museum Bijelo Polje
- 167.** PI Museums and Galleries Budva
- 168.** PI National Library Budva
- 169.** PI City Theatre Budva
- 170.** PI Mediterranean Sports Center Budva
- 171.** PI National library and Reading Room Njegoš - Cetinje
- 172.** PI Day care centre for children with disabilities and adult disabled persons in the Old Royal Capital Cetinje
- 173.** PI Royal Theatre "Zetski dom" Cetinje
- 174.** PI Art Colony Danilovgrad
- 175.** PI Cultural Center Danilovgrad
- 176.** PI Day Care Center for Children with Developmental Disabilities and Adults with Disabilities Danilovgrad
- 177.** PI Cultural Center Gusinje
- 178.** PIC Herceg Fest Herceg Novi
- 179.** PI City Museum Mirko Komnenović and Gallery Josip Bepo Benković Herceg Novi
- 180.** PIC City Library and Reading Room Herceg Novi
- 181.** PI Day Center for children with disabilities and developmental difficulties Herceg Novi
- 182.** PI Cultural Center Kolašin
- 183.** PI Cultural Center Mojkovac

- 184.** PI Day Center for children and youth with disabilities and difficulties in development Mojkovac
- 185.** PI Day Center for children with developmental disabilities and people with disabilities Nikšić
- 186.** PI Museums and Galleries Nikšić
- 187.** Nikšić Theatre
- 188.** PI Zahumlje Nikšić
- 189.** Cultural Center Petnjica
- 190.** PI Cultural Center Husein Bašić Plav
- 191.** Day Center Lipa Plav
- 192.** National Library Stevan Samardžić Pljevlja
- 193.** Gallery Vitomir Srbljanović Pljevlja
- 194.** PI Local Museum of Pljevlja
- 195.** Cultural Center Plužine
- 196.** PI Children's Association Podgorica
- 197.** PI City Theatre Podgorica
- 198.** Cultural Information Center Podgorica Budo Tomović Podgorica
- 199.** PI Cultural Information Center Zeta
- 200.** PI Museums and Galleries Podgorica
- 201.** PI National Library Radosav Ljumović Podgorica
- 202.** PI Kakaricka gora
- 203.** PI Day Center for children and youth with disabilities and difficulties in development Podgorica
- 204.** Cultural Center Rožaje
- 205.** Local museum Ganića kula Rožaje
- 206.** PI Day Center for children with developmental disabilities Rožaje
- 207.** PI Centar za kulturu, sport i medije Šavnik
- 208.** PI Cultural Center Tivat
- 209.** PI Museum and Galleries Tivat
- 210.** LLC Parking Service Tivat
- 211.** Cultural Information Centre Malesija Tuzi
- 212.** PI Day Center "Sirena" Ulcinj
- 213.** Cultural Center Žabljak
- 214.** Public preschool institution Đina Vrbica
- 215.** Public preschool institution Ljubica Popović
- 216.** Public preschool institution "Dragan Kovačević"
- 217.** Kindergarten Ljubica V. Jovanović - Maša Budva
- 218.** Kindergarten "Vukosava Ivanović-Mašanović"
- 219.** Kindergarten Herceg Novi, 'Naša Radost'
- 220.** Kindergarten Plav
- 221.** Public preschool institution "Irena Radović"
- 222.** Public preschool institution Jevrosima Jevra Rabrenović
- 223.** Kindergarten "Eko bajka"
- 224.** Public preschool institution "Radost" Kotor
- 225.** Kindergarten Boško Buha Rožaje

- 226.** Public preschool institution "Dušo Basekić"
- 227.** Public preschool institution Solidarnost Ulcinj
- 228.** Public preschool institution "Sestre Radović"
- 229.** Public preschool institution „Zagorka Ivanović“
- 230.** ES Bajo Jojić
- 231.** ES Milić Keljanović
- 232.** ES Anto Đedović
- 233.** ES Blažo Jokov Orlandić
- 234.** ES Bratstvo-jedinstvo
- 235.** ES Đerđ Kastrioti Skenderbeg
- 236.** ES Jovan Tomašević Bar
- 237.** ES Jugoslavija
- 238.** ES Kekec
- 239.** ES Meksiko
- 240.** ES Mrkojevići
- 241.** ES Srbija
- 242.** ES Donja Ržanica
- 243.** ES Lubnice
- 244.** ES Polica
- 245.** ES Radomir Mitrović
- 246.** ES Vladislav R. Korać
- 247.** ES Vuk Karadžić Berane
- 248.** ES Vukajlo Kukalj
- 249.** ES Vukašin Radunović
- 250.** ES 21. maj - Bijelo Polje
- 251.** ES 9. Maj – Bijelo Polje
- 252.** ES Aleksa Bećo Đilas
- 253.** ES Braća Ribar
- 254.** ES Dušan Korać
- 255.** ES Krsto Radojević
- 256.** ES Marko Miljanov
- 257.** ES Milomir Đalović
- 258.** ES Milovan Jelić
- 259.** ES Mladost
- 260.** ES Pavle Žižić
- 261.** ES Rifat Burdžović Trso Bijelo Polje
- 262.** ES Risto Ratković
- 263.** ES Šukrija Međedović
- 264.** ES Vladislav Sl.Ribnikar
- 265.** ES Vuk Karadžić Bijelo Polje
- 266.** ES Druga osnovna škola
- 267.** ES Mirko Srzentić
- 268.** ES Stefan Mitrov Ljubiša Bar

- 269.** ES Boro Vukmirović
- 270.** ES Lovćenski Partizanski odred
- 271.** ES Njegoš Cetinje
- 272.** ES Šunjo Pešikan
- 273.** ES Blažo Mraković
- 274.** ES Milosav Koljenšić
- 275.** ES Njegoš Danilovgrad
- 276.** ES Vuko Jovović DG
- 277.** ES Džafer Nikočević
- 278.** ES Dašo Pavičić
- 279.** ES Ilija Kišić
- 280.** ES Milan Vuković
- 281.** ES Orjenski Bataljon
- 282.** ES Dr Radosav Jagoš Vešović
- 283.** ES Međuriječje
- 284.** ES Mojsije Stevanović
- 285.** ES Risto Manojlović
- 286.** ES Vojin Čepić
- 287.** ES Ivo Visin
- 288.** ES Nikola Đurković
- 289.** ES Njegoš Kotor
- 290.** ES Savo Ilić
- 291.** ES Veljko Drobnjaković
- 292.** ES Aleksa Đilas Bećo
- 293.** ES Milovan Rakočević
- 294.** ES Radomir Rakočević
- 295.** ES Braća Bulajić
- 296.** ES Braća Labudović
- 297.** ES Branko Višnjić
- 298.** ES Dobrislav-Đedo Perunović
- 299.** ES Dušan Bojović
- 300.** ES Dušan Đukanović
- 301.** ES Ivan Vušović
- 302.** ES Jagoš Kontić
- 303.** ES Janko Bjelica
- 304.** ES Janko Mićunović
- 305.** ES Jovan Draganić
- 306.** ES Jovan Gnjatović
- 307.** ES Luka Simonović
- 308.** ES Mileva Lajović Lalatović
- 309.** ES Milija Nikčević
- 310.** ES Olga Golović
- 311.** ES Pavle Kovačević

- 312.** ES Rade Perović
- 313.** ES Radoje Čizmović
- 314.** ES Ratko Žarić
- 315.** ES 25. Maj - Petnjica
- 316.** ES Mahmut Adrović
- 317.** ES Savin Bor
- 318.** ES Trpezi Petnjica
- 319.** ES Tucanje
- 320.** ES Hajro Šahmanović
- 321.** ES Petar Dedović
- 322.** ES Boško Buha
- 323.** ES Bratstvo-Jedinstvo
- 324.** ES Dušan Ivović
- 325.** ES Jakub Kubur
- 326.** ES Kruševo
- 327.** ES Mataruge
- 328.** ES Mihailo Žugić
- 329.** ES Mile Peruničić
- 330.** ES Radoje Kontić
- 331.** ES Radoje Tošić
- 332.** ES Ristan Pavlović
- 333.** ES Salko Aljković
- 334.** ES Vladimir Rolović
- 335.** ES Živko Džuver
- 336.** ES Bajo Pivljanin
- 337.** ES Bečko Jovović
- 338.** Educational Center Plužine
- 339.** ES 18 oktobar - Podgorica
- 340.** ES 21. maj - Podgorica
- 341.** ES 29. Novembar - Podgorica
- 342.** ES Boško Radulović
- 343.** ES Božidar Vuković Podgoričanin
- 344.** ES Branko Božović
- 345.** ES Đerđ Kastrioti Skenderbeg
- 346.** ES Đoko Prelević
- 347.** ES Dr Dragiša Ivanović
- 348.** ES Vladika Danilo
- 349.** ES Jedinstvo
- 350.** ES Mahmut Lekić
- 351.** ES Maksim Gorki
- 352.** ES Marko Miljanov
- 353.** ES Milan Vukotić
- 354.** ES Milorad Musa Burzan

- 355.** ES Niko Maraš
- 356.** ES Oktoih
- 357.** ES Pavle Rovinski
- 358.** ES Radojica Perović
- 359.** ES Savo Pejanović
- 360.** ES Savo Kažić
- 361.** ES Sutjeska
- 362.** ES Šćepan Đukić
- 363.** ES Štampar Makarije
- 364.** ES Vladimir Nazor
- 365.** ES Vlado Milić
- 366.** ES Vojin Popović
- 367.** ES Vuk Karadžić
- 368.** ES Zarija Vujošević
- 369.** ES 25. Maj - Rožaje
- 370.** ES Bać
- 371.** ES Balotiće
- 372.** ES Bratstvo - Jedinstvo
- 373.** ES Bukovica
- 374.** ES Daciće
- 375.** ES Donja Lovnica
- 376.** ES Milun Ivanović
- 377.** ES Miroslav Đurović
- 378.** ES Mustafa Pećanin
- 379.** ES Bogdan Kotlica
- 380.** ES Jovan Ćorović
- 381.** Educational Centre Šavnik
- 382.** ES Branko Brinić
- 383.** ES Drago Milović
- 384.** ES Bedri Elezaga
- 385.** ES Boško Strugar
- 386.** ES Marko Nukulović
- 387.** ES Maršal Tito
- 388.** ES Dušan Obradović
- 389.** ES Vuk Knežević
- 390.** Mixed high school - Andrijevića
- 391.** Gymnasium Niko Rolović
- 392.** PI High School of Economy And Tourism in Bar
- 393.** Secondary Vocational School in Bar
- 394.** Gymnasium Panto Mališić Berane
- 395.** Medical High School "Dr Branko Zogovic" Berane
- 396.** Secondary Vocational School - Berane
- 397.** Secondary Vocational School "Vukadin Vukadinović"

- 398.** Gymnasium "Miloje Dobrašinović" Bijelo Polje
- 399.** High school for Electronics and Economics Bijelo Polje
- 400.** Secondary Vocational School Bijelo Polje
- 401.** Mixed high school Danilo Kiš
- 402.** Gymnasium Cetinje
- 403.** PI High School of Fine Arts Petar Lubarda
- 404.** Secondary Vocational School Cetinje
- 405.** Gymnasium Petar I Petrović Njegoš
- 406.** Mixed high school Ivan Goran Kovačić
- 407.** Mixed high school "Braća Selić"
- 408.** Gymnasium Kotor
- 409.** Elementary and secondary music school "Vida Matjan"
- 410.** Maritime High School - Kotor
- 411.** Mixed high school "Vuksan Đukić"
- 412.** Gymnasium "Stojan Cerović"
- 413.** First vocational high school - Nikšić
- 414.** Elementary and secondary music school "Dara Čokorilo"
- 415.** High School of Economy and Tourism in Nikšić
- 416.** Secondary Vocational School - Nikšić
- 417.** Mixed high school "Bećo Bašić"
- 418.** Gymnasium "Tanasije Pejatović"
- 419.** Secondary Vocational School - Pljevlja
- 420.** Gymnasium "25. maj" Tuzi
- 421.** Gymnasium "Slobodan Škerović"
- 422.** Secondary School of Economics "Mirko Vešović"
- 423.** Electrical Engineering High School "Vaso Aligrudić"
- 424.** High School of Civil Engineering and Geodesy "Inž Marko Radević"
- 425.** Medical High School - Podgorica
- 426.** Secondary Vocational School "Ivan Uskoković"
- 427.** Secondary Vocational School "Sergije Stanić"
- 428.** Secondary Vocational School "Spasoje Raspopović"
- 429.** Art school for music and ballet "Vasa Pavić"
- 430.** Gymnasium "30. septembar"
- 431.** Secondary Vocational School - Rožaje
- 432.** Music School in Tivat
- 433.** Secondary Vocational School "Mladost"
- 434.** Mixed high school "Bratstvo jedinstvo"
- 435.** Mixed high school „17.septembar“
- 436.** Art School of Primary and Secondary Music Education for Talents "Andre Navara"
- 437.** Institution for Holiday and Recreation of Children "Lovćen - Bečići"
- 438.** Nursing home „Bijelo Polje“
- 439.** Nursing home „Grabovac“
- 440.** Hospital for pulmonary diseases „dr Jovan Bulajić“

- 441.** Resource Centre for Children and Youth “Podgorica”
- 442.** PI Day Care Center for Children and Youth with Disabilities Berane
- 443.** PI Cultural Centre Vojislav Bulatović Strunjo Bijelo Polje
- 444.** Police Academy Danilovgrad
- 445.** Library for the blind
- 446.** CGCNP CG
- 447.** Examination Centre of Montenegro
- 448.** PI Montenegrin Cinematheque
- 449.** National Museum
- 450.** National Library of Montenegro
- 451.** Montenegrin Music Center
- 452.** Contemporary Art Centre of Montenegro
- 453.** Center for Conservation and Archeology
- 454.** Montenegrin Academy of Sciences and Arts
- 455.** Royal Theater Zetski dom Cetinje
- 456.** PI Centre for Vocational Education
- 457.** PI Resource Center for education and training “June 1st”
- 458.** Museum of Natural History of Montenegro
- 459.** Center for Ecotoxicological Research Podgorica
- 460.** Centre for Preservation and Development of the Cultures of Ethnic Minorities
- 461.** Komanski most
- 462.** Centre “Ljubović”
- 463.** Clinical Center of Montenegro (CCM)
- 464.** Specialist veterinary laboratory
- 465.** Maritime Museum Kotor
- 466.** PI Official Gazette of Montenegro
- 467.** Institute for Geological Research
- 468.** Sports centre Žabljak
- 469.** Sports centre Nikšić

PUBLIC COMPANIES

- 470.** Official Gazette of Montenegro
- 471.** Centre for Mediation of Montenegro
- 472.** Centre for professional rehabilitation
- 473.** Film Centre of Montenegro
- 474.** Airports of Montenegro
- 475.** Plantaže
- 476.** National Parks of Montenegro
- 477.** New Tobacco Plant
- 478.** Regional Water Supply System of Montenegro Coast
- 479.** PC for Coastal Zone Management of Montenegro
- 480.** Electrical Power Company of Montenegro
- 481.** Monteput

- 482.** Port of Bar
- 483.** Institut "Dr Simo Milošević", Igalo
- 484.** Montenegro Airlines
- 485.** Electric Transmission System of Montenegro
- 486.** Institute of ferrous metallurgy AD Nikšić
- 487.** Port of Kotor
- 488.** Bar navigation
- 489.** Marina Bar
- 490.** Montenegrin navigation Kotor
- 491.** Post of MNE
- 492.** Castello Montenegro Pljevlja
- 493.** Montenegrin Electricity Market Operator
- 494.** Centre for Ecotoxicological Research
- 495.** Montenegro Bonus Cetinje
- 496.** Coal mine Pljevlja
- 497.** AD Railways Maintenance Equipment Renewal
- 498.** Railway infrastructure of Montenegro
- 499.** Railway Transport of Montenegro AD
- 500.** Montecargo
- 501.** Radio Broadcasting Centre Podgorica
- 502.** Adriatic Shipyard Bijela – bankrupt
- 503.** Innovation and Entrepreneurship Center (IEC) Tehnopolis
- 504.** Energy Regulatory Agency
- 505.** Montefarm
- 506.** National Tourism Organisation of Montenegro
- 507.** Regional Diving Center
- 508.** Water supply and wastewater- Andrijevića
- 509.** DOO Utility company – Andrijevića
- 510.** Tourism Organisation Andrijevića
- 511.** LLC Water supply and wastewater Bar
- 512.** LLC Sports and Recreation Centre Bar
- 513.** LLC Sports and recreation center Bar
- 514.** JP Cultural Center Bar
- 515.** LLC Hunting Bar
- 516.** LLC Sports Center Berane
- 517.** LLC Water supply and sewerage Berane
- 518.** LLC Utility services Berane
- 519.** Tourist Organization Berane
- 520.** LLC "Utility services – Lim" Bijelo Polje
- 521.** LLC Water Supply Bistrica – Bijelo Polje
- 522.** LLC Parking Service Bijelo Polje
- 523.** Tourist Organization Bijelo Polje
- 524.** JP Parking Service Budva

- 525.** LLC Mediterranean Commercials Budva
- 526.** LLC Academy of Knowledge Budva
- 527.** Tourist Organization Budva
- 528.** JP Funeral Services Budva
- 529.** LLC Water supply and sewerage Budva
- 530.** LLC Utility services Budva
- 531.** Utility services Cetinje
- 532.** LLC Water supply and sewerage Cetinje
- 533.** LLC Sports Center Cetinje
- 534.** Tourist Organization of the Capital Cetinje
- 535.** LLC Utility services Danilovgrad
- 536.** LLC For breeding, protection and hunting of game and fish - Danilovgrad
- 537.** Water supply and sewerage Danilovgrad
- 538.** Tourist Organization Danilovgrad
- 539.** LLC Utility services Gusinje
- 540.** Tourist Organization Gusinje
- 541.** LLC Water supply and sewerage Herceg Novi
- 542.** Cleanliness LLC Herceg Novi
- 543.** Communal - residential Herceg Novi
- 544.** LLC Parking Service Herceg Novi
- 545.** LLC Sports Center Igalo
- 546.** Tourist Organization Herceg Novi
- 547.** LLC Company of Construction of Water Supply and Sewerage Infrastructure Network
- 548.** LLC Agency for Development and Protection of Orjena Herceg Novi
- 549.** LLC Agency for managing the city port Herceg Novi
- 550.** LLC Agency for Development and Construction of Herceg Novi
- 551.** LLC Utility services Kolašin
- 552.** LLC Water supply and sewerage Kolašin
- 553.** Tourist Organization Kolašin
- 554.** Directorate for Development and Construction of Kotor
- 555.** LLC Utility services Kotor
- 556.** LLC Water supply and sewerage Kotor
- 557.** Tourist Organization Kotor
- 558.** LLC Utility services Gradac - Mojkovac
- 559.** Tourist Organization Mojkovac
- 560.** LLC Utility services Nikšić - Nikšić
- 561.** LLC Water supply and sewerage Nikšić
- 562.** Sports Center Nikšić
- 563.** Tourist Organization Nikšić
- 564.** LLC Utility services Petnjica
- 565.** Tourist Organization Petnjica
- 566.** LLC Utility services Plav
- 567.** Tourist Organization Plav

- 568.** Tourist Organization Pljevlja
- 569.** LLC Cleanliness Pljevlja
- 570.** LLC Utility services Pljevlja
- 571.** LLC Water supply Pljevlja
- 572.** Piva Plužine Nature Park
- 573.** LLC Utility services Plužine
- 574.** LLC Agency for construction of Podgorica
- 575.** LLC Podgorica Housing Agency Podgorica
- 576.** LLC Parking Service Podgorica
- 577.** Putevi LLC Podgorica
- 578.** LLC Green Markets
- 579.** LLC Water supply and sewerage Podgorica
- 580.** LLC Cleanliness Podgorica
- 581.** LLC Utility Services Podgorica
- 582.** LLC Funeral Services Podgorica
- 583.** LLC Greenery Podgorica
- 584.** LLC Sports Facilities Podgorica
- 585.** Waste LLC Podgorica
- 586.** LLC Utility services Rožaje
- 587.** LLC Water Supply and Sewerage Rožaje
- 588.** LLC Sports Center Rožaje
- 589.** LLC Ski Center Hajla
- 590.** LLC Agency for design and development of Rožaje
- 591.** Tourist Organization Rožaje
- 592.** LLC Utility Services Šavnik
- 593.** Tourist Organization Šavnik
- 594.** Dragišnica and Komarnica Nature Park
- 595.** LLC Water Supply and Sewerage Tivat
- 596.** LLC Utility services Tivat
- 597.** Tourist Organization Tivat
- 598.** Parking Service Tivat
- 599.** LLC Utility services Tuzi
- 600.** JP Water supply and sewerage Ulcinj
- 601.** LLC Utility services Ulcinj
- 602.** Tourist Organization Ulcinj
- 603.** LLC Utility services Žabljak
- 604.** Tourist Organization Žabljak
- 605.** Sports Center Žabljak

