



Centar za građansko obrazovanje  
Centre for Civic Education



# Equal chances for all media in Montenegro

REPORT FOR 2021



Kingdom of the Netherlands

B | T | D The Balkan Trust  
for Democracy

A PROJECT OF THE GERMAN MARSHALL FUND

 **Norway**



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## report for 2021

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# **Equal chances for all media in Montenegro**

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Podgorica, 2022

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# Equal opportunities for all media vs convenient editorial policies

The media scene in Montenegro, for a long period, reflects a deep social polarization, accompanied by numerous problems that, in different manners, affect the environment in which the media function as well as the quality of media reporting. The problems of hard censorship are particularly emphasized, as reflected in the burden of unsolved cases of attacks on journalists and their property. This is accompanied by the dysfunctionality of self-regulatory bodies and regulators – the Agency for Electronic Media, but also the public service media RTCG that fails to genuinely transform itself, and even takes a few steps backward, which consequently limits the opportunities for citizens to be objectively informed about events in Montenegro.

Additionally, one of the key neuralgic points remains the so-called soft censorship, carried out by the authorities. This subtle way of influencing the media completed the complex mosaic of the overall media situation in Montenegro. Through the politicized, discretionary, non-transparent distribution of public funds, as well as through subsidies to the media, editorial policies were and are being influenced.

Since 2012, the Centre for Civic Education (CCE) has been recording the misuse of public funds that distorts the media market, which is directly related to how favourably or critically media outlets report on government activities. This is indicated by the data collected by the CCE from the public bodies, when preparing these reports, based on the Free Access to Information Law. The figures in those reports are those for which the CCE has collected written evidence from those bodies. More specifically, those who support the ruling structure have a privileged position with the government, while others are denied a lot, with note that this latest report gives an overview of the more balanced state of affairs than before, and bearing in mind the change of government as well as the previously signed and new contracts with the media and other houses.

This type of soft censorship is not only specific to Montenegro, but also to the region where, through the combination of ruling political options and the media, there are attempts to create a parallel reality, all with the aim of maintaining the levers of power. That is why media financing based on some measurable criteria, such as public trust, viewership, listenership, readership/attendance, but also respect for ethical standards was avoided for a long time.

CCE reports are often cited in relevant international reports and analyses, such as those produced or supported by the European Commission, then Reporters Without Borders, the State Department, Freedom House, the Council of Europe, etc.

In the process of accession negotiations with the European Union, Montenegro should comply with European standards and best practices, and this includes ensuring equal chances for all media, especially when it comes to media financing from public funds.

Within its efforts and possibilities, from 2013 to 2021, the CCE collected data on allocations from the public sector for advertising and marketing, as well as other related media services and purposes. All the findings and recommendations of the CCE in this area contributed, after a long time, to the legal regulation of this issue through the new Media Law, adopted on 27 July 2020. Nowadays, that area is regulated in such a way that the competent Ministry keeps records of the financial resources allocated to the media from public funds. According to the new Law, public bodies (state bodies, municipalities, public institutions, independent regulatory bodies, companies and legal entities in which the state or municipalities have a majority ownership share) are obliged to, by 31 March of the current year for the previous year, to publish records of payments to the media based on advertising and other contracted services on their website. In this manner, through the public disclosure of media financing data by public bodies, the public is enabled to monitor the amounts, type and basis of all contracts between public bodies and the media. The new legal provisions are harmonized with the Recommendation of the Council of Europe on media pluralism and transparency of media ownership (2018/11).

These changes preserve the public and state interest in relation to the interest of preserving control over the media. Of course, the Law is only one dimension, whereas application is the other crucially important dimension, which should provide equal market chances to all media. In this context, the competent Ministry of Culture and Media must ensure consistent application of the spirit and the letter of the Media Law, and hence to influence the reduction of some of the problems in the media field.

The CCE will continue to closely monitor this implementation, with the hope that it will no longer have to prepare such reports, but that they will be publicly available from official sources..

The research on various forms of money transfer from public funds to the media was conducted from 23 February 2022 to 8 June 2022, and included 621 public bodies. In this demanding undertaking, the CCE's research team tried to include all public bodies at the local and national level that are bound by the Free Access to Information Law.

The multi-year efforts of the CCE, through monitoring the flow of money from public funds to the media, have contributed to the improvement of the legal framework that should provide equal chances for all media in Montenegro when it comes to access to these funds. Based on the findings and recommendations of the CCE, the Media Law, which entered into force in August 2020, regulated the issue of transparency of media financing from public funds. The CCE will especially monitor the implementation of those provisions, which, among other things, prescribe the competence of the Ministry of Culture and Media to record, process and classify all payments to the media from public funds through the annual report.

This report includes data collected based on responses to requests for free access to information, as well as from available documents of competent authorities, and covers the period from 1 January 2021 to 31 December 2021. It is about the transfer of public funds by public bodies, or those who are significant budget beneficiaries, to the media, media agencies and production houses and related entities for the provision of various media services, but on other grounds, as well. In addition, the CCE research team left the opportunity for all authorities to supplement the data and possibly clarify their decisions that were of importance to the researchers.

The report also contains data on state aid granted to broadcasters throughout 2021, based on data that was available to the research team of the CCE.

The Radio Television of Montenegro (RTCG) was also the subject of analysis in the part of annual financial plans, reports and allocations from the Budget of Montenegro, in order to get a more complete picture of the structure of the financing of the media sector in Montenegro.

Conclusions and recommendations are an integral part of this report, intending to further contribute to the improvement of the situation in this area, i.e., strengthening clear criteria for investment in the media and transparent distribution of funds, in order to prevent or narrow the scope for discretionary decision-making according to whether certain media support the Government's policy or denying that funding if they do not support it.



The Law on the Control of State Aid regulates the field of state aid with the key competence of the Agency for Protection of Competition of Montenegro.

State aid is defined in Article 2 of this Law as *financial aid that is directly or indirectly allocated from the state budget, by the decision of the Government of Montenegro, the municipal budget, by the decision of the competent authority of the municipality, including European Union funds and other public funds, and which is allocated to users who perform economic activity, which puts them in a more favourable position compared to other market participants. Financial assistance that is not provided to companies under the same conditions, or is provided selectively to companies based on the size of the company, place of business or place of registration, or is intended for one company. This type of financial aid threatens competition and affects trade between Montenegro and other countries contrary to confirmed international agreements.*

The Agency for Protection of Competition decides on the compliance of state aid with the Law within 60 days from the submission of a proper application for receiving state aid. The forms of state aid in Montenegro are precisely prescribed and allowed.<sup>1</sup>

The Regulation on detailed criteria, conditions and method of awarding state aid specifies and regulates in more detail state aid<sup>2</sup> to public broadcasting services. Article 43 of this Regulation prescribes the following conditions for state aid to public broadcasting services: *that the broadcasting of radio and television programmes satisfies the interests of the public at the national and local level and takes into account the national representation of informative, cultural, educational, sports and entertainment programmes, if the provision of a public service is entrusted on the basis of an act (administrative) or contract, with the broadcasting of radio or television programmes of importance to the citizens of Montenegro, if an independent body is designated to monitor the provision of public services and if financing is provided in one of the following ways: - the public service of radio-television broadcasting is financed only from public funds, in any form, or - the public service of radio-television broadcasting is financed by various combinations of public funds and the sale of advertising space or programmes.*

<sup>1</sup> Law on State Aid Control, Article 8, State aid can 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) assignment of profits and/or dividends of the state or municipality to the beneficiary of state aid; 5) debt write-off towards the state, municipality or legal entity that manages and disposes of public revenue funds and state assets; 6) sale of immovable property 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 without compensation or with a compensation lower than the market price; and 8) other assistance in accordance with the law.

<sup>2</sup> Regulation on detailed criteria, conditions and method of awarding state aid, Official Gazette of Montenegro, no. 27/2010, 34/2011 and 16/2014



There is no publicly available systematized data on the exact amount of state aid to the media in 2021. The government previously helped the media with the aim of mitigating the economic consequences caused by the coronavirus pandemic through wage subsidies, loans for working capital, deferred payment of taxes and contributions to employees' wages, deferred payment and exemption from part of the fees to regulatory agencies, one-time financial assistance. The aid for the payment of fees to the Radio Broadcasting Center (RDF) was around €400,000.00.<sup>3</sup> This was followed by other subsidies, through other entities<sup>4</sup>. Additionally, in June 2021, the Agency for Electronic Media made a decision to exempt radio and TV broadcasters from paying a fee of around €100,000.00.<sup>5</sup>

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<sup>3</sup> <http://www.rtcg.me/vijesti/drustvo/320981/drzavna-pomoc-za-jos-14-lokalnih-medija.html>

<sup>4</sup> For example, on the initiative of the Ministry of Public Administration, Digital Society and Media, the Board of directors of the Montenegrin Organization for Collective Management of Music Authors' Rights (PAM MNE) made a decision to exempt commercial radio and TV broadcasters from the fee for using the PAM MNE repertoire for three months or, at their choice, 30% of the monthly fee for the entire year 2021. <http://www.rtcg.me/vijesti/drustvo/320981/drzavna-pomoc-za-jos-14-lokalnih-medija.html>

<sup>5</sup> <https://aemcg.org/wp-content/uploads/2021/06/Saopštenje-AEM-drzavna-pomoc-emiterima-02-747-2-25.06.2021.pdf>

Radio Television of Montenegro (RTCG) is a national public service that receives separate, predetermined funds from the Budget of Montenegro.

According to the amendments to the RTCG financial plan for 2021<sup>6</sup>, the RTCG had planned total revenues of 17,786.900 euros out of which 13,821.900 euros is from the budget of Montenegro. Total expenditures are projected at 17,781.900 euros, of which 9,197.000 euros are allocated to personal income. Projected revenues are higher compared to the previous three years, even when excluding the amount allocated to digitalization. RTCG financial report for 2020<sup>7</sup> indicates a revenue of 13,591.300 euros from the Budget, for the year 2019 the total revenue from the Budget was 13,822.200 euros, while for the year 2018 the revenue was 12,577.200 euros.

## RTCG

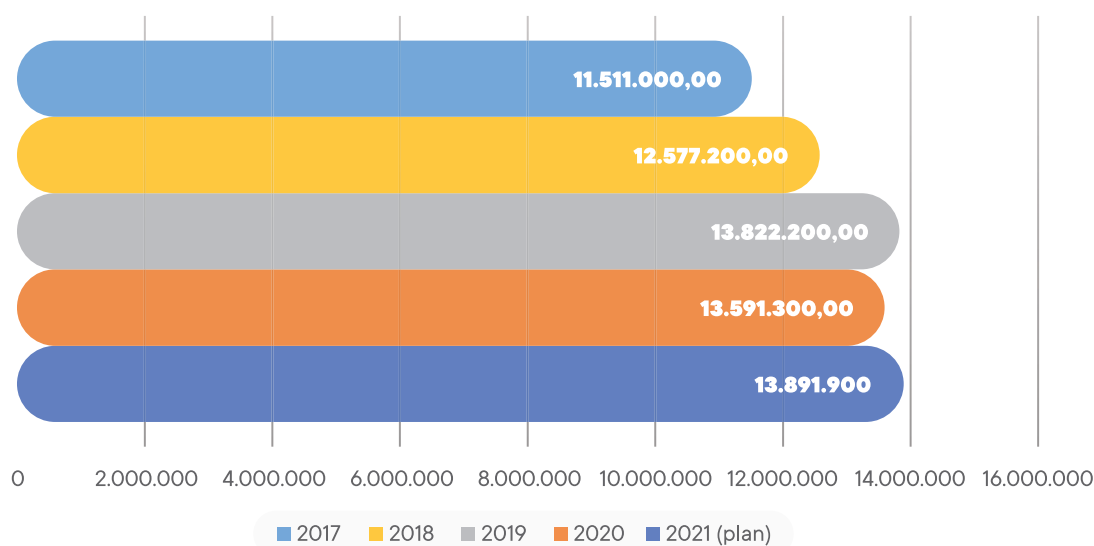


Chart 1. Overview of allocations from the Budget of Montenegro for RTCG from 2017 to 2021

Additionally, during 2021, RTCG planned revenues from marketing in the amount of 1,320.000 euros, which is less than in 2020 by almost 100,000 euros, i.e. less by about 130,000 euros than in 2019.

<sup>6</sup> <https://rtcg.me/upload/media/2021/10/25/1164961/IZMJENE%20I%20DOPUNE%20FINANSIJSKOG%20PLANA%20RTCG%202021.pdf>

<sup>7</sup> <https://rtcg.me/upload/media/2021/6/10/1145842/finansijski%20izvjestaj%20RTCG%20za%20period%2001.01.2020.-31.12.2020..pdf>

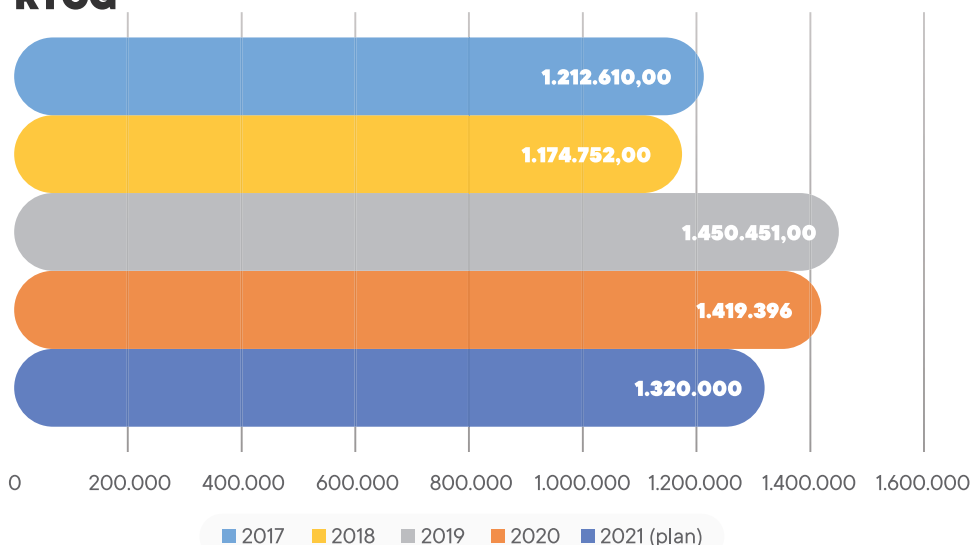
**RTCG**

Chart 2. Overview of commercial revenues of RTCG from 2017 to 2021

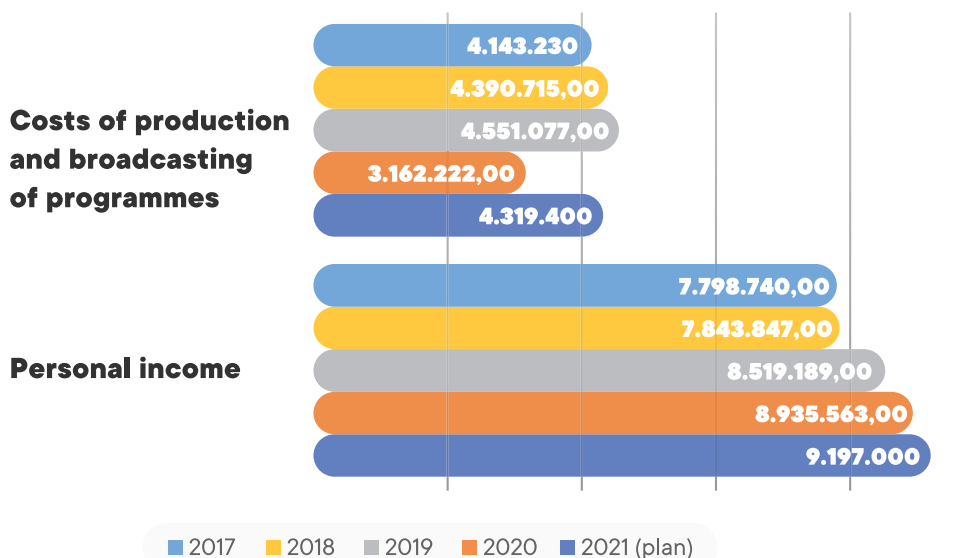


Chart 3. Overview of RTCG expenditures from 2017 to 2021

Among the planned expenditures of RTCG, in 2021, expenses based on personal income lead with 9,197.000 euros or 51.72%, followed by the costs of production and broadcasting of programmes in more than twice the amount of 4,014.045 euros or 24.29% of the total projected expenditures of RTCG.

An insight into the financial planning and implementation of the RTCG budget during the previous period indicates an increase in expenditures in relation to personal income, and a decrease in investment in the costs of production and broadcasting of programmes. This increases the criticism from the public about the excessive number of employees in RTCG, but also about a part of employees who do not come to work and use sick leave for long periods of time. Unfortunately, all this is still paid from the pockets of Montenegrin taxpayers.

Radio Television of Montenegro had a relative growth in revenue from 2017 to 2021. This growth is particularly reflected in the inflows from the Budget of Montenegro, while the marketing sector records variable results, which can partly be explained by the economic crisis caused by the COVID 19 virus pandemic. On the other hand, expenditures for personal income are continuously growing, while production costs have not yet reached the level of 2019.

RTCG's financial report for 2021 is still not publicly available and is not on RTCG's official website, so it is not possible to show the relationship between projected and realized revenue and expenses.

In the area of operating on the media market, it can be stated that RTCG is in a privileged position compared to other commercial media, regardless of the prohibition of advertising and teleshopping in the period between 8 and 10 p.m.



# Financial transactions of public bodies for media and media services

## General cross-section by fund providers

A total of 192 public bodies had payments to the media in 2021, in the total amount of 3,426,183.33 euros. It does not include state aid or funds from the budget for the RTCG public service.

Local governments allocated the most money to the media - 1,387,518.40 euros, followed by public companies that spent 1,139,791.92 euros on the media. It is important to emphasize that the amount related to local self-governments is not final, because not all local self-government units showed transparency and responded to the request of the CCE for all items. The least funds were spent by the judicial authorities, i.e. 3,646.94 euros.

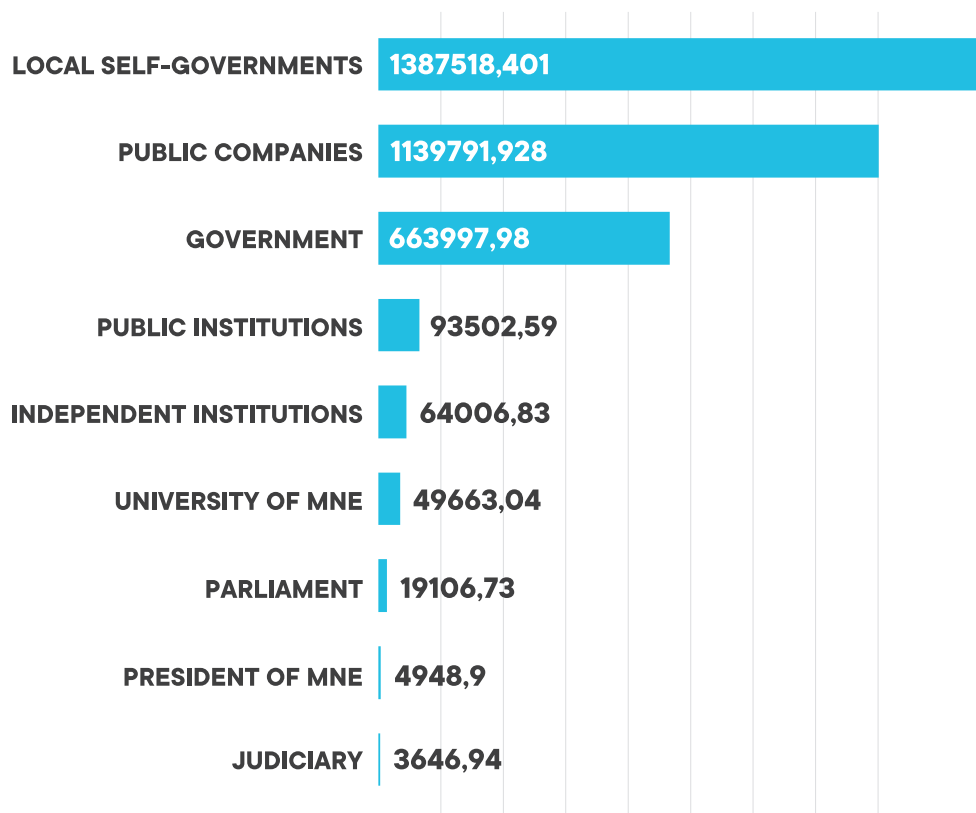
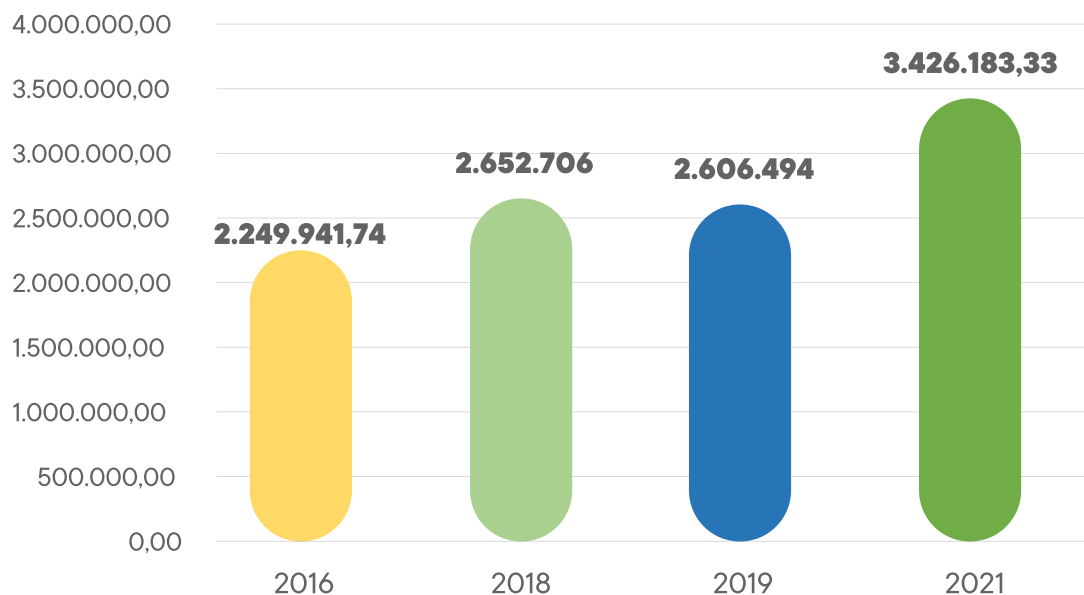


Chart 4. Overview of financial transactions of categories of public bodies according to media, media agencies and production houses in 2021

Comparing data from 2021 with data from 2019, 2018 and 2016 with these expenses indicates some variation. It should also be noted that 334 bodies were included in the research in 2016<sup>8</sup>, while the research that encompassed both 2018 and 2019 included 605 public bodies. The research for 2021 analysed 621 bodies.



*Chart 5. Comparative overview of financial transactions of public bodies for media and media services in 2016, 2018, 2019 and 2021*



# How much and how did individual public bodies spend on media and media services in 2021?

## The Cabinet of the President, Parliament and the Government

**The Cabinet of the President of Montenegro** responded within the deadline to the request for free access to information, which represents a positive step forward, bearing in mind that there was no response to the same request relating to 2018 and 2019. The total amount allocated for media and media services is 4,984.90 euros, of which 4,646.40 euros was allocated for the agency Arhimed LLC in 2021, and 302.50 euros for the agency MINA.

When it comes to the **Parliament of Montenegro**, this body submitted an answer within five days of sending the request. The total costs were 19,106.73 euros, and they were paid to the agency Arhimed LLC, daily Dan, and the agencies Mina and Ninamedia Kliping from Serbia.

**Government** bodies covered in the research include the General Secretariat of the Government, 12 ministries and 47 bodies, including agencies, administrations, institutes, funds etc. By the end of the research, there was no response from the Ministry of Education, Science, Culture and Sports, the Ministry of Health, the Ministry of Agriculture, Forestry and Water Management, as well as the Revenue and Customs Administration. This represents a step back compared to the research for 2019 and 2018, when only the Ministry of Economy did not submit the requested data. Therefore, the total amount of expenses of all these authorities, which submitted data, for the year 2021 amounts to 663,997.98 euros, with a note that some significant consumers are not included.

The Ministry of Public Administration, Digital Society and Media allocated the most money for the media - 374,823.29 euros (dominantly through two public tenders), and the Ministry of Internal Affairs allocated the least, 499.12 euros. It should be noted that neither the Ministry of Finance and Social Welfare, nor the Ministry of Economic Development submitted through their initial responses the contracts for the PR services of Duška Nedeljković from Belgrade, but CCE had to obtain it through special requests for free access to information, and only after new ministers Aleksandar Damjanović and Goran Đurović took office. It remains unclear why and for whose needs the taxpayers' money was spent during the previous government on external consultants in addition



to expert services in the ministries themselves, and why the former ministers of finance and economic development, Miloško Spajić and Jakov Milatović, hid this information from the public.

Also, the Ministry of Finance and Social Welfare, while Spajić was leading it, had commercials on Radio Television of Serbia (RTS) from 1 to 11 November 2021, and for that amount allocated 4,950.70 euros. From the submitted invoices and contracts, it is not clear why the Ministry of Finance and Social Welfare would be advertising on the public service of another country and what the Ministry's specific needs were for such an arrangement.

MINISTRY OF PUBLIC ADMINISTRATION, DIGITAL SOCIETY AND MEDIA

**374823,29**

MINISTRY OF ECOLOGY, SPATIAL PLANNING AND URBANISM

**53624,06**

MINISTRY OF FINANCE AND SOCIAL WELFARE

**31931,07**

MINISTRY OF ECONOMIC DEVELOPMENT

**11979,35**

MINISTRY OF CAPITAL INVESTMENTS

**7232,79**

MINISTRY OF DEFENCE

**6032,62**

MINISTRY OF FOREIGN AFFAIRS

**1573**

MINISTRY OF THE INTERIOR

**499,12**

MINISTRY OF JUSTICE, HUMAN AND MINORITY RIGHTS

**0**

GENERAL SECRETARIAT OF THE GOVERNMENT OF MONTENEGRO

**0**

MINISTRY OF EDUCATION, SCIENCE, CULTURE AND SPORTS

**They did not submit data**

MINISTRY OF AGRICULTURE, FORESTRY AND WATER MANAGEMENT

**They did not submit data**

MINISTRY OF HEALTH

**They did not submit data**

Chart 6. Overview of financial transactions of ministries and the General Secretariat of the Government for media and media services in 2021

During 2021, bureaus spent 71,249.94 euros, administrations 67,348.87 euros, agencies 22,843.80 euros, funds 10,238.03 euros, institutes 4,622.04 euros, while commissions, as well as other bodies, such as the State Archive, the Secretariat for Legislation, the Directorate for the Protection of Secret Data or the Social Council of Montenegro had no expenses for media and media services.

#### BUREAUS

**71249,94**

#### ADMINISTRATIONS

**67348,87**

#### AGENCIES

**22843,8**

#### FUNDS

**10238,03**

#### INSTITUTES

**4622,04**

#### COMMISSIONS

**0**

OTHER (STATE ARCHIVE, SECRETARIAT FOR LEGISLATION, SOCIAL COUNCIL, DIRECTORATE FOR THE PROTECTION OF SECRET DATA )

**0**

■ Costs of other bodies in 2021

Chart 7. Overview of financial transactions of other administrative bodies for media and media services in 2021

The financial transactions of all other bodies, of which there are 479, are 176,302.68 euros, and these are less than the amount of expenses of all ministries, who submitted answers for the same purpose (487,695.30 euros).

Beneficiaries of public sector bodies for the 2021 are categorized, and therefore transactions are aligned in the same manner. Thus, 232,067.21 euros were paid for seven print media/magazines, 27,349.11 euros for four television stations, 205,654.52 euros for 34 portals/agencies, 135,644.90 euros for 16 marketing agencies, production houses and media agencies and 63,282.24 euros to 12 other subjects that provided various services of this type in 2021. There was no costs on the radio.

9 7 bureaus, 4 agencies, 18 administrations, 3 commissions, 8 funds, 3 institutes, the Secretariat for Legislation, the Social Council of Montenegro, the State Archive and the Directorate for the Protection of Secret Data

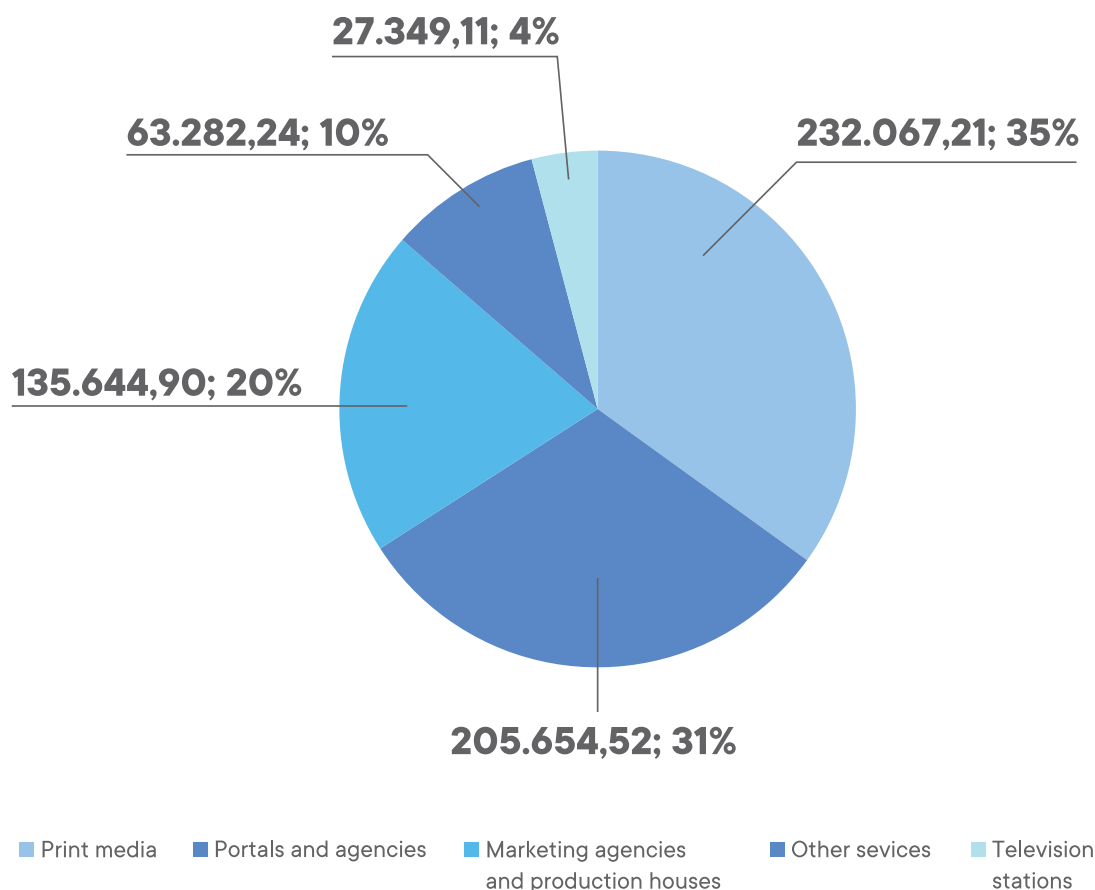


Chart 8. Overview of funds received by beneficiaries from public administration bodies in 2021

## Judiciary

Of nine bodies of the judiciary, to which requests for free access to information were sent, including the Center for Training in the Judiciary and the State Prosecutor's Office, only the Supreme State Prosecutor's Office had expenses - 3646.94 euros for the 2021, and that only for the legal entity Press clipping doo. Judiciary authorities through other CCE's researches were also identified as those who spent symbolically for these purposes.

## Local self-governments

The total financial transactions of all local self-governments in Montenegro towards the media and for media services is 1,387,518.40 euros. All 25 local self-governments (including the Golubovci Urban Municipality) submitted data, while four municipalities did not have expenses - Andrijevica, Berane, Gusinje and Plav.

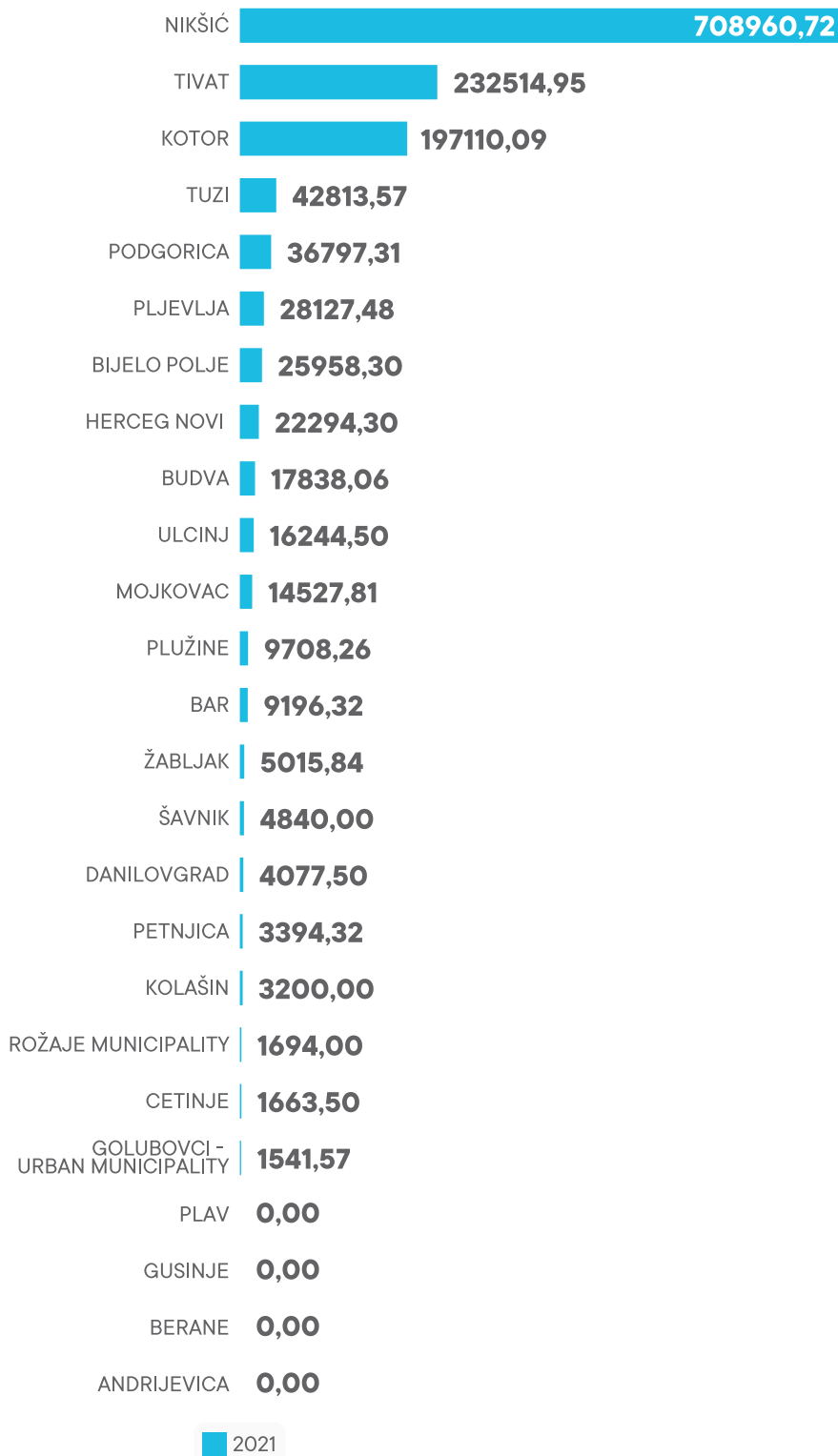


Chart 9. Overview of monetary transactions of local self-governments for media and media services in 2021

In 2021, the municipality of **Nikšić** spent the most funds for media and media services, 708,960.72 euros, followed by the municipalities of Tivat and Kotor, with 232,514.95 euros and 197,110.09 euros. It is important to emphasize that these three municipalities also lead in transparency, because in their responses to the request

for free access to information, they provided data on the amounts allocated to local public broadcasters for regular functioning (RTV Nikšić, Radio Tivat and Radio Kotor). For this reason, according to the obtained data, these three municipalities dominate the overview of the biggest consumers. However, the CCE failed to get the requested data from other local self-governments on the amounts for regular financing of local public broadcasters. The CCE did not file an appeal to the decisions of certain municipalities due to the inability of the Agency for the Protection of Personal Data and Free Access to Information to act effectively on complaints, and bearing in mind that since December 2021, when the president and member of the Council were dismissed, the Parliament did not elect new. Also, in period of closing the research, the CCE team could not check the final accounts of the municipalities, because the process of preparing the final budgets is not completed, and after the preparation, they must be verified by the municipal assemblies before making them publicly available documents.

It is known that all local public broadcasters are predominantly financed from municipal budgets. The CCE failed to obtain data on how much money they received for regular broadcasting from the budget of local self-governments: Gradska televizija Podgorica, Gradski radio, TV Pljevlja, Radio Pljevlja, TV Herceg Novi, Radio Herceg Novi, TV Budva, Radio Budva, Radio Bar, Radio Danilovgrad, TV Rožaje, Radio Rožaje, Radio Cetinje, TV Cetinje, Radio Andrijevića, Radio Berane, Radio Bijelo Polje, Radio Kolašin, Radio Ulcinj<sup>10</sup>. Accordingly, the amount of funds of local self-governments for media and media services is significantly higher compared to what the CCE received based on the Free Access to Information Law.

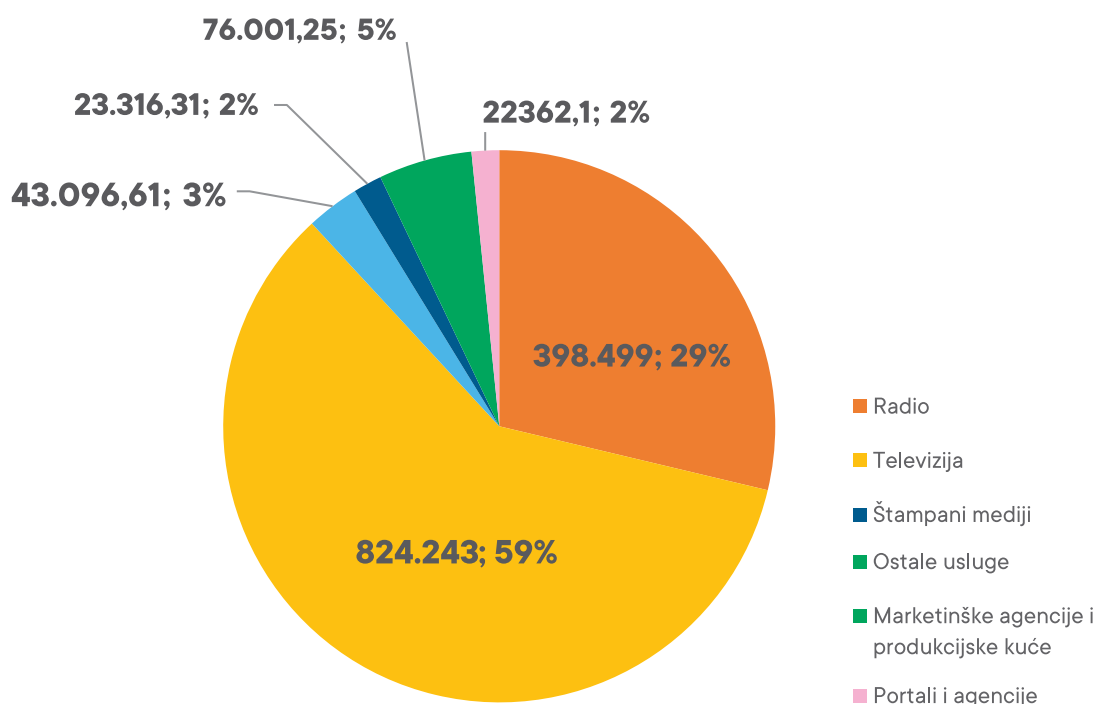


Chart 10. Overview of beneficiaries' income from local self-governments for media and related services in 2021

The biggest beneficiaries from local self-governments were televisions, so 10 TV stations got 824,243.13 euros or 59%. Following are nine radio stations, which were

<sup>10</sup> <https://aemcg.org/emiteri-i-operatori/>

allocated 398,499 or 29% of the total funds, then 15 marketing, media agencies and production houses with 76,001.25 euros (5%), as well as eight print media (newspapers and magazines) with 43,096.61 euros (3 %). The remaining 8% refers to portals and other providers of these and related services.

## Independent institutions

Of 25 independent institutions to which requests for free access to information were sent, all of them properly responded in accordance with the Law on Free Access to Information. Ten independent institutions responded that they had no expenses based on the request addressed to them. These are: Auditing Body, State Election Commission, Accreditation Body of Montenegro, Union of Municipalities of Montenegro, Central Securities Depository and Clearing Company of Montenegro, Agency for Protection of Personal Data and Free Access to Information, Bar Association, Notarie Chamber, Agency for Protection of Competition, Institute of Accountants and auditors of Montenegro.

The other 13 bodies had a total of 64,006.83 euros spent on this basis.

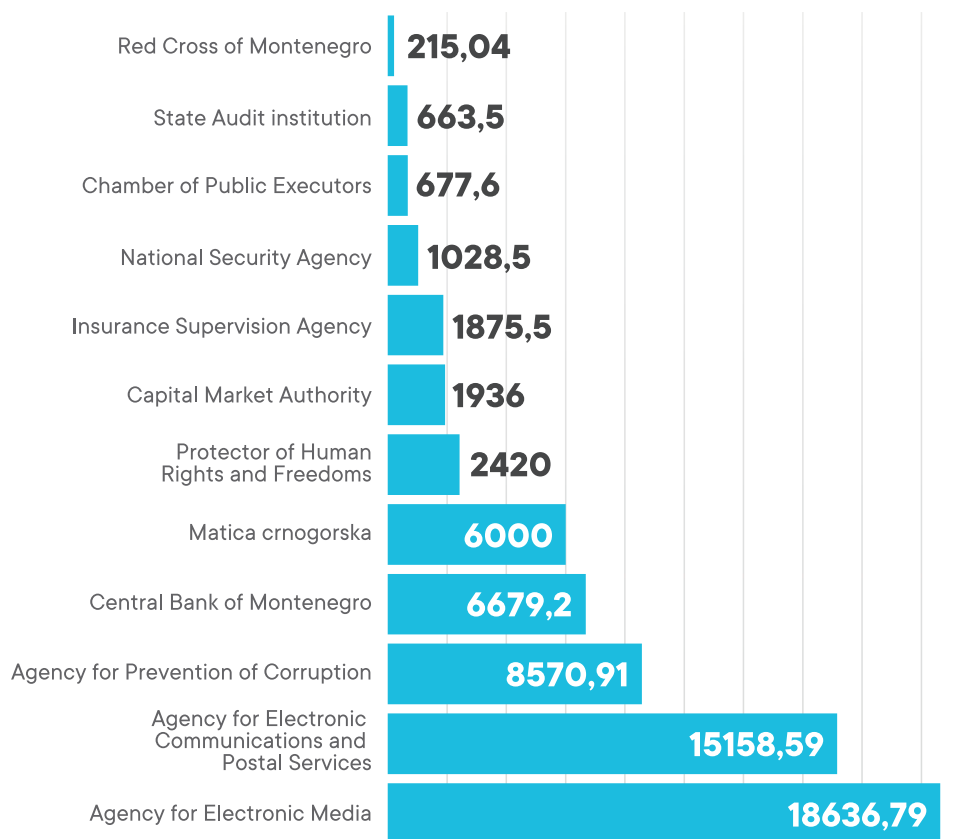


Chart 11. Overview of financial transactions of independent institutions towards the media, for media and related services in 2021

According to available information, the Agency for Electronic Media had the most financial transactions to the media - 18,636.79 euros, followed by the Agency for Electronic Communications and Postal Services and the Agency for the Prevention of Corruption with 15,158.59 that is 8,570.91 euros. The Red Cross of Montenegro (215.04 euros) and the Medical Chamber (145.02 euros) spent the least funds.

From independent institutions, marketing and media agencies and production houses (8 of them) received the most funds – 30,215.44 euros. Other related services follow with 16,641.95 euros, and print media (4) with 10,766.34 euros.

#### MARKETINŠKE I MEDIJSKE AGENCIJE I PRODUKCIJSKE KUĆE

**30215,44**

#### OSTALE USLUGE

**16641,95**

#### ŠTAMPANI MEDIJI

**10766,34**

#### TELEVIZIJE

**2916,1**

#### PORTALI I AGENCIJE

**2662**

#### RADIO

**805**

2021

Chart 12. Overview of beneficiaries income from independent institutions for media and related services in 2021

### University of Montenegro

The total cost of the University and all university units for media and media services is 49,663.04 euros. All university units (21), as well as the Rector's Office, responded to the request of the CCE, whereby 13 faculties did not have expenses on this basis. This refers to the Faculty of Architecture, Faculty of Economics, Faculty of Electrical Engineering, Faculty of Dramatic Arts, Faculty of Tourism and Hospitality, Faculty of Philology, Faculty of Philosophy, Faculty of Civil Engineering, Faculty of Mechanical Engineering, Faculty of Medicine, Academy of Music, Faculty of Maritime Affairs and Law Faculty.

Of the other higher educational institutions that had expenses, the Institute of Marine Biology spent the most on media and media services, 26,283.60 euros, followed by the Rectorate of the University of Montenegro, 21,480.77 euros. All other university bodies spent significantly less, including the Institute of History with only 65 euros.



INSTITUTE OF MARINE BIOLOGY

**26283,60**

UNIVERSITY OF MONTENEGRO (RECTORATE)

**21480,77**

FACULTY OF NATURAL SCIENCES AND MATHEMATICS

**833,13**

FACULTY OF NATURAL SCIENCES AND MATHEMATICS

**299,50**

FACULTY OF FINE ARTS

**282,38**

FACULTY OF METALLURGY AND TECHNOLOGY

**229,90**

FACULTY OF POLITICAL SCIENCE

**121,00**

BIOTECHNICAL FACULTY

**67,76**

HISTORICAL INSTITUTE

**65,00****2021**

*Grafik 13. Pregled troškova UCG i univerzitetskih jedinica za medije, medijske i vezane usluge u 2021. godini*

## Public institutions

In the category of public institutions, requests for free access to information were sent to a total of 341 bodies, which spent 93,502.59 euros on media, media services and related services. It should be emphasized that only two bodies did not submit a response (0.58%), which is the result of the persistence of the CCE's research team that sent urgent requests to the authorities to comply with the Free access to information law. In total, 281 authorities had no expenses (88.53%), and the remaining 58 bodies had expenses (18.47%) which were 93,502.59 euros in total.

## Associations

Of the 25 associations at the national level, 12 had no expenses for media and related services, four of them state that they are not bound by the Free access to information law, and seven associations reported expenses in the total amount of 47,576.90 euros. Two associations did not respond to the CCE's request - the Montenegro Judo Federation and the Montenegro Aeronautical Sports Association.

The largest share of expenses on this basis in 2021 is attributed to the Handball Federation of Montenegro - 21,415.00 euros, followed by the Volleyball and Water Polo Federation - 9,310.56 euros and 8,756.72 euros, respectively. Montenegro Sport Fishing Association recorded the lowest expenses in the category of consumers who had expenses. A frequent practice of compensation was noted as a way of settling associations' obligations with RTCG with whom most of those who had expenses cooperate.

### Other public institutions

The remaining 316 bodies include all other bodies of local self-governments, educational institutions, etc. and the total cost of these bodies for media and related services in 2021 amounted to 45,925.69 euros. However, educational institutions (elementary and high schools) predominantly had no expenses on this basis.

The largest consumer among these public institutions was PCI Herceg Fest in Herceg Novi with 10,602.90 euros for media and media services in 2021, followed by the Montenegrin National Theater with 8,157.57 euros, then Montenegrin Academy of Sciences and Arts with 4,573.42 euros. Elementary school Mihailo Žugić from Odžak in Pljevlja is the institution that had the least expenses among those who submitted data, amounting to 30 euros.

### Incomes of the beneficiaries in 2021

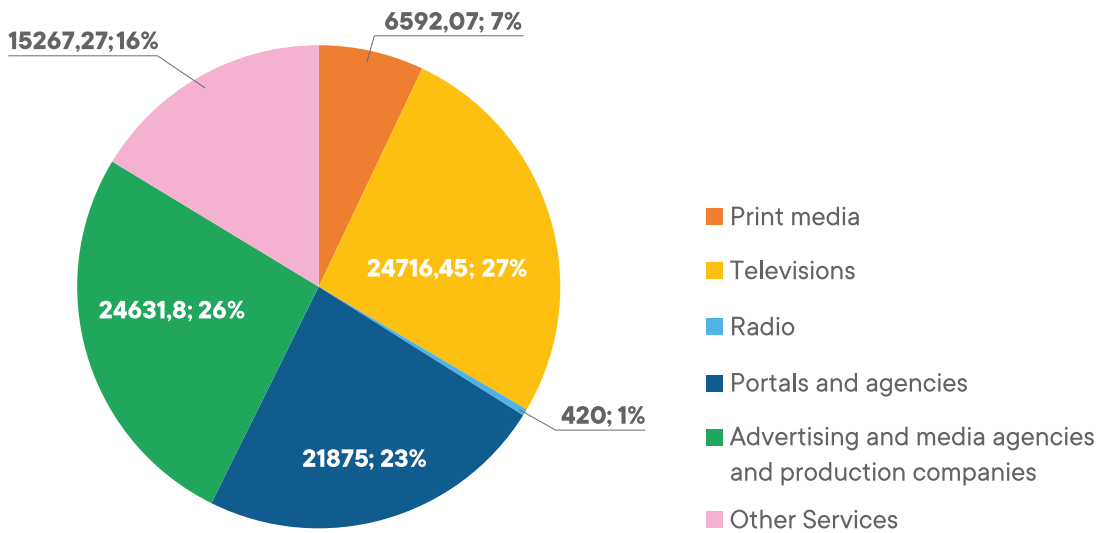


Chart 14. Overview of funds generated by the beneficiaries from public institutions in 2021

Public institutions spent the most funds on television - 24,716.45 euros or 27%, followed by advertising and media agencies and production companies with 24,631.8 euros or 26%, and then portals and agencies with 21,875 euros or 23%. Radio stations had the least income from public institutions, only 420 euros.

### Public companies

Following the local self-governments, public companies had the highest expenses towards the media, but in their case, it primarily refers to advertising, in the total amount of 1,139,791.92 euros.

Of the 137 public companies that were sent free access to information requests, 134 of them responded, with one body stating that it is not subject to the Free Access to Information Law (New Tobacco Plant, which is now privately owned), and two public

companies did not respond (1.46%) - Airports of Montenegro and Plantaže, which have returned to the blacklist of non-transparent authorities that ignore CCE's requests related to media investments, with the exception of the consolidated 2018-2019 research when they responded to the request. Of the 134 bodies that responded to the request of the CCE's research team, 69 public companies had no expenses, 65 public companies had expenses, while CCE submitted a complaint to Agency for Personal Data Protection and Free Access to Information against two companies, Air Montenegro and PC Parking service Podgorica due to the violation of procedural rules and wrong application of substantive law by unjustified reference to data confidentiality in their decisions.

The largest consumers among public companies were the National Tourism Organisation of Montenegro with 518,977.10 euros spent, of which 490,000.00 euros were paid to the marketing agency Direct media for the promotion of Montenegro's tourism on the target broadcast markets - UK, France, Germany, Austria, Switzerland, Poland and Russia, as well as for 'traditionally important markets of the region: Serbia, Slovenia, Albania and Bosnia and Herzegovina, via online channels'. LLC Public utility company Cetinje is in second place with 86,651.68 euros. It is followed by the Montenegro Post with 82,976.03 euros spent, followed by Electrical Power Company of Montenegro (EPCG) with 71,320.46 euros, and among the TOP 5 largest consumers are PC Funeral Service Budva with 64,072.02 euros. Among the major users of media and media services, the Montenegrin Electricity Distribution System (CEDIS) stands out with 54,186.18 euros spent, taking sixth place.

It is important to emphasize that companies such as LLC Public utility company Cetinje and PC Funeral Service Budva are intermediaries between citizens and print media in publishing death certificates and obituaries. However, the CCE's research team cannot ignore that transaction towards the media by a public company, bearing in mind that these transactions flow from the accounts of companies financed by municipal taxpayers, in this case the citizens of Cetinje and Budva.

### Overview of the five largest consumers among public companies in 2021

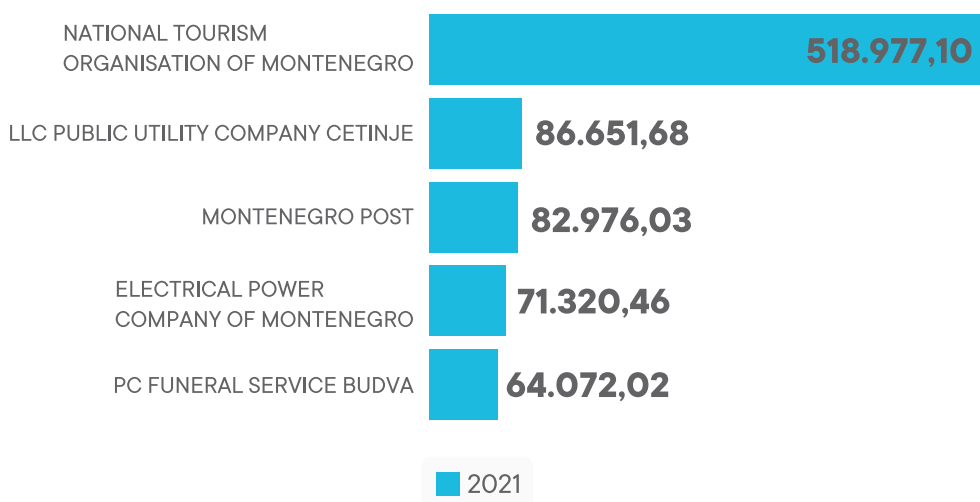


Chart 15. Overview of the five largest consumers among public companies in 2021

On 5 October 2021, the public company Coal Mine paid 500 euros of one-time payment assistance to the unregistered newspaper IN4S, after only 24 hours since the request of the portal signed by Gojko Raičević was sent. Also, in 2021, Electrical Power Company of Montenegro (EPCG) had a signed contract with the unregistered portal IN4S. EPCG pays 600 euros per month without VAT to the aforementioned portal for the publication of banners since 1 November 2021. This kind of assistance, i.e. financing with the money of all citizens, to portal that is not registered as a media and therefore does not fulfil its legal obligations towards the state of Montenegro, and on which gross violations of the Code of Ethics, as well as positive regulations regarding the protection of personal dignity and reputation, are often noted, is an example of irresponsible management of public resources. Public companies should not be an ATM from which the media in Montenegro are financed, especially not those media that persistently refuse to operate according to the laws of the state of Montenegro, but also to respect ethical norms.

When it comes to the beneficiaries of these funds, advertising, media and production companies received the most funds from public companies, 55% or 630,501.88 euros, followed by print media with 241,394.52 euros (21%), then portals and news agencies with 90,790.66 euros (8%). Even in this category, radio stations earned the least, 29,028.57 euros or 3% of the total funds invested by public companies in media and media promotional services.

### Income of beneficiaries in 2021

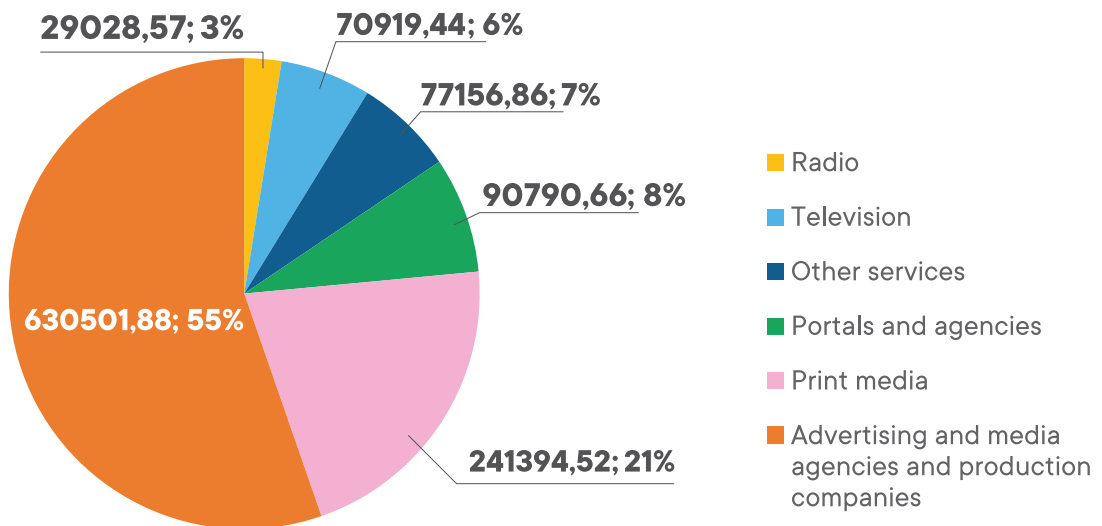


Chart 16. Overview of funds generated by the beneficiaries from public companies in 2021



# Which media, advertising and media agencies and production companies generated the most money from public funds in 2021?

## Print media

When it comes to print media in 2021, the following received the most funds from public bodies on various grounds: Pobjeda - 317,328.01 euros, Vijesti - 157,689.81 euros, Dan - 121,852.81, Daily newspapers - 63,599.31 and Monitor - 25,389.97 euros.

Among the payments to the dailies Pobjeda and Dan, a part of the income refers to death certificates, which was paid by a part of local public companies for advertising in those media. Also, even without those transactions, which are undoubted part of the marketing income of those media, their order in terms of transactions from public sector bodies would be identical (Pobjeda in first place, daily Dan in third place).

## Comparative overview of print media that generated the most funding from public funds in 2021

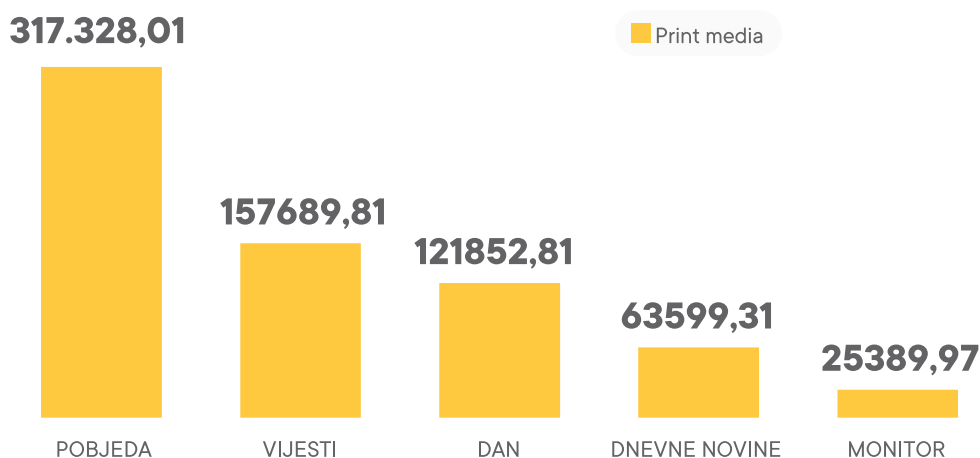


Chart 17. Comparative overview of funds generated by print media from public bodies in 2021

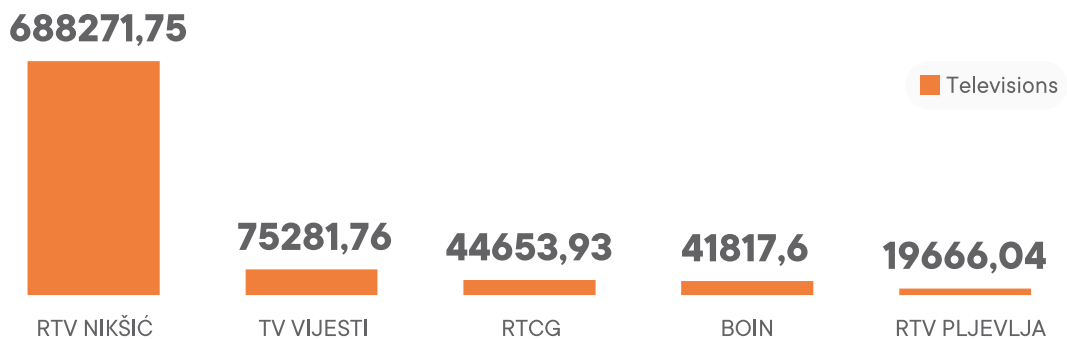
## Televisions

In terms of television, the largest beneficiary of the funds is RTV Nikšić – 688,271.75 euros. It is important to emphasize that this includes the amount allocated by the municipality of Nikšić for the regular functioning of this local public broadcaster. Without that amount, the total income of RTV Nikšić from public funds for 2021 would amount to only 6,871.75 euros.

In second place in terms of income is Vijesti television, which received 75,281.76 euros from public funds in 2021, followed by RTCG with 44,653.93 euros (funds from the Budget of Montenegro, which were processed in the first part of the report, are not included), then TV Boin 41,817.60 euros, and RTV Pljevlja in fifth place, which earned 19,666.04 euros.

### Comparative overview of televisions that generated the most fundings from public funds in 2021

\*without funds from the state budget allocated to RTCG



Grafik 18. Uporedni pregled sredstava koja su prihodovale televizije od organa javnog sektora u 2021. godini

## Radio stations

When it comes to radio broadcasters, according to the data collected by this research, the largest beneficiaries of public funds in 2021, were: Radio Tivat with 210,060.50 euros, Radio Kotor with 180,959.99 euros, then Radio Antena M with 27,199.50 euros, Radio Bar with 3,645.25 euros, and Radio Petnjica – Talas Bihora with 3,440 euros of revenue.

## Comparative overview of funds generated by radio stations from public funds in 2021 u 2021. godini

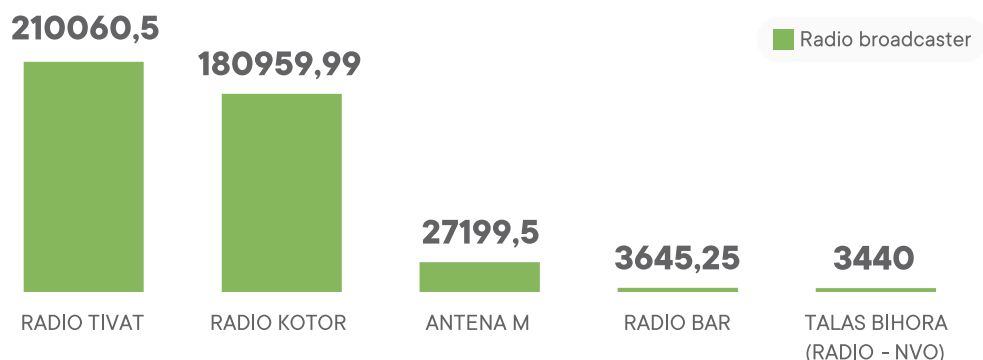


Chart 19. Comparative overview of funds generated by radio stations from public bodies in 2021

## Portals

Portals have a growing share in the financial transactions of public bodies, and received the most funds in 2021, on different grounds: Portal Analitika - 38,758.26 euros, then Portal Vijesti - 27,810.42 euros, the News Agency MINA - 23,378.67 euros, followed by the MNE rukomet portal - 21,415 euros, and the CdM portal - 19,782 euros.

## Comparative overview of funds that generated the most funding from public funds in 2021

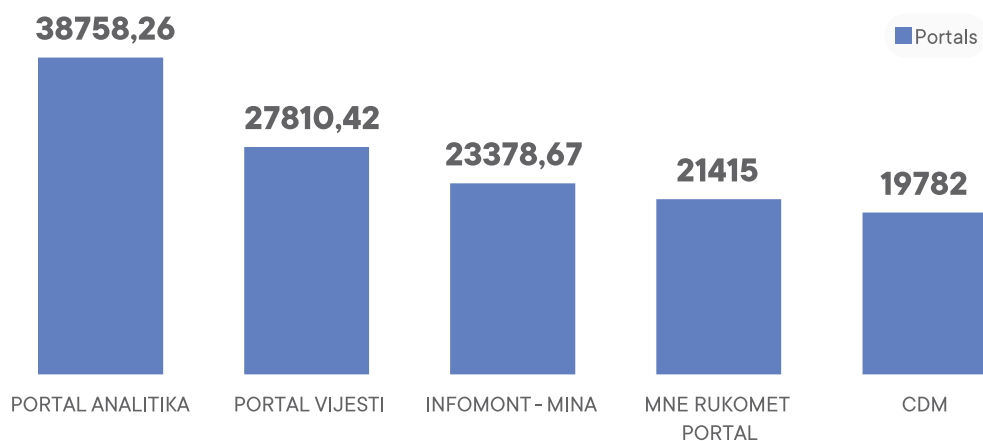


Chart 20. Comparative overview of funds generated by portals from public bodies in 2021

## Advertising agencies, media agencies and production companies

Advertising agencies, media agencies and production companies that generated the most funding from public funds are: Direct Media LLC - 491,790.80 euros, Arhimed - 69,779.20 euros, Ninamedia Clipping - 47,242.55 euros, Media biro - 37,965.35 euros, Rabbit Records - 30,734.00 euros and Represent Communications - 30,119.04 euros.



Comparative overview of the other providers who received the most funding from public funds

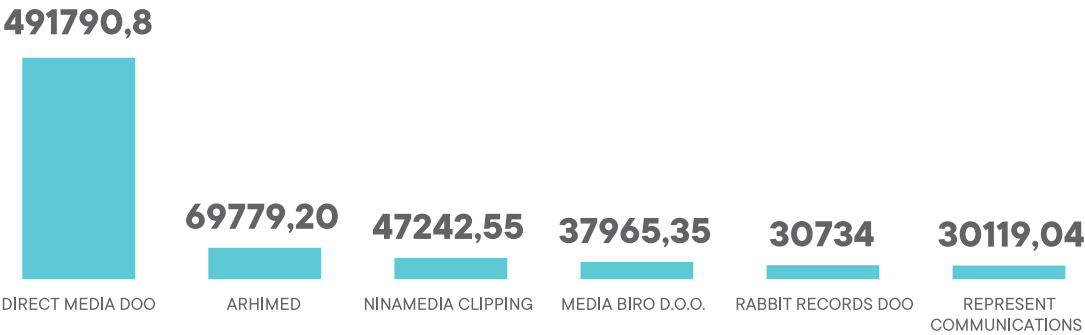


Chart 21. Comparative overview of funds generated by advertising agencies, media agencies and production companies from public bodies in 2021

Others

The largest beneficiaries of funds allocated for media and advertising services to legal and natural persons who received funds for the provision of other services that do not fit into any of the above-mentioned categories were: DMS Development - 46,738.02 euros, agency specialized in public opinion research DeFacto Consultancy - 20,560.32 euros, Veselin Gajović - 13,792.79 euros (hired for the commercial of the Montenegro Post), Duška Nedeljković - 13,750.00 euros (externally hired by the Ministry of Finance and Social Welfare for PR services), Damar Public Opinion Research Agency - 10,598.00 euros, Ittara solutions - 10,285.00 euros and Antonela Stjepčević - 10,220.00 euros (engaged on two projects of the Institute of Marine Biology 'Sharemed' and 'Tune up' for promotional, media and communication services).

Comparative overview of the other providers who received the most funding from public funds

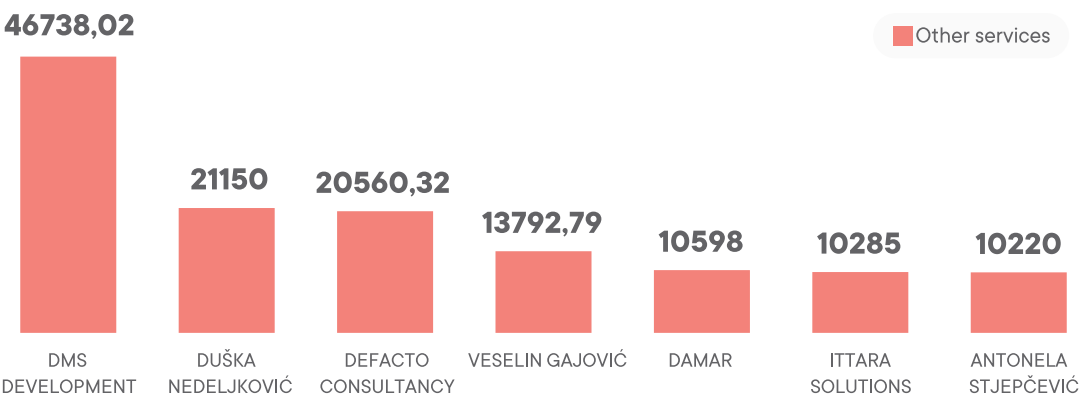


Chart 22. Comparative overview of funds generated by other service providers financed from public funds in 2021



## General overview by free access to information

In 2021, according to the records of the Agency for Electronic Media (AEM), 79 electronic media were operating in Montenegro, of which 55 were radio stations and 24 were TV stations. There are a total of 28 programmes of public radio and television broadcasters, as well as two programmes of non-profit broadcasters. Three daily print media operate in Montenegro – Pobjeda, Vijesti and Dan.

Of the **621 public bodies** to which a request for free access to information was sent, **613**, or **98.71%**, **submitted answers to the CCE's researchers**. Compared to previous researches of this type, there is a noticeable shift when it comes to responsibility in the part of compliance with the Law on Free Access to Information. There is still a problem in respecting the deadline of 15 days for submitting an answer, the limit is often breached, due to which the CCE's research team sent urgent requests, letters and complaints so that all these bodies submit decision on the request for access to information.

In eight bodies that ignored the request of the CCE's researchers, thus violating the provisions of the Law on Free Access to Information, the principle of *silence of the administration* prevails. Despite numerous urgent requests and even complaints submitted to the Agency for Personal Data Protection and Free Access to Information, they did not respond to our inquiry until the day the research was concluded.

The «black list» of non-transparent bodies includes Ministry of Education, Science, Culture and Sports, Ministry of Health, Ministry of Agriculture, Forestry and Water Management, Revenue and Customs Administration, Airports of Montenegro, Plantaže, Montenegro Aeronautical Sports Association, Montenegro Judo Federation.<sup>11</sup>

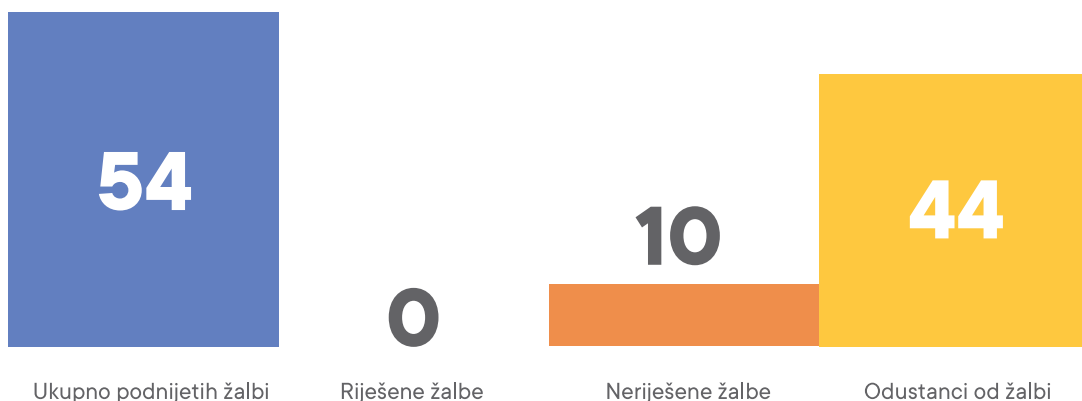
Although almost 99% of bodies and organizations responded, the length of time it took to get a response varied. As a rule, the first answers were predominantly submitted by those authorities that had no expenses, and that within an average of seven days. The fastest and most efficient in this regard were schools and kindergartens, as well as the judiciary. The general average of the time it took to get a response for all bodies was just over 10 days. Thus, the Parliament of Montenegro responded to the request in five days, the judicial authorities in

<sup>11</sup> Ministries from 2021, to which this report refers

a slightly over five days. Public institutions, dominated by kindergartens and schools, took an average of eight days to respond to the request, independent institutions - nine days, the University of Montenegro and all its units a slightly over 9 days, and public companies over 13 days. The Secretariat-General of the Government, ministries and bodies within the Government responded to the requests of the CCE in an average of 14 days. The President of Montenegro responded to the request for free access to information on the 15th day, while on average, local self-governments responded the slowest to the requests of the CCE - in about 16 days.

The body that took the longest time to respond to the CCE's request was the Ministry of Finance (and Social Welfare), after 93 days and only after the new Minister of Finance, Aleksandar Damjanović, took office, breaking the vow of silence of that authority that had grown up during Miloško Spajić's mandate.

The CCE sent 54 complaints to the Agency for Personal Data Protection and Free Access to Information (AZLP). The Agency is not able to act on complaints, bearing in mind that since December 2021, when the president and member of the Council were dismissed, the Parliament did not elect new ones, which is why the Council cannot preside and make decisions on complaints. Out of a total of 54 submitted complaints, the CCE dropped 44 of them, because the bodies have submitted data in the meantime, while 10 complaints await their epilogue at the Council of the Agency. Of the 10 complaints submitted, 8 refer to the silence of the administration, and two were directed against Air Montenegro and PC Parking service Podgorica, which responded to the request for free access to information, but in their response referred to the confidentiality of the data, after which the CCE filed a complaint for violation of procedural rules and wrong application of substantive law. If the AZLP Council was able to decide on these complaints, the CCE report would have been more complete and would have included the entire public sector in Montenegro, which is quite an achievement and a success, bearing in mind the earlier lack of promptness and lack of transparency of public bodies when it comes to publishing information about cash flows.



Grafik 23. Pregled načina rješavanja Agencije za zaštitu ličnih podataka i slobodan pristup informacijama

- In 2021, according to the CCE's documented data, public bodies paid to print media, televisions, radio stations, portals and news agencies, advertising and media agencies, production companies and other related legal entities for providing media-advertising services, but also on another basis, at least 3,426,183.33 euros, whereby this amount does not include state aid, as well as funds from the budget allocated to the RTCG public service. Also, it does not include funds for part of local public broadcasters, because certain municipalities did not submit that data to the CCE;
- Media financing from public funds is solidly regulated through the Media Law, to which the multi-year efforts of the CCE contributed. Data from the relevant Ministry, which publishes this report for the first time, in accordance with the new legal obligation, provide approximate figures. The report states that public bodies (state bodies, municipalities, public institutions, independent regulatory bodies, companies and legal entities in which the state or municipalities are majority shareholders) reported to the Ministry that they paid 3.475,473,41 euros for media and related services and that they got information from the media that they were paid 3.987,504.92 euros. A significant part of the data of the Ministry and the CCE match, and the variations can be attributed to the percentage of responses submitted by public bodies;
- It is necessary to establish a greater degree of discipline when it comes to reporting on cash flows by public bodies for the needs of the media and media services. Given that there is a clear legal norm that prescribes the obligation of public bodies to publish on their website, by 31 March of the current year for the previous year, records of payments to the media based on advertising and other contracted services, which many have not done - indicates the necessity of applying legal sanctions. The CCE expects the Ministry of Culture and Media to take a more decisive position in this area, and the CCE will carefully monitor the implementation of legal provisions both by the Ministry and by public bodies and the media;
- On several occasions, granting of state aid to the media has opened up numerous issues, therefore, it is necessary to establish a systematized and publicly available registry of state aid to the media, and the Ministry of Culture and Media, as well as the Agency for Protection of Competition, can do the most in this direction;
- The CCE supports the initiative of the Directorate for Media which states that public bodies should not advertise on unregistered media that do not

respect the laws of Montenegro. Accordingly, the CCE expects rapid legal changes in that area;

- Financing of public broadcasters, both RTCG and local public services, must be in accordance with strict rules of transparency and measurable criteria for spending taxpayers' money. This means, inter alia, that the financial reports of public broadcasters must be publicly and timely available, and published on official websites. RTCG's financial report for 2021 is still not publicly available or published on the RTCG official website, which indicates a worrying non-transparency of the public broadcaster in which the state directly invests app. 14 million euros per year.
- Prior experience indicates an unequal attitude of local self-governments when it comes to the transparency of payments to local public broadcasters. The CCE research team noted, for example, that a part of local self-governments (Nikšić, Kotor and Tivat) that submitted information about the allocated funds to local public broadcasters for regular functioning, took the lead in the review of spending for these purposes only because there is no available data for certain municipalities that also have large costs on this basis (e.g. Podgorica, Herceg Novi, Budva, etc.). Accordingly, the amount of funds of local self-governments for media and media services is significantly higher compared to what CCE obtained by the Free Access to Information Law and presented in this report;
- The practice from previous years of making treaties between public bodies and certain media from which it can be concluded that the media are paid for affirmative and protocol reporting on the work of those institutions, and which is nowhere in their reporting indicated as paid marketing has continued, and that issue requires further monitoring and adequate addressing;
- In general, when it comes to compliance with the Free Access to Information Law by public bodies, significant progress has been made, with the note that this included a great effort by the CCE research team through additional calls, urgent requests and complaints. Nevertheless, the result is the following - out of 621 bodies, to which a request for free access to information was sent, 613 bodies, or 98.71%, submitted answers to CCE researchers. Violation of the provisions of the Law on Free Access to Information consists mainly of the so-called administrative silence principle, and several of them for violations of the rules of procedure and wrong application of substantive law, because in some decisions, the bodies referred to business secret and did not submit data;
- Strong party influence on companies in which the state has a stake often affects the method of allocating public funds for media and media services. Therefore, it is necessary to establish control mechanisms for investment in the media by these entities as well, some of which do not provide information about that part of the operation, thereby creating doubts 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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**Media Law** ('Official Gazette of Montenegro' No. 82/2020)

Law on State Aid Control ('Official Gazette of Montenegro' No. 26/07)

## **Attachment 1. List of all public bodies that were the subject of research**

- 1. President of Montenegro**
- 2. Parliament of Montenegro**

### **Government**

- 3.** General Secretariat of the Government of Montenegro
- 4.** Ministry of Ecology, Spatial Planning and Urbanism
- 5.** Ministry of Economic Development
- 6.** Ministry of Finance and Social Welfare
- 7.** Ministry of Public Administration, Digital Society and Media
- 8.** Ministry of Capital Investments
- 9.** Ministry of Defense
- 10.** Ministry of Agriculture, Forestry and Water Management
- 11.** Ministry of Justice, Human and Minority Rights
- 12.** Ministry of Education, Science, Culture and Sports
- 13.** Ministry of Internal Affairs
- 14.** Ministry of Foreign Affairs
- 15.** Ministry of Health

### **Other state bodies**

- 16.** Civil Aviation Agency
- 17.** Montenegro Investment Agency
- 18.** Agency for Peaceful Settlement of Labour Disputes
- 19.** Environment Protection Agency of Montenegro
- 20.** Montenegrin Fund for Solidarity Housing Development
- 21.** Directorate for the Protection of Secret Data
- 22.** State Commission for Control of Public Procurement Procedures
- 23.** State Archives of Montenegro
- 24.** Pension and Disability Insurance Fund/PIO
- 25.** Labor Fund
- 26.** Compensation Fund
- 27.** Deposit Protection Fund
- 28.** Fund for the Protection and Realization of Minority Rights
- 29.** Health Insurance Fund
- 30.** Institute for Public Health
- 31.** Institute for Medicines and Medical Devices
- 32.** Institute for Standardization of Montenegro
- 33.** Investment and Development Fund



- 34. Commission of Concessions
- 35. National Commission for the Investigation of Accidents and Serious Accidents of Aircraft, Extraordinary Events Threatening the Safety of Railway Traffic and Maritime Accidents and Accidents
- 36. Secretariat for Legislation
- 37. Social Council of Montenegro
- 38. Public Works Administration
- 39. Police Directorate
- 40. Administration of Maritime Safety and Port Management
- 41. Revenue and Customs Administration
- 42. Directorate for Foodsafety, Veterinary and Phytosanitary
- 43. Administrative Inspection
- 44. Administration for the Execution of Criminal Sanctions
- 45. Human Resources Management
- 46. Cadastre and State Property Administration
- 47. Directorate for Traffic
- 48. Administration for cooperation with the expatriates
- 49. Directorate for Sports and Youth
- 50. Statistical Office of Montenegro
- 51. Forest Administration
- 52. Hydrocarbons Administration
- 53. Water Administration
- 54. Directorate for Cultural Heritage Protection
- 55. Railway Authority
- 56. Institute for Hydrometeorology and Seismology
- 57. Institute for Emergency Medical Assistance
- 58. Bureau of Metrology
- 59. Institute for Social and Child Protection
- 60. Bureau for Education Services
- 61. Institute for Textbooks and Teaching Aids of Montenegro
- 62. Employment Agency of Montenegro

### **Local self-governments**

- 63. Capital City Podgorica
- 64. Golubovci - urban municipality within GG Podgorica
- 65. Municipality of Andrijevica
- 66. Municipality of Bar
- 67. Municipality of Berane
- 68. Municipality of Bijelo Polje
- 69. Municipality of Budva

- 70. Municipality of Danilovgrad
- 71. Municipality of Gusinje
- 72. Municipality of Herceg Novi
- 73. Municipality of Kolašin
- 74. Municipality of Kotor
- 75. Municipality of Mojkovac
- 76. Municipality of Nikšić
- 77. Municipality of Petnjica
- 78. Municipality of Plav
- 79. Municipality of Plužine
- 80. Municipality of Pljevlja
- 81. Municipality of Rožaje
- 82. Municipality of Šavnik
- 83. Municipality of Tivat
- 84. Municipality of Tuzi
- 85. Municipality of Ulcinj
- 86. Municipality of Žabljak
- 87. Old Royal Capital Cetinje

## **Judiciary**

- 88. Centre for Training in Judiciary and State Prosecution
- 89. Misdemeanor Court in Bijelo Polje with departments (BA, ŽB, PI, PLj, RO, KO, MK)
- 90. Court for minor offenses in Budva with departments (UL, BR, KO, HN)
- 91. Misdemeanor Court in Podgorica with departments (DG, NK, CT)
- 92. Administrative Court
- 93. Constitutional Court
- 94. The High Misdemeanour Court
- 95. Supreme Court
- 96. State Prosecutor's Office

## **University of Montenegro**

- 97. Faculty of Architecture
- 98. Faculty of Biotechnology
- 99. Faculty of Economics
- 100. Faculty of Electrical Engineering
- 101. Faculty of Drama
- 102. Faculty of Fine Arts
- 103. Faculty of Political Sciences
- 104. Faculty for Sport and Physical Education
- 105. Faculty of Tourism and Hotel Management

- 106. Faculty of Philology
- 107. Faculty of Philosophy
- 108. Faculty of Civil Engineering
- 109. Institute of Marine Biology
- 110. Historical Institute
- 111. Faculty of Mechanical Engineering
- 112. Faculty of Medicine
- 113. Faculty of Metallurgy and Technology
- 114. Music Academy
- 115. Maritime Faculty
- 116. Faculty of Law
- 117. Faculty of Natural sciences and Mathematics
- 118. University of Montenegro (Rectorate)

### **Independent institutions**

- 119. Bar Association
- 120. Agency for Electronic Communications and Postal Services
- 121. Agency for Electronic Media (AEM)
- 122. National Security Agency (ANB)
- 123. Insurance Supervision Agency
- 124. Agency for Prevention of Corruption
- 125. Agency for the Protection of Competition
- 126. Agency for the Protection of Personal Data and Free Access to Information
- 127. Accreditation body of Montenegro
- 128. Central Bank of Montenegro
- 129. Central Securities Depository and Clearing Company
- 130. Red Cross of Montenegro
- 131. State Election Commission
- 132. State Audit Institution
- 133. Institute of Accountants and Auditors of Montenegro
- 134. Capital Market Authority
- 135. Chamber of Public Executors
- 136. Medical Chamber
- 137. Matica crnogorska
- 138. Notary Chamber
- 139. Chamber of Economy
- 140. Audit Authority
- 141. Association of Court Experts (NGO)
- 142. Union of Municipalities of Montenegro
- 143. Protector of Human Rights and Freedoms

## Public companies

- 144.** AD Maintenance of railway rolling stock Podgorica
- 145.** AD Fruits of Montenegro
- 146.** Airports of Montenegro
- 147.** Agency for managing the city port LLC Herceg Novi
- 148.** Agency for construction of Podgorica LLC
- 149.** Agency for Development and Construction of Herceg Novi LLC
- 150.** Agency for Development and Protection of Orjena Herceg Novi LLC
- 151.** Housing Agency Podgorica LLC
- 152.** Air Montenegro
- 153.** Navigation Bar
- 154.** Castello Montenegro Pljevlja
- 155.** Center for Alternative Dispute Resolution
- 156.** Centre for Ecotoxicological Research
- 157.** Center for professional rehabilitation
- 158.** Montenegrin navigation Kotor
- 159.** Montenegrin Electricity Distribution System
- 160.** Electric Transmission System of Montenegro
- 161.** Montenegrin Electricity Market Operator
- 162.** Cleanliness LLC Herceg Novi
- 163.** Cleanliness LLC Podgorica
- 164.** Waste LLC Podgorica
- 165.** Directorate for Development and Construction of Kotor
- 166.** LLC "Kumunalno-Lim" Bijelo Polje
- 167.** LLC Agency for design and development of Rožaja
- 168.** LLC Academy of Knowledge Budva
- 169.** LLC Cleanliness Pljevlja
- 170.** LLC "Water supply and sewage" Herceg Novi
- 171.** LLC Utility services Petnjica
- 172.** LLC Utility services Bar
- 173.** LLC Utility services Gusinje
- 174.** LLC Utility services Plav
- 175.** LLC Utility services Ulcinj
- 176.** LLC Utility services Berane
- 177.** LLC Utility services Budva
- 178.** LLC Utility services Danilovgrad
- 179.** LLC Utility services Kolašin
- 180.** LLC Utility services Kotor
- 181.** LLC Utility services Plužine

- 182. LLC Utility services - Andrijevića
- 183. LLC Utility services Rožaje
- 184. LLC Utility services Tuzi
- 185. LLC Hunting Bar
- 186. LLC Mediteran advertising Budva
- 187. LLC Parking service Bijelo Polje
- 188. LLC Ski Center Hajla
- 189. LLC Sport Center Berane
- 190. LLC Sport Center Cetinje
- 191. LLC Sport Center Rožaje
- 192. LLC Sports and recreation center Bar
- 193. LLC Water supply Bistrica - Bijelo Polje
- 194. LLC Water supply and sewerage of Bar
- 195. LLC Water supply and sewerage of Berane
- 196. LLC Water supply and sewerage of Cetinje
- 197. LLC Water supply and sewerage of Rožaje
- 198. LLC Water supply of Pljevlja
- 199. LLC For breeding, protection and hunting of game and fish - Danilovgrad
- 200. LLC Utility services Cetinje
- 201. Montenegrin Electric Enterprise
- 202. Film Center of Montenegro
- 203. Institute "Dr Simo Milošević", Igalo
- 204. Institute for Ferrous Metallurgy
- 205. JP Utility services Pljevlja
- 206. JP Cultural Center Bar
- 207. JP Morsko dobro
- 208. JP Parking service Budva
- 209. JP Funeral services Budva
- 210. JP Water supply and sewerage Ulcinj
- 211. Utility services LLC Šavnik
- 212. Utility services LLC Podgorica
- 213. Utility services Gradac - Mojkovac
- 214. Communal - residential Herceg Novi
- 215. Utilities and water supply LLC Žabljak
- 216. Utility services Nikšić - Nikšić
- 217. Utility services Tivat
- 218. Luka Bar
- 219. Luka Kotor
- 220. Marine Bar

- 221.** Montecargo
- 222.** Montefarm
- 223.** Montenegro Bonus Cetinje
- 224.** Monteput
- 225.** National Tourism Organization of Montenegro
- 226.** National parks of Montenegro
- 227.** New Tobacco Factory
- 228.** Dragišnica and Komarnica Nature Park
- 229.** Piva Plužine Nature Park
- 230.** LLC Parking service Herceg Novi
- 231.** LLC Parking service Podgorica
- 232.** Parking service Tivat
- 233.** Plantaže
- 234.** Funeral services LLC Podgorica
- 235.** Post of Montenegro
- 236.** Putevi LLC Podgorica
- 237.** Radio broadcasting center
- 238.** Podgorica Regional Diving Center for Underwater Demining and Divers Training
- 239.** Regional Water Supply of the Montenegrin Coast
- 240.** The Energy and Water Regulatory Authority of Montenegro
- 241.** Coal Mine Pljevlja
- 242.** Official Gazette of Montenegro
- 243.** Sports Center Igalo
- 244.** Sports Center Nikšić
- 245.** Sports Center Žabljak
- 246.** Sports Facilities LLC Podgorica
- 247.** Tehnopolis Innovation and Entrepreneurship Center
- 248.** Green Markets LLC
- 249.** Tourist organization – Andrijevića
- 250.** Tourist organization Berane
- 251.** Tourist organization Bijelo Polje
- 252.** Tourist organization Budva
- 253.** Tourist organization Danilovgrad
- 254.** Tourist organization Gusinje
- 255.** Tourist organization Herceg Novi
- 256.** Tourist organization Kotor
- 257.** Tourist organization Mojkovac
- 258.** Tourist organization Nikšić
- 259.** Tourist organization Petnjica

- 260. Tourist organization Plav
- 261. Tourist organization Pljevlja
- 262. Tourist organization Rožaje
- 263. Tourist organization Šavnik
- 264. Tourist organization Tivat
- 265. Tourist organization Ulcinj
- 266. Tourist organization Žabljak
- 267. Tourist organization Kolašin
- 268. Tourist organization of the Capital Cetinje
- 269. Water Supply and Sewerage - Andrijevisa
- 270. Water Supply and Sewerage Budva
- 271. Water Supply and Sewerage Danilovgrad
- 272. Water Supply and Sewerage LLC Podgorica
- 273. Water Supply and Sewerage Herceg Novi
- 274. Water Supply and Sewerage Kolašin LLC
- 275. Water Supply and Sewerage Kotor LLC
- 276. Water Supply and Sewerage Nikšić
- 277. Water Supply and Sewerage Tivat
- 278. Greenery LLC Podgorica
- 279. Railway Infrastructure of Montenegro
- 280. Railway Transport of Montenegro

### **Sports associations**

- 281. Athletic Federation of Montenegro
- 282. Bodybuilding and Fitness Association of Montenegro
- 283. Boxing Association of Montenegro
- 284. Boggling Association of Montenegro
- 285. Montenegrin Sailing Federation
- 286. Montenegrin Olympic Committee
- 287. Montenegrin Association of Sports Recreation "Sport for all"
- 288. Judo Federation of Montenegro
- 289. Football Association of Montenegro
- 290. Gymnastics Federation of Montenegro
- 291. Karate Federation of Montenegro
- 292. Montenegrin Kendo Association
- 293. Kickboxing Federation of Montenegro
- 294. The Basketball Federation of Montenegro
- 295. Volleyball Federation of Montenegro
- 296. Paralympic Committee of Montenegro
- 297. Handball Federation of Montenegro

- 298.** Union of Sports Fishing Organizations of Montenegro
- 299.** Association for Sport Fishing in the Sea of Montenegro
- 300.** Montenegro Table Tennis Federation
- 301.** Shooting Federation of Montenegro
- 302.** Students Sports Association of Montenegro
- 303.** Montenegro Chess Federation
- 304.** Tennis Federation of Montenegro
- 305.** Water Polo and Swimming Federation of Montenegro
- 306.** Aviation Association of Montenegro

## **Public institutions**

- 307.** Center Ljubović
- 308.** Center of Contemporary Art
- 309.** Center for Conservation and Archaeology
- 310.** Cultural Center Petnjica
- 311.** Cultural Center Plužine
- 312.** Cultural Center Rožaje
- 313.** Cultural Center Ulcinj
- 314.** Cultural Center Žabljak
- 315.** Center for the Preservation and Development of Minority culture
- 316.** Center for Professional Education
- 317.** Montenegrin Academy of Sciences and Arts
- 318.** Montenegrin National Theatre
- 319.** Kindergarten "Vukosava Ivanović-Mašanović"
- 320.** Kindergarten Bambi
- 321.** Kindergarten Boško Buha Rožaje
- 322.** Kindergarten Ljubica V. Jovanović - Maša Budva
- 323.** Kindergarten Mojkovac
- 324.** Kindergarten Plav
- 325.** Day care center "Lipa"
- 326.** Day Care Center for children and youth with disabilities in Berane
- 327.** Retirement home "Grabovac"
- 328.** Retirement home Bijelo Polje
- 329.** Gallery Vitomir Srbljanović Pljevlja
- 330.** Gymnasium "25. maj" Tuzi
- 331.** Gymnasium "30. septembar"
- 332.** Gymnasium "Panto Mališić"
- 333.** Gymnasium "Petar I Petrović Njegoš"
- 334.** Gymnasium "Slobodan Škerović"
- 335.** Gymnasium "Stojan Cerović"



- 336.** Gymnasium “Tanasije Pejatović”
- 337.** Gymnasium Cetinje
- 338.** Gymnasium Kotor
- 339.** Gymnasium Miloje Dobrašinović
- 340.** Gymnasium Niko Rolović
- 341.** Examination Centre of Montenegro
- 342.** Cultural Information Center Podgorica Budo Tomović Podgorica
- 343.** Public preschool institution “Radmila Nedić”
- 344.** Public preschool institution “Dragan Kovačević”
- 345.** Public preschool institution “Dušo Basekić”
- 346.** Public preschool institution “Irena Radović”
- 347.** Public preschool institution “Radost” Kotor
- 348.** Public preschool institution „Zagorka Ivanović“
- 349.** Public preschool institution Đina Vrbica
- 350.** Public preschool institution Jevrosima Jevra Rabrenović
- 351.** Public preschool institution Ljubica Popović
- 352.** Public preschool institution “Sestre Radović”
- 353.** Public preschool institution Solidarity Ulcinj
- 354.** PI Library for the blind
- 355.** PI Day Care Center for Children with Developmental Disabilities and Adults with Disabilities in the Capital
- 356.** PI Day Care Center for Children with Developmental Disabilities and Adults with Disabilities Danilovgrad
- 357.** PI Center for Culture “Vojislav Bulatović - Strunjo” Bijelo Polje
- 358.** PI Cultural Center Berane
- 359.** PI Cultural Center Danilovgrad
- 360.** PI Cultural Center Gusinje
- 361.** PI Cultural Center Husein Bašić Plav
- 362.** PI Cultural and Sports Center - Andrijevisa
- 363.** PI Cultural Center Kolašin
- 364.** PI Cultural Center Mojkovac
- 365.** PI Cultural Center Tivat
- 366.** PI Cultural Center Vojislav Bulatović - Strunjo Bijelo Polje
- 367.** PI Center for Culture, Sports and Media Šavnik
- 368.** PI Center for Support of Children and Families Bijelo Polje
- 369.** PI Center for Sports and Recreation Bijelo Polje
- 370.** PI Montenegrin Cinematheque
- 371.** PI Children’s Association Podgorica
- 372.** PI Day Center and PI of the Children’s Home “Youth” Bijela
- 373.** PI Day Center Sirena Ulcinj

- 374.** PI Day Center Tisa – Bijelo Polje
- 375.** PI Day Center for children and youth with disabilities and difficulties in development Budva
- 376.** PI Day Center for children and youth with disabilities and difficulties in development Mojkovac
- 377.** PI Day Center for children and youth with disabilities and difficulties in development Podgorica
- 378.** PI Day Center for children with disabilities and developmental difficulties Pljevlja
- 379.** PI Day Center for children with disabilities and developmental difficulties Herceg Novi
- 380.** PI Day Center for children with developmental disabilities and people with disabilities Nikšić
- 381.** PI Day Center for children with developmental disabilities Rožaje
- 382.** PI City Theatre Budva
- 383.** PI City Museum Mirko Komnenović and Gallery Josip Bepo Benković Herceg Novi
- 384.** PI City Theatre Podgorica
- 385.** PI Kakarička gora Podgorica
- 386.** PI Cultural Information Center Zeta – Golubovci
- 387.** PI “Komanski Most”
- 388.** PI Royal Theatre “Zetski dom” Cetinje
- 389.** PI Mediterranean Sports Center Budva
- 390.** PI Museum Bijelo Polje
- 391.** PI Museum and Gallery Tivat
- 392.** PI Museums and Galleries Budva
- 393.** PI Museums and Galleries Nikšić
- 394.** PI Museums and Galleries Podgorica
- 395.** PI National Library Budva
- 396.** PI National Library Radosav Ljumović Podgorica
- 397.** PI Ratković’s Poetry Evenings - Bijelo Polje
- 398.** PI Resource Center for Education and Training June 1
- 399.** PI Art Colony Danilovgrad Danilovgrad
- 400.** PI for rest and recreation of children “Lovćen – Bečići”
- 401.** PI Zahumlje Nikšić
- 402.** PI Local Museum of Pljevlja Pljevlja
- 403.** PI Institute for Geological Research
- 404.** PIC City Library and Reading Room Herceg Novi
- 405.** PIC Herceg Fest Herceg Novi
- 406.** Cultural Information Centre Malesija Tuzi
- 407.** Clinical Center of Montenegro
- 408.** Musical School - Tivat
- 409.** Montengrin Music Center

- 410.** National Library of Montenegro
- 411.** National library and Reading Room Njegoš - Cetinje
- 412.** National Library Stevan Samardžić Pljevlja
- 413.** National Museum
- 414.** Nikšić Theatre
- 415.** Educational Center Plužine
- 416.** Educational Center Šavnik
- 417.** ES 18 oktobar - Podgorica
- 418.** ES 21. maj - Bijelo Polje
- 419.** ES 21. maj - Podgorica
- 420.** ES 25. Maj - Petnjica
- 421.** ES 25. Maj - Rožaje
- 422.** ES 29. Novembar - Podgorica
- 423.** ES 9. Maj - Bijelo Polje
- 424.** ES Aleksa Bećo Đilas
- 425.** ES Aleksa Đilas Bećo
- 426.** ES Anto Đedović
- 427.** ES Bać
- 428.** ES Bajo Jojić
- 429.** ES Bajo Pivljanin
- 430.** ES Balotiće
- 431.** ES Bećko Jovović
- 432.** ES Bedri Elezaga
- 433.** ES Blažo Jokov Orlandić
- 434.** ES Blažo Mraković
- 435.** ES Bogdan Kotlica
- 436.** ES Boro Vukmirović
- 437.** ES Boško Buha
- 438.** ES Boško Radulović
- 439.** ES Boško Strugar
- 440.** ES Božidar Vuković Podgoričanin
- 441.** ES Braća Bulajić
- 442.** ES Braća Labudović
- 443.** ES Braća Ribar
- 444.** ES Braća Ribar
- 445.** ES Branko Božović
- 446.** ES Branko Brinić
- 447.** ES Branko Višnjić
- 448.** ES Bratstvo - Jedinstvo

- 449. ES Bratstvo-jedinstvo
- 450. ES Bratstvo-Jedinstvo Rožaje
- 451. ES Bukovica
- 452. ES Daciće
- 453. ES Dašo Pavičić
- 454. ES Dobrislav-Đedo Perunović
- 455. ES Donja Lovnica
- 456. ES Donja Ržanica
- 457. ES Dr Dragiša Ivanović
- 458. ES Dr Radoslav Jagoš Vešović
- 459. ES Drago Milović
- 460. ES Druga osnovna škola
- 461. ES Dušan Bojović
- 462. ES Dušan Đukanović
- 463. ES Dušan Ivović
- 464. ES Dušan Korać
- 465. ES Dušan Obradović
- 466. ES Džafer Nikočević
- 467. ES Đerđ Kastrioti Skenderbeg
- 468. ES Đerđ Kastrioti Skenderbeg
- 469. ES Đoko Prelević
- 470. ES Hajro Šahmanović
- 471. ES Ilija Kišić
- 472. ES Ivan Vušović
- 473. ES Ivo Visin
- 474. ES Jagoš Kontić
- 475. ES Jakub Kubur
- 476. ES Janko Bjelica
- 477. ES Janko Mićunović
- 478. ES Jedinstvo
- 479. ES Jovan Ćorović
- 480. ES Jovan Draganić
- 481. ES Jovan Gnjatović
- 482. ES Jovan Tomašević
- 483. ES Jugoslavija
- 484. ES Kekec
- 485. ES Krsto Radojević
- 486. ES Kruševo
- 487. ES Lovćenski partizanski odred

- 488. ES Lubnice
- 489. ES Luka Simonović
- 490. ES Mahmut Adrović
- 491. ES Mahmut Lekić
- 492. ES Maksim Gorki
- 493. ES Marko Miljanov
- 494. ES Marko Miljanov
- 495. ES Marko Nuculović
- 496. ES Maršal Tito
- 497. ES Mataruge
- 498. ES Međuriječje
- 499. ES Meksiko
- 500. ES Mihailo Žugić
- 501. ES Milan Vukotić
- 502. ES Milan Vuković
- 503. ES Mile Peruničić
- 504. ES Mileva Lajović Lalatović
- 505. ES Milić Keljanović
- 506. ES Milija Nikčević
- 507. ES Milomir Đalović
- 508. ES Milorad Musa Burzan
- 509. ES Milosav Koljenšić
- 510. ES Milovan Jelić
- 511. ES Milovan Rakočević
- 512. ES Milun Ivanović
- 513. ES Mirko Srzentić
- 514. ES Miroslav Đurović
- 515. ES Mladost
- 516. ES Mojsije Stevanović
- 517. ES Mrkojevići
- 518. ES Mustafa Pećanin
- 519. ES Nedakusi
- 520. ES Niko Maraš
- 521. ES Nikola Đurković
- 522. ES Njegoš Cetinje
- 523. ES Njegoš Danilovgrad
- 524. ES Njegoš Kotor
- 525. ES Oktoih
- 526. ES Olga Golović

- 527. ES Orjenski Bataljon
- 528. ES Pavle Kovačević
- 529. ES Pavle Rovinski
- 530. ES Pavle Žižić
- 531. ES Petar Dedović
- 532. ES Polica
- 533. ES Rade Perović
- 534. ES Radoje Čizmović
- 535. ES Radoje Kontić
- 536. ES Radoje Tošić
- 537. ES Radojica Perović
- 538. ES Radomir Mitrović
- 539. ES Radomir Rakočević
- 540. ES Ratko Žarić
- 541. ES Rifat Burdžović Tršo
- 542. ES Ristan Pavlović
- 543. ES Risto Manojlović
- 544. ES Risto Ratković
- 545. ES Salko Aljković
- 546. ES Savin Bor
- 547. ES Savo Ilić
- 548. ES Savo Kažić
- 549. ES Savo Pejanović
- 550. ES Srbija
- 551. ES Stefan Mitrov Ljubiša
- 552. ES Sutjeska
- 553. ES Šćepan Đukić
- 554. ES Štampar Makarije
- 555. ES Šukrija Međedović
- 556. ES Šunjo Pešikan
- 557. ES Trpezi
- 558. ES Tucanje
- 559. ES Veljko Drobnjaković
- 560. ES Vladika Danilo
- 561. ES Vladimir Nazor
- 562. ES Vladimir Rolović
- 563. ES Vladislav R. Korać
- 564. ES Vladislav Sl.Ribnikar
- 565. ES Vlado Milić

- 566.** ES Vojin Čepić
- 567.** ES Vojin Popović
- 568.** ES Vuk Karadžić Berane
- 569.** ES Vuk Karadžić Bijelo Polje
- 570.** ES Vuk Karadžić Podgorica
- 571.** ES Vuk Knežević
- 572.** ES Vukajlo Kukalj
- 573.** ES Vukašin Radunović
- 574.** ES Vuko Jovović
- 575.** ES Zarija Vujošević
- 576.** ES Živko Džuver
- 577.** Police Academy Danilovgrad
- 578.** Polim Museum Berane
- 579.** Maritime Museum of Montenegro Kotor
- 580.** Museum of Natural History
- 581.** First secondary vocational school - Nikšić
- 582.** Resource Center for Children and Youth "Podgorica"
- 583.** Specialist Veterinary Laboratory
- 584.** Special Hospital for Lung Diseases „dr Jovan Bulajić“
- 585.** High School for Economics "Mirko Vešović"
- 586.** High School for Economics and Hospitality - Nikšić
- 587.** High School for Economics and Hospitality, Bar
- 588.** High School for Electro-Economics Bijelo Polje
- 589.** High school for #lectrical engineering "Vaso Aligrudić"
- 590.** High school for Construction and Surveying "Inž Marko Radević"
- 591.** Secondary Art School "Petar Lubarda"
- 592.** Medical High School - Podgorica
- 593.** Medical High School "dr Branko Zogović"
- 594.** Mixed High School - Andrijevisa
- 595.** Mixed High School "Bećo Bašić"
- 596.** Mixed High School "Braća Selić"
- 597.** Mixed High School "Bratstvo jedinstvo"
- 598.** Mixed High School "Danilo Kiš"
- 599.** Mixed High School "Mladost"
- 600.** Mixed High School "Vuksan Đukić"
- 601.** Mixed High School „17.septembar“
- 602.** Mixed High School Ivan Goran Kovačić
- 603.** Maritime High School - Kotor
- 604.** Vocational High School - Bar

- 605.** Vocational High School - Berane
- 606.** Vocational High School - Cetinje
- 607.** Vocational High School - Nikšić
- 608.** Vocational High School - Pljevlja
- 609.** Vocational High School - Rožaje
- 610.** Vocational High School "Ivan Uskoković"
- 611.** Vocational High School "Sergije Stanić"
- 612.** Vocational High School "Spasoje Raspopović"
- 613.** Vocational High School "Vukadin Vukadinović"
- 614.** Vocational High School Bijelo Polje
- 615.** School for Primary and Secondary Music Education "Dara Čokorilo"
- 616.** School for Primary and Secondary Music Education "Vida Matjan"
- 617.** Art School of Primary and Secondary Music Education for Talents "Andre Navara"
- 618.** Art School of Primary, Secondary Music and Ballet Education "Vasa Pavić"
- 619.** Kindergarten "Eko bajka"
- 620.** Kindergarten Herceg Novi, "Naša Radost"
- 621.** Official Museum Ganića kula Rožaj





