

**to the Commission Implementing Decision on the financing of the multi-country multiannual action plan on an EU Civil Society Facility and Media in favour of the Western Balkans and Turkey for 2021-2023**

**Action Document for “EU Civil Society Facility and Media Programme for Montenegro 2021-2023”**

## 1. SYNOPSIS

### 1.1. Action Summary Table

<b>Title</b>	<b>EU Civil Society Facility and Media Programme for Montenegro 2021-2023</b> Multi-country multiannual action plan on an EU Civil Society Facility and Media in favour of the Western Balkans and Turkey for 2021-2023			
<b>CRIS/OPSYS number</b>	IPA III/2021/043-102/05			
<b>Basic Act</b>	Financed under the Instrument for Pre-accession Assistance (IPA III)			
<b>Team Europe Initiative</b>	No			
<b>Zone benefiting from the action</b>	Montenegro			
<b>Programming document</b>	IPA III Programming Framework			
<b>PRIORITY AREAS AND SECTOR INFORMATION</b>				
<b>Window and thematic priority</b>	Window 1. Rule of law, fundamental rights and democracy Thematic Priority 5: Fundamental rights (with reference to media - freedom of expression) Thematic Priority 7: Civil Society			
<b>Sustainable Development Goals (SDGs)</b>	Main SDG (1 only): SDG 16: Peace and Justice Strong Institutions Other significant SDGs (up to 9) and where appropriate, targets: SDG 17: Partnership for the Goals			
<b>DAC code(s)</b>	15150 Democratic participation and civil society 15153 Media and free flow of information			
<b>Main Delivery Channel</b>	20000 - Non-governmental organisations (NGOs) and civil society			
<b>Marker (from DAC form)</b>	<b>General policy objective</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	Participation development/good governance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Aid to environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Gender equality and women's and girl's empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Trade development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Reproductive, maternal, new-born and child health	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Nutrition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>RIO Convention markers</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	Biological diversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Internal markers</b>	<b>Policy objectives</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	Digitalisation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Migration	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	COVID-19	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>BUDGET INFORMATION</b>				
<b>Amounts concerned</b>	<p>Budget line: 15.020101.01</p> <p>Total estimated cost: EUR 6 850 000.00</p> <p>Total amount of EU budget contribution EUR 6 000 000.00</p> <p>The EU contribution is for an amount of <b>EUR 2 500 000.00</b> from the general budget of the European Union for financial year <b>2021</b> and for an amount of <b>EUR 1 000 000.00</b> from the general budget of the European Union for financial year <b>2022</b> and for an amount of <b>EUR 2 500 000.00</b> from the general budget of the European Union for financial year <b>2023</b>, subject to the availability of appropriations for the respective financial years following the adoption of the relevant annual budget, or as provided for in the system of provisional twelfths.</p>			
<b>MANAGEMENT AND IMPLEMENTATION</b>				
<b>Type of financing and method(s) of implementation</b>	<p>Project Modality</p> <p><b>Direct management</b> through:</p> <ul style="list-style-type: none"> <li>- Grants</li> <li>- Procurement</li> </ul>			
<b>Relevant priorities and flagships from Economic and Investment Plan for the Western Balkans</b>	<p>Priorities: “Human Capital Development”, “Governance, Rule of Law”, “Green Agenda”, “Innovation Agenda”</p>			
<b>Final date for concluding contribution / delegation agreements, procurement and grant contracts</b>	<p>For 2021 Budget: At the latest by 31 December 2022</p> <p>For 2022 Budget: At the latest by 31 December 2023</p> <p>For 2023 Budget: At the latest by 31 December 2024</p>			
<b>Indicative operational implementation period</b>	<p>72 months following the adoption of the Financing Decision</p>			

## 1.2. Summary of the Action

The overall objective of the action is to strengthen participatory democracy and the EU integration and approximation process in Montenegro through an enhanced contribution by civil society and media.

The action will focus mainly on increasing capacities and effectiveness of the Montenegrin Civil Society Organisations (CSOs) to monitor and participate in reform processes and to strengthen the overall capacities of less developed organisations as well as other actors of the civil society such as grassroots movements, through flexible financial support to third parties in all fields relevant to Montenegro's accession to the EU including rule of law, democracy and human rights, agriculture, consumers rights, green agenda and economic and social development.

The action also aims at triggering local development, by promoting informal education, social innovation and job creation with a particular focus on the most vulnerable groups, including the Roma communities.

The intervention will improve the cooperation and dialogue between the civil society and the government, as well as, reinforce inclusive civic participation in public policy processes and complementary services to the most disadvantaged population. These achievements will benefit Montenegrin citizens in general.

The action will also support professional, independent media in the COVID-19 aftermath, enabling them to operate in a sustainable way, while providing opportunities for free, fair, professional and investigative reporting.

## 2. RATIONALE

### 2.1. Context Analysis

The European Union (EU) support to Civil Society Organisations (CSOs) aims at building stronger democracies, improving accountability systems and ultimately achieving better policy and economic and social development. It seeks to empower civil society to fulfil the following key roles:

- Creating stronger links with citizens by engaging in public policy processes, reaching out to society as a whole including marginalised groups and grass-root communities including Roma and encouraging civic activism as well as public participation in policy-making across all areas;
- Becoming professional and reliable partners in the policy-making and reform process through evidence-based advocacy across all sectors and close monitoring of reforms;
- Contributing to enhancing responsible and inclusive leadership in the political, economic and social spheres,
- Strengthening economic development and create better links with business by promoting entrepreneurship, social innovation and job creation.

Civil society organisations allow citizens to take an active part in setting the political agenda and contributing to improving the fulfilment of the conditions for the EU membership.

Strengthening civil society and enhancing freedom of expression are core parts of the political criteria for the EU accession. Various documents together provide the strategic focus for the EU assistance to civil society and media: the 2012 European Commission's communication "*The roots of democracy and sustainable development: Europe's engagement with Civil Society in external relations*"<sup>1</sup>; and more recently the 2021 EU Enlargement Strategy<sup>2</sup> and the Commission Montenegro Report<sup>3</sup> advocating for media freedom and integrity of media

Civil society and media make a crucial link between the governments and citizens. By articulating citizens needs and concerns, civil society fosters pluralism and furthers participatory democracy, increasing the hope and participation of the citizens in the future of their society.

<sup>1</sup> COM(2012) 492 final. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: The roots of democracy and sustainable development: Europe's engagement with Civil Society external relations

<sup>2</sup> COM(2021) 644 final, Communication from the Commission to the European Parliament, the Council, the European Social Committee and the Committee of the Regions, 2021 Communication on EU enlargement policy

<sup>3</sup> SWD(2021) 293 final/2 Commission Staff Working Document., Montenegro 2021 Report

In a brief note by the EU-financed Technical Assistance to Civil Society Organisations in the Western Balkans and Turkey programme (TACSO 3) it was pointed out that due to the recent COVID-19, there is a need to reflect the current role of civil society organisations in the emergency situation but also to explore opportunities for the recovery situation. It is in this context that the Action document CSF 2021-23 is including support to most vulnerable groups to participate as actor in the recovery process.

Another important feature highlighted by the Monitoring Matrix Montenegro report for 2019 developed by the Balkan Civil Society Development Network (BCSDN), is a non-favorable framework without proper tax benefits underlying the further growth of giving and a non-stimulating legal framework for volunteering.

Accordingly to the Montenegro 2021 Report “*An empowered civil society is a crucial component of any democratic system and should be recognised and treated as such by state institutions.*” The report also acknowledges that “*The overall legal and institutional framework on freedom of expression, of association and assembly is in place. Draft amendments to the Law on Access to Information, went through a public consultation process, but remain to be adopted. However, information classified by public institutions and withheld from the public remains an issue, in practice restricting the access of civil society organisations (CSOs) and the public to key policy decisions. This concern needs to be addressed as a matter of priority.*”

In its various strategic and policy documents, the European Commission has continued to underline the importance of the role civil society actors can play in a participatory liberal democracy and particularly the added-value it brings to enlargement countries. The development of a thriving civil society remains a key dimension of pre-accession assistance, as CSOs continuously require support to strengthen their capacities, improve their professionalism and expand their networks within and beyond the Montenegrin borders. The number one priority is therefore to continue to support the establishment of a sustainable conducive environment that promotes CSOs operations, in line with the European Commission guidelines for EU support to civil society in enlargement countries 2014-2020<sup>4</sup> and the guidelines for EU support to media freedom and media integrity in the enlargement countries 2014-2020.

## **Media**

Freedom of expression as well as media freedom are pillars of democracy, they are essential components of open and free debate. Freedom of expression is a key indicator of a country's readiness to become part of the EU. It implies a commitment to democracy, good governance and political accountability.

Free media come as the principal precondition for freedom of expression. Since the media and their markets are basically national in scope, there is little EU *acquis*. However, in the context of EU policy, the European Commission is assessing against the Copenhagen political criteria whether there is real respect and true commitment to promoting freedom of expression in the given aspiring country. The annual assessment of the situation regarding freedom of expression and media can be found in the latest Commission Report on Montenegro<sup>5</sup>.

Montenegro has achieved some level of preparation in the area of freedom of expression. There was limited progress overall during the reporting period. Despite certain signals from the Government that it would consider this area a priority, last year's recommendations were only partially addressed and safety of journalists remains a serious concern. Full and effective judicial follow-up to important old cases of attacks against journalists remains to be ensured. In April 2021, the government established a new ad-hoc commission for monitoring violence against media, but recommendations of the previous commission still need to be addressed. The revision of the legal framework continued. More efforts are required to limit the effects of disinformation and on-line harassment and hate speech, while ensuring that such measures do not limit disproportionately freedom of expression. New RTCG Council was appointed by Parliament in June 2021. Following this change and the subsequent changes of RTCG management, the public broadcaster started to feature politically more diverse content. The media scene overall remained highly polarised. Extensive involvement of foreign media from the region was particularly notable during elections' periods. Self-regulatory mechanisms remain weak. The announced preparation of a new media policy strategy has the potential to facilitate broad and inclusive dialogue between the authorities and national stakeholders. In addressing the shortcomings, Montenegro should in particular:

---

<sup>4</sup> Guidelines for EU support to Civil Society and Media in the enlargement region were in place for the period 2014-2020, and are currently being updated for the period 2021-2027. The actions under the 2021 -2023 CSF are aligned with these documents.

<sup>5</sup> SWD(2021) 293 final/2; [https://ec.europa.eu/neighbourhood-enlargement/document/download/6d45cc87-9d19-4f06-a49f-e3690cde3da4\\_en](https://ec.europa.eu/neighbourhood-enlargement/document/download/6d45cc87-9d19-4f06-a49f-e3690cde3da4_en)

- step up efforts to effectively investigate, credibly solve and adequately sanction cases of attacks against journalists;
- safeguard against any form of political pressure or influence on RTCG and continue to restore its editorial independence and professional standards;
- complete the revision of the legal framework in the area of media in continued dialogue with the media community and civil society, while ensuring consistent application of the new legislation in accordance with international and European standards.

The EU in Montenegro supports media through the Civil Society Media strand (Media Professionalism Programme) as well as through the ongoing support provided through the European Endowment for Democracy and in line with the current Guidelines on EU support to media freedom and media integrity in enlargement countries, 2014-2020. New guidelines should be in place in 2021.

The pandemic and the resulting economic crisis have exacerbated the already dire economic conditions for the media in Montenegro. The print media outlets have seen a strong decline in circulation, while all media, electronic and print alike, have experienced a sharp drop in advertising revenues, up to 90% at the height of the pandemic. For years, there has been no progress in the area of self-regulation which remains weak. Professionalism in reporting remains at a low level. The precarious economic situation of journalists puts them at risk of editorial interference and possible self-censorship. The fact that many media outlets are not financially sustainable has a negative impact on the quality of reporting and professionalism. Security of investigative journalists and journalists in general remains an issue of serious concern. Attacks on journalists are still a reoccurring phenomenon.

Desinformation is on the rise. It is often intertwined with partisan reporting and builds on the polarised media scene where “the other side” is perceived as the source of false narratives. Most of the disinformation content is not created in Montenegro proper but adapted from regional or international sources and amplified through local portals, social media groups and pages and closed groups on messaging applications.

It is of utmost importance to support media in the aftermath of the crisis, electronic and print, central and local, as they all struggle to survive the economic crisis. Enabling the media to operate freely should enable them to improve professional standards and empower them to focus on the important topics such as countering disinformation or placing positive narratives.

Hate speech remains a global phenomenon which disproportionately affects ethnic minorities, women and Lesbian, Gay, Bisexual, Trans, Non-binary, Intersex and Queer (LGBTIQ) people, in particular on social media and leads to violence and hatred. Hate speech in the media should be tackled as a new topic and new approach from the media. Media should aim at examining the phenomenon of hate speech against vulnerable groups.

As regards Roma specifically, they are victims of discriminatory and hateful discourses, misinformation, misrepresentation and fake news, all considered as manifestations of antigypsyism. Roma and non-Roma stakeholders with relevant expertise and experience in this field as well as mainstream media stakeholders, media professionals, journalists and representatives of social media platforms, should jointly discuss the experiences of Roma communities and individuals focusing on multiple and complementary strategies to combat hate speech and antigypsyism through reactive and preventive approaches.

Montenegro adopted a set of new media laws in 2020. A review of the 2020 Law on media and the Law on public broadcaster RTCG, together with the preparation of a new Law on audio-visual media is ongoing. It should address additional issues identified in the 2020 law on media and the law on public broadcaster RTCG, to complete it with a new law on audio-visual media, and ensure their full alignment with the EU acquis and European standards. The Ministry of Public Administration, Digital Society and Media launched a public consultation process for the drafting of a comprehensive media strategy for the period 2021-2025. Once adopted, it would be a first document of this type.

## 2.2. Problem analysis by areas of support

### **AREA OF SUPPORT: CIVIL SOCIETY AND LOCAL DEVELOPMENT**

The EU remains the main funder of support for civil society in Montenegro, which otherwise would be more constraint in accessing funds and capacity building support through the government assistance as the access to independent fund mechanisms remain not very developed and not yet reflected in terms of the law.

Funding remains a vital challenge for Montenegrin CSOs as they are largely dependent on a diminishing number of external donors. Funding in relation to service provision is a major constraint for CSOs that need to undergo a complicated and costly licencing process to be able to engage in this area<sup>6</sup>. Following the exit of most international donors, the Montenegrin civil society relies largely on either public funding or EU support as institutional funding sources. The effectiveness of the public funding procedures for support to NGOs (central and municipal level) is still considered controversial by some of the civil society organisations

In this way, alternatives, such as corporate social responsibility, philanthropy, volunteerism, tax breaks, social entrepreneurship, and membership fees are all key dimensions of a sustainable civil society that urgently need to be established and developed. This will bring Montenegro nearer to other Western liberal democracies as well as address the over-dependence on public and external funding.

In 2019 a new draft Law on volunteering was prepared and following the public debate entered the parliamentary procedure. Until the adoption of the new law, volunteering remains regulated by the Law on Voluntary work, which defines it as work unpaid and done in freewill.

There are **five main areas of support** to address the main constrains mentioned above:

- **Effective inclusion of CSOs in decision making processes**

Problem: The CSOs in Montenegro continue to require support through activity grants to monitor and participate in the reform process of various sectors related to Montenegro's accession process to the EU. The CSOs have varying needs for capacity building in function of their development levels.

Though some CSOs have already a good capacity and know-how they remain very circumscribed to particular fields such as the rule of law, justice and good governance and they still require support in terms of *financial capacity* to perform effective interventions. There is still a need to support medium sized CSOs particularly in some less developed parts of Montenegro and furthermore draw on external expertise, knowledge on best-practices regionally and worldwide and support to their organisational, human resources and project management capabilities. The Roma led CSOs should take part at mainstream discussions and for that a capacity building programme, mentorship assistance, and support for their active participation in the development and implementation of central, local and EU mainstream policies for Roma is needed.

Under this action there is a need to stress the fact that CSOs need to keep the citizens informed of their actions as well as voice their concerns towards the public authorities in all areas of the EU accession process. This area of support targets a multi-sectorial policy dialogue in addition to building the capacities of CSOs, the citizens should be target and remain the main beneficiaries.

Complementarity with national strategies: Yes. Under the Law on NGOs, all Ministries are supposed to allocate funds to NGOs. Part of these funds are for co-funding of EU CSO projects.

- **Increased capacities and advocacy role of CSOs to address reform processes and EU integration process in various thematic areas.**

Problem: The civil society in Montenegro has seen in the past years an increase of smaller CSOs and other type of civic movements including Roma and grassroot organisations in particular outside of the capital city of Podgorica in areas like good governance, environment and climate action issues, economic and social policies, and agriculture.

These groups lack the size and capacity to benefit from bigger direct action grants, and require smaller amounts of financial support through the sub-granting mechanism complemented with mentoring activities. This type of support will allow to reach vulnerable groups including Roma CSOs, less favourable geographical areas, but also in other less developed areas of activity.

This area of support targets development of small size CSOs and informal groups including expert individuals and community leaders willing to contribute to evidence-based policy dialogue through research and policy papers.

---

<sup>6</sup> Costs for licencing an NGO can be up to 40,000 EUR/ year

Complementarity with national strategies: Yes. Under the Law on NGOs, the government allocates funds to NGOs.

- **Increase sustainability of civil society**

Problem: The civil society is not equally developed in every sector related to the EU accession process. Recent consultations<sup>7</sup> with civil society, as well as with the authorities, point out new areas of interest where the civil society require specific attention for development. Meanwhile the majority of the CSOs in Montenegro are highly dependant on donor funding that is available in the form of action grants. In recent consultations, civil society indicated that they need support in the form of operating grants. But it is also clear that civil society organisations need to reinforce their links with citizens and at the same time to develop other forms of funding including membership fees and crowdfunding.

Some of the areas with a comparatively weaker civil society capacity include Roma, youth organisations, civic movements and grassroots organisations in some of the less developed sectors such as agriculture, culture and environment.

Stakeholders: This area of support targets small civil society organisations', civic and grassroots movements' and local informal groups' with weak capacity.

Main stakeholders are civil society, government authorities, legislative bodies, businesses and individuals interested in philanthropy and full range of citizens are stakeholders to this area of support.

Complementarity with national strategies: Under the Law on NGOs, the government allocates funds to NGOs.

- **Support to local CSO's contribution to local development.**

Problem: Recent public consultations and experience from other EU Regional programmes such as the RELOAD programme on local democracy, point to the need to support more local development activities and to strengthen the cooperation between local authorities and civic movements, in order to increase capacity and recognition of key stakeholders (civil society, Roma, youth organisations and other local authorities, other public sector bodies) as drivers of local development.

In the post COVID-19 situation, some of the more vulnerable groups, such as Roma, are more exposed than before. For instance, unemployment and lack of job opportunities and access to basic services have increased social vulnerability.

Stakeholders: The stakeholders of this support area are groups put into or facing a situation of vulnerability and civil society organisations across the board.

Complementarity with national strategies: Yes as the Law on self-governments regulates consultations and the involvement of citizens in decision making. Under this Law the self-governments can also fund projects.

- **Improve cooperation between Government and CSOs**

Problem analysis: Despite some improvements, there is insufficient policy dialogue between CSOs and the government on the chapters of the EU accession process. There is a strong need for reinforced mechanisms to bring in civil society's knowledge and expertise into the drafting of legislation.

Under the Law on NGOs the government needs to allocate funding to CSOs. However, the public authorities still need further support in handling the process of launching, awarding and monitor implementation of grant contracts.

Stakeholders: Government authorities and government structures that enable participation of civil society in the meaningful dialogue on the government's policies.

Complementarity with national strategies: Yes, as the Ministries also provide training to their staff to implement the Law on NGOs.

---

<sup>7</sup> Consultation with CSOs and other stakeholder on the draft guidelines for CSF 2021-27 and Consultation with CSOs on CSF 2021-23 for Montenegro

### 2.3. Relevance and complementarity with strategies supported by key national stakeholders

The Montenegro government elected in October 2020 has had some initiatives regarding its commitment to continue cooperation with civil society. Notably the Chief Negotiator Kordic organised a meeting with civil society representatives in which the NGOs reiterated their availability to contribute to the accession process and their plea for greater transparency in the work of the EU negotiating structure, especially with regard to the publication of documents. Nonetheless, there is still work to be done regarding the meaningful inclusion of civil society in the working groups related with the EU chapters.

The Strategy of Cooperation with NGOs for the period 2018-2020 finished and an assessment of its implementation was done but the Ministry of Public Administration but the government still needs to develop a new strategy for the period of 2021-2023. The Council for cooperation with NGOs under the lead of the Ministry of Public Administration, Digital Society and Media has not been operational.

On the positive note, some ministries, such as the Ministry of Interior have intensified their outreach to civil society organisations. The government announced a public call for consultation in the preparation of the annual work programme of the government for 2021. The call was addressed to organisations, associations and citizens asking to submit their proposals in written and electronic form.

Also the Ministry of Public Administration established new e-Register<sup>8</sup> of NGOs which should include all organisations registered under the Law on NGOs. Under the Law on NGOs there is a total of 0,5 % of the National budget allocated to NGOs, so the Ministries are launching calls for proposals for allocation of funds for NGO projects.

### 2.4. Relevance and complementarity with EU policy and EU and other donors' assistance

The support to civil society is fully in line with Window I of the IPA III programming framework “Rule of Law, Fundamental Rights and Democracy” which states that “*An empowered civil society is a crucial component of any democratic system. It enhances political accountability and social cohesion, deepening understanding and inclusiveness of accession-related reforms, as well as supporting reconciliation in societies divided by conflict. In some cases, a more supportive and enabling environment needs to be developed that improves the conditions for policy dialogue and non-partisan input to the decision making process*”

The support to civil society is also in line with the the Guidelines for EU support to civil society in enlargement countries, in contributing to promoting a conducive environment for civil society to carry out its work, promoting a strengthened cooperation between civil society and public authorities, and their involvement in policy dialogue, and reinforcing CSO capacities and resilience<sup>9</sup>.

The 2012, European Commission’s communication “The Roots of Democracy and Sustainable Development: Europe’s Engagement with Civil Society in External Relations”<sup>10</sup> defined the set of preconditions and priorities for EU support to civil society organisations in the external relations context. For the Enlargement region, these conditions were “translated” into a more detailed tool for monitoring of the civil society development for Enlargement countries in 2013 – the Guidelines for EU Support to Civil Society in Enlargement Countries, 2014-2020 (EUCSG). A similar framework for media – the Guidelines for EU support to media freedom and media integrity in enlargement countries, 2014 - 2020 – was laid out in 2014. Since 2014, The Commission has reported on civil society developments as part of the Democracy chapter under the Enlargement package reports.

The Strategy for engaging with the Western Balkans on enlargement<sup>11</sup> is clear on the need for an inclusive structured dialogue with an empowered civil society, and highlights the need for the governments to ensure the participation of the citizens in the policy making process and creating an enabling environment for CSOs. Moreover, the 2030 Agenda

<sup>8</sup> <https://ngo.mju.gov.me>

<sup>9</sup> Guidelines for EU support to Civil Society in the enlargement region were in place for the period 2014-2020, and are currently being updated for the period 2021-2027. The actions under the 2021 -2023 CSF are aligned with both documents.

<sup>10</sup> COM(2012) 492 final; <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2012:0492:FIN:EN:PDF>

<sup>11</sup> COM(2018) 65 final: A credible enlargement perspective for and enhanced EU engagement with the Western Balkans

and the new EU Consensus on Development<sup>12</sup> also calls for the need for a stronger and more inclusive multi-stakeholder partnership.

The Declaration of Western Balkans Partners on Roma Integration within the EU Enlargement Process<sup>13</sup> introduces a strengthened commitment to tackle persistent discrimination, including antigypsyism, and to improve inclusion of Roma. The 2020 EU Roma Strategic Framework for equality, inclusion and participation for 2020-2030<sup>14</sup> have recognised antigypsyism as a barrier to inclusion, and hence the importance of tackling it.

In 2020 a new methodology<sup>15</sup> for EU accession was introduced for the Western Balkans. The chapters are grouped in six main thematic clusters: fundamentals; internal market; competitiveness and inclusive growth; green agenda and sustainable connectivity; resources, agriculture and cohesion; and external relations. The citizens participation and the enabling environment for civil society and its relation with public authorities are important components of the fundamentals.

The Civil Society Facility (CSF) was established in 2008, as a single comprehensive financial framework for support to civil society in the region. It promotes CSO involvement in policy dialogue with the authorities on democracy, human rights, social inclusion and the rule of law and various thematic areas; as well as in public debates on the EU accession process and helping to ensure better understanding of the public and a well-informed final decision on the membership. Thus, support to civil society is reflected in two main goals: achieving an environment that is conducive to civil society activities and building the capacity of CSOs to be effective and accountable independent actors.

The EU provides the majority of its financial and technical assistance to the Montenegrin civil society and media through the Civil Society Facility (CSF). Yet, there are other sources of funding, which are used by a variety of local civil society organisations, including IPA cross-border cooperation (CBC), the European Instrument for Democracy and Human Rights (EIDHR), as well as, other specific funds<sup>16</sup> under the IPA II funds related to the accession chapters. The CSF support complements the different sources of support through internal consultation as well as public consultations with civil society.

Also other donors include the British and U.S. Embassy Podgorica, Norwegian Embassy in Belgrade and Australian Embassy in Belgrade fund actions for the civil society in Montenegro as well as other smaller donors, including the European Fund for the Balkans and the Balkan Trust for Democracy.

## 2.5. Lessons learned and links with previous financial assistance

### Civil Society

The evaluation on the Civil Society Facility (2011-2016) for the Western Balkans and Turkey<sup>17</sup> concluded that the CSF was relevant for the strengthening of the enabling environment for civil society and for addressing the capacity-development of CSOs to play an active role in the policy process. On the other side, it was also noted that although the CSF reaches smaller civil society organisations through re-granting and support through networks, these organisations are not able to get funds directly but only through bigger organisations. Moreover, often the support is focused on organisations based in the capital and thus there is a need to also direct support for rural and urban areas outside the capital.

---

<sup>12</sup> Joint Statement by the Council and the representatives of the Governments of the member states meeting with the Council, the European Parliament and the European Commission, The New European Consensus on development “Our world, Our dignity, our Future”.

<sup>13</sup> <https://www.romaeducationfund.org/declaration-of-western-balkans-partners-on-roma-integration-within-the-eu-enlargement-process/#:~:text=The%20Poznan%20declaration%20pledges%20to%20increase%20the%20employment,the%20participation%20of%20Roma%20in%20the%20overall%20population.>

<sup>14</sup> COM(2020)620 final: Communication from the Commission to European Parliament and the Council,, A Union of Equality: EU Roma strategic framework for equality, inclusion and participation.

<sup>15</sup> COM(2020)57 final: Communication from the Commission to European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Enhancing the accession process - A credible EU perspective for the Western Balkans

<sup>16</sup> “Support to provision of child protection services and others” or “Increased awareness on Environmental and Climate Change Action Policies”, amongst others.

<sup>17</sup> Mid-term Evaluation of the Civil Society Facility for the Western Balkans and Turkey, 1 December 2017; Evaluation conducted by DG NEAR

Although there has been notable progress in the variety of support provided to civil society in Montenegro, the need for effective and flexible support to third parties (FSTP) continues to remain one of the priorities.

Some points emerge from the consultations held with civil society and the government:

- The need to continue medium size direct activity grants supporting evidence based policy making in priority sectors,
- The need to have more flexibility in implementation of FSTP grants to allow the final beneficiaries to avoid being obliged to comply with heavy procedures,
- The need for capacity building as well as mentorship support for smaller organisations along with FSTP,
- The need for operating grants supporting smaller organisations and vulnerable groups including Roma in their ordinary activities deriving from their work plans,
- The need to continue to support the government in improving cooperation with civil society in a meaningful partnership.

Some of these issues are also suggested by the Balkan Civil Society Development Network (BCSDN) on its recommendations to the future support of CSF under IPAIII: core/operational support to be provided to CSOs for their core missions instead of responding to calls for project proposals with predetermined priorities; locally driven and/or existing CSOs networks of strategic importance with a track record of performance are strengthened and supported; abalance needs to be ensured between continuing to support to well-established EU-funded organisations, and supporting new CSOs or civic movements and that sub-granting rules need to be revised and simplified, taking into account experiences of CSOs that have been implementing sub-granting schemes.

### 3. DESCRIPTION OF THE ACTION

#### 3.1. Planned results and intervention logic

The main impact envisaged with this action is to strengthen participatory democracy and the EU integration and approximation process in Montenegro, through an enhanced contribution by civil society.

The main output for the action are:

- CSOs supported to contribute and to monitor the reform and EU integration process in all fields relevant to accession, as well as cooperation between governments and civil society is improved, and

Under the first output, we aim to obtain the following outcomes: 1) Effective inclusion of CS in decision making processes; 2) Increased capacities and advocacy role of the CSOs to address reform processes and EU integration process in the all fields, 3) Increase sustainability of civil society, 4) Increase support to local development and 5) Improved cooperation between government and CSOs.

#### 3.2. Indicative type of activities

##### Civil Society

**Output 1: *Effective inclusion of CSOs in decision making processes across various thematic areas* and Output 2: *Increased capacities and advocacy role of CSOs to address reform processes and EU integration process in all fields.***

- **Activity 1. Support to CSOs and networks towards increased abilities to monitor and participate in reform processes in achieving an effective policy dialogue regarding the EU accession process including elements of advocacy and monitoring.**

The main areas under consideration for these activity include democracy and good governance, rule of law, justice, public administration reform, public finance management, green agenda, agriculture, consumer protection, environment, economic and social policies development. This area of support targets a multi-sectorial policy dialogue in addition to building the capacities of CSOs, the citizens should be target and remain the main beneficiaries.

Partnerships are encouraged.

Intervention : Action/operational grants through 2021 – 2023 programme.

- **Activity 2. Support to small CSOs and civil society movements in different sectors, developing grassroots movements' and local informal groups' capacities through flexible financial support to third parties mechanisms in all fields relevant to the accession to the EU**

This action will support to smaller CSOs and other type of civic movements, Roma NGOs and community leaders and grassroots organisations in particular outside of the capital city of Podgorica in areas like good governance, environment and climate action issues, economic and social policies, and agriculture.

These groups lack the size and capacity to benefit from bigger direct action grants, and require smaller amounts of financial support through the sub-granting mechanism complemented with mentoring activities. This type of support will allow to reach less favourable geographical areas, but also in other less developed areas of activity. This area of support targets development of small size CSOs and informal groups.

Support through:

- Financial support to third parties support (action grants and operating grants) through big size action or operating grants managed by experienced CSOs.

Intervention : Action/operational Grants, CSF 2021 – 2023.

### **Output 3: Increased sustainability of civil society**

- **Activity 3. Provision of capacity building and access to information to small and medium CSOs and grassroots operating in different sectors as well as support towards advocacy for improving the legal framework for funding of civil society contributing to its long term sustainability.**

Support for capacity building to be provided by EU Resource Center. In order to identify the concrete technical assistance to be provided, the Resource center needs to undertake a mapping of the needs of the CSOs in different areas and propose the type of support to provide: 1) longer term organisational and project management training; 2) support the use of digital tools and effective ways of communications with citizens; 3) operational support to annual activity programs of beneficiaries; 4) financial support for activities with strong mentoring; and 5) support towards advocacy to improve the legal framework for funding civil society.

Some of the areas that requiring such type of support with a comparatively weaker civil society capacity include youth organisations, civic movements, Roma and Roma youth and grassroots organisations in some of the less developed sectors such as such as agriculture, culture and environment.

At the same time is evident that there is a need for focused advocacy for improving the legislative framework for funding of civil society, improvement of conditions for philanthropic giving through tax incentives for businesses and individuals, including support to philanthropy in general.

The Resource Center, funded by the EU provides support through provision of trainings on organisation, advocacy and other relevant fields of activity for civil society. The Resource Center needs to provide support throughout Montenegro by establishing partnership with local resource centres.

Stakeholders: This area of support targets small and medium civil society organisations, Roma, civic and grassroots movements.

Intervention: Action grant(s). The Action grants can include sub-grant to local Resource Centres or to support to sub-granting. CSF 2021 – 2023.

### **Output 4: More capable, effective and accountable CSOs at local level**

- **Activity 4. Support to different key stakeholders to contribute to local development.**

To increase capacity and recognition of key stakeholders (civil society, youth organisations, farmers organisations and other civic actors ,as well as local authorities) as drivers of local development.

Problem: In the post COVID-19 situation some of the more vulnerable groups are in more exposed than before. For instance unemployment and lack of job opportunities is an important reason for greater social vulnerability. There for activities should target the most vulnerable groups such as women, youth, Roma communities, LGBTIQ and others through vocational training and other innovative approaches.

1. Assisting youth employment by improving digital skills,
2. Support to youth through informal education and promotion of vocational training,
3. Innovative approaches to the small bussinesses particularly in rural areas with the aim of economic development at local level,
4. Supporting of cultural and tourism initatives including eco-tourism and supporting of traditional handcrafts.

The stakeholders of this support are groups put into or face a situation of vulnerability and civil society organisations across the board.

Intervention: Action grant(s) with financial support to third parties to support to innovative ideas for both in rural and peripheric urban centres.

#### ***Output 5: Improved cooperation between government and CSOs***

#### **Activity 5. Support to government structures to improve the enabling environment for CSOs including financial sustainability.**

Technical assistance support to the government to improve policy dialogue between CSOs and the Government on the chapters of the EU accession process. There is a strong need for re-inforced mechanisms to bring in civil society's knowledge and expertise into legislation and related actions.

The main target group are the government authorithies and the government structures that enable participation of civil society in the meanfull dialogue on the government policies.

Intervention: The technical assistance is provided through procurement under the CSF 2021-23.

### 3.3. Risks and assumptions

One of the main goals to be achieved in the area of civil society development, as stated in the EU Guidelines as well as in the Strategy for development of NGOs, is to create an enabling environment for CSOs to operate. This requires explicit will and interest from a number of stakeholders as well as decision makers in various sectors of the public administration. A vital risk to this programme is a lack of pro-active collaboration and passive behaviour amongst the sector stakeholders, which would inevitably lead to partial or complete failure of envisaged capacity development gains. Both at central and municipality level, government authorities have the power to either intervene excessively in local CSOs operations or, inversely, not sufficiently support local CSOs initiatives. The consequences are similar in both cases, with hindered creativity and missed opportunities on the benefits of network governance, social contracting, citizen representation, civic activism and volunteering, etc.

With regards to supporting CSOs operations, the inherent risk is related to the maintenance of an environment where these organisations can operate. This means they are not subject to excessive government intervention.

It also implies that Montenegrin CSOs continually strengthen their capacity to remain competitive in the context of demanding tendering procedures. A significant risk is therefore that the current CSOs landscape continues to operate without a reflective approach about their capacity gaps and ability needs. A regular observation is that CSOs representatives are critical towards the government's laissez-faire attitude, and yet they rarely consider their responsibility for the current limited government-non-government cooperation. The overall risk is therefore the continued absence a frank and objective dialogue on civil society development where all stakeholders' capacity, ability and responsibility are addressed, free of bias and activism. In addition, a substantial risk is related to still low capacities of the government to conduct effective and meaningful policy dialogue, but also to design and implement grant schemes for public funding of NGOs' projects and programs, under the new procedures set by the amended law on NGOs and related by-laws. Monitoring of implementation of the amended law on NGOs, regarding funding of NGOs projects and programmes, considered as contribution to realisation of public interest will be a crucial feature.

The National Office for Cooperation with NGOs (NOC) of the Ministry of Public Administration coordinates the process of programming of public funding by assessing and supporting the ministries in developing sectoral analysis with proposals of priorities and amounts of funding of NGOs' programs and projects. The current NGO's strategy is under evaluation and the new Strategy 2021-2023 is to be approved by the end of 2021.

<b>Risks</b>	<b>Risk level (H/M/L)</b>	<b>Mitigating measures</b>
Risk 1 - Further shrinking of space for civil society to actively participate in policy dialogue and attempts to classify official documents.	<b>M</b>	Continue to follow-up of the interaction between different ministries and civil society and raising feedback at high levels when irregularities occur.
Risk 2 - Strengthening and further funding of CSOs unnaturally close to authorities getting a voice as independent civil society	<b>M</b>	Continue CSOs efforts for transparency of funding from various levels of governments.  Support the implementation and functioning of a well functioned and transparent evaluation system.
Risk 3 - Decrease in government's commitment to the EU accession process	<b>L</b>	The government's commitment to the EU accession is expected to remain unchanged, as well as political will to strengthen the cooperation mechanisms with civil society.  CSOs need to participate actively in the working groups under the different Ministries
Risk 4 - Lack of legal framework to fund CSOs	<b>M</b>	Key stakeholders need to develop and improve the legal strategic and financial framework for the for creating an enabling environment to fund CSOs
<b>Assumptions</b>		

The National Office for Cooperation with NGOs (NOC) of the Ministry of Public Administration, digital and media continues to provide coordination in the process of programming of public funding by assessing and supporting the ministries in developing sectoral analysis with proposals of priorities and amounts of funding of NGOs' programs and projects. The previous NGO's strategy has finished and the new Strategy 2021-2023 is to be approved as soon as possible.

The Law on NGOs continues its implementation providing financial support to NGOs, as well as the law on self-governments that also provides financial support to csos at local level.

The government will involve and engage in a menafull way with Civil society in its working groups in particular related to the accession process.

### 3.4. Mainstreaming

#### GENDER MAINSTREAMING

The action will be in line with the EU Gender Equality strategy 2020-2025<sup>18</sup>. The different needs and priorities of women, men, girls and boys will be considered in the action, and a gender analysis will be done in this regard, when applicable. Montenegro has a gender equality legal framework in place and there is a new Gender Equality Council. In 2016 to Gender equality Law was amended with clearer definitions, improved provisions on penalties and better referral mechanism. Gender equality action plan adopted (2017-2021) but lacks adequate resources.

Gender Equality Index is developed by the European Institute for Gender Equality (EIGE) and is used to measure inequalities in all EU member states and pre-accession countries. Base on its methodology the National Statistical Office of Montenegro publish a 2020 report, indicating that Montenegro scored 55 (out of maximum 100 points) and lower than the EU average of 67.4. There is an inherent problem related to money and power according to the report. The notable lack of women's participation in political life, as well as in entrepreneurship, where women constitutes only 9.6%. Unfortunately, women are a minority in Parliament and underrepresented in the Government; similarly, only a small percentage of business owners are women. Following the 2020 parliamentary elections, the number of women MP has decrease. On the other hand, the civil society sector has shown to be a key area for women's leadership. It is a striking example that women lead many of the most influential and most developed CSOs in Montenegro. This phenomenon clearly shows that civil society in Montenegro has a great potential to incite women to become active participants in the area of policy-making and advocacy, if they are given the opportunity to develop their capacities and engage in civic activism. Organisations active in these areas will be involved in the consultations for specific Call for proposals and will be targeted among the beneficiary of the capacity building components.

The issue of gender equality has been highlighted as a priority under the CSO consultation undertaken by the TACSO needs assessment held in December 2019 in Montenegro and also in the consultation for the CSF 2021-23 organised in April 2021 with TACSO's support.

The European Instrument for Democracy and Human Rights (EIDHR) targets Gender equality as one of the key themes, namely fight against gender based violence, economic empowerment and political participation of women should tackle those recognised priorities. Montenegro adopted the 2016-2020 strategy on combating family violence. The law fulfil most of the standards but implementation is lagging behind.

The 2018 IPA Programme earmarked EUR 200,000 for a gender equality project under the implementation of UNDP. This programme will strongly encourage actions that promote gender equality.

Under this action, gender mainstreaming will be encouraged throughtout the different activities as well as, specific actions targeting women will be forseen under the support for local development (Activity 1.4.).

#### MINORITIES AND VULNERABLE GROUPS

The various activities under the programme but particularly the Call for Proposals will focused on promoting the submission of project ideas that aim at strengthening the capacities of CSOs that advocate for minority rights and increase the participation of vulnerable groups, specifically Roma in the Montenegrin social and economic system.

---

<sup>18</sup> COM (2020)152 final:Communication from the Commission to the European Parliament, the Council, the European and Social Committee and the Committee of the Regions; A Union of Equality:Gender Equality Strategy 2020-2025

Although the CSF has always been open to all EU integration related areas of CSOs intervention, including minorities and vulnerable groups, it has been noticed over the years that LGBTIQ, Roma and women's rights CSOs are more likely to apply for grants awarded under EIDHR, rather than the CSF. The main reason for this circumstance is most probably the lower threshold for minimum grants and the less rigid co-financing requirements (5% instead of 10%). In order to mitigate the risk of minorities being excluded entirely from the CSF, financial support to third parties will remain a possibility for smaller CSOs to benefit from EU funding.

#### ENGAGEMENT WITH CIVIL SOCIETY (AND IF RELEVANT OTHER NON-STATE STAKEHOLDERS)

This is the core of the action. Civil society representatives are systematically consulted when it comes to designing EU policy of direct and indirect relevance to the civil society sector. This includes the Country Strategy Paper, calls for proposals and modalities of decentralised management of EU funds, as well as all political reporting exercises.

#### ENVIRONMENT AND CLIMATE CHANGE (AND IF RELEVANT DISASTER RESILIENCE)

Environmental and climate change considerations will be taken into account during the implementation of projects activities. All grant beneficiaries and contractors will be strongly encouraged to act in line with best practice and make responsible use of office materials, travel arrangements and energy efficient principles. In addition, action grants targeting environmental and climate change protection organisations will be proposed and encouraged through the implementation of the various activities.

### 3.5. Conditions for implementation

The main conditions for effective and timely implementation of this action has to do with timely consultation with stakeholders on needs for the design of the guidelines, launch of calls for proposals, evaluation and award of the grants both for attribution of main grants as well as for the sub-granting.

### 3.6. Logical Framework

Results	Results chain: Main expected results (maximum 10)	Indicators (at least one indicator per expected result)	Baselines (2021)	Targets (2025)	Sources of data (1 per indicator)	Assumptions
<b>Impact</b>	To strengthen participatory democracy and the EU integration and approximation process in Montenegro, through an enhanced contribution by civil society.	<i>Overall improvement in the ranking for Montenegro for civil society to operate</i>	<i>Bertelsmann Index (2020 - Governance) 6,63</i>	(2023 ) 7,0	Bertelsmann transformation Index Balkan Barometer European Commission report.	<i>Not applicable</i>
<b>Outcome 1</b>	<i>CSOs capacities and resilience to contribute to and to monitor the reform and EU integration process in all fields relevant to the EU accession is reinforced; and cooperation between the government and civil society is strengthened.</i>	<i>Mechanism for permanent dialogue with civil society developed and operational</i>  <i>Extend to which laws and bylaws, strategies and other public policy reforms are effectively consulted with civil society</i>  <i>Roma CSOs involved in legislative working groups</i>	n/a	Established	Monitoring of the EUCSG  European Commission reports.  Selection of working groups members based on public calls, equal treatment and clear criteria (ensuring gender) and balance between quality and quantity of the CSOs representatives  CSO access to information on draft policy/legal act from the beginning of its drafting until the adoption process	Political stability and EU accession process continued

<p><b>Output 1 related to outcome 1</b></p>	<p><i>Effective inclusion of CSOs in decision making processes across various thematic areas</i></p>	<p><i>Participation of CSOs, including Roma CSOs in WGs for legislation.</i></p> <p><i>Number of laws passed in urgent procedure limiting proper consultation with civil society.</i></p>		<p>At least 4 per WG</p> <p>50 /annually</p>	<p>Independent assessments by I.O. and CSOs.</p> <p>European Commission reports and EUCSG.</p> <p>Reports of the Parliament.</p> <p>Reports of civil society elucidating cooperation with authorities, in particular invitation to and reception of CS inputs in WGs.</p>	
<p><b>Output 2 related to outcome 1</b></p>	<p><i>Increased capacities and advocacy role of CSOs to address reform processes and EU integration process in all fields</i></p>	<p><i>Number of CSOs participating WGs for legislation.</i></p> <p><i>Increased capacities of the CSOs to address reform processes and EU integration process.</i></p> <p><i>Increased capacities of the Roma CSOs to address reform processes and EU integration process.</i></p> <p><i>Public perception of importance and impact of CSOs activities transparency of processes through which local funds are dispersed.</i></p>		<p>At least 4 per WG</p> <p>50 annually</p> <p>40%</p> <p>40%</p>	<p>Independent assessments by I.O. and CSOs.</p> <p>Reports compiled and published by the Ministry of Human and Minority Rights and Social Dialogue.</p> <p>TACSO reports.</p> <p>European Commission reports.</p>	

<b>Output 3 related to outcome 1</b>	<i>Increased sustainability of civil society</i>	<p><i>Improved Laws (bi-laws) for enabling funding for CSOs for different sources</i></p> <p><i>Percentage of CSOs that confirm that they are able to raise funds according to their <b>planning and in line.</b></i></p> <p><b>Diversity<sup>1</sup></b> in CSO sources of income as measured by at least 2 different donor types, no single donor is more than 50% of the organisation's budget.</p> <p><i>Extent to which there are cases of <b>alternative funding sources</b> (i.e. crowdfunding) practiced by CSOs.</i></p>		<p>50%</p> <p>At least 50%</p>	<p>Reports from Civil society and EUCSG.</p>	
<b>Output 4 related to outcome 1</b>	<i>More capable, effective and accountable CSO at local level</i>	<i>Number of vulnerable citizens benefiting from support for local development</i>		500	Monitoring reports	
<b>Output 5 related to outcome 1</b>	<i>Improved cooperation between government and CSOs</i>	<p><i>The Council for cooperation with CSOs fully operation and acting in a transparent manner.</i></p> <p><i>Law on NGOs fully implemented</i></p>		<p>2 meetings/year</p> <p>100%</p>	<p>Reports from European Commission and EUCSG.</p>	

## 4. IMPLEMENTATION ARRANGEMENTS

### 4.1. Financing agreement

In order to implement this action, it is not foreseen to conclude a financing agreement with the partner country.

### 4.2. Implementation modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures<sup>19</sup>.

#### 4.2.1. Direct Management (Grants)

**Grants: Activity 1a-** Support via Action Grants to CSOs and networks towards increased abilities to monitor and participate in reform processes in achieving an effective policy dialogue regarding the EU accession process including elements of advocacy and monitoring

(a) **Purpose of the grant(s)** effective inclusion of CSOs in decision making processes. The projects will foster partnership dialogue between CSOs from the region and their EU counterparts, public authorities and other stakeholders.

(b) **Type of applicants targeted:**

- wide range of civil society organisations and networks.
- be a legal person; and
- be non-profit-making; and

Partnerships to be encouraged.

**Grants: Activity 1b-** Support via Operating Grants to CSOs and networks towards increased abilities to monitor and participate in reform processes in achieving an effective policy dialogue regarding the EU accession process including elements of advocacy and monitoring

(a) **Purpose of the grant(s)** effective inclusion of CSOs in decision making processes. The projects will foster partnership dialogue between CSOs from the region and their EU counterparts, public authorities and other stakeholders.

(b) **Type of applicants targeted:**

- wide range of civil society organisations and networks.
- be a legal person; and
- be non-profit-making; and

Partnerships to be encouraged.

**Grants: Activity 2 a-** Support via Action Grants to small CSOs and civil society movements in different sectors, developing grassroots movements' and local informal groups' capacities through flexible financial support to third parties mechanisms in all fields relevant to the EU accession

(a) **Purpose of the grant (s)** to increase capacities and advocacy role of CSOs to address reform processes and EU integration process in all fields

<sup>19</sup> www.sanctionsmap.eu Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

**(b) Type of applicants targeted:**

- civil society organisations, farmers associations, labour organisations, academic institutions, civic and grassroots movements including local informal groups;

**Grants: Activity 2 a** - Support via Operating Grants to small CSOs and civil society movements in different sectors, developing grassroots movements' and local informal groups' capacities through flexible financial support to third parties mechanisms in all fields relevant to the EU accession

**(a) Purpose of the grant (s)** to increase capacities and advocacy role of CSOs to address reform processes and EU integration process in all fields.

**(b) Type of applicants targeted:**

- civil society organisations, farmers associations, labour organisations, academic institutions, civic and grassroots movements including local informal groups;

**Grants: Activity 3** - Provision of capacity building and access to information to small and medium CSOs, civic movements and grassroots organisations as well as support to advocacy for improving the legal framework for funding of civil society in order to improve their long term sustainability.

**(a) Purpose of the grant:** to increase capacities of the civil society, grassroot organisations, small and medium civil society organisations as well as increase sustainability of civil society organisations.

**(b) Type of applicants targeted:**

- civil society organisations; and
- be a legal person; and
- be non-profit-making

**4. Grants: Activity 4** - Support to different key stakeholders to contribute to local development.

**(a) Purpose of the grant:** to increase support to local development.

**(b) Type of applicants targeted:**

- civil society, or youth organisations, or farmers organisations, or media organisations or other civic actors and local authorities;and
- be a legal person;

#### 4.2.2. Direct Management (Procurement)

Procurement will contribute to achieving Output 5: Improved cooperation between government and CSOs (Activity 5. Support to government structures to improve the enabling environment for CSOs including financial sustainability.)

#### 4.3. Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply.

The Commission's authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult

#### 4.4. Indicative budget

	<b>EU contribution 2021 (EUR)</b>	<b>EU contribution 2022 (EUR)</b>	<b>EU contribution 2023 (EUR)</b>	<b>Indicative third party contribution, in currency identified</b>
<b>Budget for Output 1 and Output 2: Total 3 500 000</b>				

<i>Direct management (Grants)</i>				
Activity 1a and 1b. Support to CSOs and networks	1 000 000		1 000 000	400 000
Activity 2a and 2b. Support to small CSOs and civil society movements in different sectors	1 000 000		500 000	200 000
<b>Budget for Output 3: 500 000</b>				
<i>Direct management (Grants)</i>				
Activity 3. Provision of capacity building and access to information to small and medium CSOs and grassroots		500 000		50 000
<b>Output 4: Total 1 500 000</b>				
<i>Direct management (Grants)</i>				
Activity 4. Support to different key stakeholders to contribute to local development	500 000		1 000 000	200 000
<b>Output 5: Total 500 000</b>				
<i>Direct management (Procurement)</i>				
Activity 5. Support to government structures		500 000		N.A.
<b>Grants – total envelope under section 4.2.1: 5 500 000</b>				850 000
<b>Procurement – total envelope under section 4.2.2: 500 000</b>				N.A.
<b>Totals : EUR 6 000 000</b>	<b>2 500 000</b>	<b>1 000 000</b>	<b>2 500 000</b>	<b>850 000</b>

#### 4.5. Organisational set-up and responsibilities

The action will be managed by the EUD.

## 5. PERFORMANCE/RESULTS MONITORING AND REPORTING

### 5.1. Internal monitoring

Monitoring will be carried out by the Delegation of the European Union to Montenegro, possibly with the support of external consultants performing regular monitoring visits. The EU Delegation staff or assigned monitors will hold regular contacts and carry out monitoring visits to all grant beneficiaries.

Monitoring can also be undertaken by the Result Oriented Monitoring or by Technical Assistance contract.

The monitoring and evaluation will include regular, yearly, regional meetings including CSOs representatives, in order to analyse the state of play and advancement towards the set targets. These findings shall also feed into the preparation of the EU annual reports.

In addition, the Action might be subject to external monitoring in line with the European Commission rules and procedures.

## 5.2. Roles & responsibilities for data collection, analysis & reporting

The implementing partners will continuously capture, record and track key statistical information on the implementation of activities. Particular emphasis will be placed on systematic collection of data required to track progress on indicators identified in the logical framework. The monitoring methods and sources will include the following as relevant: action records showing details about events held and actions taken; website and social media analysis showing viewership, reach, and engagement of target audiences; visibility and impact of social media campaigns; number of mainstream media stories published using material provided through the action; and feedback from participants through questionnaires designed for the action.

## 5.3. Evaluation

Having regard to the importance of the action, a mid-term evaluation will be carried out for this action or its components contracted by the Commission.

It will be carried out for problem solving and learning purposes, in particular with respect to the programming of next Civil Society Facility and Media Programmes on 2024 and onwards.

The Commission shall inform the implementing partner at least 1 month in advance of the dates foreseen for the evaluation missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports shall be shared with the partner beneficiary and other key stakeholders. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the partner beneficiary, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

The financing of the evaluation shall be covered by another measure constituting a financing Decision.

## 6. AUDIT

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audits or expenditure verification assignments for one or several contracts or agreements.

The financing of the audit shall be covered by another measure constituting a financing Decision.

*"For the part of the action incorporating a form of financing not linked to costs but on the achievement of results, the verification mechanisms will focus on the results and performance indicators previously agreed"*

## 7. COMMUNICATION AND VISIBILITY

Visibility of EU funding and communication about objectives and impact of Actions are a legal obligation for all Actions funded by the EU, as set out in the EU communication and visibility requirements in force.

In particular, the recipients of EU funding shall acknowledge the origin of the EU funding and ensure its proper visibility by:

- providing a statement highlighting the support received from the EU in a visible manner on all documents and communication material relating to the implementation of the funds, including on an official website and social media accounts, where these exist; and
- promoting the actions and their results by providing coherent, effective and proportionate targeted information to multiple audiences, including the media.

Visibility and communication measures shall be implemented, as relevant, by the national administrations (for instance, concerning the reforms linked to EU budget support), entrusted entities, contractors and grant beneficiaries. Appropriate contractual obligations shall be included, respectively, in financing agreements, delegation agreements, and procurement and grant contracts.

The measures shall be based on a specific Communication and Visibility Plan, established and implemented in line with the EU communication and visibility requirements in force. The plan shall include, inter alia, a communication narrative and master messages for the Action, customised for the various target audiences (stakeholders, civil society, general public, etc.)

Visibility and communication measures specific to this Action shall be complementary to the broader communication activities implemented directly by the European Commission services and/or the EU Delegations and Offices. The European Commission and the EU Delegations and Offices should be fully informed of the planning and implementation of the specific visibility and communication activities, notably with respect to the communication narrative and master messages.

## 8. SUSTAINABILITY

Although most of the legal framework for civil society organisations to operate is in place, challenges still remain regarding transparency on allocation of funds from the state budget. Therefore, it is important to continue to support the government structures and mechanisms to allocate funding in a transparent and professional way. This action will support this process further. Moreover, financial support to CSO is also part of this action in order to support their development and possibility to improve their capacity in participating in the policy dialogue.

Therefore the sustainability of the action will result from the successful implementation of the grant contracts as well as the technical assistance, since its main objective will be the strengthening of the CSOs capacity to become financially sustainable, especially through their own fund-raising abilities, as well as through an established mechanism for transparent public funding and entrustment of management of EU funds to Montenegro authorities.