



Broj: 18-04-037/26-150/2

Podgorica, 3. 3. 2025. godine

Ministarstvo finansija rješavajući po zahtjevu za slobodan pristup informacijama Instituta Alternativa, ul. Jaglike Adžić, br. 13, 8/30, Podgorica od 20. 2. 2026. godine, na osnovu člana 30 Zakona o slobodnom pristupu informacijama („Službeni list Crne Gore“, broj 44/12, 30/17), donosi

R J E Š E N J E

I USVAJA SE zahtjev Instituta Alternativa od 20. 2. 2026. godine, tako da se dozvoljava pristup traženim informacijama dostavljanjem kopije:

- zahtjeva za isplatu predfinansiranja koji je Crna Gora predala Evropskoj komisiji u skladu sa Zakonom o potvrđivanju sporazuma o pristupanju instrumentu između Evropske unije koju predstavlja Komisija i Crne Gore koju predstavlja Vlada Crne Gore o posebnim aranžmanima za sprovođenje podrške Unije Crnoj Gori u okviru instrumenta za reforme i rast;
- zahtjeva za isplatu predfinansiranja koji je Crna Gora predala Evropskoj komisiji u skladu sa Sporazumom o zajmu između Evropske unije i Crne Gore, o posebnim aranžmanima za sprovođenje podrške Unije Crnoj Gori u okviru instrumenta za reforme i rast;
- zahtjeva za isplatu sredstava koji je Crna Gora predala u koleraciji sa predatim Trećim polugodišnjim izvještajem o sprovođenju Reformske agende Crne Gore za instrument za reforme i rast 2024-2027.

II Pristup predmetnoj informaciji ostvariće se dostavom fotokopije dokumentacije, na adresu podnosioca zahtjeva.

III Za fotokopiranje informacije iz stava 1 tačka 1 alineja 1 člana 2 Uredbe o naknadi troškova u postupku za pristup informacijama, prvih 20 stranica se ne naplaćuje („Službeni list Crne Gore“, broj 66/16 i 121/21).

IV Žalba protiv ovog rješenja ne odlaže njegovo izvršenje.

O b r a z l o ž e n j e

Institut Alternativa obratio se Ministarstvu finansija zahtjevom za slobodan pristup informacijama od 20. 2. 2026. godine, kojim je tražio dostavljanje:

- zahtjeva za isplatu predfinansiranja koji je Crna Gora predala Evropskoj komisiji u skladu sa Zakonom o potvrđivanju sporazuma o pristupanju instrumentu između Evropske unije koju predstavlja Komisija i Crne Gore koju predstavlja Vlada Crne Gore o posebnim aranžmanima za sprovođenje podrške Unije Crnoj Gori u okviru instrumenta za reforme i rast;
- zahtjeva za isplatu predfinansiranja koji je Crna Gora predala Evropskoj komisiji u skladu sa Sporazumom o zajmu između Evropske unije i Crne Gore, o posebnim

aranžmanima za sprovođenje podrške Unije Crnoj Gori u okviru instrumenta za reforme i rast;
- zahtjeva za isplatu sredstava koji je Crna Gora predala u koleraciji sa predatim Trećim polugodišnjim izvještajem o sprovođenju Reformske agende Crne Gore za instrument za reforme i rast 2024-2027.

Razmatrajući predmetni zahtjev, Ministarstvo finansija je utvrdilo da posjeduje tražene informacije, u formi i obliku kako je opisano u stavu I dispozitiva rješenja.

Odredbom člana 13 Zakona o slobodnom pristupu informacijama („Službeni list Crne Gore“, broj 44/12, 30/17) propisano je da je organ vlasti dužan da fizičkom ili pravnom licu koje traži pristup informaciji (u daljem tekstu: podnosilac zahtjeva) omogući pristup informaciji ili njenom dijelu koju posjeduje, osim u slučajevima predviđenim ovim zakonom.

Odredbom člana 33 stav 2 citiranog Zakona propisano je da podnosilac zahtjeva snosi troškove postupka za pristup informaciji, koji se odnose na stvarne troškove organa vlasti radi kopiranja, skeniranja i dostavljanja tražene informacije, u skladu sa propisom Vlade Crne Gore.

Shodno navedenom, odlučeno je kao u dispozitivu ovog rješenja.

PRAVNA POUKA: Protiv ovog rješenja može se izjaviti žalba Agenciji za zaštitu ličnih podataka i slobodan pristup informacijama u roku od 15 dana od dana prijema rješenja. Žalba se predaje ovom organu ili šalje putem pošte.



MINISTAR

mr Novica Vuković

Dostavljeno:

- Podnosiocu zahtjeva
- U spise predmeta
- a/a



Montenegro
Ministry of Finance
Directorate for management of
the EU pre-accession funds structures

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22/11/2024

No: 08-908/24-58211

Ms Valentina Superti

Director

Directorate-General for Neighbourhood and Enlargement Negotiations, Western Balkans
(NEAR.D)
Rue de la Loi 15, Wetstraat 15, 1000 Bruxelles, Belgium

Subject: Disbursement of the pre-financing under support to Montenegro within the Reform and Growth facility

Dear Ms Superti,

in line with Article 20 of the Regulation (EU) 2024/1449 of the European Parliament and of the Council, of 14 May 2024, on establishing the Reform and Growth Facility for the Western Balkan and further to the adoption of the Reform Agenda on 26 September 2024 and its submission to the Commission on 2 October 2024, I would like to request the release of 7% pre-financing of the total amount foreseen under the Reform and Growth Facility for Montenegro, as non-repayable support and loan support and the transfer of the share of this amount that is in the form of loan support to the Treasury.

We would appreciate this release to be completed as soon as the Facility and the Loan Agreements enter into force and all relevant conditions set therein are fulfilled.

Considering abovementioned, I would kindly ask EC services to undertake further activities related to processing Request for pre-financing.

Sincerely,

STATE SECRETARY/NAO
DEPUTY NATIONAL COORDINATOR FOR REFORM AGENDA 2024-2027



List of annexes

Annex 1: Financial Identification Form (original)

CC:

- Ministry of European Affairs, Ms Maida Gorčević



Montenegro
Ministry of Finance
Directorate for management of
the EU pre-accession funds structures

Address: Stanka Dragojevića 2,
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No: 08-908/26-5541

16.01.2023

Ms Valentina Superti

Director

European Commission - Directorate-General for Enlargement and Eastern Neighbourhood, Western
Balkans (ENEST.B)

Subject: Disbursement of the third tranche under support to Montenegro within the
Reform and Growth Facility 2024-2027

Dear Ms Superti,

Respecting relevant provisions of the Facility agreement and Loan agreement signed under Reform and Growth Facility for Montenegro, please find enclosed Request the release of funds under third tranche, related to steps for which deadline for implementation was December 31st 2025. In addition, within this Request steps for which deadline for implementation was February 28th 2025 and June 30th 2025 and which were not achieved in first and second reporting periods are included, as well.

Bearing in mind abovementioned, amount requested within third tranche is calculated based on the sum of total amounts related to steps fully achieved, including first three reporting periods.

Regarding Summary of audits performed by relevant authorities, including weaknesses identified and any corrective actions taken, no audits are performed in regard to the Reform agenda in Montenegro during 2026, thus no summary of audits, including weaknesses identified and any corrective actions taken are submitted with this Request for the release of funds. However, it should be noted that Montenegro undertook several activities in regard to establishment of system for management of programme, including audit and control system, based on which it is defined that internal audit units will perform controls under the Programme during 2026, as well as Audit Authority of Montenegro, who will perform system audit during 2026.

With the appreciation of the Commission cooperation and support, I would kindly ask EC services to undertake further activities related to processing Request for the release of funds.

Sincerely,

STATE SECRETARY/
DEPUTY COORDINATOR FOR REFORM AGENDA 2024-2027



Milica Adžić

REFORM	STEP		FINANCIAL VALUE
		Integrity tests are created and delivered in the Customs Administration and the Tax Administration – target is reaching at least 30% of staff	
4.3.1	4.3.1.2	Increase of 20% in filling vacant positions – in accordance with the Rules on Internal Organization and Job Systematization – in the relevant courts for the fight against corruption	2,317,185.60
4.4.2	4.4.2.1	Decreased number of complaints before the Ombudsperson and Decreased number of incidents reported by LGBTIQ CSOs	2,317,185.60
4.6.1	4.6.1.4	Terminating visa-free agreements with countries (at least one per year) which are visa required for the EU.	4,634,371.20
Total (steps with deadline 31/12/2025)			44,026,526.40
Total (steps with deadline 28/02/2025; 30/06/2025 and 31/12/2025)			59,088,232.80

On the basis of the above I request that the amount of EUR 59,088,232.80 is made available, EUR 27,476,028.25 disbursed directly to the treasury of Montenegro, and EUR 31,612,204.55 to be made available through the Western Balkans Investment Framework (WBIF), of which EUR 14,653,881.73 in the form of loans and EUR 16,958,322.81 in the form of non-repayable support¹².

I hereby attach an assessment of each step, the required evidence showing the satisfactory fulfilment of the qualitative and quantitative steps set out in the relevant Annex to the Commission implementing decision³ and other information requested as per Article 14 of the Facility Agreement.

I hereby also declare that measures related to the reforms for which satisfactory fulfilment has been declared previously in prior Commission decisions have not been reversed by Montenegro.

Podgorica, 16 -01- 2026



Milica Adžić

**STATE SECRETARY/
DEPUTY COORDINATOR FOR REFORM AGENDA 2024-2027**

¹ Subject to rules laid down in Articles 16 and 17, each instalment shall draw from the indicative financial contributions set out in Article 2 paragraph 2, as follows: a) 28.7% from the non-repayable support and 24.8% from the loan support, in sum 53.5%, to be made available through the Western Balkans Investments Framework (WBIF), and b) 46.5% from the loan support to be channelled directly to the treasury.

² A condition precedent to the disbursement of the loan to the Treasury, to be channelled to the WBIF, is the submission of the signed contribution arrangement with the WBIF. This signed arrangement must be provided before any loan disbursements are processed.

³ CID C(2024) 7375 final, from 23/10/2024

REFORM	STEP		FINANCIAL VALUE
1.1.3	1.1.3.5	Feedback on administrative barriers to business. Activities for addressing barriers to business of the administrative nature, registered by the Competitiveness Council Secretariat, including new barriers, are initiated by the public administration within 6 months from their registration in the list. Proposed actions to resolve them, indicative timelines and updates on progress are reported biannually to the Competitiveness Council Secretariat and made available to all Council members	2,317,185.60
1.1.4	1.1.4.2	Updating land registries. Migrating all data from the existing land ownership database to the e-cadastre	579,296.40
1.2.1	1.2.2.1	Number of funded R&I actors (physical persons – researchers and innovators, and legal entities – scientific research institutions, companies, clusters, NGOs) in the National R&I System is increased by 50% and the impact is demonstrated through improved figures in research and innovation statistical reporting.	3,475,778.40
2.2.1	2.2.1.2	Law on protection from the negative impacts of climate change and protection of ozone layer in line with a climate neutrality target for 2050 enters into force.	2,317,185.60
2.3.4	2.3.4.5	Increase annual rate of building renovation and street lighting in accordance with the targets agreed in the Energy Community at least 60.000 sqm renovated	4,634,371.20
2.3.4	2.4.3.2	Deployment of public e-services based on the Plan (1st step)	2,317,185.60
2.4.4	2.4.4.2	Frameworks introduced through NIS2 alignment (Coordinated Vulnerability Disclosure framework, crisis management framework), are in place and in use	1,158,592.80
3.1.1	3.1.1.3	Work based learning in higher education: 20% of total students (of which approx. 50% women) benefit from substantial work-based learning with employers during their respective education	4,634,371.20
3.1.1	3.1.1.4	A new model for career guidance and counselling adopted within the Strategy on career guidance and counselling 2025-2030	579,296.40
3.1.3	3.1.3.1	Activation of beneficiaries of material support: Law on Social and Child Protection and its accompanying bylaws has been amended to enable sequenced transition from receiving material support to labour market activation	2,317,185.60
3.2.1	3.2.1.1	Tendering procedures launched for construction or refurbishment of schools as required to reduce the number of shifts in most overcrowded primary schools from current 5 shifts to 3 by December 2027	1,158,592.80
3.2.2	3.2.2.1	2,000 teachers/participants participated in trainings on digital competences as per the adopted Framework on Teachers' Digital Competences.	3,475,778.40
4.3.1	4.3.1.1	Anti-corruption strategy/action plan implementation):	2,317,185.60



Montenegro

Ministry of Finance

Directorate for management of the EU pre-accession funds structures

ANNEX A: REQUEST FOR THE RELEASE OF FUNDS

I declare that, for the implementation of the EU financial assistance to Montenegro under the Facility for the period second half of 2025, based on my own judgement and on the information at my disposal, as well as on the evidence enclosed, the payment conditions set out in the Montenegro Reform Agenda for the following steps have been fulfilled:

REFORM	STEP		FINANCIAL VALUE
1.1.5	1.1.5.1	Improving integrity in inspection services. A mandatory annual declaration of assets and conflict of interest statements is introduced for inspectors- subject to verification by the Agency for Prevention of Corruption.	2,317,185.60
2.1.1	2.1.1.1	The complete transposition of the electricity integration package in accordance with the requirements of the Energy Community and the continuation of its implementation.	2,317,185.60
4.4.1	4.4.1.1	Supreme state prosecutor has put in place and monitor standard operating procedures for the prosecution as regards the handling of sexual and gender-based violence cases, in line with relevant articles of the Istanbul Convention on preventing and combating violence against women and domestic violence, as well as of the EU Directive of Victim Protection; Standard operating procedures for the sentencing in cases of sexual and gender-based violence are put in place, in line with the new Criminal Code	2,317,185.60
4.6.1	4.6.1.3	Abolition of visa-free agreements with countries (at least one country per year) for which the EU requires a visa	4,634,371.20
Total (steps with deadline 28/02/2025)			11,585,928.00
2.2.1	2.2.1.1	Governance structures mandated to implement and monitor just transition actions are operational and have adopted a plan for training and job creation for people employed in mining and coal power production	579,296.40
2.3.1	2.3.1.1	Announcement of the auction plan for the next three years, within which at least 400 MW will be offered, along with the launch of the first auction.	579,296.40
2.3.4	2.3.4.2	Long-term renovation strategy and action plan adopted and starts to be implemented with retrofitting of existing public buildings ongoing and aligned with the annual 3% renovation target	2,317,185.60
Total (steps with deadline 30/06/2025)			3,475,778.40
1.1.3	1.1.3.2	Public consultations and Regulatory Impact Assessments (primary and secondary legislation). 100% of new legislation is subject to public consultation with businesses and civil society organisations and the local self-governments. 100% of new legislation is subject to RIA prior to public consultation	3,475,778.40

Management, calculated according to the Cost Allocation Methodology. We irrevocably undertake to bear the costs of implementation and any fees due in respect of the implementation of the EWBIF in accordance with its General Conditions;

- c. the issue by the Lender, in due course, of a Confirmation Notice
 - d. the Lender having received from the Borrower a copy of a signed Contribution Arrangement, covering the same amount of this Request for Payment.
3. We confirm that:
- The list of authorised signatories sent on behalf of the Borrower by the Minister of Finance on May 6th 2025 remains valid and applicable.
 - No event has occurred that would render incorrect any statement made in the Legal Opinion issued on May 6th 2025.
 - No Event of Default has occurred.



Milica Adžić

**STATE SECRETARY/
DEPUTY COORDINATOR FOR REFORM AGENDA 2024-2027**



Montenegro
Ministry of Finance
Directorate for management of the EU pre-accession funds structures

ANNEX 1 (A) REQUEST FOR PAYMENT

Subject: European Union Reform and Growth Facility for the Western Balkans
Request for Payment for Loan Instalment (Allocated Percentage)

Dear,

We refer to Regulation (EU) 2024/1449, notably Article 21 thereof, and the Loan Agreement (the "**Loan Agreement**") dated 14/03/2025 between the European Union, represented by the European Commission (the "**Lender**"), and Montenegro (the "**Borrower**"). Terms defined in the Loan Agreement shall have the same meaning herein.

We confirm that the relevant qualitative and quantitative steps set out in the Commission Implementing Decision have been satisfactorily fulfilled and we hereby request the disbursement of EUR 14,653,881.73 **that the Borrower must further transfer to the EWBJF** as set out in the Commission Implementing Decision.

We will provide a copy of the Contribution Arrangement covering the Loan Instalment and we shall transfer the Loan Instalment to the EWBJF upon receipt of a payment request from the Fund Managers.

1. We hereby irrevocably request that Loan Instalments be disbursed under and in accordance with the Loan Agreement upon the following terms:
 - a. Total principal amount of the Loan Instalment: up to EUR 14,653,881.73 **that the Borrower must further transfer to the EWBJF** as set out in the Commission Implementing Decision.
 - b. We request a Cost of Funding, Cost of Liquidity Management and Cost of Service for the Loan Instalment based on the Cost Allocation Methodology.
 - c. The Maturity Date of the Loan Instalment shall not exceed 40 years with amortised repayment of principal starting after a grace period of 10 years.
 - d. The Loan Instalment shall be disbursed in one instalment or several Tranches.
2. We acknowledge and agree that the Disbursement shall be in accordance with and subject to:
 - a. the Lender being satisfied at all times that the corresponding funds are available to it from counterparties in the international capital markets on terms and conditions that are acceptable to it;
 - b. the Lender having previously obtained through Funding Instruments the funds requested in this Request for Payment. We irrevocably undertake to pay any fees, costs and expenses, including if applicable breakage costs and Cost of Liquidity

c. the issue by the Lender, in due course, of a Confirmation Notice

3. We confirm that:

- The list of authorised signatories sent on behalf of the Borrower by the Minister of Finance on May 6th 2025 remains valid and applicable.
- No event has occurred that would render incorrect any statement made in the Legal Opinion issued on May 6th 2025.
- No Event of Default has occurred.



M. Adžić

Milica Adžić

STATE SECRETARY/

DEPUTY COORDINATOR FOR REFORM AGENDA 2024-2027



Montenegro
Ministry of Finance
Directorate for management of the EU pre-accession funds structures

ANNEX 1 (B) REQUEST FOR PAYMENT

Subject: European Union Reform and Growth Facility for the Western Balkans
Request for Payment for Loan Instalment

Dear,

We refer to Regulation (EU) 2024/1449, notably Article 21 thereof, and the Loan Agreement (the "**Loan Agreement**") dated 14/03/2025 between the European Union, represented by the European Commission (the "**Lender**"), and Montenegro (the "**Borrower**"). Terms defined in the Loan Agreement shall have the same meaning herein.

We confirm that the relevant qualitative and quantitative steps set out in the Commission Implementing Decision have been satisfactorily fulfilled and we hereby request the disbursement of EUR 27,476,028.25 **that the Borrower must not further transfer to the EWBJF** as set out in the Commission Implementing Decision. We have provided the due justification of this payment request.

1. We hereby irrevocably request that Loan Instalments be disbursed under and in accordance with the Loan Agreement upon the following terms:
 - a. Total principal amount of the Loan Instalment: up to EUR 27,476,028.25.
 - b. We request a Cost of Funding, Cost of Liquidity Management and Cost of Service for the Loan Instalment based on the Cost Allocation Methodology.
 - c. The Maturity Date of the Loan Instalment shall not exceed 40 years with amortised repayment of principal starting after a grace period of 10 years.
 - d. The Loan Instalment shall be disbursed in one instalment or several Tranches.
2. We acknowledge and agree that the Disbursement shall be in accordance with and subject to:
 - a. the Lender being satisfied at all times that the corresponding funds are available to it from counterparties in the international capital markets on terms and conditions that are acceptable to it;
 - b. the Lender having previously obtained through Funding Instruments the funds requested in this Request for Payment. We irrevocably undertake to pay any fees, costs and expenses, including if applicable breakage costs and Cost of Liquidity Management, calculated according to the Cost Allocation Methodology. We irrevocably undertake to bear the costs of implementation and any fees due in respect of the implementation of the EWBJF in accordance with its General Conditions;



Montenegro
Ministry of European Affairs
Ministry of Finance

ANNEX B: DECLARATION OF ASSURANCE

I, the undersigned, Gorčević Maida, in my capacity as Coordinator and Adžić Milica, in my capacity as deputy Coordinator

Declare that, for the implementation of the Union financial assistance to Montenegro under the Facility for the period 2024-2027, based on my own judgement and on the information at my disposal, in particular the results from the national control and audit systems described in the Reform Agenda:

1. The information submitted with the request for the release of funds is complete, accurate and reliable; duly justifying that the qualitative and quantitative steps have been satisfactorily fulfilled and that the audit trail demonstrating the achievement of these steps is in place.
2. The control systems in place give the necessary assurances that the financing provided has been used in accordance with all applicable rules, in particular on the prevention, detection and correction of fraud, corruption, conflicts of interests and irregularities.
3. The arrangements in place give the necessary assurance that the financing provided has not resulted in double funding from the Facility and other Union programmes or instruments, as well as other donors.

A summary of the national audits carried out in relation to 1 to 3 above, with an analysis of the related weaknesses found and the corrective actions taken or planned, complements this declaration of assurance.

Finally, I confirm that I am not aware of any undisclosed reputational matter related to the implementation of the programme.

Podgorica, 16/01/2026

Gorčević Maida

MINISTER/
COORDINATOR FOR REFORM
AGENDA 2024-2027

Podgorica, 16/01/2026

Adžić Milica

STATE SECRETARY/
DEPUTY COORDINATOR FOR
REFORM AGENDA 2024-2027