



GUIDELINES OBJECTIVE/RESULT/INDICATOR	COMMENT	PROPOSAL
1.1.b. There is no case of grave violation or infringement of the freedom of association, assembly and expression in practice	We suggest to delete grave and just leave violation as any violation in this regard disable people to exercise their rights	There is no case of violation or infringement of the freedom of association, assembly and expression in practice
1.3aCSOs are treated equally and any preferential treatment is based on clear and objective criteria such as:	To be treated equally in terms of what: public funding, participation in working bodies, (it should be specified). And the main question remain how this can be proved when the procedures and decisions are 100% legal, but there is a doubt that political will or other interests prevail in these relations- GONGO issues...	-number of cases where state bodies, have preferential and/or discriminative treatment toward specific CSOs in public funding, acceptance of initiatives, participation in working bodies, providing state space...
1.4.a Small community/local organisations and civic initiatives are recognised by the law or in case not, can operate freely without registering	In Montenegro, there is a clear difference between registered associations and non registered groups or initiatives. Therefore, we may consider non registered groups/initiatives who are active locally or nationally as grassroots. But, only registered associations are recognized by the law, and have legal obligations and rights (public funding, participation in working bodies etc). As	





	<p>grassroots (non registered groups) are not recognised by the law, they cannot benefit these rights. But, the existing legislation allow them to protest, express freely, submit initiatives etc? Is this what is considered under this indicator?</p>	
<p>2. An enabling financial environment, which supports sustainability of CSOs, and ensures CSOs are adequately funded.</p>	<p>In terms of supporting sustainability of CSOs, there is another possibility that is being used but is not recognized in formal procedures: providing of state/public space and land for use to CSOs. These practices exist in almost all countries in the region, but are uneven, without criteria and non-transparent. That is why such decisions of institutions rightly raise the issue of discrimination against some NGOs and at the same time, preferential treatment in relation to others. Therefore, we suggest to add another results under this objective (after public funding), as, apart from public funding, this is also an important indicator of state support to CSOs' sustainability</p>	<p>Proposal: Result 2.3 Public institutions (state and local level) support CSOs sustainability through : provision of state space and land for use to CSOs. Indicator: There are legal procedures for assignment of state space and land for use to CSOs. 2.3.aQuality of procedures for allocation of state space and land for use to CSOs in terms of: - clear and objective criteria; -regulated conflict of interests; - regular reporting of the work of CSOs that are using public spaces 2.3.b The application process for the space is transparent, information are widely published</p>





		and selection criteria are publicly announced in advance.
3.1. Public institutions include CSOs in decision- and policy-making process and acknowledge the importance of CSOs in improving good governance	All the proposed indicators for this result are in place, but we also suggest to add one more related to substantial participation of CSOs' on working bodies. For many years, EC is asking for meaningful and not only formal consultations with CSOs. Therefore there should be indicators that would allow us to track at least perception whether CSOs' may really influence public policies and what is the quality of their inputs. This monitoring may be conducted both by institutions and CSOs.	To add another indicator to the list of indicators under this result: - CSO's and state representatives' perception of the quality of CSOs' inputs and possibilities to truly influence the shape of public policies
4.1 CSOs' internal governance structures follows the principles of good governance* <i>*CSOs have clearly defined management structure, including a recognised division of responsibilities between the governance (governing board) and executive bodies (director, staff members).</i>	In Montenegrin legislation, the only obligatory bodies for CSOs are Assembly and the person authorised to represent CSOs (it could be director, president etc). Therefore, we would suggest to add these two terms so this would be totally clear for national use	<i>*CSOs have clearly defined management structure, including a recognised division of responsibilities between the governance (assembly, governing board) and executive bodies (director, president, staff members).</i>

COMMENTS RELATED TO THE INDICATORS ON THE LOCAL LEVEL:

GUIDELINES	COMMENT:	PROPOSAL:
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OBJECTIVE/RESULT/INDICATOR		
<p>2.2. Public institution support to CSOs is available and provided in a transparent, accountable, fair and non-discriminatory</p> <p>3.1. Public institutions include CSOs in decision- and policy-making process and acknowledge the importance of CSOs in improving good governance</p>	<p>We strongly advocate that indicators should be set for the local level in all the relevant areas (public funding, CSOs' inclusion in decision making, allocation of public space). The development of participatory democracy begins at the local level, which has been neglected all these years. Only the national level is monitored which does not give a complete and realistic picture of the enabling environment for CSOs' development and work. It encompasses all levels of government. If there is no data at the beginning, it is exactly the Guidelines and EC reports that may additionally encourage both CSOs and local authorities to provide a regular track record on this level. Technically, this is not demanding- all the indicators set for national level in all these areas may be applied for the local level.</p> <p><i>*we already added this formulation under the proposal related to the allocation of public space (result 2.3)</i></p>	<p>Public institutions (state and local level)...</p> <p>Public institutions (state and local level)...</p>

