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1. Overview

<table>
<thead>
<tr>
<th>Quick Facts</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td>609,859(^1)</td>
</tr>
<tr>
<td>GDP per capita</td>
<td>8,832.0(^2)</td>
</tr>
<tr>
<td>10-year average annual GDP growth</td>
<td>3.2%(^3)</td>
</tr>
<tr>
<td>CO2 emissions per capita</td>
<td>3.556(^4)</td>
</tr>
<tr>
<td>Renewable energy consumption share</td>
<td>over 60%(^5)</td>
</tr>
<tr>
<td>Unemployment rate</td>
<td>15.9%(^6)</td>
</tr>
<tr>
<td>Global Gender Gap Index 0-1 (gender parity)</td>
<td>0.693(^7)</td>
</tr>
</tbody>
</table>

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2. Policy and Regulatory Framework

There are several laws on environmental protection in place in Montenegro that address the activities from the private sector and could, therefore, form an incentive for the transition to and development of green businesses, such as the law on environment, the law on environmental impact assessment, the law on waste management, the law on air protection, the law on energy efficiency, and the law on industrial emissions. Montenegro has started the process of Accession to the European Union in November 2015. The negotiations on EU chapter 27 of the acquis on Environment and Climate Change have started in December 2018. This chapter contains over 200 legal acts in various environmental topics. The policies under this chapter aim to eliminate, to mitigate or to prevent pollution, to ensure the ecologically balanced use of natural resources in order to foster sustainable development, to prevent environmental damage at its source, to secure the integration of environmental issues into other sectoral policies. According to the local experts we have spoken to, policy enforcement in Montenegro could receive extra attention. To accomplish this, more financing and (skilled and experienced) manpower would be needed.

The National Strategy for Sustainable Development by 2030 (NSSD), which got adopted in 2016, recognizes the importance of the transition to the circular economy and includes greening the economy as one of its six priority themes. According to Governmental officials, this is the most updated policy measure regarding the integration of circular economy principles. One of the main goals of this strategic document is to improve waste management by applying circular economy principles. According to the "Regional Circular Economy Country Specific Report", the implementation of these principles should be stimulated by the following measures in order to achieve this goal; the encouragement of the reduction of waste generated in the territory of Montenegro, the application of primary waste selection when possible, the establishment of efficient waste collection and recycling, the development of a system for the management of special waste, the gradual introduction of circular economy approaches into the waste management system, the improvement of the application of penalties in waste management, and awareness-raising on the importance and advantages of sustainable waste management. However, the systems that are currently in place are inefficient without enforcement on the practices mentioned above.

The Ministry of Sustainable Development and Tourism addresses its commitment to strengthen the coherence of sustainable development funding policies both institutionally and organizationally (SDG10) under the National Strategy for Sustainable Development. This called for the inclusion of one employee in the Ministry of Finance to be in charge of financing, planning, and monitoring for sustainable development. However, until now this position has not been filled.

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9 Personal interview with Robin Gellately-Smith, (Green Building Council) 08 July 2020.
10 Personal Interview with Ivana Stojanovic (Directorate for Climate Change and Mediterranean Affairs, Ministry of Sustainable Development and Tourism), 06 July 2020.
Progress in Montenegro on the regulatory framework related to the circular economy and green businesses is mainly based on recent EU strategies. One example is the development and integration of the Micro, Small and Medium Enterprises Strategy (MSME) 2018 – 2022, which includes elements that reflect all ten objectives from the Small Business Act, an overarching framework for the EU policy on small and medium-sized enterprises. The MSME strategy incorporates measures for promoting the application of eco-labeling through educational and promotional workshops and seminars for SMEs on this topic and includes the NSSD. In December 2019, Montenegro was the first non-EU candidate country to adopt the Smart Specialization Strategy, which focuses on a green and resource-efficient economy and on the creation of synergies between the government, academic institutions, businesses, and the civil sector. The strategic priorities of this strategy are sustainable agriculture and the food value chain, energy and sustainable environment, and sustainable and health tourism. Under this strategy, a partnership between circular change, a non-profit based in Slovenia, the UNDP, and the Chamber of Economy Montenegro was established to deliver the first circular economy roadmap for Montenegro next to a platform for stakeholder engagement and learning in this field. By drafting this strategy, Montenegro has joined the initiative of the European Union focusing on a new model of economic development. Several workshops were given in the context of the national circular economy roadmap that aims to accelerate the transition away from a linear economy together with stakeholders. The workshop topics include “Defining Montenegro’s circular journey”, “Co-creation of the first draft”, and a “Moderated discussion focused on the finalization of the CE roadmap-mapping journey”. Since 2014, the Government of Montenegro and the UNDP have established a close cooperation to implement reform measures targeted at improving the business environment, developing MSMEs, and reinforcing employability by the focus on increasing the competitiveness and productivity of businesses in Montenegro. The activities until now have included developing capacities of local self-governments in the establishment, regulation, management, and promotion of business zones, enhancing the competitiveness of MSME through reinforcing the process of joining in clusters (by the implementation of the Cluster Development Programme), supporting municipalities in drafting and adopting strategic development plans, and through nine programs on financial and technical support in all Montenegrin municipalities, amongst which the “Caravan of good business opportunities” (“Business caravan”). The Caravan visited several municipalities in order to give SME representatives and stakeholders the opportunity to share their views on the strategic draft of the MSME Strategy 2018-2022, where after a working group for the development of the strategy was established. The business caravan project aims for better communication between the government and entrepreneurs. The estimated end date of this project is December 2020. According to experts, however, many of the business centers that received EU support remained empty.

Last October (2019), Montenegro adopted a new law on the “protection of negative impacts of climate change”. It includes a low-carbon development strategy, a national adaptation plan, greenhouse gas (GHG) level projections and reports, a GHG inventory, the obligation to obtain a special permit for GHG emissions for industrial plants, the obligation to monitor, report, and verify

GHG emissions for airlines and industrial and energy facilities, as well as the obligation to obtain a license to perform activities that deplete the ozone layer. The bill addresses several EU directives and regulations.

Eco-labeling is integrated into the tourism sector in Montenegro through the EU Eco-Label for touristic accommodations from Green Globe and Travellife certification (both internationally recognized). The implementation of the Travellife certification, however, has not been labeled as successful by experts, since very few certifications were granted. The other eco-labels that are in place in Montenegro are Monteorganica, on organic Montenegrin produce, and Dobro iz Crne Gore – Goods from Montenegro. In 2015 there were fifteen companies for 67 products registered, covering abroad range of product types, such as locally produced agricultural products, food, textile, wood, metal and engineering, building materials and construction equipment, chemical products, electrical products, arts, health insurance, drugs and medical devices and software.

Montenegro is working on the integration of the ‘polluter pays principle’, based on the EU environmental liability Directive, that got adopted by Montenegro in 2008. The revenues from this scheme get collected by the Eco-fund. The purpose of this fund is to finance and provide technical support to projects and programs in the field of the environment, climate change and energy. At the moment the eco-fund is about to be operationally active.

In 2019, the Ministry of Economy has created the Program for Improving the Competitiveness of the Economy, which focuses on the development of entrepreneurship and the business sector, especially under less developed local governments (municipalities), and mainly in the Northern region. The program is mostly based on encouraging compliance with international standards related to products and services, management systems, staff, testing, control and certification, and support for obtaining accreditation for conformity assessment. The program line supported 71 companies during 2019. Further implementation with additional improvements of existing- and the introduction of the new- program lines, is planned for 2020. One of the recently added program lines is the support of the circular economy, with the objective to introduce and use of modern biological processes in wastewater treatment in Montenegro. Support under this program can reach up to 70% of eligible costs for small enterprises, and up to 60% of eligible costs for medium-sized enterprises.
3. Market Demand

Basic legal provisions governing the enhancement of green public procurement do exist, however, they still do not play a significant role in refocusing public expenditure towards green products. The Montenegrin public procurement law (2017) addresses the environmental benefits in the decision-making process for goods.23 Nevertheless, the Montenegrin public procurement law is incompatible with EU legislation on many crucial aspects,24 and selects providers on the principle of the lowest price.25 It has been criticized frequently for its lack of transparency and the incapability to prevent corruption.26 The public procurement law has been revised and adopted in December 201927, but the details on green and circular economy have remained the same as the 2017 Public Procurement Law.28 In line with the UN sustainable development agenda 2030, the Ministry of Sustainable Development and Tourism, has expressed to continuously establish a transparent framework for green public procurement and to implement the competitiveness strengthening program through the development of the green economy.29 However, until now, there has not been any progress regarding this framework yet. Local experts suggest that the circular economy roadmap (mentioned above) might address public procurement practices.10 Zero Waste Montenegro, an NGO working in the country, established a pilot project on green procurement and recommended sub-criteria such as “environmental protection” or “energy efficiency criteria”, which could be integrated without going against the principle of ensuring competition. According to the report on the pilot project, all procurement is centralized by the Property Administration Unit under the Ministry of Finances, which is not sharing data on more specific procurement practices.30

According to experts, levels of consumer awareness towards green and circular products is considered to be low.25 Due to factors as a high unemployment rate, high levels of corruption in the political system, a low minimum wage, and a poor health system, conscious consumer behavior is not seen as a priority by citizens of Montenegro. Nevertheless, the general low purchasing power of individuals causes people to use the full potential of the goods they buy and limit the amount of waste they generate. Circular economy principles are unknown to the general public. Most awareness-raising is done around waste management and prevention of littering in the form of “clean-up” sessions. Besides that, a coalition of 13 NGO’s has been performing brand and waste audits according to the methodology of BreakFreeFromPlastic, which is an international coalition of organization working on single-use plastic waste reduction.25

As part of Montenegro’s accession process to the European Union, the environmental awareness campaign “Be a Champion” was designed by the EU delegation together with the Ministry of Sustainable Development and Tourism and the National Parks of Montenegro (2017). The campaign aimed to tackle the use of plastic bags and pollution issues, to educate the public about

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24 European Western Balkans, Interview Radunovic, Montenegro is Lacking Key Reults in the Areas of Rule of Law and Democratisation, 2019.
25 Personal Interview with Alexandra Aubertin (Zero Waste Montenegro), 31July 2020.
28 Personal Interview with Ana TripKovic,(Lecturer on Sustainable Tourism), 08 July 2020.
plastic alternatives, to increase awareness on waste disposal and recycling, and to combat illegal waste disposal.\textsuperscript{31}

Together with the German Embassy, the Green Building Council Montenegro created a free Green Building Sector Certification and Training Programme to improve the knowledge of all those involved in urban planning, design, and construction in Montenegro in order to contribute more effectively to the principles of green, sustainable, ecological construction, and improvement of building standards in the state.\textsuperscript{32}


4. Startup and Investment Climate

According to the UNDP project on green business in Montenegro (2018), Montenegro’s business community is largely unaware of existing business opportunities in the green sectors. Besides that, the local banking sector views the risks of investment in green businesses as high.

To stimulate, support, and finance programs and projects in the field of the environment, climate change, and energy, the Eco-Fund was created by the Government of Montenegro in November 2018. It is currently being worked out and will start its operations in 2020.

As mentioned above, the Ministry of Sustainable Development and Tourism has called for the inclusion of one employee in the Ministry of Finance to be in charge of financing, planning, and monitoring for sustainable development, but until now, this position has not been filled.

In 2014, Montenegro joined the EU Competitiveness for Enterprises and Small and Medium Enterprises Programme (COSME), for which the Framework Partnership Agreement and Implementation Strategy 2014-2020 was established. COSME aims to make it easier for SMEs to access finance during all phases of their lifecycle. A crucial part of the COSME program under the program line addressing “Access to Finance” is the agreement between the Montenegrin Commercial Bank and the European Investment Fund that has been signed in July 2015. As part of the agreement, the Investment and Development Fund of Montenegro signed the contract for participation in the COSME Loan Guarantee Facility. The most successful program focusing on support for internationalization for MSMEs through the services of the Enterprise Europe Network (EEN) Montenegrin Network is ongoing. This program focuses on providing advisory services on international markets, technological transfer, organization of training sessions to strengthen export opportunities and the involvement in value chains, and business networking. The activities are led by the Ministry of Economy and in a consortium consisting of the University of Montenegro (Faculty for Mechanical Engineering), The Chamber of Economy of Montenegro, and the Business start-up Centre Bar. Business Centre Bar, an organization that supports the creation of an enabling environment for economic growth through the creation of small and medium-sized enterprises, has become part of the network in 2008 under the first call for the project.

The Regional and Local Competitive Boosting Program has been implemented in 2014 to support SMEs in terms of reimbursement of costs on the implementation of standards, certification, and recertification such as ISO 14001 (eco-management). The financial assistance for this support covers 70% of the eligible costs for SMEs and up to 60% for medium-sized enterprises. Until now, the Montenegrin laws do not recognize a start-up company as a separate category, and therefore they are obliged to register mainly as an Ltd company, i.e. to have headquarters, a director, to pay full contributions and taxes. This is unfavorable for small scale companies.

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expected-by-end-2018/
35 EU Monitor, Montenegro Joins COSME, the EU’s Financing Programme for Small and Medium Sized Enterprises, 2014. https://www.eumonitor.nl/9353000/1/9vvik7m1c3gxyxvlykxle2he8ybbctx=vyj0jwxz75yr
5. Socio-Cultural Context

Montenegro has a service-based economy with a small domestic market that is characterized by low diversification. Nevertheless, the export of goods and services shows a steady increase in the past years. The report on investment and business opportunities in Montenegro, mentions several priority sectors with strong growth and export potential including; the manufacturing industry – agro-food, wood processing, metal and pharmaceuticals, and energy and tourism. The services sector employs over 70% of all persons employed, next to the agricultural and industrial sectors. With an unemployment rate just below 15%, unemployment and poverty are significant, varying from lower levels in the coastal south to higher ones in the rural north. According to the report "Investing and Doing Business in Montenegro", there is a certain mismatch between labor supply and demand caused by a lack of alignment of the market requirements and vocational education. According to the "Skills Mismatch Measurement" in Montenegro, the efficiency of the higher education and labor market system is rather low, where out of ten students that enter the system, only two find a well-matched job. According to the same report, the higher education sector enrolls too many students in a narrow range of subjects such as business administration and law, which attracts more than a fifth of all students. On the labor market side, there is an oversupply of graduates in these subjects, as well as in the broader study fields of Arts and Humanities, Social Sciences, Journalism, and Information. There is a large and continuing shortage of graduates in Natural Sciences, Mathematics, and Statistics. According to local experts we have spoken with, it is extremely difficult to find highly qualified and skilled and experienced labor in Montenegro.

Montenegrin women comprise just 9.6% of the total business owners as of 2016. This is in large contrast to the 30% average in the European Union. Montenegro faces high youth unemployment, low female labor force participation, and high long-term unemployment. The entrepreneurial climate in Montenegro is characterized by a low level of internationalization of SMEs.

The latest "Global Competitiveness Report", placed the country in 100th position among 140 countries with regard to attitudes towards entrepreneurial risk (2018). According to the report of the Horizon 2020 support facility, there is a cultural bias according to which hard work is not seen as a badge of honor but rather as a sign of lack of capacity to succeed in life or of failure. A secure work path in government is perceived as a favored career choice. According to the same report, actors in the current Montenegrin ecosystem seem to approve of the status quo and appear compliant with existing conditions. On the other hand, here is a significant level of frustration among entrepreneurs and other innovation actors both in the private and public sectors, combined with high dissatisfaction levels regarding untransparent procedures and potential for it to change.

41 European Training Foundation, Skills Mismatch Measurement in Montenegro, 2019
42 Global Environment Facility, GEF-6 Request for one-step Medium Sized Project Approval, 2017
### 6. Opportunities and Obstacles

<table>
<thead>
<tr>
<th>Opportunities</th>
<th>Obstacles</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General economic context and investment climate</strong></td>
<td>Montenegro is a small country with limited funding opportunities. The local banking sector perceives the risk of investment in green businesses as high.</td>
</tr>
<tr>
<td><strong>General political context</strong></td>
<td>Strengthening international relations.</td>
</tr>
<tr>
<td><strong>Policy and regulatory (both national and regional/local)</strong></td>
<td>Montenegro recently adopted advanced regional legislation on GHG reduction.</td>
</tr>
<tr>
<td><strong>Subsidies and fiscal benefits</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Public procurement</strong></td>
<td>Public procurement accounts for a large share of consumption and can drive the circular economy.</td>
</tr>
<tr>
<td><strong>General knowledge and awareness about CE</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Consumer demand (linked to previous point)</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Public-private partnerships</strong></td>
<td>Montenegro was one of the first non-EU countries that adopted the Smart Specialization Strategy that is focusing on synergies.</td>
</tr>
<tr>
<td><strong>Support programs or platforms for green and circular businesses</strong></td>
<td></td>
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</tbody>
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recognized research teams, there are creative individuals with skills both in Montenegro and in its diaspora. Therefore, the government could increase the budget for funding entrepreneurial projects and support high-potential innovators. This can be done even with limited resources by offering honor loans to ‘start-uppers’ or developing visiting fellowship programme.37

<table>
<thead>
<tr>
<th>Professional training and education on CE / Skilled labour</th>
<th>A mismatch between labor supply and market demand.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Specific economic sectors</td>
<td>According to experts, the tourism sector could accelerate the circular economy. It is the largest sector in Montenegro and affects other sectors such as food and mobility. Besides tourism, experts are mentioning the mobility sector as a promising sector, since decent highways and public transportation is absent. Montenegro is recognized as a Regional Green Energy Hub, through the potential for and establishment of renewable energy projects. 28 The leading renewable energy projects that have been established are a submarine electric cable (between Montenegro and Italy), the largest solar power plant in the region, and several wind power-plants.</td>
</tr>
<tr>
<td>Other socio-cultural factors (incl. gender issues)</td>
<td>Cultural bias on hard work which is seen as a lack of capacity to succeed in life. A secure career path is seen as a favorable career choice.</td>
</tr>
<tr>
<td>Other commercial or legal challenges</td>
<td>Overwhelming bureaucracy in Public Institutions including outdated administration processes and tools</td>
</tr>
<tr>
<td>Available technologies and infrastructure</td>
<td>Limited systems for collecting and processing pollution and environmental data. Poor access to electricity.</td>
</tr>
</tbody>
</table>

7. Impact Indicators and Other Data

<table>
<thead>
<tr>
<th>Topic</th>
<th>Numbers</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Green Jobs</td>
<td>According to the National Strategy for Sustainable Development, the greatest potential for the creation of green jobs lies in renewable energy generation, recycling, public transportation, energy efficiency in housing, organic agriculture on small farms, and sustainable forestry. In economic sectors, the greatest potential for new employment is in agriculture, energy and tourism.</td>
<td><a href="https://www.rec.org/project-detail.php?id=191">https://www.rec.org/project-detail.php?id=191</a></td>
</tr>
</tbody>
</table>


8. List of Interviewees

<table>
<thead>
<tr>
<th>Name</th>
<th>Role and Organization</th>
<th>Date of Interview</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aubertin, Alexandra</td>
<td>Founder of Zero Waste Montenegro</td>
<td>31.07.2020</td>
</tr>
<tr>
<td>Bolbojevski, Kosta</td>
<td>Regional Manager Zinco Green Roof</td>
<td>16.07.2020</td>
</tr>
<tr>
<td>Dragojevic, Milica</td>
<td>Senior Advisor Private Sector Advocacy GIZ</td>
<td>17.07.2020</td>
</tr>
<tr>
<td>Gellately-Smith, Robin</td>
<td>Board Green Building Council</td>
<td>08.07.2020</td>
</tr>
<tr>
<td>Markovic Tripkovic, Ana</td>
<td>Academic Sustainable Tourism and Entrepreneurship</td>
<td>10.07.2020</td>
</tr>
<tr>
<td>Stojanovic, Ivana</td>
<td>Adviser, Division for Mediterranean Affairs</td>
<td>06.06.2020</td>
</tr>
</tbody>
</table>

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the chamber of economy montenegro to deliver the first ce roadmap for montenegro accessed 20 July 2020.


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Global Environment Facility, *GEF-6 Request for one-step Medium Sized Project Approval*,2017 
Link: [https://www.thegef.org/sites/default/files/project_documents/11-7-17_-_Endorsement_Doc_0.pdf](https://www.thegef.org/sites/default/files/project_documents/11-7-17_-_Endorsement_Doc_0.pdf)

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Link: [https://doi.org/10.1787/g2g9fa9a-en](https://doi.org/10.1787/g2g9fa9a-en).


Link: [http://www.mna.gov.me/ResourceManager/FileDownload.aspx?rId=395955&rType=2](http://www.mna.gov.me/ResourceManager/FileDownload.aspx?rId=395955&rType=2)


Link: [https://mne.today/business-caravan-montenegro/](https://mne.today/business-caravan-montenegro/)


Personal Interview with Alexandra Aubertin, (Zero Waste Montenegro), 31 July 2020.

Personal Interview with Ana TripKovic,(Lecturer on Sustainable Tourism), 08 July 2020. 


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