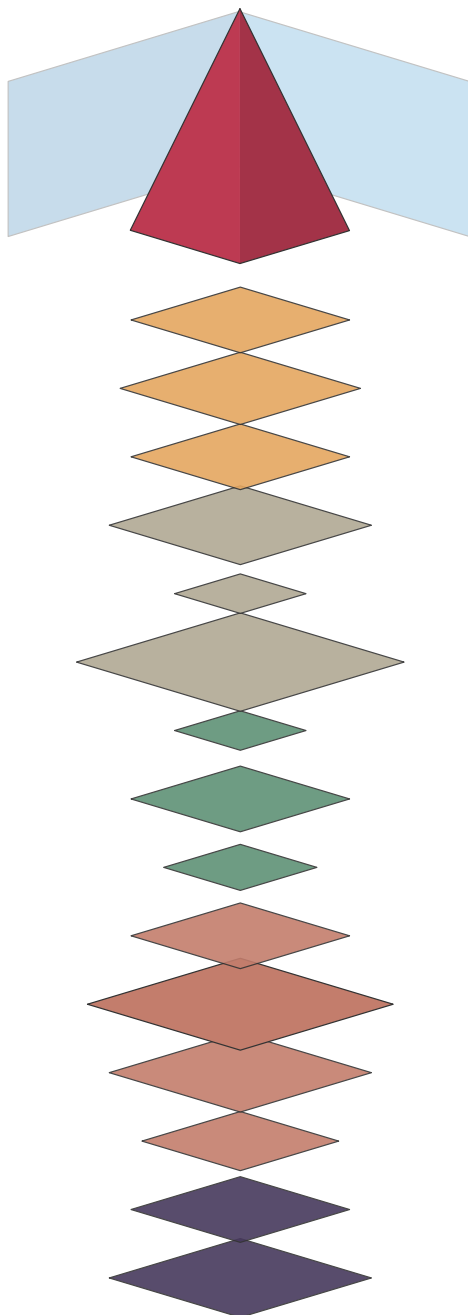




MONTENEGRO



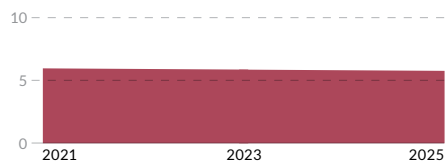
5.82 $\nearrow 0.08$

CRIMINALITY SCORE

64th of 193 countries $\nearrow 10$

10th of 44 European countries $\nearrow 5$

6th of 17 Central and Eastern European countries $\nearrow 2$



CRIMINAL MARKETS

5.13 $\nearrow 0.07$

HUMAN TRAFFICKING	5.00	0.00
HUMAN SMUGGLING	5.50	0.00
EXTORTION & PROTECTION RACKETEERING	5.00	0.00
ARMS TRAFFICKING	6.00	0.00
TRADE IN COUNTERFEIT GOODS	3.00	0.00
ILLCIT TRADE IN EXCISABLE GOODS	7.50	0.00
FLORA CRIMES	3.00	0.00
FAUNA CRIMES	5.00	$\nearrow 0.50$
NON-RENEWABLE RESOURCE CRIMES	3.50	0.00
HEROIN TRADE	5.00	$\nearrow 0.50$
COCAINE TRADE	7.00	0.00
CANNABIS TRADE	6.00	0.00
SYNTHETIC DRUG TRADE	4.50	$\nearrow 0.50$
CYBER-DEPENDENT CRIMES	5.00	$\nearrow 0.50$
FINANCIAL CRIMES	6.00	0.00



CRIMINAL ACTORS

6.50 $\nearrow 0.10$

MAFIA-STYLE GROUPS	7.50	0.00
CRIMINAL NETWORKS	7.00	0.00
STATE-EMBEDDED ACTORS	7.00	0.00
FOREIGN ACTORS	6.00	0.00
PRIVATE SECTOR ACTORS	5.00	$\nearrow 0.50$



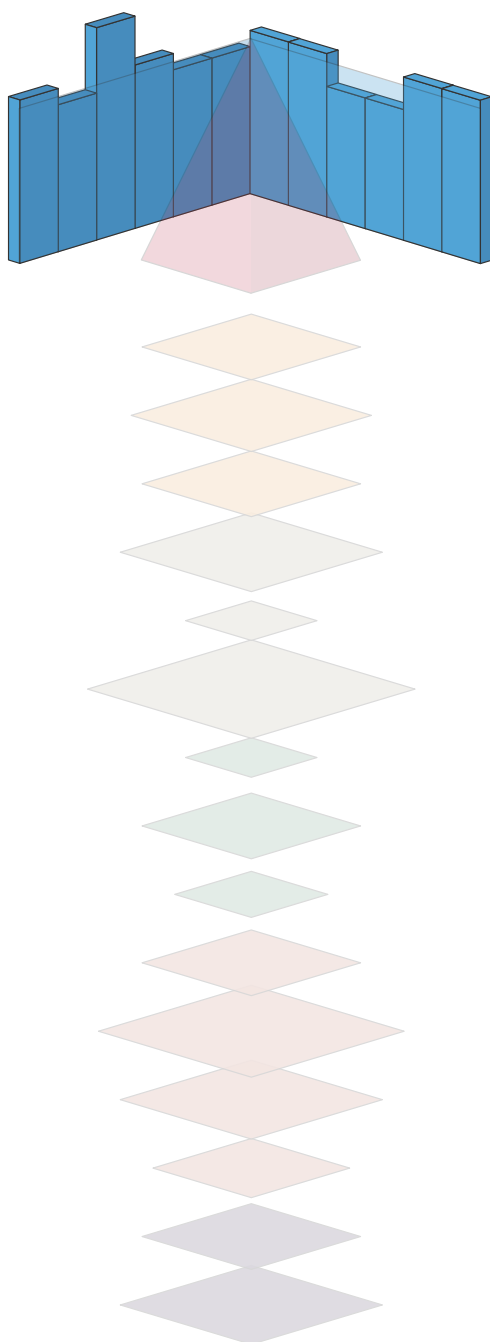
This project was funded in part
by a grant from the United
States Department of State.



Funded by
the European Union

ENACT is funded by the European Union
and implemented by the Institute for
Security Studies and INTERPOL, in
affiliation with the Global Initiative Against
Transnational Organized Crime.

MONTENEGRO



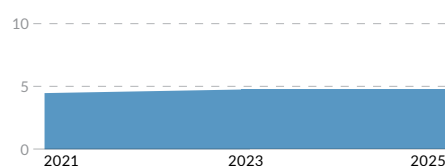
4.83 $\nearrow 0.08$

RESILIENCE SCORE

95th of 193 countries $\nearrow 7$

37th of 44 European countries $\nearrow 1$

11th of 17 Central and Eastern European countries $\nearrow 1$



POLITICAL LEADERSHIP
AND GOVERNANCE **5.00** $\nearrow 0.50$

GOVERNMENT TRANSPARENCY
AND ACCOUNTABILITY **4.50** 0.00

INTERNATIONAL COOPERATION **6.50** $\nearrow 0.50$

NATIONAL POLICIES AND LAWS **5.00** 0.00

JUDICIAL SYSTEM AND DETENTION **4.50** 0.00

LAW ENFORCEMENT **4.50** 0.00

TERRITORIAL INTEGRITY **5.00** 0.00

ANTI-MONEY LAUNDERING **5.00** 0.00

ECONOMIC REGULATORY CAPACITY **4.00** 0.00

VICTIM AND WITNESS SUPPORT **4.00** 0.00

PREVENTION **5.00** 0.00

NON-STATE ACTORS **5.00** 0.00



This project was funded in part
by a grant from the United
States Department of State.



Funded by
the European Union

ENACT is funded by the European Union
and implemented by the Institute for
Security Studies and INTERPOL, in
affiliation with the Global Initiative Against
Transnational Organized Crime.

CRIMINALITY

CRIMINAL MARKETS

PEOPLE

Montenegro serves as both a source and destination country for human trafficking, with victims primarily exploited for sex trafficking and forced labour. The transnational nature of this market encompasses local criminal groups alongside foreign actors. Victims of sex trafficking in Montenegro are primarily women and girls from Montenegro, neighbouring Balkan nations and Eastern Europe. In recent years, there has been a notable increase in Russian nationals becoming victims of trafficking, reflecting shifting demographic trends. Roma children are often subjected to forced begging and illicit marriages, with law enforcement frequently dismissing these cases as cultural practices. Despite legislative efforts, Montenegro has not met minimum standards for victim protection, and there has been no significant increase in prosecutions or convictions. Additionally, government officials have also been implicated in cases involving forced labour, particularly concerning Turkish nationals working on construction sites.

The human smuggling market in Montenegro remains a concern, particularly due to the country's geographic location along key migration routes. However, no major incident has been reported since the previous reporting period. Migrants from Asia are primarily smuggled into Montenegro through land or air routes, often attempting to cross into Croatia or Bosnia and Herzegovina. While Montenegrin authorities have made efforts to disrupt smuggling networks through regular police operations, the country continues to struggle with weak prosecution capabilities and inadequate data collection. Smuggling networks primarily consist of Montenegrin nationals and foreign actors, notably individuals from Türkiye and Albania, who facilitate illegal border crossings. Extortion and protection racketeering remain embedded in Montenegro's criminal landscape, involving both domestic and foreign actors, including criminal networks with political connections. These activities primarily target the hospitality and construction sectors, with businesses in tourist hubs such as Budva, Herceg Novi, Tivat and Bar frequently subjected to coercion. Extortion schemes typically involve threats, blackmail and physical violence, often employing third-party enforcers to intimidate victims.

TRADE

Montenegro is a transit hub for arms trafficking, with weapons flowing through the country from Bosnia and Herzegovina to Kosovo and subsequently to Western Europe. The market is dominated by notorious organized

crime groups, such as the Kava² and Škaljari clans, as well as state-embedded actors. These groups procure illegal firearms for various criminal activities, including drug trafficking, extortion and conflicts between gangs. Smuggling methods range from concealing firearms among legal goods to modifying readily available items into weapons suitable for criminal use. Despite some government initiatives, including international collaboration to destroy seized weapons, arms-related crimes remain prevalent, with Montenegro recording one of the highest rates of firearm incidents in the region.

The trade in counterfeit goods is driven by demand from both local consumers and tourists, with most counterfeit items originating from Türkiye and China. While law enforcement has intensified market inspections and customs controls, the online sale of counterfeit goods presents new challenges. Montenegro primarily serves as a destination market for counterfeit branded merchandise, including clothing, accessories and pirated optical media.

Montenegro remains a significant player in the illicit trade of excise goods, particularly tobacco. Smuggling operations have historically benefited from corruption within law enforcement, resulting in high-profile arrests, including that of a former head of the Revenue and Customs Administration. The Port of Bar serves as a key hub for cigarette smuggling into Europe. While government efforts have led to a decline in the illicit cigarette market share, transnational smuggling networks continue to exploit Montenegro's strategic location, making it one of the primary origin points for seized cigarettes worldwide, alongside the UAE and Türkiye.

ENVIRONMENT

Illegal logging in Montenegro is a well-organized criminal market, facilitated by corruption within the relevant authorities and lenient enforcement policies. The market is dominantly domestic, with illegally harvested wood used for heating, while small quantities are exported to the EU. Abuses of the concession system enable private companies to exceed quotas or engage in fraudulent documentation, thereby misrepresenting illegal logging as a legitimate activity. The state's limited enforcement capacity has led to a lack of prosecutions and inadequate penalties.

Wildlife crimes, including poaching and the illegal trade in protected species, continue to be prevalent. Reports of illegal killings of griffon vultures, bears and pelicans highlight ongoing challenges in conservation efforts. Montenegro also serves as a transit hub for wildlife smuggling, with exotic species such as birds, big cats, monkeys and tropical reptiles being trafficked to the EU. The criminal market operates

on both domestic and transnational levels, with many animals exported to the EU through Croatia, particularly through the Debeli Brijeg border crossing. The absence of proper enforcement mechanisms and weak inter-agency coordination exacerbate these issues.

Non-renewable resource crimes, particularly the illicit extraction of gravel and sand, continue to pose significant environmental and economic risks. Despite efforts to regulate excavation, illegal operations persist, often involving private-sector actors and foreign entities. Recent allegations also suggest the complicity of state-embedded actors, specifically in the illicit extraction of gravel. Although less widespread, fuel smuggling has been linked to transnational networks operating between Montenegro, Albania and Libya.

DRUGS

The heroin trade in Montenegro is predominantly transnational, with the country serving as a transit point for heroin trafficked from Iran, Pakistan and Türkiye. Local demand for heroin is relatively low, and seizures tend to be small, though occasional large-scale busts highlight the continued presence of established smuggling routes. Law enforcement bodies have reported an increased presence of unregistered psychoactive substances, including fentanyl, which raises concerns about potential shifts in the drug market.

Montenegro is deeply entangled in the global cocaine trade, with local criminal groups such as the Kavač and Škaljari clans playing a significant role in smuggling cocaine from South America to Europe. The Port of Bar has been implicated in several large-scale cocaine shipments. Despite occasional high-profile arrests, the market remains highly lucrative, with drug profits laundered through real estate and hospitality investments along the Adriatic coast. Internal conflicts within Montenegrin crime groups have led to violent clashes both domestically and internationally, demonstrating the high stakes of the cocaine trade.

Cannabis trafficking continues to be a well-established market, with Montenegro primarily serving as a transit country for Albanian-produced cannabis headed for the EU. Local cultivation has been observed in border regions, and law enforcement institutions have documented significant seizures. Reports indicate that there is a potential increase in cannabis smuggling through the Port of Bar, raising concerns over evolving trafficking routes.

The synthetic drug trade in Montenegro is relatively small but is experiencing growth, evidenced by a notable increase in the seizure of synthetic drugs. The market is closely linked to cocaine and heroin trafficking, with synthetic drugs primarily entering Montenegro from Western Europe through Serbia. Consumption spikes during the summer months, particularly in tourist areas. A limited government response and weak

monitoring mechanisms hinder efforts to address emerging threats, such as the distribution of fentanyl.

CYBER-DEPENDENT CRIMES

Montenegro has experienced a rise in cyber-dependent crimes, with foreign actors targeting government systems and financial institutions. Ransomware and Distributed Denial of Service (DDoS) attacks as well as cryptocurrency-related fraud are prevalent forms of cyber-dependent crimes seen in the country. A series of cyberattacks in recent years has disrupted state services, leaving authorities struggling to restore full system functionality. These historic attacks led to governmental efforts to strengthen its cyber capabilities; however, Montenegro's cybersecurity infrastructure remains inadequate. The shortage of skilled personnel and limited investment in cybersecurity measures have rendered government institutions particularly vulnerable.

FINANCIAL CRIMES

Financial crime in Montenegro is deeply entrenched, characterized by the mismanagement of public funds, irregularities in political financing and large-scale corruption. The procurement sector remains particularly vulnerable. The misuse of EU funds and fraudulent privatization schemes further highlight the systemic vulnerabilities within the financial sector. The ongoing prevalence of financial crime in Montenegro underscores the broader challenge of institutional corruption, which continues to impede the country's efforts to combat organized crime effectively.

CRIMINAL ACTORS

Montenegro is home to two dominant mafia-style groups: the Kavač and Škaljari clans, which maintain significant influence within the country's criminal landscape. While they do not control territories outright, their operations extend across Montenegro and into other countries, where members frequently seek refuge from law enforcement. Despite intensified efforts by law enforcement bodies, including the arrest of key figures, these groups continue to exert control over criminal markets by actively recruiting new members, even within the prison system. The primary sources of income for these clans are cocaine trafficking and money laundering, with Europol estimating that they control at least 30% of the cocaine trade from Latin America to Europe. Their extensive financial holdings, including substantial real estate investments in Bosnia and Herzegovina, further illustrate their economic power. Additionally, they engage in extortion and racketeering, employing violence and intimidation to secure their criminal enterprises. These activities have fuelled ongoing conflicts between the two clans, leading to a surge in homicides.

Criminal networks in Montenegro, concentrated in coastal and border areas near Albania and Serbia, operate with moderate levels of violence. Groups based in Budva, Bar, Berane and Mojkovac play key roles in international drug trafficking and are connected to the broader Balkan cartel, a transnational alliance of criminal groups from across the region. Unlike mafia-style organizations, these networks rely less on direct control and more on political connections that grant them relative impunity. Leaked encrypted communications have revealed how criminal proceeds are used to secure political protection and influence the judiciary and law enforcement. Recent reports identified several high-risk groups, each with dozens of members, primarily engaged in cocaine trafficking and collaborating with other Western Balkan networks to distribute drugs across Europe.

State-embedded actors in Montenegro maintain deep-rooted connections to organized crime, facilitating illicit activities through corruption and regulatory weaknesses. High-ranking officials have been implicated in significant transnational crimes, including drug trafficking, illicit tobacco trade and illegal logging. Despite ongoing investigations and arrests, the persistent involvement of state officials in these markets undermines law enforcement efforts. Notable cases include the prosecution of high-ranking law enforcement and judicial officials for alleged connections to notorious organized crime groups, underscoring ongoing concerns about corruption and the influence of criminal networks within state institutions. The systemic nature of corruption extends beyond law enforcement, with former high-ranking officials implicated in financial crimes. In 2024, transcripts from encrypted communications revealed the involvement of criminal groups in Montenegro's electoral processes, exposing illegal funding of political campaigns and political protection in exchange for financial incentives.

Foreign criminal actors play a significant role in Montenegro's organized crime landscape, with increasing cooperation between local and international groups. Major clans maintain strong ties with criminal organizations in the EU, Latin America and the broader Western Balkans, particularly through drug trafficking networks. Port cities such as Bar and Kotor serve as key entry points for illicit drug shipments, attracting foreign actors involved in cocaine trafficking. In addition to drug smuggling, foreign actors have been active in human trafficking, particularly Turkish criminal groups that facilitate the transit of migrants through Montenegro to Western Europe. These networks exploit legal loopholes, using transit visas and temporary residence permits to create pathways for irregular migration. Recent reports have highlighted the growing presence of foreign criminal organizations from Türkiye, Georgia, Russia and Eastern Europe, underscoring Montenegro's increasing involvement in transnational organized crime networks.

The private sector in Montenegro is a key enabler of organized crime, particularly through real estate investments and financial crimes. According to recent reports, real estate has become the primary vehicle for money laundering, with illicit proceeds from drug trafficking and corruption funnelled into high-value properties. Business owners often engage in bribery to secure favourable regulatory conditions, while foreign investors seek to establish political connections to facilitate their business operations. While there is no evidence that criminal organizations entirely control any specific private-sector industry, corruption within the private sector allows these criminal groups to operate with minimal oversight. Cases of financial mismanagement, such as fraudulent privatization schemes and the misuse of EU funds, further highlight the systemic vulnerabilities that enable illicit financial flows. Despite efforts to improve regulatory oversight, Montenegro's private sector remains susceptible to exploitation by organized crime networks.

RESILIENCE

LEADERSHIP AND GOVERNANCE

Montenegro has experienced political instability over the past two years, with the formation of a new government in October 2023 after prolonged negotiations. The coalition government has pledged to prioritize EU integration, NATO membership and regional cooperation. However, despite commitments to combat organized crime and corruption, political divisions continue to hinder effective governance and legislative reforms. While there have been notable arrests of high-profile figures linked to organized crime, concerns remain regarding the sustainability of these efforts, given Montenegro's history of corruption

and political interference. In 2024, Montenegro's EU accession process advanced with the adoption of an Interim Benchmark Assessment Report, which confirmed the country's compliance with judicial and anti-corruption benchmarks. This development resulted in the unfreezing of Montenegro's EU accession negotiations. Nevertheless, domestic critics have raised concerns regarding the quality of the implemented reforms, arguing that legislative amendments lacked sufficient consultation and may not lead to long-term systemic improvements.

Montenegro's transparency and accountability mechanisms have demonstrated mixed progress. Initiatives such as the establishment of a National Council for the Fight Against Corruption and a registry for ultimate beneficial ownership reflect efforts to enhance transparency. Yet, the effectiveness of these initiatives remains in question due to ongoing governance gaps. Furthermore, the Parliament has yet to adopt amendments to the Law on access to information that could significantly increase space and opportunity for civil control over Government operations. The Anti-Corruption Agency, despite showing some improvements, continues to face political influence and operational limitations.

Montenegro has strengthened its international cooperation by engaging with Europol, INTERPOL and regional law enforcement agencies. The country has participated in various EU-funded initiatives aimed at combating organized crime, arms trafficking and human trafficking. Montenegro has demonstrated compliance with extradition agreements, successfully extraditing several high-profile criminal suspects in 2023 and 2024. Additionally, through collaboration with UNODC, the country receives support for legislative reforms, financial investigations, international cooperation and strengthening anti-corruption institutions. However, issues related to state capture and political instability continue to pose challenges to effective cross-border cooperation.

Montenegro has established a legal framework to combat various forms of organized crime. Recent legislative reforms have aligned national laws with EU directives, thereby improving compliance with international standards. However, enforcement remains inconsistent, and gaps persist in implementation, particularly regarding asset recovery and financial transparency regulations. Amendments to anti-corruption and criminal procedure laws have aimed to enhance prosecutorial efficiency; however, their practical impact has been undermined by limited institutional capacity and ongoing political interference.

CRIMINAL JUSTICE AND SECURITY

Montenegro's judicial system continues to face significant challenges, including limited resources, corruption, inefficiency, political interference and persistent case backlogs. While previous constitutional reforms enhanced judicial independence, their enforcement remains weak. The judiciary has made some progress in prosecuting organized crime and corruption, as reflected in a rise in convictions in recent years. However, reforms have not addressed gaps in the disciplinary and ethical framework for judges and prosecutors. Although the Prosecutor's Council created a commission to handle complaints about threats to independence, the ethical commission acts only reactively on complaints and does not proactively monitor compliance with ethical standards. Lenient sentencing and prolonged trials further undermine the effectiveness of legal proceedings. The system also struggles with inconsistent

enforcement of asset declarations among judges and prosecutors. Detention conditions remain substandard, with reports of regular abuse by corrections officers and a high percentage of the prison population held in pre-trial detention.

Law enforcement in Montenegro has undergone structural changes, leading to enhanced cooperation between police and prosecution offices. The Special Prosecution Office has achieved notable successes in targeting organized crime, securing budget increases and additional personnel. However, several weaknesses persist, including underfunding, staffing shortages, insufficient specialized training and political interference in police leadership. The dismissal of police officials in recent years has sparked controversy, raising concerns about procedural irregularities and the political motivations behind these decisions. Additionally, Montenegro has also faced criticism for its limited implementation of intelligence-led policing, as most investigations remain reactive rather than proactive.

Border security continues to pose a challenge, with Montenegro serving as a key transit point for various illicit activities. The country has taken steps to enhance border management through joint patrols and enhanced collaboration with Frontex. However, critical gaps in staffing, surveillance infrastructure and monitoring capabilities remain. Despite some improvements, smuggling activities, particularly in the illicit tobacco trade and drug trafficking, continue to exploit weaknesses in border controls.

ECONOMIC AND FINANCIAL ENVIRONMENT

Montenegro's anti-money laundering (AML) framework has improved in recent years, yet enforcement remains inconsistent. The country's financial intelligence unit has undergone multiple restructurings, which have impacted its stability and operational effectiveness. Despite legislative reforms that align with international AML standards, challenges persist in asset seizures, financial investigations and prosecution rates for money laundering cases. Recently, organized crime groups have increasingly exploited regulatory gaps in digital assets, complicating asset traceability. High-profile acquittals in money laundering cases have raised concerns about judicial independence and the quality of investigations.

Montenegro's economic regulatory environment exhibits structural weaknesses, particularly in transparency and oversight mechanisms. While macroeconomic indicators have shown signs of improvement, the country remains vulnerable to illicit financial flows due to regulatory gaps in real estate investment and cryptocurrency transactions. The government has taken steps to modernize tax regulations and enhance corporate governance; however, political instability has delayed key economic reforms.

CIVIL SOCIETY AND SOCIAL PROTECTION

Victim and witness support services in Montenegro are still underdeveloped. Despite increased efforts to identify victims, the role of law enforcement in screening and assisting them remains limited, with NGOs and international organizations often filling the gap. The country lacks a comprehensive witness protection programme, and the quality of legal aid for trafficking victims varies. While Montenegro has made progress in aligning its legal framework with international standards, the implementation of victim compensation laws is still pending. Additionally, allegations of mismanagement in NGO-run shelters have further highlighted deficiencies in the victim support infrastructure.

Preventive measures against organized crime and corruption in Montenegro lack cohesion. The country has not adopted a comprehensive anti-corruption strategy in recent years, and legislative amendments addressing corruption, organized crime and human trafficking remain fragmented. The Anti-Corruption Agency is involved in whistle-blower protection and public interest cases, but its effectiveness is limited by political influence and inconsistencies in enforcement.

Montenegro's civil society sector plays a vital role in investigating corruption and organized crime, with NGOs and investigative journalists frequently uncovering high-profile cases. However, the operating environment for civil society remains challenging due to government scrutiny, inadequate legal protections, and economic pressures that limit media independence. While Montenegro has shown improvements in press freedom rankings, concerns remain over political interference, journalist safety and disinformation campaigns.

This summary was funded in part by a grant from the United States Department of State. The opinions, findings and conclusions stated herein are those of the authors and do not necessarily reflect those of the United States Department of State.