



## **CIRCULAR ECONOMY**

# **PROPOSAL OF CIRCULAR ECONOMY ACTIONS FOR MONTENEGRO**

**EU 4 Green Recovery:**

**Support the implementation of the Green Agenda for the Western Balkans**

IPA/2021/429-949

Deliverable WP1-02 Support national circular economy implementation actions

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# EXECUTIVE SUMMARY

The Chamber of Economy of Montenegro, with support from UNDP, published a *Roadmap towards Circular Economy (CE Roadmap)* that outlines global challenges and trends, the current state of play in Montenegro, and a strategic direction for the transition towards a CE. It recommends **34 action areas** across public policy, circular business models and culture. The Roadmap served as a starting point for the *National Strategy for Circular Transition until 2030 (NSCT2030)*, which includes a *CE Action Plan 2023–2024* with **60 activities**. Implementation is ongoing, with evaluation and update scheduled for 2025.

The EU4Green project supported this update process of the Action Plan between September 2024 and February 2025, in cooperation with the Ministry of Ecology, Sustainable Development and Northern Region Development<sup>1</sup>, Ministry of Economic Development<sup>2</sup>, the Chamber of Economy, and local experts. A **CE Working Group (WG)** was established to govern and monitor the process, with a focus on **new circular business models** and **extended producer responsibility (EPR)**. The WG coordinated the identification of actionable CE measures and potential next steps for strengthening Montenegro's CE ecosystem.

To identify the actionable CE measures a **public online survey** was conducted (Nov 2024 – Jan 2025) and sent to 400 companies. With a response rate of only 7.5%, the survey indicated limited familiarity with CE and EPR among businesses. 43 percent of respondents were not aware of existing EPR legislation, half did not know which products fall under EPR, and only 20 % stated that they are obliged to participate. Companies consistently pointed to the need for campaigns, workshops, trainings, awareness raising, and stronger institutional support to create enabling conditions for CE and EPR implementation.

Based on survey results and Working Group discussions, 15 actionable CE measures were identified. They cover four main areas: 1) Education, Training and Capacity Building, (2) Support and Funding Programs, (3) Awareness and Public Engagement, and (4) Collaboration & Recognition. These measures, together with the results of the ongoing evaluation of the current Action Plan, served as input for the upcoming CE Action Plan 2025 update.

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<sup>1</sup> formerly Ministry of Ecology, Spatial planning and Urbanism

<sup>2</sup> Formerly Ministry of Economic Development and Tourism

# 1. INTRODUCTION

## 1.1. Background

The Chamber of Economy of Montenegro, supported by United Nations Development Programme (UNDP) published a Roadmap towards Circular Economy (briefly called **CE Roadmap**) in Montenegro<sup>3</sup>. The CE Roadmap gives a brief overview of global challenges and trends of CE, focused on the current state of play in Montenegro and outlines a strategic direction for the transition towards a CE in Montenegro. Finally, the CE Roadmap recommends 34 action areas related to public policy (e.g. harmonization of a legal framework), circular business models (e.g. focus on circular design) and culture (e.g. encouraging a circular lifestyle). The CE Roadmap was used as starting point to develop the **National Strategy for Circular Transition until 2023 (NSCT2030)**<sup>4</sup>. The NSCT2030 is governed by the Ministry of Economic Development<sup>5</sup> (MEK) and includes a **CE Action Plan 2023-2024** with 60 individual activities. The implementation of the 60 activities is ongoing, and an evaluation and update of the CE Action Plan is scheduled for 2025.

## 1.2. Aim and scope of EU4Green support

The project's aim was to support the **update of the CE Action Plan in 2025**. In detail, the Ministry of Ecology, Sustainable Development and Northern Region Development<sup>6</sup> (MERS) and MEK needed support to identify new CE activities (new, circular business models, EPR and waste management), done via establishment of a CE working group (WG) and to produce a list of actionable CE Measures in Montenegro. The CE WG decided to focus on new circular business models and extended producer responsibilities.

The results of this support shall be used as an input for the update of CE Action Plan in 2025. It is noted that Montenegro will also take the results from the evaluation of the existing CE Action Plan into account and will consider CE actions beyond new circular business models and EPR. It is also noted that further consultation and official approval processes are beyond the EU4Green mandate and solely under responsibility of MERS and MEK.

## 1.3. Approach

The undertaking is a jointly coordinated and implemented by MERS and MEK, the Chamber of Economy and EU4Green expert staff. Additionally, E3Consulting has been selected to support the implementation as a local expert.

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<sup>3</sup> Chamber of Economy of Montenegro, UNDP (2022), Roadmap towards Circular Economy. Retrieved at 13.06.2024, retrieved from <https://www.privrednakomora.me>

<sup>4</sup>Ministry of Economic Development and Tourism (2022). National strategy for circular transition until 2030 including Action Plan 2023-2024, Podgorica. Retrieved at 3.7.2024, retrieved from <https://www.gov.me/>.

<sup>5</sup> Formerly Ministry of Economic Development and Tourism

<sup>6</sup> formerly Ministry of Ecology, Spatial planning and Urbanism

The EU4Green project supported the Ministries in the following tasks:

1. Establishment of CE Working Group in Montenegro in order to govern and monitor the implementation of the EU4Green activity – described in 2.1
2. Identification of actionable CE measures - described in Chapter 2.2
3. Identification potential next steps - described in Chapter 2.3.

The period of implementation was September 2024 to February 2025.

## 2. METHODOLOGY

### 2.1. Establishment of CE Working Group

A EU4Green CE Working Group has been installed to govern and monitor the implementation of the EU4Green activity. The CE Working Group was governed by MERS. The members were the following:

- Ružica Brnovic (Coordinator for Circular Economy, MERS)
- Sanja Varajic (Coordinator for Circular Economy, MEK)
- Milena Rmuš (Chamber of Economy)
- Ulrich Kral (EU4Green Circular Economy Coordinator, EAA).

### 2.2. Identification of actionable CE measures

This task aimed to develop a list of actionable circular economy (CE) measures for Montenegro, aligned with the 34 action areas of the national CE Roadmap. Key stakeholders involved in the identification process included policymakers, authorities, businesses, academia, and civil society. The measures addressed both sector-specific and cross-cutting issues across the entire value chain, with particular attention to new circular business models, extended producer responsibility (EPR) systems, and waste management.

The development process followed these key steps:

1. **Public Online Survey:** An open online survey in Montenegrin was launched to collect CE measure proposals from a wide audience. CE Working Group members supported its distribution to relevant target groups. The responses were translated into English, duplicates were removed, and similar proposals were clustered into a consolidated list.
2. **Feasibility Screening:** The consolidated measures were assessed against viability criteria (e.g. legal feasibility) as defined in Tool #16 of the Better Regulation Toolbox<sup>7</sup>. The assessment results were reviewed by the CE WG and its comments were considered. CE measure that failed to meet at least one viability criteria were categorized as

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<sup>7</sup> European Commission (2023). Better regulation toolbox. Retrieved at 30.07.2025, retrieved from [https://commission.europa.eu/law/law-making-process/better-regulation/better-regulation-guidelines-and-toolbox\\_en](https://commission.europa.eu/law/law-making-process/better-regulation/better-regulation-guidelines-and-toolbox_en)

“non-viable CE measures” and have not been further considered. This resulted in a list of feasible CE measures.

3. **Specification of Measures:** Each viable measure was then described in more detail, including key implementation parameters such as financial effort, timeline, policy instrument, responsible actors, target groups, and expected outcomes.

## 2.3. Identification of follow up activities

The findings of the EU4Green activity and discussions among CE WG members have been used to identify potential follow up activities. It is a non-exhaustive list of options to draw a landscape on enhance the CE ecosystem in Montenegro.

# 3. RESULTS

## 3.1. Survey

The survey was conducted in the period from end of November 2024 until end of January 2025. The questionnaire was developed in cooperation with the Ministry of Ecology, Sustainable Development and Northern Region Development, Ministry of Economic Development, Chamber of Economy and representatives of the EU4Green project. The Chamber of Economy was in charge of disseminating the questionnaire. The total number of companies to which the survey was sent is 400, whereby all the companies were contacted via email (4 times) and via phone (2 times each). However, majority of the companies did not participate in the survey, due to the fact that the topic of EPR is not familiar to them, and they instantly stated that they do not have the interest to take part in the survey. Additionally, some companies rejected participation due to the fact that the end of the year required them to allocate their resources to other company activities, and they did not have the time to take part in the survey, albeit they were contacted again in January.

The response rate of 7,5% indicates a low interest in the topic and survey is the first indicator of the lack of familiarity of the private sector with the topic of EPR, as well as circular economy. This is further supported by the survey results, according to which 43 % of the surveyed companies stated that they are not familiar with the EPR legislation, whereby 50% of the respondents are not even familiar with the products which fall under the scope of the EPR system. Additionally, 20 % of the surveyed companies stated that their companies are obliged to participate in the EPR system.

The main requirements defined by the companies, in relation to bridging the gaps to implementation EPR are related to the following: implementation of dedicated campaigns, workshops, trainings, awareness raising activities and support programmes dedicated to EPR and circular economy. The companies believe that they lack institutional support. They expect the relevant ministries to take initiative and to create the necessary preconditions for the implementation of EPR. This includes establishing a stimulating and comprehensive environment for implementation of the system, which shall be done through implementation of the abovementioned activities. Moreover, the companies are not fully familiar with the existing

opportunities on the market and waste management, recycling and circular economy facilities, thereby they also request additional institutional support in identifying and using these resources.

Detailed survey results are presented in Annex 6.2, and the outputs of the survey were used for identification of actionable measures and the relevant parameters (see chapter 3.2). The final list of actionable measures, and the accompanying guidance for implementation, have been further discussed with the relevant ministries, as they are going to be in charge of developing and implementing the relevant activities, in accordance with their current implementation plans.

### **3.2. Actionable CE measures**

The identified 15 actionable measures have been clustered in four different categories:

- Education Training and Capacity Building focuses on knowledge development, practical skills and legal understanding (Figure 1).
- Support and Fundings programmes provide tailored assistance, infrastructure support and financial incentives for CE and EPR.
- Awareness and Public Engagement encompasses behavioural changes and communication with citizens.
- Collaboration and recognition consist of stakeholder involvement and incentives, as well as collaboration and recognition.

**Figure 1: Actionable CE measures**

<p style="text-align: center;"><b>Education, Training and Capacity Building</b></p> <ol style="list-style-type: none"> <li>1. Training on legal provisions</li> <li>2. Development of informational guides</li> <li>3. Organisation of practical trainings</li> <li>4. Organisation of workshops</li> <li>5. Implementation of educational course</li> </ol>	<p style="text-align: center;"><b>Support and Funding Programs</b></p> <ol style="list-style-type: none"> <li>6. Development of tailored support programs for EPR</li> <li>7. Development of tailored support programs for circular economy</li> <li>8. Development of programs for assistance for improvement of sustainable waste management infrastructure</li> <li>12. Development of subsidies program for circular economy</li> <li>13. Development of subsidies program for EPR</li> </ol>
<p style="text-align: center;"><b>Awareness and Public Engagement</b></p> <ol style="list-style-type: none"> <li>9. Development and implementation of awareness raising campaigns about EPR</li> <li>10. Development and implementation of awareness raising campaigns about Circular Economy</li> <li>11. Development and implementation of awareness raising campaigns about recycling</li> </ol>	<p style="text-align: center;"><b>Collaboration &amp; Recognition</b></p> <ol style="list-style-type: none"> <li>14. Establishment of cooperation with national private funds</li> <li>15. Establishment of annual awards for companies</li> </ol>

The implementation horizon for the measures varies between one and two years. The target group of the first two clusters, and the last one are private companies with national impact. The Awareness and Public engagement cluster also focuses on private companies as well as the general public. Detailed summary of action parameters can be seen in the Annex (Chapter 5.4Action parameters).

## 4. OUTLOOK

The EU4Green intervention in Montenegro formed a CE Working Group with members from the Ministry of Ecology, Sustainable Development and Northern Region Development (MERS), Ministry of Economic Development and the Chamber of Economy of Montenegro. The CE Working Group governed the implementation of the EU4Green activity. The collaboration across different institutions was a clear advantage. Montenegro might institutionalise the CE Working Group and invite additional experts from ministries and private sector to become a member.

The EU4Green intervention identified 15 viable CE Actions in the area of new business models and Extended Producer Responsibility (EPR) schemes. The findings act as input for the upcoming CE Action Plan 2025-2026.

During this work it became clear that Montenegro needed additional support in order to evaluate the CE Action Plan 2023-2024 and to identify additional CE measures for the upcoming CE Action Plan 2025-2026 beyond the scope of the EU4Green activity. Against this background, Montenegro request for the support in the preparation of the CE Action Plan implementation report from the EU4Green Project.

## 5. ANNEX

### 5.1. Survey results – Statistical report

#### 1. Sector of activity

	Frequency	Percent	Valid Percent	Cumulative Percent
Accounting, bookkeeping and auditing activities; tax consultancy	2	6.7	6.7	6.7
Agriculture	1	3.3	3.3	10.0
Agriculture - production of meat and processed products	1	3.3	3.3	13.3
Business and other management consultancy activities	2	6.7	6.7	20.0
Collection of hazardous waste	1	3.3	3.3	23.3
Engineering activities and related technical consultancy	1	3.3	3.3	26.7
Holiday and other short-term accommodation	1	3.3	3.3	30.0
Human health and social work activities	1	3.3	3.3	33.3
Not disclosed	9	30.0	30.0	63.3
Other financial service activities, except insurance and pension funding n.e.c.	1	3.3	3.3	66.7
Other information service activities n.e.c.	1	3.3	3.3	70.0
Other transportation support activities	1	3.3	3.3	73.3
Promotion and protection of interest of employers	1	3.3	3.3	76.7
Remediation activities and other waste management services	1	3.3	3.3	80.0
Renting and operating of own or leased real estate	1	3.3	3.3	83.3
Technical testing and analysis	2	6.7	6.7	90.0
Tourism and hospitality	1	3.3	3.3	93.3
Wholesale and retail trade - Import and distribution of packaging and end-of-line packaging	1	3.3	3.3	96.7
Wholesale of dairy products	1	3.3	3.3	100.0
Total	30	100.0	100.0	

#### 2. Is your company familiar with legislation related to EPR in Montenegro

	Frequency	Percent	Valid Percent	Cumulative Percent
No	13	43.3	43.3	43.3
Yes	17	56.7	56.7	100.0
Total	30	100.0	100.0	

**3. Do you know which products are subject to EPR according to the Waste Management Law?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	15	50.0	50.0	50.0
Yes	15	50.0	50.0	100.0
Total	30	100.0	100.0	

**4. Is your company subject to EPR obligations?**

	Frequency	Percent	Valid Percent	Cumulative Percent
Don't know	6	20.0	20.0	20.0
No	17	56.7	56.7	76.7
We have still not set up all the processes for analysis of the commitments. It is highly likely that we are not subject to the requirements	1	3.3	3.3	80.0
Yes	6	20.0	20.0	100.0
Total	30	100.0	100.0	

**5. If response to the previous question is yes, please indicate your role in the EPR system**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	24	80.0	80.0	80.0
Import/distribution of products	3	10.0	10.0	90.0
Waste collection	1	3.3	3.3	93.3
Waste producer	2	6.7	6.7	100.0
Total	30	100.0	100.0	

**6. What are the types of products and/or materials in your company that EPR responsibilities can be applied to?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	7	23.3	23.3	23.3
Batteries, printer cartridges, packaging, plastic products, and we already recycle all these products	1	3.3	3.3	26.7
Don't know	4	13.3	13.3	40.0
Electrical and electronic equipment, batteries, packaging	2	6.7	6.7	46.7
Electronic waste, tires, packaging, plastic packaging	1	3.3	3.3	50.0
Electronic waste, tires, plastic packaging	1	3.3	3.3	53.3
Glass packaging	1	3.3	3.3	56.7
Most probably, office supplies packaging and paper	1	3.3	3.3	60.0
Not applicable to the company	2	6.7	6.7	66.7
Organic waste and cardboard packaging	1	3.3	3.3	70.0
Paper	1	3.3	3.3	73.3
Paper and plastic bags, cardboard packaging	1	3.3	3.3	76.7
Paper, plastics	3	10.0	10.0	86.7
Plastics, cardboard, nylon	1	3.3	3.3	90.0
The products which are a direct result of our activities, primarily promotional material, electronic equipment and devices we are using	1	3.3	3.3	93.3

	Frequency	Percent	Valid Percent	Cumulative Percent
Tires, electrical and electronic waste, packaging, batteries, vehicles	1	3.3	3.3	96.7
We are not engaged in production activities, but there are products which can be recycled	1	3.3	3.3	100.0
Total	30	100.0	100.0	

### 7. Does your company have a waste management strategy?

	Frequency	Percent	Valid Percent	Cumulative Percent
No	18	60.0	60.0	60.0
Not yet, because we have not yet reached requirements for mandatory development of the plan	1	3.3	3.3	63.3
We are expecting to receive detailed instructions from the competent authorities	1	3.3	3.3	66.7
We hand over chemical waste to the only authorized legal entity for the export of such waste. Specifically, this is related to chemical waste from research.	1	3.3	3.3	70.0
Yes	9	30.0	30.0	100.0
Total	30	100.0	100.0	

### 8. What type of activities is your company implementing in relation to recycling and/or sustainable use of resources?

	Frequency	Percent	Valid Percent	Cumulative Percent
Energy efficiency	1	3.3	3.3	3.3
Energy efficiency, resource efficiency, re-use of products	1	3.3	3.3	6.7
EPR	1	3.3	3.3	10.0
None	1	3.3	3.3	13.3
Re-use of products	1	3.3	3.3	16.7
Recycling	2	6.7	6.7	23.3
Recycling, energy efficiency	1	3.3	3.3	26.7
Resource efficiency	2	6.7	6.7	33.3
Waste separation	4	13.3	13.3	46.7
Waste separation, energy efficiency	1	3.3	3.3	50.0
Waste separation, energy efficiency, re-use of products	1	3.3	3.3	53.3
Waste separation, re-use of products, energy efficiency	1	3.3	3.3	56.7
Waste separation, recycling	1	3.3	3.3	60.0
Waste separation, recycling, energy efficiency	2	6.7	6.7	66.7
Waste separation, recycling, energy efficiency, EPR	1	3.3	3.3	70.0
Waste separation, recycling, re-use of products	1	3.3	3.3	73.3
Waste separation, recycling, re-use of products, energy efficiency	3	10.0	10.0	83.3
Waste separation, recycling, resource efficiency, re-use of products, energy efficiency, EPR	1	3.3	3.3	86.7
Waste separation, resource efficiency, energy efficiency, ERP starting in 2025	1	3.3	3.3	90.0

	Frequency	Percent	Valid Percent	Cumulative Percent
Waste separation, waste disposal at landfill	1	3.3	3.3	93.3
We do not have activities related to recycling	2	6.7	6.7	100.0
Total	30	100.0	100.0	

**9. List any other programs for recycling and/or sustainable use of resources you are planning to implement**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	16	53.3	53.3	53.3
As part of the improvement of the waste zone, we plan to introduce a composting program and install a press baler/container. We also plan to expand our fleet with specialized vehicles.	1	3.3	3.3	56.7
Our company is fully committed to the valorization of all components from waste materials, giving them a new purpose through recycling processes.	1	3.3	3.3	60.0
Raising awareness about the importance of recycling among employees in the workplace.	1	3.3	3.3	63.3
Recycling	1	3.3	3.3	66.7
Reduction of the amount of waste	1	3.3	3.3	70.0
Treatment of construction waste, mechanical processing of tires, utilization of landfill gas for energy purposes, and potential construction of a waste incineration plant.	1	3.3	3.3	73.3
Waste separation and re-use of products	3	10.0	10.0	83.3
Wastewater treatment system	1	3.3	3.3	86.7
We are expecting to receive detailed instructions from the competent authorities	1	3.3	3.3	90.0
We are handing over waste to the recycling centre	1	3.3	3.3	93.3
We are only taking paper to the recycling centre	1	3.3	3.3	96.7
We have eliminated single-use plastic products, installed solar panels on the roof, monitor electricity and water consumption, use well water first before switching to municipal supply, and operate the laundry during the night shift to reduce electricity consumption.	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**10. How does your company collect and/or process end-of-life products?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	10	33.3	33.3	33.3
A part of waste is re-used, and the rest is handed over to the authorised companies	1	3.3	3.3	36.7

	Frequency	Percent	Valid Percent	Cumulative Percent
Products at the end of their life cycle are collected and delivered to "Deponija", the authorised landfill	2	6.7	6.7	43.3
Products past their expiration date (food) are destroyed at the local landfill, in accordance with the law, while packaging waste generated during handling, storage, and distribution is sorted and handed over to the local operator for further treatment (recycling). Pharmaceutical waste is handed over to the authorized company Hemosan for further treatment, in accordance with the law.	1	3.3	3.3	46.7
Separate segregation of recyclable components in specially designed containers.	1	3.3	3.3	50.0
Since our activities do not include manufacturing/production, we do not collect products	1	3.3	3.3	53.3
So far, we have not organised this system	1	3.3	3.3	56.7
Some of it is reused, while the rest is handed over to authorized companies.	1	3.3	3.3	60.0
The relationship regarding municipal waste is in accordance with the existing system in Montenegro, i.e. there is no separation. An exception is EEE waste, which is sent separately to recycling yards, and chemical waste, which is exported through an authorized company.	1	3.3	3.3	63.3
They are handed over to the recycling centre	2	6.7	6.7	70.0
Waste is sent for recycling to recycling centres	1	3.3	3.3	73.3
Waste separation	1	3.3	3.3	76.7
Waste separation and recycling	1	3.3	3.3	80.0
We contact partners for replacement or additional payment for a new device, or the devices are given as gifts to some of the employees, etc.	1	3.3	3.3	83.3
We do not collect waste, nor do we separate it	1	3.3	3.3	86.7
We have a work unit that interacts with private and legal entities and we collect packaging material with or without compensation.	1	3.3	3.3	90.0
We haven't had many such products because all the equipment is new, and for now, they are still in stock.	1	3.3	3.3	93.3
We recycle products at the end of their life cycle – batteries, accumulators, electronic waste, etc. Additionally, at the site, we treat wastewater for reuse – a system for irrigation.	1	3.3	3.3	96.7
We separate the waste and take it to the recycling yard, where it is sorted and managed according to the appropriate category.	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**11. Does your company allocate financial resources for fulfillment of EPR responsibilities?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	1	3.3	3.3	3.3
In accordance with legal provisions	1	3.3	3.3	6.7
No	20	66.7	66.7	73.3
No, because we are not obligated to fulfill those requirements.	1	3.3	3.3	76.7
Not yet, but we will start allocating funds in accordance with the obligations set by the legal regulation from 2025.	1	3.3	3.3	80.0
Not yet. According to the new law, implementation of ERP will begin in about 2.5 years. We are still gathering more detailed information about this regulation.	1	3.3	3.3	83.3
We allocate funds for the procurement of products and equipment in a way that aligns with environmental protection principles and sustainable waste management. We do not directly fall under the EPR obligation.	1	3.3	3.3	86.7
Yes	4	13.3	13.3	100.0
Total	30	100.0	100.0	

**12. Describe readiness of your company to implement EPR responsibilities**

	Frequency	Percent	Valid Percent	Cumulative Percent
High readiness level: Everything is in place and operational	4	13.3	13.3	13.3
Low readiness level: We haven't started setting up internal processes to be EPR compliant	18	60.0	60.0	73.3
Medium readiness level: EPR processes are set up internally, not ready now but expected to be ready soon	8	26.7	26.7	100.0
Total	30	100.0	100.0	

**13. To what extent are your employees trained about the proper waste management and EPR? (1 being lowest, and 5 highest)**

	Frequency	Percent	Valid Percent	Cumulative Percent
1	13	43.3	43.3	43.3
2	2	6.7	6.7	50.0
3	6	20.0	20.0	70.0
4	6	20.0	20.0	90.0
5	3	10.0	10.0	100.0
Total	30	100.0	100.0	

**14. Do you cooperate with other companies, NGOs or state institutions in relation to waste management and EPR?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	17	56.7	56.7	56.7
Yes	13	43.3	43.3	100.0
Total	30	100.0	100.0	

**15. If the response to the previous question is "yes", describe your cooperation with other entities**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	18	60.0	60.0	60.0
As mentioned earlier, the mentioned work unit collects packaging material from institutions or carries out destruction if required by legal regulations (confidential documentation, old archives, etc.).	1	3.3	3.3	63.3
Cooperation with "Hemosan" and "Deponija"	2	6.7	6.7	70.0
Cooperation with relevant companies in the field of waste management.	1	3.3	3.3	73.3
Cooperation with the national institutions	1	3.3	3.3	76.7
Implementation of joint projects on topics related to waste management.	1	3.3	3.3	80.0
In the waste management process, we collaborate with authorized organizations regarding waste collection and recycling (Hemosan, Zeleni talas, Pretovarna stanica Komulano Kotor, Komunalno Tivat, Ekomedika d.o.o.).	1	3.3	3.3	83.3
Sale of secondary raw materials that other companies can recycle or use.	1	3.3	3.3	86.7
We are co-owners of the company Recomont, a waste management company.	1	3.3	3.3	90.0
We collaborate with the relevant Ministry, as well as with the Environmental Protection Agency, in terms of providing information on the conditions required for the implementation of EPR and the overall application of the new Waste Management Law.	1	3.3	3.3	93.3
We have actively participated in organizing eco-educational workshops for children and have also financially supported the work of NGOs through waste collection campaigns.	1	3.3	3.3	96.7
We invite companies responsible for collecting products for recycling.	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**16. Does your company use some ecolabels and/or eco certificates in relation to waste management?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	25	83.3	83.3	83.3
Yes	5	16.7	16.7	100.0
Total	30	100.0	100.0	

**17. If the response to the previous question is "yes", please list the certificates you have**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	25	83.3	83.3	83.3
Cleaner production	1	3.3	3.3	86.7

In accordance with the new Waste Management Law, we possess: an Integrated Permit, a waste processing permit, approval for collecting municipal waste, registration in the Waste Collectors Register, registration in the Waste Transporters Register, and registration in the Exporters of Non-Hazardous Waste Register.	1	3.3	3.3	90.0
ISO 14001	1	3.3	3.3	93.3
ISO 45001:2018, ISO50001:2018, ISO 14001:2015	1	3.3	3.3	96.7
We have the ISO 14001 certification, and all declarations feature the Mobius strip since the packaging of our products is recyclable.	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**18. In which ways does your company carry out education/training/awareness raising activities among consumers about the importance of EPR?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	5	16.7	16.7	16.7
By attending various workshops and conferences organized by the relevant ministry and NGOs working in this field.	1	3.3	3.3	20.0
By recommending interested clients to design products that are easier to recycle.	1	3.3	3.3	23.3
Currently, we are not focused on consumer education, considering that waste management at the national level is not yet aligned with the principle of extended producer responsibility. All of our products' labels feature a symbol indicating the possibility of recycling the packaging after product use.	1	3.3	3.3	26.7
Education through seminars, training, employee communication, online education (LinkedIn)...	1	3.3	3.3	30.0
Our company contributes to raising consumer awareness of the importance of EPR indirectly through our work with clients on ESG-related activities. In this regard, we promote responsible behavior, recycling, and sustainable resource management within the business community, aligning all activities with the principles of environmental protection, social responsibility, and corporate governance.	1	3.3	3.3	33.3
Product packaging from the EU already includes information on packaging treatment and recycling options.	1	3.3	3.3	36.7
Since we are not subject to reporting obligations and our activity is specific, employees currently ensure the implementation of EPR practices in accordance with their upbringing.	1	3.3	3.3	40.0

	Frequency	Percent	Valid Percent	Cumulative Percent
The introduction of the Extended Producer Responsibility (EPR) system marks an important step for Montenegro towards sustainable resource management and alignment with European standards, requiring manufacturers, importers, and distributors to take responsibility for the products they place on the market.	1	3.3	3.3	43.3
This is not applicable to our company	1	3.3	3.3	46.7
Through collaboration with our clients, we promote the basic principles of circular economy and sustainable development, and thus the aforementioned concept.	1	3.3	3.3	50.0
Through conversations	1	3.3	3.3	53.3
We are not doing any activities in this regard	3	10.0	10.0	63.3
We are not familiar with EPR	1	3.3	3.3	66.7
We are not familiar with EPR, so we do not conduct any training.	1	3.3	3.3	70.0
We are not familiar with the functioning of EPR. We need institutional support and education regarding it	1	3.3	3.3	73.3
We are not implementing activities in this regard, as we currently do not have any connection to the EPR programme	1	3.3	3.3	76.7
We are not implementing any activities in this regard	5	16.7	16.7	93.3
We have not yet focused on consumer education.	1	3.3	3.3	96.7
We haven't started preparing for this topic yet. We are currently focused on implementing the first part of the Waste Management Law.	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**19. Have you heard about some relevant experience from the region, i.e. testimonies about implementation of EPR?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	25	83.3	83.3	83.3
Yes	5	16.7	16.7	100.0
Total	30	100.0	100.0	

**20. If the response to the previous question is "yes", please describe**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	25	83.3	83.3	83.3
As part of implementation of the BEST project (IPA Serbia-Montenegro), a series of trainings on this topic were conducted by experienced experts from Serbia.	1	3.3	3.3	86.7
I am somewhat familiar with the situation in Serbia, as I have collaborated with a company that operates both there and in Montenegro, and is directly related to EPR, as well as the fact that the project we worked on was specifically focused on this topic.	1	3.3	3.3	90.0

	Frequency	Percent	Valid Percent	Cumulative Percent
Imlek Boka is a subsidiary of the parent company Imlek, so we are familiar with their experiences.	1	3.3	3.3	93.3
Through our business partners, we are familiar with the functioning of the extended producer responsibility system in Croatia and Slovenia.	1	3.3	3.3	96.7
We are familiar with the extended producer responsibility systems for waste in the region.	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**21. What type of information, training, education, assistance does your company and/or employees need in relation to EPR?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	5	16.7	16.7	16.7
An informational guide to begin with.	1	3.3	3.3	20.0
As previously mentioned, we are not related to the EPR system in any way.	1	3.3	3.3	23.3
Detailed training is needed for employees in this area.	1	3.3	3.3	26.7
Don't know	2	6.7	6.7	33.3
Education about everything	6	20.0	20.0	53.3
Everything, starting from the legislative requirements and beyond.	1	3.3	3.3	56.7
In-house training, where it would be possible to explain, through concrete examples from our business and operations, what are the obligations, and what are the rights/benefits for producers.	1	3.3	3.3	60.0
Information in the form of a publication (online or printed).	1	3.3	3.3	63.3
It is necessary to organize seminars where relevant stakeholders can become more familiar with the mentioned system.	1	3.3	3.3	66.7
It is probably necessary to hold as many workshops as possible to raise awareness about the importance of the mentioned topic.	1	3.3	3.3	70.0
Not applicable to our company	2	6.7	6.7	76.7
Practical training	1	3.3	3.3	80.0
Training - theory with examples of best practices. A visit to an organization that has successfully implemented regulatory requirements.	1	3.3	3.3	83.3
Training is needed for employees involved in the procurement of raw materials and the sale of finished products, related to the management of different types of waste covered by the extended producer responsibility system (waste tires, waste oils, waste packaging, etc.).	1	3.3	3.3	86.7
Training or lectures that would allow us to understand how the system functions in practice or in the field, so our company can adapt to future trends.	1	3.3	3.3	90.0

	Frequency	Percent	Valid Percent	Cumulative Percent
We have no information at all, full education on everything is needed.	1	3.3	3.3	93.3
We need a complete presentation of the system and program, how it works, as well as our obligations, etc.	1	3.3	3.3	96.7
We need complete education, but much clearer and more detailed than the one we received for the first part of the Law. We still have different interpretations of certain provisions from the first part of the Law, for which we have not yet received adequate clarifications from the relevant institutions.	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**22. Do you have additional comments and/or suggestions in relation to EPR?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	6	20.0	20.0	20.0
It is necessary for the relevant state authorities and companies to provide the required infrastructure for the implementation of the demands set by the Waste Management Law.	1	3.3	3.3	23.3
It is necessary to create an environment that fosters the establishment of an efficient system, in which the obligations from the manufacturer/importer to the collector/processor are clearly defined.	1	3.3	3.3	26.7
It is necessary to familiarize the industry with the obligations, as we are not familiar with EPR at all.	1	3.3	3.3	30.0
It would be important to create a brochure that will thoroughly inform the public about all the details.	1	3.3	3.3	33.3
No	17	56.7	56.7	90.0
Not applicable	1	3.3	3.3	93.3
We believe that Deponija LLC must position itself as an essential partner in the future functioning of the EPR system. We have both the logistical and human resources to meet all these challenges.	1	3.3	3.3	96.7
We need a complete presentation of the system and program, how it functions, as well as our obligations, etc.	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**23. To what extent are you familiar with the activities and practices from the domain of CE, and especially from the domain of waste management, new circular business models? (1 being lowest, and 5 highest)**

	Frequency	Percent	Valid Percent	Cumulative Percent
1	4	13.3	13.3	13.3
2	7	23.3	23.3	36.7
3	12	40.0	40.0	76.7
4	4	13.3	13.3	90.0
5	3	10.0	10.0	100.0
Total	30	100.0	100.0	

**24. Is your company implementing certain practices and/or activities from the domain of CE?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	18	60.0	60.0	60.0
Yes	12	40.0	40.0	100.0
Total	30	100.0	100.0	

**25. If the response to the previous question is "no", please state the reasons**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	18	60.0	60.0	60.0
In our company, the implementation of the extended producer responsibility program has not been fully completed on one hand, and on the other hand, we are a subsidiary of the company Imlek, which is a manufacturer.	1	3.3	3.3	63.3
Not applicable to our company	2	6.7	6.7	70.0
Storing waste in an environmentally safe manner	1	3.3	3.3	73.3
The nature of our activities – consulting in the field of communications and ESG – does not involve the production, distribution, or management of physical resources. As a service-oriented business focused on providing strategic advice, we see our role in supporting clients in integrating circular economy principles into their business models, while the structure of our activities does not allow for the direct application of these principles within the company itself.	1	3.3	3.3	76.7
Unfamiliarity with the topic in general.	1	3.3	3.3	80.0
We are in process of development of such practices	1	3.3	3.3	83.3
We are not familiar with all the possibilities that exist.	1	3.3	3.3	86.7
We are not well familiar with the mentioned.	1	3.3	3.3	90.0
We do not have experience in this area	1	3.3	3.3	93.3
We do not have materials and resources that could be minimized.	1	3.3	3.3	96.7
We do not need that, except in the area of sustainable energy sources, i.e., the procurement of energy-efficient devices.	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**26. What are the current practices and activities from the domain of CE which are implemented in your company?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	7	23.3	23.3	23.3

	Frequency	Percent	Valid Percent	Cumulative Percent
Certain types of waste are used in production as energy sources, while other types of waste are managed in a way that allows them to be recycled.	1	3.3	3.3	26.7
Currently, we do not have reporting obligations, but we pay attention to energy consumption and waste disposal in accordance with the law.	1	3.3	3.3	30.0
Not applicable	3	10.0	10.0	40.0
Nothing	2	6.7	6.7	46.7
Proper resource management	1	3.3	3.3	50.0
Reducing paper consumption for printing to the lowest possible level.	1	3.3	3.3	53.3
Reusing products and extending their lifespan.	1	3.3	3.3	56.7
Reusing products, reducing waste.	1	3.3	3.3	60.0
Separation and reuse	3	10.0	10.0	70.0
The implementation of activities in the field of circular economy is limited and conditioned by the activities of the parent company, so we must rely on Imlek's activities in this area. Imlek certainly uses biodegradable packaging, follows regulations, and aligns its activities with them.	1	3.3	3.3	73.3
The only waste we have in our complex is municipal waste, which is placed in containers, and non-municipal waste (packages, rubble, etc.) is disposed of in cages made by our company.	1	3.3	3.3	76.7
Through the wastewater treatment system, we reuse wastewater for the irrigation system. The excavated stone at the destination is used during construction in the implementation of planned projects. Used edible oils are forwarded to the authorized waste collection organization - M5 Company.	1	3.3	3.3	80.0
Use of solar panels on parts of the buildings, LED lighting, and electric vehicles.	1	3.3	3.3	83.3
Use of solar panels, well water, no use of single-use plastic, etc.	1	3.3	3.3	86.7
We are not implementing any such practices	1	3.3	3.3	90.0
We carry out activities through which old equipment is repurposed for other uses, as much as possible in office work.	1	3.3	3.3	93.3
We do not have materials and resources that could be minimized.	1	3.3	3.3	96.7
We separate packaging material from municipal waste in the recycling center and collect packaging material from legal and natural persons with or without compensation.	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**27. Which practices and/or activities from the domain of CE are you planning to implement in the future?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	8	26.7	26.7	26.7
All activities that we will be obligated to implement.	1	3.3	3.3	30.0
Don't know	1	3.3	3.3	33.3
Increasing the percentage of reuse	3	10.0	10.0	43.3
It is not applicable to our company	1	3.3	3.3	46.7
Mechanical processing of tires, treatment of construction waste, converting landfill gas into electricity.	1	3.3	3.3	50.0
Not applicable	1	3.3	3.3	53.3
Plan to reduce electricity, water, and other costs. We plan to apply for the Green Key certification, which is linked to sustainable development goals.	1	3.3	3.3	56.7
Plans include continuing activities related to using certain types of waste as energy sources, utilizing renewable energy sources, and using various types of waste for recycling.	1	3.3	3.3	60.0
Recycling	1	3.3	3.3	63.3
Recycling recyclable fractions.	1	3.3	3.3	66.7
Recycling, design for longevity	1	3.3	3.3	70.0
Still nothing	1	3.3	3.3	73.3
This is not planned by our company	2	6.7	6.7	80.0
Use of digital technologies	1	3.3	3.3	83.3
Using energy from solar panels on all buildings and increasing the number of electric vehicles.	1	3.3	3.3	86.7
We are going to stay on this level for now	1	3.3	3.3	90.0
We do not have materials and resources that could be minimized.	1	3.3	3.3	93.3
We don't have a concrete plan, but we want to learn more about the possibilities in this area.	1	3.3	3.3	96.7
We plan to continue adhering to all that is prescribed by the Law of Montenegro, as well as positive legal regulations	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**28. Are you planning certain investments into new technologies which are going to allow you to implement measures and activities from the domain of CE?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	22	73.3	73.3	73.3
Yes	8	26.7	26.7	100.0
Total	30	100.0	100.0	

**29. If the response to the previous question is "yes", please describe the planned investments**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	24	80.0	80.0	80.0
Composting facility Reverse vending machines	1	3.3	3.3	83.3
Mechanical processing of tires, treatment of construction waste, converting landfill gas into electricity	1	3.3	3.3	86.7
Organic waste management	1	3.3	3.3	90.0
Procurement of equipment for recycling secondary raw materials	1	3.3	3.3	93.3

The plan includes the use of renewable energy sources through the installation of solar panels	1	3.3	3.3	96.7
We still cannot provide a concrete answer to this question, but we will invest in everything that will be necessary	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**30. Please assess the current waste resource utilisation rate in your operations?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	1	3.3	3.3	3.3
1	9	30.0	30.0	33.3
2	5	16.7	16.7	50.0
3	7	23.3	23.3	73.3
4	5	16.7	16.7	90.0
5	3	10.0	10.0	100.0
Total	30	100.0	100.0	

**31. Do you see new market opportunities in the context of circular economy?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	22	73.3	73.3	73.3
Yes	8	26.7	26.7	100.0
Total	30	100.0	100.0	

**32. If the response to the previous question is "yes", please describe**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	25	83.3	83.3	83.3
By introducing new technologies into the waste processing system, we plan to extract larger quantities of packaging material that could be used in the new technological process to create new products	1	3.3	3.3	86.7
It is the lifestyle and work ethic of every institution in the future (less waste, waste as a resource...)	1	3.3	3.3	90.0
Packaging production where caps are attached to the packaging, use of biodegradable materials	1	3.3	3.3	93.3
We recognize opportunities in the area of consulting and education. As a company that focuses on ESG consulting, we see potential in supporting clients with developing strategies for transitioning to circular business models.	1	3.3	3.3	96.7
We possess a large amount of plant waste that we cannot dispose of in accordance with the principles of circular economy	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**33. Please describe the main challenges in implementation of measures and activities from the domain of CE**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	9	30.0	30.0	30.0
Currently, we have not implemented any specific measures, so I cannot answer this question	1	3.3	3.3	33.3
Don't know	1	3.3	3.3	36.7
Lack of education, people's closed-mindedness on the topic of environmental protection	1	3.3	3.3	40.0
Lack of education and the system in the country are not such that they follow the requirements of the Circular Economy, although it is recognized in the law	1	3.3	3.3	43.3
Lack of infrastructure and technology, lack of awareness and education, resistance to change, complexity and logistics, market for recycled products	1	3.3	3.3	46.7
Lack of knowledge about the very essence of this concept	1	3.3	3.3	50.0
Lack of system support	3	10.0	10.0	60.0
Legal regulations and potential benefits for those who implement Circular Economy	1	3.3	3.3	63.3
Limited market	1	3.3	3.3	66.7
Not applicable to our company	1	3.3	3.3	70.0
Primarily, education about circular economy	1	3.3	3.3	73.3

	Frequency	Percent	Valid Percent	Cumulative Percent
Primary selection, citizen education, applied technologies in the field of waste treatment, state participation in subsidizing the work of companies engaged in waste treatment	1	3.3	3.3	76.7
Reliable waste collection and improvement of landfills	1	3.3	3.3	80.0
Systematic (at the state level) solution to waste disposal issues	1	3.3	3.3	83.3
There is lack of awareness about this topic	1	3.3	3.3	86.7
There is no organized system for collecting certain types of waste that could be reused	1	3.3	3.3	90.0
We are not sufficiently informed	1	3.3	3.3	93.3
We do not have a response to this question	1	3.3	3.3	96.7
We don't have enough knowledge about the circular economy and its application in business operations	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**34. Are you facing any challenges in relation to missing resources for implementation of measures and activities from the domain of CE?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	21	70.0	70.0	70.0
Yes	9	30.0	30.0	100.0
Total	30	100.0	100.0	

**35. If the response to the previous question is "yes", please describe**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	23	76.7	76.7	76.7
Improvement of landfills	1	3.3	3.3	80.0
Insufficient recycling points	1	3.3	3.3	83.3
Lack of implementation in the country due to the absence of adequate consideration for waste management in a Circular Economy way	1	3.3	3.3	86.7
Lack of information	1	3.3	3.3	90.0
Lack of training, workshops, and capacity building	1	3.3	3.3	93.3
State subsidies for collected or processed waste quantities. It is well known that businesses dealing with packaging materials and treated waste are not profitable and, as a rule, require state subsidies	1	3.3	3.3	96.7
There is no organized system for collecting certain types of waste that could be reused	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**36. Are you facing any challenges in relation to lack of workforce and/or lack of qualified workforce, which have an impact on implementation of measures and activities from the domain of CE?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	23	76.7	76.7	76.7
Yes	7	23.3	23.3	100.0
Total	30	100.0	100.0	

**37. If the response to the previous question is "yes", please describe**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	27	90.0	90.0	90.0
Lack of skilled workforce for the operationalization of certain processes and technologies (such as the implementation of a composting facility, which requires qualified personnel...)	1	3.3	3.3	93.3
Lack of workforce training	1	3.3	3.3	96.7
We do not have a sector or person responsible for Circular Economy	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**38. Are you facing any challenges in terms of lack of awareness among the consumers, which have an impact on implementation of measures and activities from the domain of CE?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	22	73.3	73.3	73.3
Yes	8	26.7	26.7	100.0
Total	30	100.0	100.0	

**39. If the response to the previous question is "yes", please describe**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	26	86.7	86.7	86.7
Infrastructure – lack of containers for primary selection, as well as a lack of willingness from legal entities to separate packaging waste	1	3.3	3.3	90.0
Modern machines are used worldwide, which significantly facilitate the process	1	3.3	3.3	93.3
There is no organized system for collecting certain types of waste that could be reused	1	3.3	3.3	96.7
We don't have information about what is available at the national and local level	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**40. Are you facing any challenges from the domain of regulations and/or legislation, which have an impact on implementation of measures and activities from the domain of CE?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	17	56.7	56.7	56.7
Yes	13	43.3	43.3	100.0
Total	30	100.0	100.0	

**41. If the response to the previous question is "yes", please describe**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	22	73.3	73.3	73.3
Generally, we are witnessing low awareness when it comes to the implementation of Circular Economy principles in Montenegro	1	3.3	3.3	76.7
Lack of awareness about the importance of environmental preservation	1	3.3	3.3	80.0
Lack of awareness, insufficient information, and knowledge in this area	1	3.3	3.3	83.3
Lack of willingness from legal entities to separate packaging waste	1	3.3	3.3	86.7
Low awareness about recycling, reuse, and waste prevention	1	3.3	3.3	90.0
One example is consumer complaints about packaging where the caps are attached to the bottle	1	3.3	3.3	93.3
There is no organized system for collecting certain types of waste that could be reused	1	3.3	3.3	96.7
We believe there is generally insufficient awareness among entrepreneurs regarding the circular economy, and that education is needed for all sectors of activity	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**42. Please describe the main opportunities for improvement of your operation from the domain of CE**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	10	33.3	33.3	33.3
Digitalisation	1	3.3	3.3	36.7
Don't know	2	6.7	6.7	43.3
Education and raising awareness among space users, such as waste reduction, recycling, reuse of equipment and furniture (shelves, pallets), repair and reuse. Installation of solar panels	1	3.3	3.3	46.7
Establishing an organized system for collecting certain types of waste that could be reused, and providing support for the introduction of renewable energy sources	1	3.3	3.3	50.0
Government institutions should organize training sessions for all sectors of activity	1	3.3	3.3	53.3

	Frequency	Percent	Valid Percent	Cumulative Percent
Greater emphasis should be placed on waste prevention, as well as full valorization of recyclable fractions	1	3.3	3.3	56.7
Hold presentations and training sessions to provide the business sector with more information and raise awareness about its importance	1	3.3	3.3	60.0
Improvement of technologies for selective waste separation and recycling	1	3.3	3.3	63.3
Increasing the percentage of reuse	1	3.3	3.3	66.7
Introducing primary waste sorting and separating packaging materials at legal entities	1	3.3	3.3	70.0
Introducing separate waste collection and sorting, as well as improving the recycling industry	1	3.3	3.3	73.3
Not applicable to our company	1	3.3	3.3	76.7
System support	2	6.7	6.7	83.3
Use of sustainable materials, development of products that are easier to recycle and reuse	1	3.3	3.3	86.7
We are not sufficiently informed	1	3.3	3.3	90.0
We cannot provide a response at this moment	1	3.3	3.3	93.3
We do not have information	1	3.3	3.3	96.7
We don't have materials and resources that could be minimized	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**43. Have you used any of the measures for assistance aimed at improvement of your operations/business, from the domain of CE?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	26	86.7	86.7	86.7
Yes	4	13.3	13.3	100.0
Total	30	100.0	100.0	

**44. If the response to the previous question is "yes", please list the assistance measures from the domain of CE you have used**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	28	93.3	93.3	93.3
Applying to EKO FOND grants	1	3.3	3.3	96.7
Support program for small and medium-sized enterprises to implement measures in the field of circular economy	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**45. Are you familiar with the manners in which you can access financial assistance/funds aimed at improvement of business/operations from the domain of CE?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No	24	80.0	80.0	80.0
Yes	6	20.0	20.0	100.0
Total	30	100.0	100.0	

**46. If the response to the previous question is "yes", please list the opportunities for financing you are aware of**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	25	83.3	83.3	83.3
Applying for EU funds	1	3.3	3.3	86.7
In collaboration with the Electric Power Company (EPCG), as part of the 5000+ Program, the construction of a solar power plant on our land is planned	1	3.3	3.3	90.0
Support from the Ministry of Economic Development for small and medium-sized enterprises, aimed at improving measures in the field of circular economy	1	3.3	3.3	93.3
The Ministry of Economic Development program, EBRD, commercial banks	1	3.3	3.3	96.7
We do not have information about this	1	3.3	3.3	100.0
Total	30	100.0	100.0	

#### 47. What would contribute to reduction of operational and/or manufacturing costs within your company?

	Frequency	Percent	Valid Percent	Cumulative Percent
	7	23.3	23.3	23.3
An analysis would be required to answer this question, which would take some time	1	3.3	3.3	26.7
Development of an adequate plan when it comes to Circular Economy	1	3.3	3.3	30.0
Digitalisation	1	3.3	3.3	33.3
Don't know	2	6.7	6.7	40.0
Efficient space management to reduce unused square footage. Use of smart technologies for monitoring and analyzing space usage. Energy efficiency (solar panels, thermal insulation) that can reduce electricity costs	1	3.3	3.3	43.3
Establishment of landfills and recycling centers for organic waste in Nikšić	1	3.3	3.3	46.7
Implementation of measures and activities in the field of circular economy, in line with initiatives and opportunities available at the national level	1	3.3	3.3	50.0
Improvement of the waste zone in a technological sense	1	3.3	3.3	53.3
Increasing the percentage of reuse	1	3.3	3.3	56.7
Modernisation of recycling facilities	1	3.3	3.3	60.0
More efficient use of raw materials	2	6.7	6.7	66.7
Not applicable to our company	1	3.3	3.3	70.0
Obtaining subsidies for the implementation of EPR (Extended Producer Responsibility) and Circular Economy programs, products for multiple uses	1	3.3	3.3	73.3
Our operational costs are very low, and we have no production costs	1	3.3	3.3	76.7
Recycling of different types of waste and the introduction of renewable energy sources	1	3.3	3.3	80.0
Reduction of electricity costs, although they are not currently at a high level	1	3.3	3.3	83.3
Resource optimization, automation of business processes	1	3.3	3.3	86.7

	Frequency	Percent	Valid Percent	Cumulative Percent
State subsidies, introduction of primary waste sorting, improvement of energy efficiency	1	3.3	3.3	90.0
Transition to fully online operations	1	3.3	3.3	93.3
We do not have information	1	3.3	3.3	96.7
We do not have materials and resources that could be minimized	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**48. What would contribute to improvement of resource efficiency in your company - in reference to processes and/or products?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	12	40.0	40.0	40.0
At this moment, we see the greatest resource in the upcoming construction of a cogeneration plant	1	3.3	3.3	43.3
Development of an adequate implementation plan	1	3.3	3.3	46.7
Digitalisation	1	3.3	3.3	50.0
Don't know	3	10.0	10.0	60.0
Increasing the percentage of reuse.	1	3.3	3.3	63.3
More efficient use of raw materials	1	3.3	3.3	66.7
More efficient use of raw materials.	1	3.3	3.3	70.0
Not applicable to our company	1	3.3	3.3	73.3
Obtaining subsidies for the implementation of the EPR and CE programs, products for multiple uses	1	3.3	3.3	76.7
Recycling of different types of waste and the introduction of renewable energy sources	1	3.3	3.3	80.0
Support for the implementation of new processes and the procurement of products/equipment that will improve business operations and resource efficiency	1	3.3	3.3	83.3
Technological innovations, efficiency in energy management	1	3.3	3.3	86.7
Use of resource-efficient devices, vehicles, etc.	1	3.3	3.3	90.0
We do not have a response to this question at the moment	1	3.3	3.3	93.3
We do not have information	1	3.3	3.3	96.7
We do not have materials and resources that could be minimized	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**49. What would contribute to product lifecycle extension in your company - in reference to measures and activities?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	13	43.3	43.3	43.3
Don't know	3	10.0	10.0	53.3
Improvement of quality of information	3	10.0	10.0	63.3
Modularity, standardization of product components	1	3.3	3.3	66.7
Not applicable to our company	1	3.3	3.3	70.0
Obtaining subsidies for the implementation of the EPR and CE programs, products for multiple uses	1	3.3	3.3	73.3
Recycling packaging waste	1	3.3	3.3	76.7

Repairing products that have not yet reached the end of their lifecycle.	1	3.3	3.3	80.0
Reuse, recycling	1	3.3	3.3	83.3
The products that Imlek Boka imports are perishable goods (dairy products - shelf life of 25-30 days, UHT milk up to 6 months), so this issue is not applicable to the product range that is the subject of our business	1	3.3	3.3	86.7
We are not familiar with the available opportunities, education is needed	1	3.3	3.3	90.0
We do not have a response to this question at the moment	1	3.3	3.3	93.3
We do not have information	1	3.3	3.3	96.7
We do not have materials and resources that could be minimized	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**50. Assess the degree to which your operations are adapted to the CE principles and practices**

	Frequency	Percent	Valid Percent	Cumulative Percent
1	6	20.0	20.0	20.0
2	8	26.7	26.7	46.7
3	12	40.0	40.0	86.7
4	3	10.0	10.0	96.7
5	1	3.3	3.3	100.0
Total	30	100.0	100.0	

**51. Do you have any additional comments and/or suggestions in relation to implementation of measures and activities from the domain of CE?**

	Frequency	Percent	Valid Percent	Cumulative Percent
No response	8	26.7	26.7	26.7
Education and the presentation of available opportunities in this area are absolutely essential	1	3.3	3.3	30.0
Greater support from government authorities is needed for the implementation of measures in the field of the circular economy	1	3.3	3.3	33.3
It is essential to raise awareness among entrepreneurs about the importance of the circular economy and the benefits it brings	1	3.3	3.3	36.7
It is necessary to organize more frequent training sessions, workshops, etc.	1	3.3	3.3	40.0
No	16	53.3	53.3	93.3
Not applicable to our company	1	3.3	3.3	96.7
We do not have information about this	1	3.3	3.3	100.0
Total	30	100.0	100.0	

## 5.2. Viability criteria

Taken from Tool #16 of the Better Regulation Toolbox

<b>Criteria</b>	<b>Description</b>
Legal feasibility	Options should respect the principle of conferral. They should also respect any obligation arising from the EU Treaties (and relevant international agreements) and ensure respect of fundamental rights. Legal obligations incorporated in existing primary or secondary EU legislation may also rule out certain options.
Technical feasibility	Technological and technical constraints may not allow for the implementation, monitoring, or enforcement of theoretical options.
Previous policy choices	Certain options may be ruled out by previous policy choices or mandates by EU institutions. Unless there is compelling evidence that these choices should be revisited, there is no point in reinventing the wheel.
Coherence with other EU policy objectives	Certain options may be ruled out early due to poor coherence with other general EU policy objectives.
Effectiveness and efficiency	It may already be possible to show that some options would with certainty achieve a worse cost-benefit balance than some alternatives.
Proportionality	Some options may clearly restrict the scope for national decision-making over and above what is needed to achieve the objectives satisfactorily.
Political feasibility	Options that would clearly fail to garner the necessary political support for legislative adoption or implementation could also be discarded. This, however, does not mean that such options should not be mentioned or not be subject to at least a minimal assessment. Options superior to other options but lacking political feasibility may still be discussed at the legislative stage, which may increase their chances of being politically feasible.
Relevance	There is no point in retaining options that do not address the needs of the policy intervention as identified in the problem definition.
Identifiability	When it can be shown that two options are not likely to differ materially in terms of the proposed measures, their significant impacts, or their distribution, only one should be retained.

### 5.3. Viability assessment

No.	Title of SE measures	Description of CE measures	Legal feasibility	Technical feasibility	Effectiveness and efficiency	Political feasibility	Relevance	Identifiability	Viable
1	Training on legal provisions	Training on legislative requirements related to EPR, Circular Economy and Waste Management aimed at the private sector and their employees	Yes	Yes	High	High	High	Impact identifiable through the number of companies which implement new measures and join the EPR programme	Yes
2	Development of informational guides	Development of informational guides (e.g brochures, online promotional material) related to EPR, Circular Economy and Waste Management aimed at the private sector and their employees	Yes	Yes	High	High	High	Impact identifiable through the number of companies which implement new measures and join the EPR programme	Yes
3	Organisation of practical trainings	Organisation of practical trainings related to EPR, Circular Economy and Waste Management aimed at the private sector and their employees	Yes	Yes	High	High	High	Impact identifiable through the number of companies which implement new measures and join the EPR programme	Yes
4	Organisation of workshops	Organisation of workshops related to EPR, Circular Economy and Waste Management aimed at the private sector and their employees	Yes	Yes	High	High	High	Impact identifiable through the number of companies which implement new measures and join the EPR programme	Yes
5	Implementation of educational courses	Development and implementation of courses dedicated to each of the relevant topics: EPR, Circular Economy, Waste Management aimed at the private sector and their employees	Yes	Yes	High	High	High	Impact identifiable through the number of companies which implement new measures and join the EPR programme	Yes

No.	Title of SE measures	Description of CE measures	Legal feasibility	Technical feasibility	Effectiveness and efficiency	Political feasibility	Relevance	Identifiability	Viable
6	Development of tailored support programs for EPR	Development of tailored support programs for introduction of EPR into private companies, per sectors of activity	Yes	Yes	High	High	High	Impact identifiable through the number of companies which implement new measures and join the EPR programme	Yes
7	Development of tailored support programs for circular economy	Development of tailored support programs for introduction of circular economy into private companies, per sectors of activity	Yes	Yes	High	High	High	Impact identifiable through the number of companies which implement new measures	Yes
8	Development of programs for assistance for improvement of sustainable waste management infrastructure	Development of programs for assistance to the waste management centres and recycling yards, for the purpose of purchase of equipment and improvement of overall infrastructure	Yes	Yes	High	High	High	Impact identifiable through the number of waste management companies which implement new technologies, equipment and processes	Yes
9	Development and implementation of awareness raising campaigns about EPR	Development and implementation of awareness raising campaigns (e.g. media, including digital and traditional media) about EPR, aimed at the private sector, as well as the general public	Yes	Yes	High	High	High	Impact identifiable through the number of companies which implement new measures and join the EPR programme	Yes
10	Development and implementation of awareness raising campaigns about Circular Economy	Development and implementation of awareness raising campaigns e.g. media, including digital and traditional media) about circular economy, aimed at the private sector, as well as the general public	Yes	Yes	High	High	High	Impact identifiable through the number of companies which implement new measures	Yes

No.	Title of SE measures	Description of CE measures	Legal feasibility	Technical feasibility	Effectiveness and efficiency	Political feasibility	Relevance	Identifiability	Viable
11	Development and implementation of awareness raising campaigns about recycling	Development and implementation of awareness raising campaigns (e.g. media, including digital and traditional media) about recycling, aimed at the private sector, as well as the general public	Yes	Yes	High	High	High	Impact identifiable through the number of companies which implement new measures	Yes
12	Development of subsidies program for circular economy	Development of subsidies program for those companies which implement new technologies and processes aimed at improvement of resource efficiency	Yes	Yes	High	High	High	Impact identifiable through the number of companies which use the subsidies program	Yes
13	Development of subsidies program for EPR	Development of subsidies program for the companies which join the EPR programme in the initial stage (e.g. subsidies for the first 2 years of implementation of EPR for the first 50 companies which join the programme)	Yes	Yes	High	High	High	Impact identifiable through the number of companies which use the subsidies program	Yes
14	Establishment of cooperation with the national private funds	Establishment of cooperation with the national private funds aimed at improvement of implementation and awareness about EPR and circular economy (e.g. cooperation with EKO FOND), which would provide joint support programs for the private sector	Yes	Yes	High	High	High	Impact identifiable through the number of companies which use the joint support programs	Yes
15	Establishment of annual awards for companies	Establishment of annual awards for companies which achieve the best performance in relation	Yes	Yes	High	High	High	Impact identifiable through the number of companies which	Yes

No.	Title of SE measures	Description of CE measures	Legal feasibility	Technical feasibility	Effectiveness and efficiency	Political feasibility	Relevance	Identifiability	Viable
		to implementation of new circular economy measures (e.g. new processes)						implement new circular economy measures and the number of new circular economy processes on company level	

## 5.4. Action parameters

No.	CE measures	Viable	Financial effort	Instrument	Funding sources	Stakeholders	Target groups	Impact level (national, regional, local)	Impact scope (businesses, households, general population)	Estimated duration for implementation	Waste reduction potential	Green economy potential	Blue economy potential	Potential for new products and services	Resource efficiency potential	Environmental certification potential (EU Eco-label, ESG)	4R potential	Digitalization potential
1	Training on legal provisions	Yes	Medium	Training	The competent ministries	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies	National	Businesses	1 year	High	High	High	High	High	High	High	High
2	Development of informational guides	Yes	Low	Educational material	The competent ministries	Authorities, the business sector and co-operatives (e.g. business development hubs,	Private companies	National	Businesses	3 months	High	High	High	High	High	High	High	High

No.	CE measures	Viable	Financial effort	Instrument	Funding sources	Stakeholders	Target groups	Impact level (national, regional, local)	Impact scope (businesses, households, general population)	Estimated duration for implementation	Waste reduction potential	Green economy potential	Blue economy potential	Potential for new products and services	Resource efficiency potential	Environmental certification potential (EU Ecolabel, ESG)	4R potential	Digitalization potential
						specialised companies)												
3	Organisation of practical trainings	Yes	Medium	Training	The competent ministries	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies	National	Businesses	1 year	High	High	High	High	High	High	High	High

No.	CE measures	Vi- a- ble	Fi- nan- cial ef- fort	Instru- ment	Funding sources	Stake- holders	Target groups	Impact level (na- tional, re- gional, local)	Impact scope (busi- nesses, house- holds, general popula- tion)	Esti- mated duration for im- plemen- tation	Waste reduc- tion po- tential	Green econ- omy po- tential	Blue econ- omy po- tential	Poten- tial for new prod- ucts and services	Re- source effi- cency po- tential	Environ- mental certifi- cation po- tential (EU Eco- label, ESG)	4R po- tential	Digitali- zation po- tential
4	Organisation of work-shops	Yes	Me- dium	Training	The compe- tent min- istries	Authori- ties, the business sector and co- opera- tives (e.g. busi- ness devel- opment hubs, special- ised com- panies)	Private compa- nies	National	Busi- nesses	1 year	High	High	High	High	High	High	High	High
5	Implemen- tation of ed- ucational courses	Yes	Me- dium	Educa- tional material	The compe- tent min- istries	Authori- ties, the business sector and co- opera- tives (e.g. busi- ness devel- opment hubs, special- ised com- panies)	Private compa- nies	National	Busi- nesses	2 years	High	High	High	High	High	High	High	High

No.	CE measures	Viable	Financial effort	Instrument	Funding sources	Stakeholders	Target groups	Impact level (national, regional, local)	Impact scope (businesses, households, general population)	Estimated duration for implementation	Waste reduction potential	Green economy potential	Blue economy potential	Potential for new products and services	Resource efficiency potential	Environmental certification potential (EU Ecolabel, ESG)	4R potential	Digitalization potential
6	Development of tailored support programs for EPR	Yes	High	Support programme	The competent ministries	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies	National	Businesses	2 years	High	High	High	High	High	High	High	High
7	Development of tailored support programs for circular economy	Yes	High	Support programme	The competent ministries	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies	National	Businesses	2 years	High	High	High	High	High	High	High	High

No.	CE measures	Viable	Financial effort	Instrument	Funding sources	Stakeholders	Target groups	Impact level (national, regional, local)	Impact scope (businesses, households, general population)	Estimated duration for implementation	Waste reduction potential	Green economy potential	Blue economy potential	Potential for new products and services	Resource efficiency potential	Environmental certification potential (EU Ecolabel, ESG)	4R potential	Digitalization potential
8	Development of programs for assistance for improvement of sustainable waste management infrastructure	Yes	High	Support programme	The competent ministries	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies	National	Businesses	2 years	High	High	High	High	High	High	High	High
9	Development and implementation of awareness raising campaigns about EPR	Yes	Medium	Campaign	The competent ministries	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies and the general public	National	Businesses	1 year	High	High	High	High	High	High	High	High

No.	CE measures	Viable	Financial effort	Instrument	Funding sources	Stakeholders	Target groups	Impact level (national, regional, local)	Impact scope (businesses, households, general population)	Estimated duration for implementation	Waste reduction potential	Green economy potential	Blue economy potential	Potential for new products and services	Resource efficiency potential	Environmental certification potential (EU Ecolabel, ESG)	4R potential	Digitalization potential
10	Development and implementation of awareness raising campaigns about Circular Economy	Yes	Medium	Campaign	The competent ministries	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies and the general public	National	Businesses and general population	1 year	High	High	High	High	High	High	High	High
11	Development and implementation of awareness raising campaigns about recycling	Yes	Medium	Campaign	The competent ministries	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies and the general public	National	Businesses and general population	1 year	High	High	High	High	High	High	High	High

No.	CE measures	Viable	Financial effort	Instrument	Funding sources	Stakeholders	Target groups	Impact level (national, regional, local)	Impact scope (businesses, households, general population)	Estimated duration for implementation	Waste reduction potential	Green economy potential	Blue economy potential	Potential for new products and services	Resource efficiency potential	Environmental certification potential (EU Ecolabel, ESG)	4R potential	Digitalization potential
12	Development of subsidies program for circular economy	Yes	High	Support programme	The competent ministries	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies	National	Businesses and general population	2 years	High	High	High	High	High	High	High	High
13	Development of subsidies program for EPR	Yes	High	Support programme	The competent ministries	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies	National	Businesses	2 years	High	High	High	High	High	High	High	High

No.	CE measures	Viable	Financial effort	Instrument	Funding sources	Stakeholders	Target groups	Impact level (national, regional, local)	Impact scope (businesses, households, general population)	Estimated duration for implementation	Waste reduction potential	Green economy potential	Blue economy potential	Potential for new products and services	Resource efficiency potential	Environmental certification potential (EU Ecolabel, ESG)	4R potential	Digitalization potential
14	Establishment of cooperation with the national private funds	Yes	Medium	Support programme	The competent ministries and national support funds	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies	National	Businesses	2 years	High	High	High	High	High	High	High	High
15	Establishment of annual awards for companies	Yes	Medium	Awards	The competent ministries and CSR companies	Authorities, the business sector and co-operatives (e.g. business development hubs, specialised companies)	Private companies	National	Businesses	2 years	High	High	High	High	High	High	High	High

