

Peer Assessment Mission to Montenegro on Wine and quality policy

Mission timeframe: from 12th November 2019 to 15nd November 2019

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Disclaimer

The views articulated and expressed in this report are purely those of the author and may not in any circumstances be regarded as stating an official position of the European Commission.

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1. Background

Within its alignment efforts within the EU Agriculture and rural development area, Montenegro presented a comprehensive national strategy on agriculture and rural development, including an action plan, which is a basis for the transposition, implementation and enforcement of the EU *acquis*. The Action Plan guides Montenegro's alignment process with the *acquis* in the field of agriculture and rural development, including wine and quality policy.

2. Introduction

2.1. Mission's Objective

The Mission's Objective was to contribute to the assessment of Montenegro's level of alignment and implementation in the wine sector and quality policy according to these points:

- provide a comprehensive overview of the state of play on legislative alignment;
- assess the implementation of the legal framework in the wine sector and on quality policy;
- provide a comprehensive overview of the administrative capacity of Montenegro in both the sector of wine and in the area of quality policy. The criteria is to have sufficient administrative capacity to implement the *acquis* in this area, including on the enforcement side;
- assess the extent of market development, looking at controls on the market, controls at custom, training of staff, share of information;
- evaluate the interaction and cooperation of the institutions concerned with wine and quality policy with other services and institutions;
- ascertain whether cooperation and exchange of information between the different actors involved in the system is formalised and occurs on systematic basis;
- recommend how Montenegro can enhance its capacity and performance to protect and enforce quality schemes.

2.2. Methodology of the Evaluation

Prior to the initiation of the Mission, the experts were provided with a list of pieces of legislation adopted in Montenegro regarding quality schemes and wine, including by-laws and the last version of the Action Plan for *acquis* alignment in the area of Agriculture and rural development.

The experts were then given the opportunity to meet with the main Government institutions in charge of the wine sector and of quality policy, during the Mission.

At the meeting in the morning of the first day of the mission, there were representatives from the Ministry of agriculture's different units, National Accreditation Body, Ministry of economics – Intellectual Property office, accredited Laboratory, Control Body Monteorganica, Ministry of Finance – Customs Administration.

In the afternoon of the first day, other visits were carried out at the Laboratory accredited – the Centre for Ecotoxicological Research (CETI) and at the Control body premises.

On the second day, they also had the opportunity to meet stakeholders and Associations of producers (wine and ham) at the Chamber of Commerce, in order to collect information about these institutions, discuss the current situation and critical point of the implementing process of quality schemes. Finally, regarding quality schemes, two visits were carried out on sites of production of a product with geographical indication (PGI), out of

Podgorica. Regarding wine, 3 producers were visited, among them Plantaze, the biggest wine producer in Montenegro. Interesting debates took place in each of the meetings.

A closing meeting was held on 15 November 2019 with the attendance of representatives of the CA where the experts presented the main preliminary findings of the mission and some points were further clarified. The day following the mission further documents, procedures in place, pieces of legislation have been sent to the Parties involved in the peer-mission.

3. Executive Summary

3.1. Wine

- The legislation is in general harmonized with the main EU regulations and conditions and does not contain major obstacles for the further and final alignment. It has to be stated that to a very high extent EU legislative texts have been transferred one by one into Montenegrin law. The question is if all the transferred legal texts are really necessary and practicable in Montenegro (e.g. rulebook on oenological practises and restrictions).
- Intended wine growing zones (for EU wine growing classification purpose) and geographical origins are very small structured and could cause challenges in the field of controls but also for producers and trade. Wines with designation of origin (PDO) should be the most typical wines of a region (on the contrary to the example of PDO Podgorica subregion).
- All elements for an operating control system are established but not yet connected in a sufficient manner, e.g. via a database. No vineyard register yet as foreseen under 1308/2013 is realised. Following the revised version of the action plan for acquis alignment (may 2019) the establishment of a computerized vineyard register is planned for 2020 and the setting up of a computerized system for monitoring wine products is foreseen for 2021.
- The cooperation between the different institutions, associations and stakeholders seems to be very close and fruitful.
- Two remarks regarding the organisation of the mission: Finally only 2 mission-days of stay in Montenegro (mostly together with the topic „quality schemes“) have not been enough to assess all elements in the wine sector. Moreover, all implementing regulations were available just as raw machine translations; for a final assessment correct translations are needed.

3.2. Quality policy

The legal framework for quality policy in Montenegro is made up of the Law on quality schemes for agriculture and food products, adopted in 2017, and three Rulebooks as secondary legislation, two of them from 2014 and one from 2017. The legal framework is quite well set up at a general level, only a few technical points are still to be further defined by the way of separate implementing acts, especially on the field of official controls.

The Law on Quality Schemes for Agricultural Products and Foodstuffs (Official Gazette of Montenegro 22/2017), which has been harmonised with the Regulation (EU) No 1151/2012 of the European Parliament and of the Council of 21 November 2012 on quality schemes for agricultural products and foodstuffs, entered into force on 11 April 2017. The defined quality schemes for agricultural products and foodstuffs are: designation of origin (PDO), geographical indication (PGI), traditional specialty guaranteed (TSG), “high quality” indication, “mountain product” indication and “my farm product” indication. Seven geographical Indications have been registered.

The Competent authority (CA) is the Ministry of Agriculture and Rural development (MARD). Monteorganica is the only Control body in charge of certification process for labels of origin. In December 2018, it has been authorized by the CA to perform assessments of the conformity of agricultural products or foodstuffs, recognized as PDO or PGI, with their product specification. However, controls on PDO/PGI/TSG are only defined in theory but not fully implemented yet, as no products have been certified and put on the market labelled as PDO/PGI so far. Control plans and other written control procedures, drawn up by the Control body in order to verify the compliance with the product specification, have not been approved by the CA yet.

The control system largely relies on internal controls performed by Producers associations, they play a central role even in organizing and developing a quality food system for each GI recognized. The Control body carries out documentary and inspection checks on a smaller number of operators, on a risk-based approach.

A point on which a deeper attention is needed is the supervision on control activity of the Control body by the Competent authority, following the general rules defined in the EU Reg. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules (or the New Reg. 625/2017) and the Reg. 1152/2012 on quality schemes for agricultural products and foodstuffs.

Market controls are carried out by two different Inspection services belonging to the MARD and to the Administration for Inspection Affairs. This part has not been put in practice yet because the process of certification is only at an early stage and no product has been sold as a certified PDO/PGI product.

Checks on external GI products are not implemented neither controls at the borders and cooperation with Customs Unions is still to be put in place by the means of interinstitutional cooperation.

Dissuasive and proportionate enforcement measures are defined in the Law for quality schemes for national operators who are found to make an illegal use of the registered names.

Many activities have been conducting since the implementation of the new Law, with the purpose of educating and motivating producers to get involved in the quality schemes and to register for the control and conformity assessment. The MARD, in cooperation with the authorised body "Monteorganica", is performing workshops in all Montenegrin municipalities in order to raise awareness about the importance and benefits of protecting product names by quality schemes, and about the registration and control procedures.

The Chamber of Commerce is also very active on carrying out projects to enhance connection between food producers and internal and foreign market, tourism and food service (HORECA) markets or even to the promotion of sustainable value chains. Many stakeholders were invited to a workshop in 2019 to discuss possibilities to achieve a better interconnection between the local gastronomic offer and tourism as gastronomy and traditional foodstuffs play an important role in promoting the national identity and culture.

This report makes recommendations to the CA, aimed at rectifying some shortcomings identified and enhancing the correct implementation of the EU legislation.

4. Findings

4.1. Wine

4.1.1. Degree of acquis alignment for EU legislation and all obligations as required by EU legislation for the wine sector

Law on Wine (Official Gazette MNE 41/2016) and implementing regulations

In the following the Law on Wine is examined and compared with the relevant conditions foreseen in reg. (EU) nr. 1308/2013 and/or implementing regulations. In case implementing regulations are existing they are mentioned together with the relevant articles in the Law on Wine. (Remark: The English language version of the implementing regulations has been done only via raw machine translation and therefore is not completely reliable!).

In a second part below some additional remarks are given with respect to certain aspects of the law.

The Law on Wine contains:

- Definitions of products, of the marketing year and of wine growing areas as well as categories of grapevine products:
 - The definitions of products, marketing year and categories correspond to the ones foreseen in reg. (EU) nr. 1308/2013, art. 6 (marketing year), annex II part IV (definitions of products) and annex VII part II (categories).
 - The definition of Wine growing areas in art. 3 of the Law on Wine does not correspond to the reg. 1308/2013 and seems to be a „mixture“ between a geographical indication and the wine growing zones foreseen in annex VII app. I of reg. 1308/2013.
 - The list of wine growing areas is fixed by an implementing regulation (Official Gazette Nr. 65 from 13.10.2017).
- Conditions on the use of grapevine varieties: The Ministry of Agriculture and Rural Development has to classify varieties for the purpose of wine production in Montenegro (a list 146 classified varieties is published in the Montenegro Official Gazette Nr. 92/17). These varieties have to belong to the species *Vitis vinifera* or have to come from a cross between the species *Vitis vinifera* and other species of *Vitis*. Areas planted with other varieties have to be grubbed up.
 - This is fully in line with the conditions foreseen in art. 81 of reg. 1308/2013, except the missing strict ban of certain varieties (Noah, Othello, ...).
 - In addition it has to be stated that currently a proposal of the European Commission about amendments in this field is under discussion.
 - The implementing regulation about quality, labelling, packaging and presentation (Official Gazette nr. 92/17 from 30.12.2017) contains in annex 6 a list of authorised grapevine varieties. Some of them contain (partly) geographical indications and their integration into annex IV of reg. 2019/33 is already part of the accession negotiations.
- Rules on protected origins, geographical indications and traditional terms including definitions, application procedures and protection:
 - These rules are in accordance with the conditions foreseen in the relevant articles of the reg. (EU) nr. 1308/2013.

- An implementing regulation (29.3.2018) contains rules about a register of protected designations, about the verification of the product specification and about forms (application, single document, ...), which are in line with the EU conditions. Regarding the producers entitled to apply for the protection of a GI the implementing regulation foresees that the applicant must represent more than 50% of the producers in the area, which is not conform with art. 95 of reg. 1308/2013.
- Another implementing regulation about quality, labelling, packaging and presentation (Official Gazette nr. 92/17 from 30.12.2017) contains in annex 2 detailed requirements for wines with geographical indications (maximum yields, analytical parameters and detailed organoleptical characteristics for the different regions). This annex 2 is nearly like a product specification for the different origins.
- Rules on vineyard register, cellar records, production declaration, harvest declaration, treatment or marketing declaration and stock declaration: The current vineyard register is paper based (Excel) and kept by the Ministry of Agriculture and Rural Development but has to be developed electronically to meet the requirements of Regulation 1308/2013. The harvest declaration is obligatory to all producers except if their grape production is not intended for wine production or if they are small producers (< 0,1 ha) who do not sell their grapes on the market or deliver their grapes to cooperatives. Also the treatment or marketing declaration is obligatory to all holdings who do marketing wine products except those belonging to a cooperative.
 - This chapter generally is in line with the respective conditions in reg. 1308/2013.
 - In this respect it has to be stated that reg. (EU) nr. 2018/273 does not foresee an obligation for harvest declaration and treatment or marketing declaration („Member states may...“).
 - The content and manner of keeping the vineyard register and the different declarations is set by an implementing regulation (Sept. 2016) in line with EU conditions.
- Basic rules on oenological practices and the corresponding restrictions and prohibitions: The decision on the use of an oenological practice is based on the same parameter (OIV, human health,..) as foreseen in art. 80 of reg. 1308. Enrichment with sucrose or concentrated grape must is allowed in case of bad weather conditions (has to be stated by an accredited laboratory) and shall not increase the natural alcohol content by more than 1,5% vol. and the total alcohol content of the enriched wine must not exceed 12,5% vol.
 - No connection with the definition of the minimum alcoholic strength of a wine (8,5% vol.) in art. 4 of the Law on Wine is given, therefore it should be mentioned in the law, that the value of 8,5% vol. is without enrichment.
 - No limits or further conditions are set by the law for PDO and PGI wines (e.g. minimum natural sugar content of the grapes, alcohol content restrictions, acidity, etc.).
 - No rules or limits are set for other basic oenological practices (acidification, sweetening). The condition that PDO and PGI wines may not be subject to acidification, de-acidification, enrichment or sweetening seems to be very strict, especially with regard to acidification.
 - The Law also forbids to turn grapes, must, etc. from foreign countries into wine and to blend foreign wines with Montenegrin wine. The law sets a transitional period allowing wine production from foreign grapes up to 1. January 2019. This may be extended as has been explained by representatives of the Ministry. Regulation 1308/2013 only sets a ban on third country products to be turned into wine in the European Union.
 - An implementing regulation (rulebook on oenological practises and restrictions) has been published in the Official Gazette Nr. 92/17. This rulebook is a combination (copy) of the different annexes of reg. 606/2009 and the restrictions in annex VIII part I of reg. 1308/2013.

- Controls in the wine sector: Before marketing every wine has to undergo a physical-chemical and an organoleptical analysis. The law states that analysis shall be performed by an authorized laboratory. The Ministry of Agriculture and Rural Development issues a licence on the basis of this analysis and publishes the list of wines with licence in the Official Gazette on an annual basis. Organoleptic tasting is performed by a commission of 3 tasters; a list of tasters is published in the Official Gazette.
 - Reg. 1308/2023 does not foresee specific rules or conditions on controls, only art. 120 asks member states to introduce laws, regulations or administrative provisions to verify the harvest year and the variety on the label.
 - In addition reg. 2019/34, art. 19 implements an annual verification for GI wines, consisting of organoleptic and/or analytical testing and checks on the conditions set out in the product specification. This annual verification shall be carried out through random checks based on a risk analysis or sampling or systematically.
 - The licence for Montenegrin wines foreseen in the Law on Wine can be considered as fulfilling all these conditions for wines without GIs.
 - For wines with GIs at least the decision about controls of the product specification either by the State or by certified bodies should be fixed in the Law on Wine.
 - The implementing regulation about quality, labelling, packaging and presentation (Official Gazette nr. 92/17 from 21.12.2017) contains conditions for on-the-spot controls of wines with and without geographical indication, sampling of these wines, analytical and sensory evaluation (tasting commissions) and an annual verification of the conditions set out in the product specifications.
- Rules on labelling and presentation: The law contains definitions for labelling and presentation, a list of compulsory labelling elements and a list of optional elements.
 - These lists are fully in line with the conditions in reg. 1308.
 - The compulsory elements lot-number, size of package and allergen warning are regulated in the implementing regulation about quality, labelling, packaging and presentation (Official Gazette nr. 92/17 from 30.12.2017).
 - The law also contains the two derogations of art. 119 in reg. 1308, which allow to omit the category name in the case of PDO/PFI wines (art. 119 par. 2) or to omit the terms PDO/PGI for wines with a traditional expression (art. 119 par. 3). From the experts point of view these two derogations should be more specified (e.g. which traditional expression can replace the terms PDO/PGI?) and should not be a choice for every producer but fixed uniform for all Montenegrin wines.
 - The implementing regulation about quality, labelling, packaging and presentation (Official Gazette nr. 92/17 from 30.12.2017) contains a list of traditional terms and the conditions for their use; the possible volumes of the bottles; labelling conditions for all elements on the label (e.g. alcohol content, origin, bottler, producer, variety, harvest year, sugar content, production methods,..).
- Circulation, transport and foreign trade: This chapter of the Law on Wine contains definitions about circulation and the prohibition of circulation, rules about an accompanying document, conditions for imported and exported wines and basic rules about fees for different actions (issuance of the licence, wine analysis, ...). Regarding the foreign trade the law stipulates the obligation of a certificate of quality for imported and also exported wines.
 - Specifications for an accompanying document (paper version) in general are in line with the conditions set in reg. (EU) 2018/273.
- Penalty provisions: The law differs between the various infringements and fixes penalties for these infringements (financial fines from € 5.000,- up to € 20.000,-).

- Reg. (EU) 1306/2013 states the basic rule for penalties in art. 89, Paragraph 4 (in the event of infringement of Union rules in the wine sector, member states shall apply proportionate, effective and dissuasive administrative penalties). No more detailed specifications are set by Union law so that the provisions in the Law on Wine can be considered as in line with EU rules.

Additional remarks and recommendations with regard to the legal situation:

- Wine growing zones: The study "Technical support drafting new zoning of vineyard areas of Montenegro" by the agricultural research centre of Bari (Italy) identified 4 regions and 11 subregions in the viticultural production area of Montenegro. Following the wine growing zones foreseen in annex VII app. I of reg. 1308/2013 the Montenegrin region „Skadar Lake Basin“ is classified as zone CIII, the Montenegrin „Coastal region“ is classified as zone CII and the Montenegrin regions „Nudo“ and (potential) „North“ can be classified as zone B. (Annex VII app. I of reg. 1308/2013 differs also between CIIIa and CIIIb).
 - It has to be considered that following the annexes VII and VIII of reg. 1308/2013 a lot of limits and restrictions are connected with the different zones: minimum alcohol content, enrichment limits, acidification and/or deacidification, place of oenological treatments.
 - Montenegro has a total vineyard area of 2.850 ha, a total number of 267 grape producers and 112 wine producers. 2.378 ha (including about 200 ha of table grapes) belong to the biggest producer „Plantaze“ in the Region of „Skandar Lake Basin“ (CIII), but „Plantaze“ is not the only producer in the „Skandar Lake Basin“. This means that the remaining roughly 500 ha (or 266 grape producers / 111 wine producers) are divided into 3 wine growing zones (CIII, CII, B), each zone with different conditions and restrictions.
 - From the experts point of view such a very small structured zoning causes challenges in the controls and restricts very much the trade of grapes and wines between the different producers. As an example: Hail (or frost, fire, dryness, ...) destroys the harvest in a certain region. Due to the little size of the regions the damage could destroy nearly all of the grapes. So the producers from this damaged region have to buy grapes from other regions, but are not allowed to do oenological treatments. In the case of PDO wines the product specification maybe requires certain conditions (e.g. a minimum limit for acidity), but no acidification is possible, because the grapes are from another zone).
 - With regard to PDO and PGI wines one must not forget that different origins within one zone cause additional restrictions.
 - It is recommended to support the Ministry of Agriculture and Rural Development in the final process of zoning and in the assessment of the consequences of this. This should be done from a very *practical* point of view, e.g. via seminars or workshops held by experts from Member States with similar conditions in the field of viticulture. These seminars should be open to producers and stakeholders, too.
 - (To compare: The whole Dalmatian coast in Croatia (from Zadar down to Dubrovnik) at the moment is CII (and will be CIIIb after the reform of the reg. 1308/2013)).
- Connection of different control elements: The Montenegrin Law on Wine contains all necessary elements for controls (vineyard register, declarations, accompanying documents, cellar register). At the moment all data are gained by paper documents (registration for vineyard register, declarations, ...).
 - To establish a functioning system of controls the connection between the different control elements via a database is necessary. Especially the elements for the controls of the *amount* of wine produced

and marketed have to be connected (e.g. what happens if a producer with registered vineyards does not show a production declaration? Etc.)

- Following the revised version of the action plan for acquis alignment (may 2019) the establishment of a computerized vineyard register is planned for 2020 and the setting up of a computerized system for monitoring wine products is foreseen for 2021.
 - If this is realized on the basis of the land parcel identification system (LPIS), Montenegro should assure by law an obligation for every producer to be registered (not only the ones applying for direct payments). In the wine sector not all producers are interested in direct payments, especially when these payments are connected with a lot of obligations.
 - In establishing a database, Montenegro should be supported by experts from member states having already such a database or a comparable system.
- System of origins: In the Stabilisation and Association Agreement between the EU and Montenegro the following geographical indications for Montenegrin wine are protected: In the specified region „Crnogorsko primorje“ the subregions „Bokokotorski“, „Budvansko-Barski“, „Ulcinjski“ and „Grahovsko-nudoski“ and in the specified region „Crnogorski basen Skadarskog jezera“ the subregions „Podgorički“, „Crminički“, „Riječki“, „Bjelopavlički“ and „Katunski“.
 - In the presentation held by a representative of the Ministry of Agriculture and Rural Development during the mission it has been mentioned that Montenegro intends to establish PDO wines based on the subregions.
 - That would lead to very small PDO regions and could cause the same challenges as mentioned above under the topic „wine growing zones“.
 - A product specification and a single document for the PDO „Podgorica subregion“ (raw machine translation) has been submitted to the expert. This product specification contains more than 40 different wine characters (mainly still wines with different varieties, but also sparkling wines and liqueur wines), every wine character with different parameter regarding alcohol content, residual sugar, acidity, etc.. In practice that means that more or less every wine produced in the Podgorica subregion will have a PDO status.
 - Given the experience of countries with very „broad“ product specifications (e.g. Austria, Germany) such a high number of different wines within one PDO has simply the effect that the name of the origin has no meaning for the consumer.
 - From the experts point of view this system of origins should be reconsidered and PDO wines should only the most typical wine(s) of a region.
 - Enrichment by sucrose: It should be considered if this oenological practice is really needed in Montenegro, in order to limit alignment with the EU acquis alignment to the necessary.
 - System of planting authorisations: Art. 67 par. 2 of reg. 1308/2013 allows member states with less than 10.000 ha vineyard area not to implement the system of planting authorisations. So far the Montenegrin law does not contain any disposition about the management of the Montenegrin production potential, new plantings are unlimited. From the experts point of view it should be considered if – at least on a national level – certain restrictions in replanting and new planting would make sense in Montenegro. For explanation: In general planting limitations as the 1%-rule in the EU should help to avoid unbalanced market situations or disruptions between supply and demand. Many member states have plans about their future markets and their optimal production potential to avoid surplus in production.

4.1.2. Institutional capacities of the main institutions for wine

- The Ministry of Agriculture and Rural Development is the central and main institution for the management of the wine sector in Montenegro. Wine is handled in the Directorate of plant production and for the moment this is responsible for all control components: Vineyard register, declarations, quality control (licence) and control body for wines with GI. One person is in charge of this. As soon as the vineyard register is established in the frame of LPIS, the Directorate for payments will be responsible for it.
- The Agricultural Inspection is part of the Ministry of Agriculture. In the wine sector it is responsible for all controls on producer level (cellar registers, accompanying documents, labelling and marketing) and on market level. The staff of the Agricultural Inspection is 7 persons, they have local responsibilities. Due to the local structure two persons are mainly dealing with controls in the wine sector, because their area of responsibility covers the main wine regions. No control plans or statistics with regard to the control activities in the wine sector have been shown.
- The Agricultural Advisory Service is also part of the Ministry of Agriculture and is organized in 7 regional offices. Every regional office does consultancy to the agricultural producers in the region. The Advisory Service is in contact with the Agricultural Inspection, which gives – following the explanations of a representative of the Ministry – an additional „level of controls“ in the different agricultural sectors.
- Two laboratories are involved in analysing wine samples: The Centre for Ecotoxicological Research (CETI) and the laboratory of the Biotechnical Faculty of the University of Podgorica. CETI is accredited by ISO 17025, while the laboratory of the Biotechnical Faculty has no accreditation so far. CETI has been visited during the mission and is a very well equipped laboratory (gas chromatography, liquid chromatography, atomic absorption spectrophotometry, ...) with highly qualified staff. In the wine sector 260 samples have been analysed in the last year, out of them 190 from market controls and 70 submitted by the Ministry of Agriculture (40 samples for issuing the licence before marketing and 30 samples for export). The main part of the samples for issuing the licence before marketing is done by the laboratory of the Biotechnical Faculty (has not been visited during the mission).

4.1.3. Inter-institutional cooperation and relations between institutions and stakeholders

- Chamber of Commerce in Montenegro: The Chamber of Commerce has been visited during the mission. The Chamber represents all registered producers and is organized in committees. The Committee of Agriculture within the Chamber has 29 members from all parts of the food sector. Its main tasks are support in promotion, education and international cooperation of the members. Furthermore the Chamber represents the sectors via the government and has therefore an intensive cooperation with the Ministry (legislation, budget, ...). The Chamber is also part of the negotiation team for the EU accession. So far there is no specific wine group in the Chamber but for the next year a higher degree of specialisation is planned.
- The National Association of Montenegrin Wine Producers has been founded in 2008, current president is the wine producer , who has been met in the frame of the visit in the Chamber of Commerce. The association represents 70 producers and acts as a classical NGO. It has a close cooperation with the Ministry of Agriculture and is involved into the activities of the Ministry. pointed out that one of the major problems for the Montenegrin wine producers are the very low prices of imported wines. The Chamber of Commerce on the other hand is very active in cooperation with the National Tourism Board to promote local wines together with local cuisine.
- Together with the National Association also a local association presented itself in the frame of the visit in the Chamber, headed by the wine producer. This local association represents 160 producers, 36 of them

registered as producers. So the majority of the members in this local association are producers for self-consumption. In total there are 5 local associations in Montenegro. confirmed the problem with the low prices of imported wines and in addition has the impression that for many producers it is very difficult to manage all administrative burdens like cellar record, declarations, accompanying documents and so on.

- In the course of the mission three wine producers have been visited: Plantaze (the biggest wine producer of Montenegro), Otašević Veselin family winery and the Radevic Estate Winery.
 - The discussions with the representatives mentioned above lead to the impression that all acting persons and institutions in the Montenegrin wine sector are closely connected. The interaction between the Ministry of Agriculture and the wine sector is given in many cases and seems to be uncomplicated and - also due to the little number of producers – direct. For sure the producer Plantaze has big influence in the decision processes, but also the small producers can take part in the decision findings via their associations.

4.1.4. International collaboration:

- Montenegro is a member of the OIV, the International Organisation for Vine and Wine. The OIV is the main international association in the field of oenology, methods of analysis and scientific cooperation in the global wine sector. Via the OIV Montenegro has access to the worldwide research community covering all aspects of wine production and marketing.
- In the frame of the Stabilisation and Association Agreement between the EU and Montenegro there is an agreement on reciprocal concessions for certain wines and about the reciprocal recognition, protection and control of wine, spirit drinks and aromatised wine names. This obliges Montenegro to recognize and protect all geographical indications and traditional expressions of the EU and gives the basis for mutual cooperation between the EU and Montenegro in these important aspects of the wine sector. In addition, reciprocal preferential trade concessions for certain wines have been agreed. The agreement needs to be updated to take account of developments in both Parties and the addition of newly registered wine and spirit names.

4.2. Quality schemes

4.2.1. Degree of *acquis* alignment

The legal framework in the area of quality policy in Montenegro is made up of a national general Law on Geographical indications (GIs) and three Rulebooks as secondary legislation.

- The **Law on Quality Schemes for Agricultural Products and Foodstuffs** (Official Gazette of Montenegro 22/2017), which has been harmonised with the Regulation (EU) No 1151/2012 of the European Parliament and of the Council of 21 November 2012 on quality schemes for agricultural products and foodstuffs, entered into force on 11 April 2017. Seven geographical indications have been registered so far, two of them as PGI: 'Njeguški pršut' (PGI, registered on 9 December 2016), 'Pljevaljski sir' (PDO, registered on 3 October 2017), 'Crnogorski goveđi pršut' and 'Crnogorska stelja' (PDO, registered on 16 July 2018), 'Crnogorski pršut' (PGI, registered on 28 December 2018), 'Durmitorski skorup' (PDO, registered on 25 March 2019) and 'Kolašinski lisnati sir' (PDO, registered on 6 May 2019). Two products under the "high quality" label are under the recognition process: wheat craft beer (on 19 December 2018) and honey (on 21 March 2019).
- **Rulebook on the manner of registration of the designation of origin and geographical indications of agricultural products and foodstuffs** (Official Gazette of Montenegro No. 27/2014) – It lays down content and manner of submitting the application for registration, the manner of filing an objection,

keeping the register of designations of origin or register of geographical indication, the content of the application for entry in the Records on users of registered designations of origin and of registered geographical indications, the content and the method of keeping the records, the procedure for entry and deletion from the records, the manner of submitting the application for amending the product specification as well as for cancellation of the decision on registration of the designation of origin or geographical indication. Considering this Rulebook's content and annexes, the Reg 665/2014 can be considered as fully aligned. The part of definition of product specification, single document, procedures and documents for application, complaints, etc. are in the annexes to the rulebook and even if they were issued before (2014) the enacting of the new Law (2017), they don't need to be amended.

- **Rulebook on the approval and dimensions of designations of the Designation of Origin, Geographical Indications and Traditional Specialties Guaranteed in agricultural and food products** (Official Gazette of Montenegro No. 47/18) – It provides rules for design and dimensions of the label and logo of the geographical indications and the indication of the traditional specialties guaranteed for agricultural products and foodstuffs and rules about the way agricultural and food products have to be labelled. This rulebook is not completely aligned with the Reg. 664/2014 as the sign, logo and their use are allowed only to geographical indications with an EU dimension and not at a national level of a third country. It will need to be fully aligned by the time of accession.
- **Rulebook on indications of traditional specialties guaranteed of agricultural products and foodstuffs** (Official Gazette of Montenegro No. 22/2014) – It lays down the content and manner of keeping the register of traditional specialties guaranteed, content and manner of submitting the application for registration of TSG, the manner of filing an objection, the content and procedure of acting upon a request for cancellation of a decision on registration of the name, conditions, manner and content for submitting the application for amending the specification, and the manner of keeping the records and conditions to be met by a certification body.

Regarding the Reg 668/2014, a large part of the articles are not yet transposed but, according to the Beneficiary explanation, they will go in a separate rulebook to be soon issued. In the general Law there are many articles ending with a reference to further technical details "to be laid down by the Ministry" in separate acts, so they should be in separate rulebooks to be issued soon too.

Before the approval of the primary Law on Quality schemes for agricultural products and foodstuff legislation, the MARD sent a draft to the EU Commission (DG AGRI) for comments and suggestions in order to make it fully aligned, so in term of suggestions by EU, the LAW ON QUALITY SCHEMES is considered almost fully aligned to EU regulation by the European Commission. Montenegro can benefit from TAIEX assistance for the development of all rulebooks and byelaws.

Five Associations of producers applied to certificate their products to the CB but nobody completed the certification process with CB probably because operators are not fully complying with the specification and there are often disagreements inside the association among producers themselves. Producers, that generally are big for ham GIs and small for cheese GIs, are often scared of the certification process, about following stricter rules and controlling each other.

The Ministry of Agriculture and Rural Development, in cooperation with the authorised body "Monteorganica" is conducting informative and educational workshops in all Montenegrin municipalities for the purpose of raising awareness about the importance and benefits of protecting product names by quality schemes, and about the

registration and control procedures. One of the workshop's conclusions was that gastronomy and traditional foodstuffs play an important role in promoting the national identity and culture, and that they need to be more present in the tourism offer.

4.2.2. Institutional Capacities of the main institutions (Ministry of Agriculture and Rural Development, customs authorities)

MINISTRY FOR AGRICULTURE AND RURAL DEVELOPMENT

The MARD is the Competent authority for quality schemes, it is responsible for recognition process of GIs. The Directorate for Quality Schemes has two employees, but only one is in charge of preparation of legislation, harmonization of regulations with the acquis and all the other topics related to quality policy. The Quality Scheme Officer attended all relevant trainings for this area with the support of TAIEX, FAO, BTSE.

A registration Committee for Quality Schemes is in force at the MARD, in charge of the recognition procedure. The members of the commission are determined and appointed by the Ministry, some are permanent (two representatives of the MARD, one working on quality schemes and the other working in legal affairs and a representative of the certification body) others change depending on the product. These are usually experts from University, or other economic sectors and, in some cases, representatives of the Directorate for Intellectual Property. After a request's examination, the Commission transmits the final document to the Ministry for publication on the Official Gazette of Montenegro for possible complaint, then the final publication on the Ministry website and inscription on the GI's register. Register of Geographical Indications is only an excel format.

Furthermore, there are seven Advisory services belonging to the Ministry, well connected to it and producers/associations.

The National Accreditation Body is in charge of control bodies' accreditation under the standard UNI EN CE ISO 17065 and is also responsible for supervisory activity on control bodies.

The general organization of controls on agricultural products and foodstuff is based on two different institutions:

- AGRICULTURAL INSPECTION (seven inspectors) from the MARD is in charge of official controls at the production and processing level, according to the Act on Inspection, the Administrative Procedure Act and the Criminal Offences Act, as well as to the Law on the Quality of Agricultural and Food Products, specific for GIs' duties.
- MARKET INSPECTION from the Administration for Inspection Affairs in charge of controls on the market.

Operators involved in quality schemes can apply for financial support; the agro budget for 2019 has a chapter of funding for quality schemes with the following measures for agricultural producers involved:

- Covering a part of costs for preparation of producers for registration of a collective quality scheme;
- Support to promotion, participation in regional and international fairs, exhibitions, study visits for producers;
- Participation in costs of introduction, certification of the quality management system and food safety standards;
- Covering a part of the laboratory analyses costs.

LABORATORIES

Regarding laboratories for chemical-physical analysis on food, wine, agricultural products, the beneficiary part informed that one laboratory has already been accredited according to the to the ISO 17025 (CETI), while another laboratory is in the process of accreditation (UDG). A third laboratory, at the University of Montenegro

Biotechnical Faculty, is the oldest laboratory in the country, that also provides analysis in wine sector and advices to producers, but it is not accredited and neither in the process of accreditation.

CETI is the Laboratory visited during the mission to Podgorica. It is the only laboratory accredited even if only for wine (accreditation since 2004), is the reference laboratory for food and environment and it is also a Centre for technological research.

The laboratory structure is divided in 3 units for food, air and water and then divided in many sub-segments. There are 75 employees for testing and research.

There is not a system set up for laboratory analysis for GIs so far, this topic is just at an early stage of research, but there is a strong interest in developing it.

There is an ongoing process with the aim of building a centre of excellence with 9 labs to be involved for food and wine. There is also a project to develop a scheme to protect names of herbs for medicinal aims.

This laboratory is financed both by the government and by the market: analysis can be submitted by the MARD and by producers if they want to analyse samples on their own initiative, and are paid according to a detailed price list. In case of negative analytical results, only the ministry has the authority to take appropriate action as the laboratory is not in charge of sanctions or punishments.

CONTROL BODY

The MARD has delegated control tasks on Geographical indications to a control body. Monteorganica is a private company authorized by the Ministry and the legal requirement for authorization is the accreditation to the ISO17065, but the accreditation process is not yet completed. The Control body is financed by the Ministry for carrying out certification tasks.

The staff of the organisation fluctuates between 6 and 8 employees with administrative and inspection duties. They have in place a complete set of control procedures ready or in draft: documents for producers, modules for joining the control system, control schemes, check list with minor and mayor non compliances. More in details, in case of minor non-compliance, a corrective action is required, in case of mayor, the irregular production lot is excluded under the association's responsibility and the Competent authority is informed to take more severe measures if necessary. Certificate for producer's association is distributed to each operators and lasts three years. However, at the time of the mission, none of the aforementioned documents had been approved officially by the Ministry yet.

So far, producers of five (out of seven) protected products have submitted a conformity assessment request to the authorised control body "Monteorganica". Regarding the example of Prosciutto Negusji PGI, the certification process started as a trial, visiting three operators, according to the square root of the total number as a risk criteria adopted. CB prepared a control plan, containing even the agenda and timing of checks, and sent it to association for sharing and approval. Before the inspection, the CB took all information, data, documents kept by association of producers and, within 14 days from the end of the visit, a report was sent containing any possible non compliances.

4.2.3. Inter-institutional cooperation

In order to face important issues relating to quality policy, MARD – Quality policy Unit has a strong cooperation system in place with other entities, as a sort of network of different expertise and responsibilities: Ministries (Directorate for Agriculture of the MARD, Ministry of economics - Intellectual Property Service, Ministry of finance – Customs Administration), Control body, Universities, Accreditation Body, Chamber of Commerce etc.

Cooperation with other institutions on the field of international protection of GIs, transborder checks, are still to be put in place.

4.2.4. Relations with stakeholders

CHAMBER OF COMMERCE

During a meeting at Chamber of commerce premise, the experts had the opportunity to meet the vice president and the secretary of Committee on agriculture, and many stakeholders.

Within the Chamber of Commerce, the Committee on Agriculture has an internal staff of 22 people. It several times per year organizes meeting for agricultural budget, accession matters, IPARD support and so on. They cooperate with Ministries attending to their meetings on many topics, even IPARD and negotiations accessions. They contact stakeholders to have report about their problems in order to ask for amendments to legislation.

Montenegro is largely import dependent, so a big issue on which they are very active is about making operators more competitive and helping them to open foreign market by the means of organizing workshop, seminars to develop the business sectors knowledge, and even meeting with retailers, industries, trade fairs to place their products.

They registered two trademarks: “The best from Montenegro” registered with WIPO (100 products, of which 29 are wines) and “Local flavour” registered with Ministry of economics, investment and tourism office, for catering and hotel industry with the aim to enhance tourism linked to special food.

MONTENEGRIN PROSCIUTTO ASSOCIATION OF PRODUCERS

Producers associations play an important role in the PDO/PGI/TSG system in Montenegro. The example of Montenegrin Prosciutto has been in depth examined during the mission. This association is made up of five founder members and other three associated members, each of which is a ham producer, providing also cutting and slicing operations (90% of the market regards ham in pieces of slices and the other 10% regards ham sold as entire). They applied for registration of PGI Montenegrino prosciutto in 2018, obtained the registration on February 2019, they are going to start with the first certificated product labelled as PGI on February 2020, after the minimum ageing period. They will start with a pioneer ten tons of certified ham for the first experimental phase and in the future, they hope to certify all the production. A key reason for not having completed the certification process yet is that the process is new and requires time to be completed and to come into effect fully. They want to apply for EU registration for Prosciutto Montenegrino. At the moment, there are some important safety requirements to fix in order to be allowed to export on the EU market animal products (prosciutto). Since 2010, members are obliged to follow the requirements of HACCP (Hazard analysis and critical control points approach), a process that started in 2004-2005) and invested a lot on these rules successfully but some EU standards are not fully respected yet.

Control system is divided in two steps: Internal controls carried out by external, independent auditors (now only one) and external controls carried out by Control body. Each producer has a document sets to keep regularly. The frequency of internal controls from Producers association is monthly, including also an organoleptic test. There are tasters internal to the association defined in the Statute, for organoleptic aspects, who make visual test even if they are implementing a panel at the association level. They even take samples and send them to several laboratories not yet accredited. All the documentation about internal control is at disposal of the Control Body that could also take samples in case of suspicion.

If case of non-conformities during internal controls, consequences depend on the seriousness: from a first warning to the exclusion from association as the worst case.

Regarding traceability issues, lot number is used for tracing and tracking requirements even if they have also an additional mark from the association, a stamp put on the certified product. Producers pay a fee for each pig's leg produced for association duties.

4.2.5. Overview on international collaboration (incl. neighbouring countries)

Regarding international registration, Montenegro is under the Lisbon agreement. There is a bilateral agreement with the EU for mutual recognition of geographical indications for wines and spirits, which contains lists of protected names on both sides. This agreement needs to be updated to take account of developments in both Parties and the addition of newly registered wine and spirit names.

According to the article 33 of the agreement, Montenegro shall provide protection for the geographical indications of the EU registered and Geographical indications of Montenegro shall be eligible for registration in the EU. Protection includes prohibition of using a name similar to a registered GI for comparable products, even using the expression such as 'kind', 'type', 'style', 'imitation', 'method' or the geographical indication in question is used in translation. Even the registration of a trademark the use of which could jeopardize an existing GI shall be prohibited. If a trademark already exists, it shall no longer be used after the agreement. Montenegro shall ensure the protection referred to in the agreement on its own initiative as well as at the request of an interested party.

5. Recommendations

5.1. Wine

- A more intensive assessment of the legal situation on the basis of correctly translated Montenegrin implementing regulations is needed.
- It is recommended to support the Ministry of Agriculture and Rural Development in the final process of fixing wine growing zones (for EU wine growing classification). An assessment of the consequences of small structures from a practical point of view is necessary together with a strong integration of producers, e.g. via seminars or workshops held by experts from Member States with similar conditions in the field of viticulture.
- With regard to the establishment of origins (regions for wines with geographical indications – PDO and PGI) and based on the product specification of the Podgorica subregion Montenegro should reconsider the strategy of the integration of more or less all possible wines of a region in one PDO. PDOs should mirror the most typical wine(s) of a region. Montenegro should therefore be supported in the development of executable and functioning origins creating an additional value for the wines produced there.
- To establish a functioning system of controls on all relevant elements in the sector the *connection* between the different control elements (vineyard register, production declaration, accompanying documents, ...) via an (electronic) database is necessary. In this field Montenegro should be supported from experts of the MS.

5.2. Quality Policy

Legislation

From the overall examination of the legal framework of quality schemes, it appears that some points may deserve further explanation or a specific definition in the same law or in separate rulebooks as described below.

Law on Quality Schemes for Agricultural Products and Foodstuffs:

The article 8 of the Law describes the main duties of Associations of producers in terms of internal control tasks but their comprehensive role and tasks, legal status, requirements and commitments are not clearly specified as in the Reg. 1151/2012 art. 45 "Role of group". It may be necessary to describe somewhere all the important commitments of producer groups like their contribution to ensure that the quality and reputation of their products are guaranteed by monitoring the use of the name in trade and, if necessary, by informing competent authorities. They can also take actions to ensure adequate legal protection of GIs and to prevent or counter any measures which are harmful to the image of GIs. Then, Groups can be very active in developing information and promotion activities aiming at communicating the value-adding attributes of the product to consumers, developing activities in order to ensure compliance of a product with its specification and to improve the performance of the scheme, as developing economic expertise, carrying out economic analyses, spreading economic information on the scheme and advice to producers.

Articles 64-65 of the Law about inspectorial supervision creates a bit of confusion. In setting up a proper control system on geographical Indications, it may be important clearly divide requirements, roles and tasks among all the actors involved. It is suggested to make a specific Rulebook for control and supervision requirements, including annexes with modules for written procedures about frequency of controls, control plan, check lists and guidelines for inspectors.

Supervision on the control body, authorized by the Competent authority (MARD) and accredited by the National Accreditation Body, has to be carried out from the competent authority on the basis of risk-based control procedures (according to the EU Reg. 625/2017). The MARD should be legally recognized as the Competent authority for quality schemes somewhere in the Law or in the above mentioned Rulebook or in another official legal act; similarly, its supervision tasks on control bodies should be formally defined.

A clear distinction between two levels of controls carried out on GIs should be done. On one side, controls about respecting the product specification are carried out by the control body before putting the GIs in the market and on the other side, inspection services are in charge of controlling the GIs in the market place. So, the Control Body and the Inspection Service are in charge of controls at two different stages of the food chain and of the certification/control process.

Regarding the quality indication "high quality product" proposed within the Law from 2017, the Beneficiary explained that this simple scheme is thought to promote products of smaller producers, if there are no GI that can be used. Higher quality label is a simplified procedure already used abroad to motivate small producers to differentiate their product. Anyway, this name seems to be too generic and, especially, it could conflict with the general principles of fair information to consumers defined in the EU Reg. 1169/2011 Article 7 "Fair information practices". According to its content and principles, food information shall not be misleading, specifically as to the characteristics of the food and, in particular, as to its nature, identity, properties, composition, quantity, durability, country of origin or place of provenance, method of manufacture or production (...) or by suggesting that the food possesses special characteristics when in fact all similar foods possess such characteristics (...) food information shall be accurate, clear and easy to understand for the consumer. The suggestion could be to make

the label more specific and linked to a precise set of characteristics of the production process or to a system based on the name's registration, product specifications and related checks of conformity. Anyway, the European Commission developed guidelines showing best practice for the operations of voluntary certification schemes at the national level or run by private operators (Best practice guidelines for voluntary certification schemes for agricultural products and foodstuffs) that can help at this point.

Art. 27 of the Law on Quality Schemes for Agricultural Products and Foodstuffs refers to the cancellation of a TSG if the Ministry doesn't receive information on verification of compliance with the product specification from the Control body in five years. This point is not completely in line with the EU Reg. 1151/2012 and also not properly fair for producers as the lack of information is a Control body's fault not to be charged on producers.

In the Law on Quality Schemes for Agricultural Products and Foodstuffs, the list of products admissible for application for registration of TSG is wider than the list of admissible products in the EU Reg. 1151/2012 art.2 "Scope": ex. prepared condiment sauces, soups or broths, ice-creams and sorbets are not included in the EU list of possible GIs.

Registers for geographical indications should be made public, on the MARD website or by other ways.

Official controls

Before the authorization is granted to the Control body, Competent authority should authorize its control plan containing certification and control procedures, frequency of controls, and a grid of non-conformities. Indeed, at the time of the mission, the Control body was authorized without a formal approval of its control plan and other procedures so these should be approved before the certification process officially starts.

From the examination of the documented procedures of controls, transmitted by the Control body, it appears that no appeal procedures, according to the ISO 17065, are in place neither in the control plan. In case of non-conformity (analytical or inspectional or documentary), before issuing any corrective action request or any other more severe measure, the operator has always the right to make an appeal. A specific commission, impartial and different from the certification role, should have a deadline to evaluate the appeal and decide whether to accept or reject the appeal. This point is described in the ISO 17065 requirements for bodies certifying products, processes and services as a mandatory requirement.

An IT system of exchange of mandatory information among Competent authority, Control Body and operators could be a useful instrument in order to guarantee a quick and effective communication exchange among actors and ensure mandatory communication requirements are respected, and the best coordination as well.

It could be also considered to involve the Chamber of Commerce in the control's activity as a public authority can be authorized to perform control tasks to verify that product specifications are met. In that way, a public authority doesn't need to be accredited to ISO 17065 as absence of conflicts of interests, impartiality, financial resources, equality and other requirements are guaranteed as a public entity.

Cooperation

Inter-institutional cooperation is active among some institutions (Ministries, Universities, Laboratories, Chamber of Commerce) but, on the other hand, it should be more encouraged in some cases where it seemed to be lacking regarding geographical indications issues. For example, the Customs Administration (Ministry of Finance) is not involved in the protection of GIs at the border's inspection. Even the control activity to be carried out on the market for ensuring protection of GIs from misuses, evocation, or usurpation should be coordinated as it is carried out by different institutions (Market Inspectorate - Administration for Inspection Affairs). Even the Department for Intellectual Property (within the Ministry of Economy's Directorate for Internal Market and

Competition) could be more involved in some kind of a cooperation agreement in order to ensure and strengthen protection of GIs within the national borders and especially abroad as it is a contact point for international cooperation of IP rights.

Enforcement

- The Montenegrin Prosciutto PGI implies the entire country of Montenegro even if the producers explained that the geographical area is the traditional Montenegrin area for prosciutto production and not all the country area (Cetinje and other municipalities as it is written in the product specification). At the Ministry they knew that the name could be a problem, especially because another prosciutto is registered as PGI but it is the traditional name for the prosciutto made in the ancient historical borders, they stated that they had documented evidence going back several years and it has been traditionally traded with this name. A suggestion could be to add to the name a reference to the restricted production area.
- The accreditation according to the ISO 17025 for laboratories involved in GI's analytical tests is a point still not reached but it is mandatory to keep the entire system in line with the quality requirements in general, according to the EU Reg. 625/2017.
- Similarly, the accreditation process of the authorized control body should be completed as soon as possible as a mandatory legal requirement.

Capacity Building

Training

In addition to all the work already done on training of stakeholders and others actors involved in the management of food quality schemes, it would be useful to consider more training targeted to the Control body and Competent Authority personnel in charge of controls on Geographical Indications, on the following topics which have a much wider impact than just quality policy:

- quality standards requirements in general and ISO 17065 in particular way as the certification activity carried out by the control bodies and even the supervisory activity performed by the Competent Authority are strictly connected to ISO 17065 requirements deep knowledge;
- official controls in regards to the new EU Regulation 625/2017, which will be enforced beginning 14 December 2019 replacing the Reg. 882/2004 (food safety, veterinary and phytosanitary policy). It represents the reference point, from now on, in the field of official controls performed to ensure the application of food and feed law in the EU. The article 1, Subject matter and scope, clearly states that the Regulation lays down rules for the performance of official controls and other official activities by the competent authorities in the areas of use and labelling of PDO, PGI and TSG. The article 162 contains amendments to the Reg. 1151/2012 concerning official controls as well. So the control system to put in place under Reg. 1151/2012 shall be in line with requirements of official controls on food and feed as stated in the EU Reg. 625/2017.

It could be useful to develop specialised training courses and prepare GI's enforcement guides in order to help staff and institutions involved with the quality schemes to develop their knowledge of GI's protection and enforcement.

National Strategy

It is strategic to continue an effective GI's awareness campaigns targeting different segments of the food chain: operators, retailers, and consumers in order to make the whole system valuable and reliable, to increase consumers' confidence, and to spread information about a different, certified, kind of quality products. This kind

of awareness campaign should highlight the similarity of the GI's enforcement system in Montenegro to the GI's enforcement system in EU member states.

At the consumer and stakeholder level, leaflets, brochures or even a book containing information and technical details regarding all the PDO/PGI (food and wine) recognized and certified (when they will be on the market) could be published and spread at fairs and other public events in order to advertise and spread widely the quality products scheme and their valued added characteristics.

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The present report has been written and submitted by ⁼⁼⁼ to the EU Commission on 02 December 2019.