MONTENEGRO

AUDIT AUTHORITY

N^{o}: 01-908/26-172/1

Date: 13th March 2026

ANNUAL AUDIT ACTIVITY REPORT

OF THE AUDIT AUTHORITY FOR

IPA II 2014-2020 CROSS-BORDER COOPERATION PROGRAMME

“MONTENEGRO – KOSOVO”

FOR THE PERIOD

1st JANUARY 2025 – 31st DECEMBER 2025

Podgorica, March 2026

Contents

List of abbreviation

AA	Audit Authority of Montenegro
AAAR	Annual Audit Activity Report
AAO	Annual Audit Opinion
AMD	Annual Management Declaration
AMG	Annual Management Guarantee
CA	Contracting Authority
CB	Control Body
CBC	Cross-border cooperation
CFCU	Central Finance and Contracting Unit
DMS	Directorate for Management Structure
DoE	Declaration of Expenditures
EC	European Commission
EU	European Union
EUD	Delegation of the European Union
FA	Financial Agreement
GoA	Group of Auditors
HOS	Head of Operating Structure
IA	Implementing Agency
ICF	Internal Control Framework
IPA II	Instrument for Pre-Accession Assistance II perspective
ISA	International Standards on Auditing
JTS	Joint Technical Secretariat
MCSS	Management, Control and Supervision System
MLGA	Ministry of Local Government Administration
MoP	Manual of Procedures
MS	Management Structure
NAO	National Authorising Officer
NAO SO	NAO Support Office
NFD	National Fund Division
NIPAC	National IPA Coordinator
OG MNE	Official Gazette of Montenegro
OS	Operating Structure
OTSC	On-the-spot check
PLCP	Programme level control procedures
WA	Written approval

1. INTRODUCTION

1.1 Details of the responsible Audit Authority and other bodies that have been involved in preparing the Report

The Audit Authority of Montenegro, as an independent audit body, was established by the Law on Audit of European Union funds ("*Official Gazette of Montenegro*" Nº 14/12, 54/16, 37/17 and 70/17). The Audit Authority is responsible for audit of EU funds (IPA, Structural Funds after the accession of Montenegro to the European Union and other EU funds). According to the Article 3 of Law on Audit of EU funds, the Audit Authority is functionally and operationally independent of all actors in EU funds management and control system.

The Law on Audit of EU Funds prescribes that auditees are public institutions and organisations, authorities and organisations of local self-government units, natural and legal persons who receive, use and manage EU funds respectively.

The functions and responsibilities of the Audit Authority are set out in the Framework Agreement between Montenegro and the European Commission on the arrangements for implementation of Union financial assistance to Montenegro under the Instrument for Pre-accession Assistance (IPA II), ("*Official Gazette of Montenegro*", Nº 5/2015) and in the Commission Implementing Regulation (EU) Nº 447/2014 on the specific rules for implementing Regulation (EU) Nº 231/2014 of the European Parliament and of the Council establishing an Instrument for Pre-accession Assistance (IPA II).

The Audit Authority is responsible for verifying:

- The completeness, accuracy and veracity of the annual financial reports or statements and the underlying annual accounts;
- The efficient and effective functioning of the management, control and supervision systems;
- The legality and regularity of the underlying transactions.

The Audit Authority of Montenegro is responsible for the performance of audit tasks in respect of the IPA II 2014-2020 Cross-Border Cooperation Programme "Montenegro-Kosovo" (C (2014) 9307). It has been assisted by the Group of Auditors (GoA) composed of representatives by the Audit Authority of Montenegro and Central Harmonization Unit for Internal Audit (CHU-IA) within Ministry of Finance of Kosovo.

The Audit Authority is obliged to draw up Annual Audit Activity Report (AAAR) and Annual Audit Opinion (AAO) following the model set out in Annexes D and E of the Framework Agreement for IPA II.

This Report has been prepared by the Audit Authority of Montenegro.

1.2 Reference period (i.e. the year) and the scope of the audits (including the expenditure declared to the Commission for the year concerned)

Pursuant to Article 3(f) of the Framework Agreement between Montenegro and the European Commission on the arrangements for implementation of Union financial assistance to Montenegro under the Instrument for Pre-accession Assistance (IPA II), reference period for this Annual Audit Activity Report is financial year and covers the period from 1st January 2025 to 31st December 2025.

In 2025 Audit Authority did not perform system audit. Only follow up of findings and recommendations from previous system audits was performed as separate activity before issuing the Annual Audit Activity Report and the Annual Audit Opinion.

In the reference period Audit Authority performed audit of operation on the sample of operations for which the expenditures were declared to the European Commission (EC) during 2025.

The following Declarations of Expenditure were sent to the European Commission (EC) during the reference year (2025):

- Declaration of Expenditure regarding the 2018 allocation including 730.075,65 € of total cost recognised (598.557,34 € EU part and 131.518,31 € other sources)
- Declaration of Expenditure regarding the 2019 allocation including 480.334,98 € of total cost recognised (405.751,86 € EU part and 74.583,12 € other sources)
- Declaration of Expenditure regarding the 2020 allocation including 446.639,05 € of total cost recognised (367.107,86 € EU part and 79.531,19 € other sources)

Additionally, during 2025 Final Declaration of Expenditure regarding the 2016 allocation was sent to the European Commission. According to regulation Audit Authority submitted Final Audit Activity Report and Final Audit Opinion to EC on 13th June 2025.

As for financial allocation for 2017 no expenditures were declared during the year 2025. Consequently, the Audit Authority was unable to conduct an audit of transactions/operations regarding the financial year 2025.

At the end of February and beginning of March 2026, Audit Authority performed audit of the annual financial reports for the year 2025 and assessment of the Management declaration for the respective Programme.

1.3 Identification of the sector/policy area(s) covered by the report and of its/their operating structure and management structure

The Annual Audit Activity Report covers the Cross-Border Cooperation Action Programme "Montenegro-Kosovo" for the years 2017-2020 (2017/038-183, 2018/041-472, 2019/041-474 and 2020/041-475) which provide assistance for cross-border cooperation in the thematic area spelled out in the IPA II 2014-2020 CBC Programme "Montenegro – Kosovo" (C(2014) 9307).

Structures and bodies being part of the management and control system of this Programme are, as follows:

- National IPA Coordinators of both countries;
- The National Authorising Officer of Montenegro;
- The Management Structure of Montenegro (National Fund and NAO Support Office);
- The Operating Structure (OS) of Montenegro composed of: Head of the Operating Structure (Montenegrin HOS), Cross-border Cooperation Body (Montenegrin CBC Body) and Contracting Authority (CA/CFCU). The first two are located in the Directorate for European Territorial Cooperation within Ministry of European Affairs. Contracting Authority is located in the Montenegrin Ministry of Finance - Directorate for Finance and Contracting of the EU Assistance Funds (CFCU);
- the Operating Structure (OS) of Kosovo composed of: Head of the Operating Structure (HOS) and the Cross-border Cooperation Body (CBC Body) which are located in the Ministry of Local Government Administration;
- Control Body (KOS CB) placed in Ministry of Local Government Administration.

1.4 Description of the steps taken to prepare the report and to draw the audit opinion

To prepare the Annual Audit Activity Report, the Audit Authority processes, summarises and assesses the findings and recommendations included in the final reports on performed audits and carries out a follow-up to assess the time proportional implementation of audit recommendations.

The Annual Audit Activity Report sets out, inter alia, deficiencies found in the management, control and supervision systems and corrective measures taken or planned by the NAO/NAO Support Office, National Fund and/or the operating structures concerned, and details of any substantial changes in the management and control systems.

With a view to drawing up an audit opinion, Audit Authority assessed results of audit activities from the audits of management, control and supervision system performed in period 2017-2024 and audits of operations performed during 2025, result of follow up of the findings and recommendations, results of audit of annual financial reports for 2025 and assessed the consistency of the management declaration with regard to performed audit work.

Based on the available information, final audit reports and follow up activities the Audit Authority prepares Annual Audit Activity Report and Annual Audit Opinion.

The Annual Audit Activity Report and Annual Audit Opinion have been submitted to the European Commission and Government of Montenegro with a copy to the NIPAC and NAO by 15th March each year.

2. SUBSTANTIAL CHANGES IN MANAGEMENT AND CONTROL SYSTEMS

2.1 Details of any substantial changes in the management and control systems, and confirmation of its compliance with Article 7 of Commission Implementing Regulation (EU) No 447/2014 based on the audit work carried out by the audit authority under Article 12 of Commission Implementing Regulation (EU) No 447/2014

During 2025 NAO informed the European Commission and Audit Authority about substantial and planned changes in the system. The following changes occurred in 2025:

- **National IPA Coordinator**

At the Government session held on 6th February 2025, Minister of European Affairs – Ms Maida Gorčević has been appointed as NIPAC.

NAO informed European Commission and Audit Authority on these personal change on 2nd April 2025. (Letter No: 08-908/25-9418).

2.2 The dates from which these changes apply, the dates of notification of the changes to the audit authority, as well as the impact of these changes on the audit work are to be indicated

The changes that occurred in MCSS in 2025 have been communicated to the European Commission and the Audit Authority. Changes have been assessed by Audit Authority and we can confirm their compliance with Article 7 of Commission Implementing Regulation (EU) Nº 447/2014.

Above listed changes do not have an impact on the audit work.

3. CHANGES TO THE AUDIT STRATEGY

According to the Article 12 of Commission Implementing Regulation N° 447/2014 the Audit Authority shall carry out audit in accordance with Audit Strategy prepared on a tri-annual basis.

The Audit Strategy for IPA II 2014-2020 CBC Programme "Montenegro – Kosovo" was prepared and submitted to the European Commission with a copy to the NAO in November 2024. The Audit Strategy was prepared on a tri-annual basis for period 2025-2027 following the model in Annex G of Montenegrin Framework Agreement and approved by General Auditor after having obtained the opinion of GoA members.

The Audit Strategy has not been changed in the reference period to which the Annual control report relates.

4. SYSTEMS AUDITS

4.1. Details of the bodies that have carried out system audit

The audit body that has carried out system audit is Audit Authority of Montenegro. The Audit Authority of Montenegro, as an independent audit body, was established by the Law on Audit of European Union funds ("Official Gazette of Montenegro" N° 14/12, 54/16, 37/17 and 70/17). Audit Authority of Montenegro is responsible for carrying out the function of the Audit Authority for IPA II 2014-2020 CBC Programme "Montenegro - Kosovo", in line with the functions and responsibilities set out in Clause 5 of Annex A to the Framework Agreement.

Since the Audit Authority does not have the authorisation to directly carry out its functions in the whole territory covered by CBC Programme "Montenegro – Kosovo", it is assisted by Group of auditors comprising a representative of Audit Authority of Montenegro and the Central Harmonization Unit for Internal Audit (CHU-IA) within Ministry of Finance of Kosovo.

4.2 Summary table of the audits carried out, with the indication of the authorities/bodies audited, the assessment of the key requirements for each body, issues covered and comparison to the audit planning

Not applicable.

System audit was not performed in the reference period. According to Audit Strategy for 2025-2027 and based on risk assessment and professional judgement system audit was not planned considering that in period 2017-2024 it was performed each year and all authorities and functions included in the MCSS as well as key control requirements set out in Annex B of FWA were audited.

Only follow up of findings and recommendations from previous system audits was performed during February 2026. The results of follow up are presented in Audit Recommendation Status Report.

4.3 Description of the basis for selection of the audits in the context of the audit strategy

Not applicable.

4.4.1 Description of the principal findings and conclusions drawn from the audit work for the management and control system and their functioning

Not applicable.

4.4.2 Details of whether any problem identified were considered to be of systemic character, and of measures taken, including a quantification of the irregular expenditure and any related financial corrections

Not applicable.

4.5 Description of specific deficiencies related to the management of financial instruments

Not applicable.

4.6 Level of assurance obtained following the system audit (low/average/high) and jurisdiction

The evaluation of the MCSS is expressed within one of the four categories as follows:

- Works well; only minor improvements are needed;
- Works, but some improvements are needed;
- Works partially; substantial improvements are needed;
- Essentially does not work.

According to the results of the system audits conducted in previous years (2017-2024), as well as results of follow up of findings performed in 2025, MCSS established for implementation of the IPA II 2014-2020 CBC Programme ″Montenegro-Kosovo″ has been classified in Category 2 that is it **'works, but some improvements are needed'**. Therefore, the level of assurance obtained from the system is average.

5. AUDITS OF SAMPLES OF TRANSACTIONS

5.1 Authorities/bodies that carried out the sample audits, including the audit authority

The audit of sample of transaction in the framework of IPA II 2014-2020 CBC Programme "Montenegro - Kosovo" was conducted by the Audit Authority of Montenegro according to Audit Strategy 2025-2027. In conducting the audit AA was assisted by the Group of Auditors composed of representatives of the Audit Authority of Montenegro who performed the audit in territory of Montenegro and representatives of the Central harmonization unit for internal audit (CHU-IA) who performed the audit in the territory of Kosovo in accordance with Rules of procedures of Group of Auditors.

5.2 Description of the sampling methodology applied and information whether the methodology is in accordance with the audit strategy

The sampling was performed by the Audit Authority in accordance with the method described in the Audit Strategy 2025-2027 adopted for the Programme and in accordance with international auditing standards and having regard to the EGESIF 16-0014-01 Guidance on sampling methods for audit authorities.

Bearing in mind small number of operations in accounting year 2025 the sample was selected applying non-statistical sampling method by random selection of items. Sample size has been determined taking into account AA overall assessment of the MCSS and EGESIF 16-0014-01 guidance regarding minimal sample size when applying non-statistical sampling.

5.3 Indication of the parameters used for statistical sampling, materiality level, the confidence level, the expected error rate applied, calculation of the required sample and the interval, sampling unit, number of sampling units in the population, number of sampling units actually audited.

Not applicable bearing in mind that AA used non-statistical method.

5.4 Reconciliation of the expenditure declared to the Commission in the financial year to the sampled expenditure. Reconciling items include negative items where financial corrections have been made in the financial year, as well as differences between amounts declared in euro and amounts in national currency, where relevant.

The audit of operations was performed on the sample of operations for which the expenditures were declared to the European Commission during 2025.

During 2025 NAO submitted to EC Declarations of expenditures regarding the CBC Action Programme "Montenegro - Kosovo" for the years 2018, 2019 and 2020. Additionally, Final Declaration[1] of Expenditure regarding the 2016 allocation was sent to the European Commission. As for financial allocation for 2017 no expenditures were declared during the year 2025. Consequently, the Audit Authority was unable to conduct an audit of transactions/operations regarding the financial year 2025.

- *CBC Action Programme ˝Montenegro - Kosovo˝ for the year 2018*

Declaration of Expenditures was sent to the European Commission on 19th September 2025 in total amount of cost recognised of 730.075,65 € (598.557,34 € EU part and 131.518,31 € private co-financing).

No negative items were present in the amounts declared to the Commission during 2025.

The population consists of four (4) operations including 730.075, 65 € of total cost recognised amounts included in CA accounting records and declared to the Commission in the financial year 2025.

Population is given in the table below:

Contract	Name of the Contract	Contractor	Cost recognised		
			EU part	Private co-financing	Total
CFCU/MNE/223	Act SMART, save water!	Kosova Development Center	145.943,99	45.567,30	191.511,29
CFCU/MNE/224	New Environment Revitalization Approach - NERA	The Municipality of Tuzi	285.550,12	56.469,26	342.019,38
CFCU/MNE/226	Skills for Sustainable Employment, Employment in Cross-Border	Chamber of Economy of Montenegro	55.694,89	9.828,51	65.523,40

[1] According to regulation Audit Authority submitted Final Audit Activity Report and Final Audit Opinion to EC on 13th June 2025.

	Region of Montenegro and the Republic of Kosovo - No Borders				
CFCU/MNE/232	In Employment, Education, Training – IN EET	NGO Juventas	111.368,34	19.653,24	131.021,58
Total			598.557,34	131.518,31	730.075,65

- *CBC Action Programme ˝Montenegro - Kosovo˝ for the year 2019*

Declaration of Expenditures was sent to the European Commission on 21st February 2025 in total amount of cost recognised of 482.334,98 € (407.751,86 € EU part and 74.583,12 € private co-financing).

No negative items were present in the amounts declared to the Commission during 2025.

The population consists of four (4) operations including 480.334,98 € of total cost recognised amounts included in CA accounting records and declared to the Commission in the financial year 2025.

Population is given in the table below:

Contract	**Name of the Contract**	**Contractor**	**Cost recognised**		
			EU part	**Private co-financing**	**Total**
CFCU/MNE/225	Young NEETs: new opportunities for work and increased employability - UNEETED	Institute for Strategic Studies and Prognoses	40.523,79	10.131,09	50.654,88
CFCU/MNE/227	The Cultural Renaissance from Skadar Lake to Kosovo - TIME TRAVEL	Community Development Fund (CDF)	111.253,26	19.632,94	130.886,20
CFCU/MNE/229	Evocation and Attraction of Cultural Heritage-Christian Antiquity and Turkish Bath for Cultural Tourism	Museum of Polimlje - Berane	146.026,52	25.769,39	171.795,91
CFCU/MNE/230	C.L.O.S.E.R. - Culture-Led Opportunities for Sustainable Economic Revitalisation	Kosovo Foundation for Cultural Heritage without Borders	107.948,29	19.049,70	126.997,99
Total			405.751,86[2]	74.583,12	480.334,98[3]

[2] Expenditure actually declared was 407.751,86€, due to technical error

[3] Expenditure actually declared was 482.334,98€, due to technical error

- *CBC Action Programme ˝Montenegro - Kosovo˝ for the year 2020*

Declaration of Expenditures was sent to the European Commission on 19th September 2025 in total amount of cost recognised of 446.639,05 € (367.107,86 € EU part and 79.531,19 € private co-financing).

No negative items were present in the amounts declared to the Commission during 2025.

The population consists of two (2) operations including 446.639,05 € of total cost recognised amounts included in CA accounting records and declared to the Commission in the financial year 2025.

Population is given in the table below:

Contract	Name of the Contract	Contractor	Cost recognised		
			EU part	**Private co-financing**	**Total**
CFCU/MNE/228	Cross-border Green deal	FORS Montenegro	254.064,81	59.582,42	313.647,23
CFCU/MNE/231	Turning our villages into tourism destinations	Municipality of Peja	113.043,05	19.948,77	132.991,82
Total			367.107,86	79.531,19	446.639,05

5.5 Where there are negative items, confirmation that they have been treated as a separate population.

Not applicable.

5.6 In case of the use of non-statistical sampling, indicate the reasons for using the method in line with Article 12 (2) of Commission Implementing Regulation (EU) No 447/2014, the percentage of actions/operations / expenditure covered through audits, the steps taken to ensure randomness of the sample (and its representativeness) and to ensure a sufficient size of the sample enabling the audit authority to draw up a valid audit opinion. A projected error rate is calculated also in case of non-statistical sampling.

According to EGESIF_16-0014-01 "Guidance on sampling methods for audit authorities Programming periods 2007-2013 and 2014-2020" of 20th January 2017, the sampling unit in ETC programmes when designing the sampling methodology may be the operation, project partner or payment claim.

During the planning phase of audits of operation AA decided that operation is set as sampling unit considering that said sampling unit will allow the AA to assess all audit area in order to attain audit of operation´s objectives.

Bearing in mind small number of operations per programme (4 operations each for allocations 2018 and 2019 and 2 operations for allocation 2020) the sample was selected applying non-statistical sampling method by random selection of items. Sample has been determined taking into account AA overall assessment of the MCSS, Commission statement regarding minimal sample size when applying non-statistical sampling, and risks identified in previous audit engagements.

To assure the randomness of the sample, the AA used a specialized CAAT tool CaseWare IDEA.

For audit of operation in respect to CBC Action Programme Montenegro - Kosovo for the year 2018 two (2) operations in overall amount of 407.542,78 € have been selected in the sample which represents 50% of the total number of units/operations (population) and 55,82% of total amount of declared costs.

For audit of operation in respect to CBC Action Programme Montenegro - Kosovo for the year 2019 one (1) operation in overall amount of 171.795,91 € has been selected in the sample which represents 25% of the total number of units/operations (population) and 35,77% of total amount of declared costs.

For audit of operation in respect to CBC Action Programme Montenegro - Kosovo for the year 2020 one (1) operation in overall amount of 132.991,82 € has been selected in the sample which represents 50% of the total number of units/operations (population) and 29,78% of total amount of declared costs.

Taking into account the level of assurance provided by the system audits and risks identified, the AA considers that the drawn samples are sufficient to draw conclusions and an audit opinion.

5.7 Summary table (see below), broken down where applicable by programme indicating the eligible expenditure declared to the Commission during the year, the amount of expenditure audited, and the percentage of expenditure audited in relation to total eligible expenditure declared to the Commission for the last year, as well as the total number of sampling units in the population and the number of sampling units actually audited for the random sample. Information relating to the random statistical sample is distinguished from that related to other samples if applicable (e.g. risk-based complementary samples).

CBC Action Programme "Montenegro - Kosovo" for the year 2018		
1	Amount of declared expenditures	730.075,65 €
2	No of units in population	4

3	Value of the sample tested	407.542,78 €
4	Value of the sample tested in %	55,82 %
5	No of units in sample	2
6	No of units in sample in %	50 %
7	Materiality 2% of expenditure declared in reference period (tolerable misstatement) (1*2%)	14.601,51 €
8	Error amount determined by the audit	0,00
9	Sample error rate ((8/3)*100)	0,00
10	Projected random error (1*9)	0,00

CBC Action Programme "Montenegro - Kosovo" for the year 2019		
1	Amount of declared expenditures	480.334,98 €
2	No of units in population	4
3	Value of the sample tested	171.795,91 €
4	Value of the sample tested in %	35,77 %
5	No of units in sample	1
6	No of units in sample in %	25%
7	Materiality 2% of expenditure declared in reference period (tolerable misstatement) (1*2%)	9.606,70 €
8	Error amount determined by the audit	0,00
9	Sample error rate ((8/3)*100)	0,00
10	Projected random error (1*9)	0,00

CBC Action Programme "Montenegro - Kosovo" for the year 2020		
1	Amount of declared expenditures	446.639,05 €
2	No of units in population	2
3	Value of the sample tested	132.991,82 €
4	Value of the sample tested in %	29,78 %
5	No of units in sample	1
6	No of units in sample in %	50%
7	Materiality 2% of expenditure declared in reference period (tolerable misstatement) (1*2%)	8.932,78 €
8	Error amount determined by the audit	0,00
9	Sample error rate ((8/3)*100)	0,00
10	Projected random error (1*9)	0,00

5.8 Analysis of the principal results of the audits (sample items selected and audited, together with the respective amount and types of error by operation) as well as the nature of errors found, root causes and corrective measures proposed, including mitigating these errors in the future.

The overall audit objective is to verify the legality and regularity of declared expenditures, in accordance with AA competencies established by the Law on Audit of EU Funds and functions and the responsibilities set out in Annex A of the Framework Agreement concluded between the Government of Montenegro and the European Commission.

- *CBC Action Programme ˝Montenegro - Kosovo˝ for the year 2018*

The audit was performed on sample of two operations. Details about operation we have selected are given in the table below:

N°	Sampled Contracts (operations)	EU part	Private co-financing	Total cost recognised declared to the Commission	Expenditure audited (EUR)	Audited / Declared expenditure (%)
1	CFCU/MNE/224 – New Environment Revitalization Approach - NERA	285.550,12	56.469,26	342.019,38	342.019,38	100%
2	CFCU/MNE/226 - Skills for Sustainable Employment, Employment in Cross-Border Region of Montenegro and the Republic of Kosovo - No Borders	55.694,89	9.828,51	65.523,40	65.523,40	100%
Total		**341.245,01**	**66.297,77**	**407.542,78**	**407.542,78**	**100%**

Following bodies were covered during the audit:

- Directorate for Finance and Contracting of the EU Assistance Funds (CFCU) – Contracting Authority (CA)/Implementing Agency (IA);
- National Fund Division (NFD);
- Control Body (CB).

Audit Authority of Montenegro carried out on-the-spot checks at the premises of the Project Coordinator The Municipality of Tuzi for the Contract CFCU/MNE/224 where the procured equipment has been delivered and installed on the field, and at the premises of the Project Coordinator Chamber of Economy of Montenegro and the Project Partner Regional Business Centre Berane for the Contract CFCU/MNE/226 where the procured equipment has been delivered.

The Kosovo GoA members carried out on the spot check at the premises of Kosovo project partner, i.e. The Municipality of Peje for the Contract CFCU/MNE/224 and Chamber of Commerce of the Republic of Kosovo Education Training and Research Institute – ETRI for the Contract CFCU/MNE/226.

During the audit, we have not identified audit findings.

- *CBC Action Programme "Montenegro – Kosovo" for the year 2019*

The audit was performed on sample of one operation. Details about operation we have selected are given in the table below:

N°	Sampled Contracts (operations)	EU part	Private co-financing	Total cost recognised declared to the Commission	Expenditure audited (EUR)	Audited / Declared expenditure (%)
1	CFCU/MNE/229 "Evocation and Attraction of Cultural Heritage - Christian Antiquity and Turkish Bath for Cultural Tourism Creating Employment in Agriculture"	146.026,52	25.769,39	171.795,91	171.795,91	100%
Total		**146.026,52**	**25.769,39**	**171.795,91**	**171.795,91**	**100%**

Following bodies were covered during the audit:

– Directorate for Finance and Contracting of the EU Assistance Funds (CFCU) – Contracting Authority (CA)/Implementing Agency (IA);
– National Fund Division (NFD);
– Control Body (CB).

Audit Authority of Montenegro carried out on-the-spot check at the premises of project Coordinator Polimski muzej Berane where the procured equipment has been delivered and at the Tumbarice castrum were excavation works were carried out.

The Kosovo GoA members carried out on the spot check at the premises of Kosovo project partner, i.e. Shoqata Alpinistike Marimangat e Pejes.

During the audit, we have identified and documented audit findings. The categories which we use to classify our findings are as follows:

- *System findings* - Findings for which action should be taken to ensure full compliance, but have no financial consequences

- *Transaction findings* - Findings which have financial impact

System findings:

- **Finding N° 1: Incorrect amount of the total cost recognized in the Declaration of Expenditure**

Responsible body: *NAO/Head of DMS*

According to Financing Agreement for the CBC Programme between European Commission, Montenegro and Kosovo for the year 2019, CRIS Ref.no.2019/041-474, Annex II, General Conditions, Article 10 (5): *„Cost recognised in the accounting system maintained under the section 4 of this Article must have been incurred, paid and accepted and correspond to actual costs proven by supporting* *documents and shall be used when appropriate to clear pre-financing paid by the IPA II beneficiary that is the Contracting Authority under local contracts.“*

During the Audit of Operation, auditors concluded that the total amount of cost recognised in Declaration of Expenditure sent to the EUD in the Request for Funds for CBC Programme Montenegro-Kosovo for the year 2019 on 21st February 2025, do not correspond with the cost actually recognised by the Operating Structure.

Namely, in the Declaration of Expenditure sent to the EUD, amount of total cost recognised by the CFCU was EUR 482.334,98. By reviewing the supporting documentation from the Structure, auditors concluded that the total cost which was incurred, paid, accepted and correspond to actual costs proven by supporting documents was EUR 480.334,98.

The difference between the total cost recognised in the DoE and the total cost that is actually incurred, paid and accepted is EUR 2.000,00.

Level of priority: *Major*

Recommendation:

We recommend to the NAO to give a correct data of total cost recognised in the next Annual Financial Report and in the next Declarations of Expenditure, taking into account incurred, paid and accepted cost.

Follow up:

Based on the documents/evidence provided by the auditee during the audit of accounts it is evident that NAO gave a correct data of total cost recognized in the Annual Financial Report for 2025. Finding is closed.

Transaction findings:

No transaction findings have been identified during the audit.

- *CBC Action Programme ˝Montenegro – Kosovo˝ for the year 2020*

The audit was performed on sample of one operation. Details about operation we have selected are given in the table below:

Nº	Sampled Contracts (operations)	EU part	Private co-financing	Total cost recognised declared to the Commission	Expenditure audited (EUR)	Audited / Declared expenditure (%)
1	CFCU/MNE/231 – Turning our villages into tourism destinations	113.043,05	19.948,77	132.991,82	132.991,82	100%
Total		**113.043,05**	**19.948,77**	**132.991,82**	**132.991,82**	**100%**

Following bodies were covered during the audit:

- Directorate for Finance and Contracting of the EU Assistance Funds (CFCU) – Contracting Authority (CA)/Implementing Agency (IA);
- National Fund Division (NFD);
- Control Body (CB).

Audit Authority of Montenegro carried out on-the-spot check at the premises of the Project Partner Regional Development Agency for Bjelasica, Komovi and Prokletije where the procured equipment has been delivered and installed on the field.

The Kosovo GoA members carried out on the spot check at the premises of Project Coordinator, the Municipality of Peje and the Project Partner Regional Development Agency – West.

During the audit, we have not identified audit findings.

5.9 Details of the most likely error rate (total error rate) and, in case of statistical sampling method, the upper limit of the error rate as a result of the audits of operations, and the amount of irregular expenditure detected and the error rate resulting from the random sample audited.

Not applicable. No irregular expenditures were detected during the audit of operation.

5.10 Compare the total error rate with the set materiality level, in order to ascertain if the population is materially misstated or not. If so, analyse the significance of the total error rate for the audit opinion and report the recommended corrective measures.

Not applicable.

5.11 Corrections relating to the current year implemented by the operating structure/management structure before submitting the final declaration of expenditure and financial statements to the Commission, and resulting from the audits of operations, including flat rate or extrapolated corrections.

Not applicable.

5.12 Residual total error rate following the implementation of the above-mentioned corrections and significance for the audit opinion.

Not applicable.

5.13 Information on the results of the audit of the complementary (e.g. risk based) sample, if any.

Not applicable.

5.14 Information on the follow-up of irregularities, including revision of previously reported residual error rates, as a result of all subsequent corrective actions.

See Part 7.1. Follow-up of previous years' audit activity - *Status of audit of operation findings.*

5.15 Details of whether any problems identified were considered to be systemic in nature, and the measures taken, including a quantification of the irregular expenditure and any related financial corrections.

Not applicable.

5.16 Description (where applicable) of specific deficiencies or irregularities related with financial instruments. Where applicable, indication of the sample error rate concerning the audited financial instruments.

Not applicable.

5.17 Analysis of the principal results of the audits of negative items, including conclusions as to whether the negative items audited correspond to the decisions of the country or of the Commission, and reconcile with the amounts included in the accounts on amounts withdrawn and recovered during the year and amounts to be recovered at the end of the year.

Not applicable.

5.18 Conclusions drawn from the results of the audits with regard to the effectiveness of the management and control system.

The conclusions of the audits are based on the information and documents gathered during the audits from beneficiaries and MCSS bodies, interviews conducted in the audited bodies and tests performed following the working papers and checklists for specific audit areas.

Based on the audit work performed we have obtained reasonable assurance that the expenditure declared in respect to CBC Programme Montenegro – Kosovo for the year 2018 in the amount of 730.075,65 € in the period 01/01 – 31/12/2025 is in all material aspects, legal and regular.

Based on the audit work performed we have obtained reasonable assurance that the expenditure declared in respect to CBC Programme Montenegro – Kosovo for the year 2019 in the amount of 480.334,98 € in the period 01/01 – 31/12/2025 is in all material aspects, legal and regular.

Based on the audit work performed we have obtained reasonable assurance that the expenditure declared in respect to CBC Programme Montenegro – Kosovo for the year 2020 in the amount of 446.639,05 € in the period 01/01 – 31/12/2025 is in all material aspects, legal and regular.

On the basis of result of the audit of operation, Audit Authority concluded that assessment of MCSS given during system audit which is in Category 2 ('works, but improvements are needed') shall remain same.

6. AUDITS OF THE ANNUAL FINANCIAL REPORTS OR STATEMENTS/ANNUAL ACCOUNTS

6.1 Indication of the authorities/bodies that have carried out audits of the annual financial reports or statements/annual accounts.

The audit of the annual financial reports or statements/annual account in the framework of IPA II 2014-2020 CBC Programme "Montenegro-Kosovo" was conducted by the Audit Authority of Montenegro according to Audit Strategy 2025-2027.

6.2 Description of audit approach used to verify the elements of the annual financial reports or statements/annual accounts defined in Article 12(2) and Article 23(1)(b) of Commission Implementing Regulation (EU) No 447/2014.

Audit of accounts was carried out in compliance with the Audit Authority Manual of procedures, Programme Audit Strategy 2025-2027, Framework Agreement and relevant Financing Agreements.

The NAO submitted to the Commission, in accordance with Article 59(2) of the Framework Agreement, the Annual Financial Reports for Action and CBC Programmes for Montenegro, managed under indirect management on 13th February 2026 including the CBC Programmes "Montenegro-Kosovo" for years 2017-2020[4].

The amounts declared in the Annual Financial Report for 2025 are presented in the table below:

Programme Reference	**Financing Agreement contract number**	**Total Amount Disbursed**		**Total Costs Recognised**		**Total Open Pre-financing**		**Bank Balances (EU contribution)**	**Recovery context**
		EU contribution	**Other sources**	**EU contribution**	**Other sources**	**EU contribution**	**Other sources**		
CBC MNE-KOS 2017	2017/038-183	715.614,61	0,00	715.614,61	148.317,64	0,00	0,00	101.063,62	34.520,65
CBC MNE-KOS 2018	2018/041-472	956.298,35	0,00	755.980,17	161.633,26	200.318,18	0,00	243.701,65	N/A
CBC MNE-KOS 2019	2019/041-474	1.128.637,37	0,00	841.556,47	151.489,82	287.080,90	0,00	71.362,63	N/A
CBC MNE-KOS 2020	2020/041-475	851.632,71	0,00	826.678,47	185.214,32	24.954,24	0,00	228.367,24	N/A

During the audit AA took into consideration the results of the audits performed in 2025 and results of follow up of findings issued in the previous audits.

Moreover, in accordance with the EGESIF Guidance 15-0016-04 of 03/12/2018, the AA performed additional verifications on the accounts in order to provide an opinion whether the accounts give a true and fair view. AA also checked whether the accounts had been prepared in accordance with the templates set out in Annex 4a and 4b of Financing Agreement.

The Audit Authority, on the basis of the Annual Financial Reports provided by the National Fund Division (NF), verified that:

a) the total amounts submitted in the Annual Financial Report (programme budget, contracted amounts, amounts disbursed, total costs recognised, amounts of open pre-financing and the relevant percentages based on appropriate total amounts submitted to the Commission in accordance with the Annex IV of the Financing Agreements, as well as recovery context information on ineligible cost and recoveries) correspond to the amounts entered in the accounting system of National Fund Division (NF) and Implementing Agency/CFCU;
b) the total amounts submitted in the Annual Financial Report correspond to the amounts in the electronic database for each contract, in relation to the contract reference, contract value including any amendments, contract signature date, contract implementation start and end date, amount total paid by contract, amount related to total pre-financing paid and pre-financing cleared, total costs recognized, amount of recoveries under the contract;
c) the bank account statement balances and the bank confirmation letter correspond to the year-end balances in the accounting systems of the National Fund Division (NF);
d) reconciliation of the accounting records and cash flow statements of the National Fund Division (NF) and Implementing Agency (CFCU) is performed;
e) total amounts of recoveries correspond to supporting documents for recoveries.

Audit was performed using the Checklist for audit of accounts (Annex 4c of the AA MoP). Comparison and testing data were carried out on Annual Financial Reports – (Annexes 4a and 4b of Financial Agreements), IA Requests for Funds, IA Financial Reports Register, Quarterly Progress Report on contracts and payments, Written Approval Letters, IA payment orders, Payment books, IA Cash flow statements, Bank statements and IA Accounting records in the General ledger.

Furthermore, verifications on the amounts were carried out on the following evidence in the National Fund Division (NF): Year-end cut-off reports, Analytical cards of MF-NF IPA CBC MNE-KSV

[4] NAO submitted Final Declaration to the EC for allocations 2014 and 2015 in 2024. Final Declaration for allocation 2016 was submitted to EC in 2025.

accounts, Payment requests to the EC, Requests for Funds from IA, Liquidity books, Bank statements and Transfer orders and accounting records in the General Ledger.

See reconciliation table below:

Programme/Grant beneficiary					NF Accounting System													IA/CFCU								
Name of allocation	Current contract value/ EU part	Current contract value/ Other sources	Source	Payment Request by Grant beneficiary	RfF from IA	Record in NF Acc system	Bridge Financing	Record in NF Acc system	RfFs to EC	Record in NF Acc system	Bank statement MF-NF-IPA Acc	Record in NF Acc system	Bank statement State Treasury Main Acc	Record in NF Acc system	Financial Forecast	Cost recognised EU part	Calculation by AA	Payment Order	Bank statement	Record in CFCU Acc system	Pre-financing/Final payment paid	Pre-financing/ Final payment cleared	Open pre-financing	Calculation by AA	Recovery by AA	Recovery by CFCU
CBC MNE-KSV 2017	816,678.23	167,464.47	Pre-financing Further pre-financing Final payment	750,135.26	750,135.26	750,135.26	0.00	0.00	750,135.26	750,135.26	750,135.26	750,135.26	750,135.26	750,135.26	0.00	715,614.61	715,614.61	750,135.26	750,135.26	750,135.26	750,135.26	715,614.61	34,520.65	34,520.65	34,520.65	34,520.65
CBC MNE-KSV 2018	1,200,000.00	274,436.06	Pre-financing	956,298.35	956,298.35	956,298.35	0.00	0.00	956,298.35	956,298.35	956,298.35	956,298.35	956,298.35	956,298.35	0.00	755,980.17	755,980.17	956,298.35	956,298.35	956,298.35	956,298.35	755,980.17	200,318.18	200,318.18	0.00	0.00
CBC MNE-KSV 2019	1,200,000.00	223,905.01	Pre-financing Further pre-financing	1,112,177.26	1,112,177.26	1,112,177.26	0.00	0.00	1,128,637.37	1,128,637.37	1,128,637.37	1,128,637.37	1,128,637.37	1,128,637.37	0.00	841,556.47	841,556.47	1,128,637.37	1,128,637.37	1,128,637.37	1,128,637.37	841,556.47	287,080.90	287,080.90	0.00	0.00
CBC MNE-KSV 2020	1,079,999.95	318,564.20	Pre-financing Further pre-financing	851,632.71	851,632.71	851,632.71	0.00	0.00	851,632.71	851,632.71	851,632.71	851,632.71	851,632.71	851,632.71	0.00	826,678.47	826,678.47	851,632.71	851,632.71	851,632.71	851,632.71	826,678.47	24,954.24	24,954.24	0.00	0.00

CBC MNE-KSV 2017* 34.520,65 € is amount of initiated recovery for the Contract CFCU/MNE/147-0 and for the Contract CFCU/MNE/150. The amount has been recovered.

CBC MNE-KSV 2018* 1.109,93 € is amount of initiated recovery by the CFCU for the Contract CFCU/MNE/232. The recovery has not been made in 2025 and thus is not presented in the columns showing recovery.

During the audit, no findings which have an influence on the completeness, accuracy and veracity of the amount reported in annual accounts have been identified for CBC Programme MNE-KSV 2017 - 2020.

6.3 Indication of the conclusions drawn from the results of the audits in regard to the completeness, accuracy and veracity of the declaration of expenditure and financial statements, including an indication on the financial corrections made and reflected in the declaration of expenditure and financial statements as a follow-up to the results of the audit on transactions/operations.

The conclusion of the audit is based on the analysis of the procedure in place, information and documents collected in the Directorate for Finance and Contracting of the EU Assistance Funds (CFCU) and Directorate for Management Structure/ National Fund Division (NF), as well as the tests performed in the course of the audit by applying the Checklist for the audit areas.

The Audit Authority also considered the results from the audits performed during 2025 and results of follow up of findings issued in the previous audits.

System audits performed in previous years have not resulted in financial corrections regarding the reference period and have not affected the accuracy of the Annual Financial Reports for 2025.

The audits of operation performed in previous years as well as in 2025 have not resulted in financial corrections regarding the reference period. Technical error detected during the audit of operation for allocation 2019 has been corrected. (see Finding No.1 in point 5.8 of the Report). Namely, amount of 2.000,00 € of the cost recognised which was wrongly presented in Declaration of Expenditure submitted to EC on 21st February 2025 was deducted from the total recognised cost in AFR for allocation 2019.

Based on the audit work performed we have obtained reasonable assurance on the completeness, accuracy and veracity of the amounts declared in the accounts submitted to the Commission for the accounting year 2025.

6.4 Indication of whether any problems identified were considered to be systemic in nature, and the measures taken.

No problems considered to be systemic in nature were identified.

7. FOLLOW-UP OF PREVIOUS YEARS' AUDIT ACTIVITY

7.1 Information on the follow-up of outstanding audit recommendations and on the follow-up of results of systems audits and audits of transactions/operations (including the audits done in regard to the complementary sample) from earlier years.

During the February 2026 Audit Authority in cooperation with Kosovo GoA members performed follow up of recommendation related to open findings from the previous years, as separate activity before issuing the AAAR and AAO. Follow up covered the findings and recommendations given during system audit, audit of operations and audit of accounts. Results of follow up were presented in Audit Recommendations' Status Reports which were submitted to all IPA Bodies in Montenegro and Kosovo.

A summary of the results of the follow up of findings from previous years' system audits is shown in the tables below.

Status of system audit findings in respect to bodies of MS and OS in Montenegro:

Nº	Findings identified during the System audit 2017	Body	Status in February 2026	New deadline
1.	Deficiency in the MoP Written Procedures	NAOSO	***Not implemented*** It is evident that NAOSO staff is continuously working on improving the MoP. The MoP (version 2.0) has been updated regarding the Chapters: Irregularities and NF Financial Management, and it is clear that exceptions to the procedures have been issued. However, bearing in mind the AA auditors' recommendations from previous audits (system, operation and accounts) regarding the modification of the MoP for all IPA OS Bodies, as well as the numerous exceptions to the procedures, the recommendation remains the same. Level of priority: *Minor*	6 months
2.	Inadequate backup of data and insufficient number of trainings related to IT	NAOSO IA/CFCU	***Not implemented*** It is evident that both MS and CFCU staff is continuously working on implementation of given recommendations. However, adequate back up of data still has not been ensured and risk of loss still persist. Finding remains open. Level of priority: *Minor*	3 months
Nº	**Findings identified during the System audits 2018-2020**	**Body**	**Status in February 2026**	**New deadline**
	No open findings			
Nº	**Findings identified during the System audit 2021**	**Body**	**Status in February 2026**	**New deadline**
1	Technical errors observed in process of control and supervision of grant beneficiaries financial reports and payment requests	CFCU	***Not implemented*** Based on the reviewed documents related to approval of payment request, it was evident that: 1. FC1 and FC2 filled out all Checklists in hard copy. This part of finding is closed.	3 months

			2. The Head of CFCU didn't approve and sign Checklist for Request for Funds since, in accordance with the MoP, this Checklist is not foreseen to be approved by the Head of CFCU. The MoP (version 2.1) still has not been updated in order to include the requirement for the signing the Checklists by the Head of CFCU. This part of recommendation remains open. Level of priority: *Intermediate*	
Nº	**Findings identified during the System audit 2022**	**Body**	**Status in February 2026**	**New deadline**
1.	Failure to meet prescribed deadlines	CFCU CB	***Not implemented*** Delays in performing verifications of expenditures by CFCU and CB and payment executions are still evident. The finding remains open. Level of priority: *Major*	Immediately
Nº	**Findings identified during the System audits 2023-2024**	**Body**	**Status in February 2026**	**New deadline**
	No open findings			

Out of 4 findings that remained open after the previous Annual Audit Activity Report, none are closed during the follow up.

Status of system audit findings in respect to bodies of OS in Kosovo:

Nº	**Findings identified during the System audit 2017**	**Body**	**Status in February 2026**	**New deadline**
1.	Internal audit unit in the Ministry of Local Government Administration (MLGA)	HOS CBC Body	***Implemented*** Recommendation was addressed by the responsible institution for auditing based on the Bilateral Agreement. The responsible institution, by decision, has determined the audit team, which has conducted the audits in accordance with the internal audit methodology harmonized with the partner party. The annual plan includes the audit of cross-border funds with Montenegro, and appropriate training has been attended to conduct the audit. Finding is closed.	

Nº	Findings identified during the System audits 2018-2024	Body	Status in February 2026	New deadline
	No open findings			

Regarding the Kosovo bodies, one (1) finding from previous audits has been closed.

Status of audit of operation findings:

Nº	Findings identified during the Audit of operation 2025 (allocation 2019)	Body	Status in February 2026	New deadline
1.	Incorrect amount of the total cost recognized in the Declaration of Expenditure	NAO, DMS	***Implemented*** Based on the response and documents/evidence provided by the auditee it is evident that NAO gave a correct data of total cost recognized in the Annual Financial Report for 2025. The finding is closed.	
Nº	**Findings identified during the Audit of operation 2024**	**Body**	**Status in February 2026**	**New deadline**
1.	Deficiencies in implementation of On-the-spot verification by CFCU	CFCU	***Not implemented*** Template for OTS Verification Checklist for Grant Contract does not contain detailed questions related to the existence of the supplied equipment, performed works or any physical aspects of project implementation and visibility. Based on this, auditors are not convinced that the existence of the equipment can be checked in a valid manner. It is necessary that CFCU update OTS Verification Checklist for Grant Contract and check/verify existence of the project equipment, facilities and other physical aspects of project through on-the-spot verification in the future period. Level of priority: *Intermediate*	*-for checking/verifying existence of the project equipment:* During on-the-spot verification period; *- for updating the OTS Verification Checklist for Grant Contract:* 3 months

Of the 2 findings that remained open after the previous Annual Audit Activity Report, one was closed during the follow up.

7.2 Subsequent events affecting the previous opinion and the previous annual audit activity report under Article 12(3) of Commission Implementing Regulation (EU) No 447/2014.

Not applicable.

8. OTHER INFORMATION

8.1 Information on reported fraud and suspicions of fraud, together with the measures taken.

Not applicable.

8.2 Subsequent events occurred after the submission of the declaration of expenditure and financial statements and before the transmission of the annual audit activity report under Art. 12 (3) of Commission Implementing Regulation (EU) No 447/2014 to the Commission and considered when establishing the level of assurance and opinion by the audit authority.

Not applicable.

8.3 Any other information that the audit authority considers relevant and important to communicate to the Commission, in particular to justify the audit opinion, is reported in this section.

Not applicable.

9. OVERALL LEVEL OF ASSURANCE

9.1 Explanation on how the overall level of assurance on the proper functioning of the management and control system is obtained from the combination of the results of the system audits and audits of operations.

The overall level of assurance regarding CBC Programe Montenegro – Kosovo 2017 could not be obtained bearing in mind that Audit Authority did not perform audit of operations in the reference period since no expenditure were declared to the European Commission in the financial year 2025. The assurance on the proper functioning of the management and control system is based only on the result of follow-up of the findings given in the previous years where the management, control and supervision system is assessed as *works, but some improvement(s) are needed*.

On the basis of above mentioned, we will issue an unqualified opinion on the proper functioning of the system and disclaimer of opinion on the legality and regularity of expenditure.

As for CBC Programme Montenegro - Kosovo for the years 2018-2020 the assurance on the proper functioning of the management and control system is based on the combined results of both the follow up of the findings given in the previous years (system assessment – please see section 4 above) and the audit of operations (total error rate – please see section 5 above).

The assessment of MCSS as *works, but some improvement(s) are needed* resulting from the system audits performed in period 2017-2024 and follow-up activities is confirmed also by the results of the audit of operations, as the determined total error rate is below materiality level. Therefore, as the management, control and supervision system is assessed as works and the total error rate is below the materiality level, we will issue an unqualified opinion on the proper functioning of the system and on the legality and regularity of expenditure for CBC Programme Montenegro-Kosovo for the years 2018-2020.

The assurance on the Annual Financial Reports or Statements/Annual Account is based on the results of the audit as described in section 6.3 of this AAAR. Therefore, as based on the performed audit of Annual Financial Reports or Statements/Annual Account we have obtained reasonable assurance on the completeness, accuracy and veracity of the amounts declared in the accounts submitted to the Commission for the accounting year 2025, it is appropriate to issue an unqualified opinion on the reliability of Annual Financial Reports or Statements/Annual Account for CBC Programme Montenegro - Kosovo for the years 2017-2020.

9.2 Where the total error rate relating to the expenditure declared in the payment claims in a year is above the materiality level, analyse its significance and assess whether this indicates a serious deficiency (ies) in the functioning of the relevant management and control system during the year. Where relevant, take also account of the results of other national or Union audit work carried out in relation to the year.

Not applicable.

9.3 Assessment of the corrective action necessary both from a system and financial perspective.

Not applicable.

9.4 Assessment of any relevant subsequent adjustments made and corrective actions taken such as financial corrections included in the declaration of expenditure and financial statements and assess the residual error rate and the need for any additional corrective measures necessary both from a system and financial perspective.

Not applicable.

10. TABLE FOR DECLARED EXPENDITURE AND SAMPLE AUDITS

			A	B		C	D	E		F	G	H=F-G	GI	JH
Fund	Reference (CCI)	Programme	Expenditure declared to the Commission in reference to the year	Expenditure in reference to the financial year audited for the random sample		Total number of units in the population	Number of sampling units for the random sample	Amount and percentage (error rate) of irregular expenditure in random sample		Total projected error rate	Corrections implemented as a result of the total error rate	Residual total error rate	Other expenditure audited	Amount of irregular expenditure in other expenditure sample
				Amount	%			Amount	%	%				
IPA	C(2014) 9307 2017/038-183 2018/041-472 2019/041-474 2020/041-475	CBC Programme Montenegro- Kosovo 2017	/	/	/	/	/	/	/	/	/	/	/	/
		CBC Programme Montenegro- Kosovo 2018	730.075,65	407.542,78	55,82%	4	2	0,00	0	0	/	/	/	/
		CBC Programme Montenegro- Kosovo 2019	480.334,98	171.795,91	35,77%	4	1	0,00	0	0	/	/	/	/
		CBC Programme Montenegro- Kosovo 2020	446.639,05	132.991,82	29,78%	2	1	0,00	0	0	/	/	/	/