

# Montenegrin citizenship en route to the EU

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## *Executive summary*

Citizenship in Montenegro is defined exclusively as the legal link between the individual and the state, and it does not entail any ethnic affiliation. The 2008 Montenegrin Citizenship Act, which has been amended first in 2010 and twice in 2011, posits this country's citizenship policy, which is – compared to the neighbouring countries – a rather restrictive one. This restrictiveness is a direct outcome of Montenegro's political history after the fall of Yugoslavia. While it is a prerogative of the sovereign state to regulate the matter of inclusion and exclusion, there are a number of counts on which the legal and implementation aspects of the 2008 Montenegrin Citizenship Act could be improved. Some of the points, presented in this analysis, may be required in the context of broader human rights standards required in the process of accession to the European Union. Other points, and especially the facilitated access to citizenship to the socially vulnerable or marginalised groups should be considered by the Montenegrin authorities on humanitarian and/or compassionate grounds.

## *Background*

Speaking about the formation of new states in the post-Cold War world in the early 1990s, Rogers Brubaker (1992: 180) said that 'citizenship is the last bastion of national sovereignty'. Indeed, the regulation of citizenship is the prerogative of the state, which is why the state's citizenship legislation can explain a great deal about how the state is construed and how it functions. This is also the case in Montenegro, which established its first independent citizenship regime through its 2007 Constitution and its 2008 Montenegrin Citizenship Act. Hence, what follows is an analysis of the potential challenges posed before this country by the legal aspects of the Montenegrin Citizenship Act and its implementation. This analysis focuses on some broader aspects that may become con-

tentious in the context of Montenegro's European Union (EU) accession, paying particular attention to human rights which are enshrined in the EU's conditions of membership. This brief does not extensively deal with the issue of the status of the citizens of the former Yugoslav republics, but it does acknowledge that this is a subject of political debates and a matter commonly decided through political consensus. Therefore, following the analysis, this brief offers recommendations on how to enhance the regulation and implementation of Montenegro's citizenship policy with the aim of enhancing the state of human rights in this new Balkan state.

Prior to the constitutionalisation of Montenegro as a sovereign state, its citizenship policies were the second tier of the citizenship regime in the socialist Yugoslavia until 1992, Federal Republic of Yugoslavia from 1992 to 2003, and in Serbia and Montenegro from 2003 to 2006. In 1999, when the Montenegrin government conducted its 'creeping independence' policy, i.e. at the time when it used a series of policies to detach from the federal level, the citizenship legislation thus adopted read as if it were a policy of a sovereign state (ESI 2000; Džankić 2010). The 1999 Montenegrin Citizenship Act legally succeeded the 1975 socialist citizenship law of Montenegro, and laid the pillars of the contemporary citizenship policies in Montenegro. The first step towards an independent citizenship regime after Montenegro became independent in 2006 was enshrined in the October 2007 Constitution of Montenegro and the subsequent Law on the Implementation of the Constitution of Montenegro. While the Constitution established the Montenegrin citizenship (art. 12), the Law on its implementation regulated the matters pertaining to dual citizenship after the country's independence. According to art. 12 of the Law on the Implementation of the Constitution of Montenegro, the status of the holders of dual citizenship prior to 3 June 2006 would remain unchanged. The same provision stipulated that those who acquired the citizenship of another country after this date were allowed to hold on to their Montenegrin citizenship until the signature

of a bilateral agreement with the respective country, and at most until a year after the adoption of Montenegro's Constitution.

The detailed regulation of citizenship in Montenegro was codified on 14 February 2008, almost two years after the country became independent, due to the divisions over statehood and identity in Montenegro.<sup>1</sup> The 2008 Montenegrin Citizenship Act reflects three basic principles, which include the legal continuity of citizenship, the prevention of statelessness, and the restrictive approach to dual citizenship. At the time when the law was adopted, the opposition parties, members of the former unionist camp claimed that the Montenegrin Citizenship Act was discriminatory and restrictive, while the ruling coalition claimed that the law adopted was a 'better solution' (*Pobjeda*, 15 February 2008). Yet the abovementioned principles enshrined in the law reveal two tendencies: 1) the history of divisions over statehood and identity in Montenegro, and the tense relationship with Serbia; and 2) the tendency of the ruling parties to preserve the fragile ethnic and electoral balances in Montenegro. These two tendencies are further embedded in the core legal text, which regulates Montenegrin citizenship, and which defines citizenship (*državljanstvo*) exclusively as the legal relationship between individuals and the state. That is, there are no references in the law on the relationship between different ethnic groups and the state, since Montenegro is constitutionally defined as a 'civic' state and not the state of 'Montenegrins'.

Since its adoption in 2008, the Montenegrin Citizenship Act has been amended on three occasions - in July 2010, in June 2011 and in September 2011, but neither of the changes introduced made the country's citizenship policy significantly more liberal. The first amendment largely reflected the changes required in light of 2010 Montenegro's accession to the Council of Europe's European

1 The statehood debate refers to the question over Montenegro's independence from the common state with Serbia, while the identity debate refers to the issue of whether Montenegrins are a separate nation or a subgroup of Serbs. The statehood issue, which gained salience after the fall of Milošević in 2000, was formally resolved with Montenegro's independence referendum of 21 May 2006, and independence was declared on 3 June 2006. The identity debate, which concurred with it, is still on-going and is reflected in the census results (see below) and the debates over the symbols of the state.

Convention on Nationality (ECN) and the Convention on the Avoidance of Statelessness in Relation to State Succession (CASRSS). The two latter legal developments regulated the status of the people from the former Yugoslav republics who fled to Montenegro throughout the 1990s and of whom many were at risk of statelessness (art. 41). The addenda to art. 41 were sparked by a series of political compromises between the government and the opposition in the light of the conditions that the European Union (EU) stipulated for Montenegro to move forward in the accession process.

More recently, the government of Montenegro has also amended the Decision on the Criteria for Determining the Conditions for Acquisition of Montenegrin Citizenship by Admission, in order to resolve the status of the people who have, in 1991, on grounds of a bilateral agreement, come as refugees to the then Socialist Federal Republic of Yugoslavia from the then Socialist Republic of Albania. Upon their arrival to Montenegro in 1991, many of these people were relocated to Kosovo, as a part of the federal policy of ethnic engineering. During 1998 and 1999, these people fled the Kosovo conflict to Montenegro, and due to the multiple disintegrations of the common state with Serbia, their residence status remained unclear. This prevented them from obtaining the Montenegrin citizenship after independence, which rendered them *de facto* stateless, although in principle their citizenship of origin was Albanian. The government's exceptional amendment to the Decision came as a result of several protests of these individuals, who claimed to be of Montenegrin ethnic background. It was further supported by the need to resolve citizenship issues in the wake of the European Commission's 2012 Progress Report for Montenegro and the October 2012 parliamentary elections.

## ***How to improve the legal aspects of citizenship regulation in Montenegro?***

As noted above, the regulation of citizenship is above all a political matter. In a tense political context it is more difficult to tackle the various contentious aspects of citizenship legislation. Indeed, there is no 'perfect' citizenship law that could serve as a model for regulating the link between individuals and the state. However, it is possible to identify some shortcomings and pitfalls in the

law and present those to the policy-makers, with the view of improving the legislative context in the view of EU integration. In the Montenegrin context, a report on the degree of consolidation of the 2008 Montenegrin Citizenship Act with the EU's data protection standards has been produced by Schmaus (2011). Issues covered by that report are not the subject of analysis here. Rather, what will be pointed out in the subsequent elaboration are the challenging aspects of those provisions that affect the most the vulnerable groups in society, such as for instance the Roma, Egyptian and Ashkali (RAE).

According to the 2008 Montenegrin Citizenship Act, Montenegrin citizenship can be acquired by origin, birth, naturalisation or under international treaties. The acquisition at birth is predominantly driven by the *ius sanguinis* (right of blood) principle, while the *ius soli* (right of the soil) is mostly used for the prevention of statelessness in cases of foundlings. The 2010 Law on Amendments and Addenda to the Montenegrin Citizenship Act introduced a number of changes in the articles related to the acquisition by origin, birth and admission, following the country's accession to the Council of Europe's CASRSS and ECN. Commendably, a number of these changes directly tackled the issues stemming from the ECN, such as the facilitation of naturalisation for spouses of Montenegrin citizens (art.10), or the simplification of the release requirement for those who are unable to obtain the underlying documents due to military duty (art. 8, para 2). However, these provisions were accompanied by the restrictive changes in articles dealing with acquisition by origin or admission of children whose one parent is a Montenegrin citizen by birth (art. 6), or whose one or both parents have been naturalised in Montenegro (art. 16). These individuals are required to prove that they do not have the citizenship of the other parent, or that they have release from the citizenship of another state.

### The question of dual citizenship

The restrictive approach of Montenegro to dual citizenship (art 8., para. 1, pt. 2) has proven to be a major challenge not only for the various categories of applicants for naturalisation, but also for some who were Montenegrin citizens but who acquired the citizenship of another state after Montenegro's independence. In the latter case, the respective individuals lose their Montenegrin citizenship *ex lege* (by force of law), as has been the case with the

former leader of the People's Party (NS) – Predrag Popovic in 2011. The matter of dual citizenship in Montenegro is particularly complex due to the country's recent political history, the tense relations with Serbia, and fragile ethnic and political balances. It is also a matter of loyalty, since dual citizenship raises the question of whether an individual can be loyal to multiple states at the same time.

In fact, on a number of occasions the politicians from Serbia and the opposition politicians from Montenegro requested the Montenegrin citizenship for ethnic Montenegrins living in Serbia. In fact, while these requests do not have the legal grounds, as the Montenegrin citizenship does not imply acquisition through ethnicity (unlike in some other countries, including Serbia, Bulgaria, Croatia, etc.), they also point to the reasons as to why the liberal dual citizenship policy is not the preferred option of the Montenegrin policymakers. In a country of less than 700,000 inhabitants of diverse ethnic belonging,<sup>2</sup> an adjunction of tens of thousands of individuals who have lived in Serbia (and thus likely share emotional, and possibly political and ethnic affiliation with it) would likely change not only the ethnic composition, but also – eventually – the electoral dynamics in Montenegro.

Yet the Montenegrin requirement for release from dual citizenship proves to be particularly problematic for two categories of people – the citizens of the former Yugoslav republics (art. 41) and persons with recognised refugee status (art. 13). The 2011 amendments and addenda to the Montenegrin citizenship legislation indeed facilitated the acquisition of citizenship for the citizens of

2 According to the 2011 population census, 45 per cent identify as Montenegrins; 28.7 per cent as Serbs; 8.6 per cent as Bosniaks; 4.9 per cent as Albanians; 3.3 per cent as Muslims; and 1 per cent as Croats (Monstat 2011). By comparison, according to the 2003 census (Monstat 2003), the major group in Montenegro were Montenegrins (43.2%), followed by Serbs (32%), Bosniaks (7.8%), Albanians (5%), Muslims (4%), Croats (1.1%), and Roma (0.4%), as opposed to the 1991 census when the largest ethnic/national group in Montenegro were Montenegrins (61.9%), followed by: Muslims (14.6%); Serbs (9.3%); Albanians (6.6%); Yugoslavs (4.3%); Croats (1%), and other minor communities (Federal Statistical Office 1992). The percentages are rounded to the first decimal. The change in the percentages of Montenegrins and Serbs from 1991 to 2011 is not a result of demographic changes. Rather, they are a consequence of the debate over statehood and identity (see fn. 1).

the former Yugoslav republics. The new article 41v of the 2008 Montenegrin citizenship act stipulated that the citizens of the former Yugoslav republics (and their children), with registered residence in Montenegro for at least two years before 3 June 2006 and a valid ID were not required to submit the release from their citizenship of origin, if they applied for naturalisation by 31 January 2012. Further requirements for this group of people were that they did not unregister from Montenegro, and that they submitted a written statement confirming that they accept the rights and duties of Montenegrin citizenship (art. 41v). The data of the Ministry of interior (Ministry of Interior and Public Administration 01-653/2), indicate that a total of 2,579 people submitted new applications, in addition to a further 2,535 persons whose admission Montenegrin citizenship was pending because of their dual citizenship submitted the written statement confirming that they accept the rights and duties of Montenegrin citizenship. Hence art. 41v induced a total of 5,114 naturalisations in Montenegro, which is the highest number of admissions generated by a single legislative change. Although it is commendable that several thousands of people were thus able to resolve their status, the provision 41v has been criticised for its short duration (September 2011 to January 2012), particular in view of the fact that the citizenship status of several thousands of people from the former Yugoslav republics is still unresolved.

### **Potentially contentious issues in the Montenegrin citizenship legislation from the aspect of human rights**

A further issue with the dual citizenship requirement in the 2008 Montenegrin Citizenship Act raises a major normative concern, and it is potentially contentious from the aspect of human rights. In fact, art.13, among other criteria, requires individuals with a recognised refugee status to obtain release from their citizenship of origin, and the proof of non-conviction from that country, in order to be naturalised in Montenegro. The contention thus generated contains an underlying moral question – how can those who have been proven to have had a valid claim to flee from a country be asked to obtain proof of release, and a proof of non-conviction? In many instances, these would require the individual to physically enter his or her country of origin, which may result in severe repercussions for such an individual. Although at

present no individuals in Montenegro have the status of a recognised refugee in line with the 2006 Law on Asylum,<sup>3</sup> so the problem has yet to emerge in practice, the policymakers should consider the contention of human rights contained in the current wording of this provision.

Among other criteria stipulated in art. 8 of the 2008 Montenegrin Citizenship Act, the restrictive approach of Montenegro to naturalisation is also manifest in the criterion that applicants for ordinary naturalisation are required to prove that they have ‘lawfully and uninterruptedly’ resided in Montenegro for at least 10 years (there are waivers for spouses of Montenegrin nationals, expatriates, but those are regulated by different legal provisions). Moreover, compared to other countries in Europe and the post-Yugoslav space, the 10 year residence requirement places Montenegro on the higher end of citizenship restrictiveness. Commonly in the EU, countries targeted by immigration (Spain, Greece, Italy) pose high residence requirements (10 to 12 years), along with the citizenship regimes that have been traditionally restrictive (Austria, Denmark, Germany) (see Wallace Goodman 2010). In the post-Yugoslav states, only Slovenia and Montenegro operate the 10 year residence requirement. The length in other states varies from 8 years in Croatia, Macedonia and Bosnia and Herzegovina; to 5 years in Kosovo; to 3 years in Serbia.

The rulings of the Administrative Court of Montenegro (2012, web), which deals with citizenship complaints, reveal that ‘lawful’ and ‘uninterrupted’ stay in Montenegro have often been grounds for rejection of naturalisation applications. In fact, in many cases the legality of the applicant’s stay was a matter of registration with the correct authority, which is a technical matter that the foreigners should be acquainted with upon their arrival to Montenegro. Yet this technical issue of registration was an impediment to many people who fled the wars of Yugoslav disintegration, found shelter in Montenegro, and registered with the Institute for the Protection of Refugees, instead of the Ministry of Interior. In addition, many of these people, according to the Administrative Court rulings, ‘interrupted’ their stay in Montenegro when obtaining documents (often ID cards and passports)

<sup>3</sup> Citizens from the former Yugoslav republics have the status of ‘displaced persons’ (Bosnia and Herzegovina, Croatia) or ‘internally displaced persons’ (from Kosovo) unless they obtained the status of ‘resident alien’ in line with the Law on Aliens.

of their country of origin. While legally justified, this provision would also require some explanation for applicants, who may lose the right to claim Montenegrin citizenship because they are unaware of the legal glitches.

The final article under consideration here deals with the legal imprecision of article 15, stipulating that a person 'born in Montenegro or in another state, who resides in Montenegro legally and uninterruptedly before the age of 18 may acquire the Montenegrin citizenship by admission if he or she fulfils the conditions of art. 8, para 1, pts. 1, 2, 3, 5, 7 and 8 of the law'.<sup>4</sup> While describing what is commonly defined as acquisition through socialisation, art. 15 of the Montenegrin Citizenship Act does not stipulate the length of residence for such individuals before the age of 18. That is, the individual may apply at the age of 18, if he or she resided in Montenegro from the age of 8, or at the age of 27 if he or she resided in the country since the age of 17. In both cases, the only facilitating circumstances are the economic requirements (income and accommodation) and language competence.

## *Implementation challenges*

All legislation has its practical consequences. The restrictive Montenegrin citizenship legislation certainly reflects on the number of people naturalised in the country. While the challenging legal aspects of the 2008 law have already been analysed, here it is important to highlight that the practice of naturalisation could be brought closer to the citizen or the aspiring citizen. That is, in implementing the citizenship legislation, the government of Montenegro could and should modernise its practice.

The submission of applications is a centralised process in this country, and all naturalisation requests are lodged at the Ministry of Interior and Public Administration in Podgorica. For many applicants this requires (occasionally multiple) travel to the country's capital. Information on the naturalisation process may be acquired at the information counter, and over the telephone, the website of the Ministry of Interior does not have a specialised webpage. At the information counter, the applicant may receive a printed A4 page listing the documents required for each naturalisation type (ordinary naturalisation, expatriates, spouses, etc.). However, there are no leaflets explaining in simple language the

different naturalisation procedures, and listing the documents required for each of them. These leaflets are commonly used (online and in print) in many EU Member States, including the United Kingdom, Ireland, Malta, the Netherlands and others. Availability of leaflets in PDF form at the Ministry's website, and in print in each municipality in Montenegro would significantly reduce the workload of the employees at the central office in Podgorica. This would allow a more efficient processing of the applications.

A further issue that may present a problem to the applicants is the physical availability of forms. In fact, application forms are only available at the central office in Podgorica, and the website of the Ministry of Interior and Public Administration does not contain downloadable forms for the various types of naturalisation. An *ex ante* insight in the form would largely facilitate the procedure for the applicants. Of note, forms in PDF file are available at the website of the Consulate of Montenegro in Germany, which implies that there are no legal obstacles for them to be posted online. However, the underlying PDF files are only available through a general internet search, which requires perhaps a greater computer literacy than if the forms were ready available at the Ministry's website, perhaps at a page devoted only to naturalisation.

Apart from the administrative glitches, the issue for some applicants may be the very way to meet the admission requirements. One of those issues may be the language competence, which is tested – in cases of ordinary naturalisations – by the Examination Centre of Montenegro. Applicants required to prove basic language competence are thus required to pass a language exam. No courses are organised for the prospective applicants to prepare for the exam, and no study guide or book is available. Applicants are expected to have learned the language through socialisation, or to take private tutoring. For many applicants, private tutoring may significantly increase the costs of naturalisation, compared to the study guide (or an online study guide), which would be available at minimum or no cost.

The economic aspects of naturalisation may also pose a problem for some categories of applicants, particularly the ones from the socially vulnerable groups such as the Roma, Ashkali and Egyptian (RAE). As a result of the high cumulative costs of naturalisation, a significant number of RAE people are unable to obtain Montenegrin citizenship. Although the law stipulates that the fees will not

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4 Author's translation.

represent a barrier to naturalisation, the cumulative costs of seeking admittance into Montenegrin citizenship may be on the high end, given the living standards in the country. In fact, at the time of application, the applicant is required to cover the administrative tax of 5.00 euros (Law on Administrative Taxes), but if the application is successful, a further 100.00 eur per person is payable to the Montenegrin government. In addition to this, the language exam costs 55.00 eur per person (unless there is an exemption from this requirement), and taxes are payable for a number of other requirements – birth certificates, release from citizenship of origin, criminal record certificate. Applicants are also very often required to obtain documents from their country of origin, which entails additional costs. The 2008 Montenegrin Citizenship Act foresees no exemption from the naturalisation fees on grounds of poor economic condition of applicants (rather, applicants are also required to prove that they are able to sustain themselves in order to be naturalised). In addition to this, there is no exemption from the naturalisation fee on humanitarian and/or compassionate grounds, which exists in many countries, such as Canada, the United States, Ireland, Germany, Denmark, Latvia etc.

## Conclusions

It is upon each state to decide on its citizenship. Hence naturalisation rules in vary across the different countries in the world. In principle, there are conditions for naturalisation that each individual should fulfil (ordinary naturalisation), and waivers for certain types of applicants (spouses, expatriates, etc.). Most of the countries in the world, including Montenegro, also operate a facilitated naturalisation on grounds of ‘exceptional achievements’ for the ‘national interest’, whereby all the naturalisation criteria are waived (art. 12). According to the data of the Ministry of Interior and Public Administration (01-653/2), from 5 May 2008 to 12 March 2012, a total of 121 people acquired the Montenegrin citizenship on grounds of art. 12. This fact reveals the tension that is inherent in the Montenegrin Citizenship Act – the restrictiveness of the law to the potential high number of ordinary naturalisations that might disrupt the ethnic and electoral balances versus the openness to admittance of individuals on grounds of exceptional achievements<sup>5</sup>. However,

<sup>5</sup> Many of such individuals are also unlikely to reside in Montenegro.

as there is no citizenship regime that could serve as a model, such issues – rather than requiring amendment – should be taken as indicators of the state of Montenegrin politics and society.

## Recommendations

In light of the previous analysis, the regulation and implementation of the 2008 Montenegrin Citizenship Act can be improved on a number of counts:

- Article 13 of the Montenegrin Citizenship Act should be amended so as not to require the recognised refugees to obtain release from their citizenship of origin, and a criminal record certificate therefrom.
- Article 15 of the 2008 Montenegrin Citizenship Act should clearly stipulate the time limit for the submission of the request for naturalisation. Moreover, the policymakers should consider facilitating further the applications based on socialisation, perhaps by reducing the residence requirement.
- The policymakers should instigate further changes to resolve the status of the people from the former Yugoslav republics who reside in Montenegro since the 1990s, but fail to meet the current criteria for naturalisation.
- The policymakers should reconsider the 10 year residence criterion. Although there are no rules in the European Union as to the length of residence required for naturalisation, the Montenegrin criterion is on the strict side.
- The policymaker should inform prospective applicants of what ‘lawful and uninterrupted residence’ entails at the time of their registration as residents.
- The policymakers should reconsider the overall costs of application and perhaps enshrine in laws fee exemptions on humanitarian and/or compassionate grounds, which is a practice in many democratic countries in the world, including several EU Member States.<sup>6</sup>
- The website of the Ministry of Interior and Public Administration should have a separate

<sup>6</sup> Full or partial fee waivers on humanitarian and/or compassionate grounds exist in Canada, the United States, Ireland, Germany, Denmark, Latvia etc. At present, naturalisation is free of charge in France, Belgium, Hungary, Luxembourg, etc.

webpage devoted only to naturalisation. Forms and procedures should clearly be stipulated on that webpage. The webpage should be advertised in the media.

- The Ministry of Interior and Public Administration should print promotional material, such as leaflets, and make those available to the authorities in different municipalities, in order to facilitate the naturalisation of applicants who are not based in Podgorica.
- The Ministry of Interior and Public Administration should discuss the possibility with the Examination Centre to make available a language course, and a study guide to prospective applicants.

### Sources and documents consulted:

- Bošković, M. (2011). 'MUP donio rješenje o oduzimanju državljanstva Predragu Popoviću', *Vijesti* (23/03/2011). <http://www.vijesti.me/vijesti/mup-donio-rjesenje-oduzimanju-drzavljanstva-predragu-popovicu-clanak-12128>.
- 'Djukanović: sporazum o dvojnog državljanstvu neizvjestan', *PCNEN* (04/02/2009). [http://www.pcnen.com/detail.php?module=15&news\\_id=622](http://www.pcnen.com/detail.php?module=15&news_id=622).
- 'Dvojno državljanstvo s Crnom Gorom je destruktivan potez', *FENA* (19/03/2009). <http://www.sarajevo-x.com/bih/politika/clanak/090319098>.
- Džankić, J. (2010), 'Transformations of Citizenship in Montenegro'. *CITSEE Working Paper 2010/03*. Edinburgh: University of Edinburgh.
- European Stability Initiative (2001), *Odnosi između Srbije i Crne Gore i implikacije na državljanstvo status građana SRJ*. Beograd: ESI.
- Federal Statistical Office (1992), *Population Census 1991*. Belgrade: FSO.
- Ministry of Interior and Public Administration of Montenegro (2012), *Ref: Reply to parliamentary questions of MP Mrs. Snežana Jonica*. No. 01-653/2.
- Monstat (2011). 'Population Census of Montenegro 2011', *Statistical Office: Monstat*. [www.monstat.me](http://www.monstat.me).
- Monstat (2003). 'Population Census of Montenegro 2003', *Statistical Office: Monstat*. [www.monstat.me](http://www.monstat.me).
- Odluka o kriterijumima za utvrđivanje uslova za sticanje crnogorskog državljanstva prijmom* (Službeni list Crne Gore 47/08, amended Službeni list Crne Gore 80/08).
- Odluka o kriterijumima za utvrđivanje naučnog, privrednog, ekonomskog, kulturnog i sportskog interesa crne gore za sticanje crnogorskog državljanstva prijmom* (Službeni list Crne Gore, 34/10).
- Schmaus, C. (2011), *Zakon o crnogorskom državljanstvu*. Agencija za zaštitu ličnih podataka. <http://azlp.me/index.php/en/projects/twinning/analiza-zakona/152-zakon-o-crnogorskom-dravljanstvu>
- Uputstvo o primjeni kriterijuma na osnovu kojih se cijeni postojanje privrednog i ekonomskog interesa Crne Gore za sticanje crnogorskog državljanstva prijmom* (Službeni list Crne Gore, 13/08/2010)
- Ustav Crne Gore* (Službeni list Crne Gore 1/07).
- UNHCR (2012), *2012 Regional Operations Profile - South-Eastern Europe*. <http://www.unhcr.org/pages/49e48d986.html>
- Wallace-Goodman, S. (2010). *Naturalisation Policies in Europe: Exploring Patterns of Inclusion and Exclusion*. *RSCAS/EUDO Working Paper*. Florence: EUI.
- Zakon o crnogorskom državljanstvu* (Službeni list Crne Gore 13/08 od 26.02.2008, 40/10 od 22.07.2010, 28/11 od 10.06.2011, 46/2011 od 16.09.2011).
- Zakon o crnogorskom državljanstvu* (Službeni list Republike Crne Gore 41/99).
- Zakon o državljanstvu NR Crne Gore* (Službeni list Narodne Republike Crne Gore 3-4/50).
- Zakon o državljanstvu NR Crne Gore* (Službeni list Narodne Republike Crne Gore 6/65).
- Zakon o državljanstvu SR Crne Gore* (Narodne Novine 26/75).
- Zakon o izmjenama i dopunama Zakona o državljanstvu FNRJ* (Narodne Novine 39/48).
- Zakon o jugoslavenskom državljanstvu* (Službene novine KSHS 10:66, 1928).
- Zakon o jugoslovenskom državljanstvu* (Službeni list SFRJ, 38/64).
- Zakon o jugoslovenskom državljanstvu* (Službeni list SFRJ, 35/76).
- Zakon o jugoslovenskom državljanstvu* (Službeni list SRJ, 33/96, 9/01).
- Zakon o sprovođenju Ustava Crne Gore* (Službeni list Crne Gore 1/07).

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