

ANNUAL REPORT ON THE ACTIVITIES AND IMPLEMENTATION OF NALED'S STRATEGIC GOALS 2024/25

INTRODUCTION

NALED's Strategic Plan for the period 2022 to 2025/26, revised and adopted at the previous session of the Assembly, defines 12 programmatic goals grouped into two key levels of activity: (1) Improving Public Policies and Services, and (2) Promoting Territorial Development and EU Integration.



In the third year of implementing NALED's Strategic Plan, 64% of the 166 results and activities planned for 2024 and 2025/26 have been fully or partially achieved. Ongoing activities are expected to contribute to an additional 18% of planned outcomes. The implementation of the remaining initiatives is either scheduled or deferred until the necessary preconditions are met.

An outline of the current implementation status by strategic area is provided below:

Strategic Area 1: Improving Public Policies and Services

Achieved	Partially Achieved	Ongoing	Planned / Postponed	Total
66	23	25	27	141
47%	16%	18%	19%	100%

Strategic Area 2: Promoting Territorial Development and EU Integration

Achieved	Partially Achieved	Ongoing	Planned / Postponed	Total
15	2	5	3	25
60%	8%	20%	12%	100%

Overall (Strategic Areas 1 and 2 combined):

Achieved	Partially Achieved	Ongoing	Planned / Postponed	Total
81	25	30	30	166
49%	15%	18%	18%	100%

KEY RESULTS IN 2024/25

In 2024/25, NALED was engaged in the implementation of over 30 projects aimed at improving business conditions, supported by various EU funds, international organizations such as SIDA, GIZ, EBRD, the British Embassy, the World Bank, as well as private donors including PMI, Visa, Mastercard, Nanoinspekt, and Novo Nordisk. These efforts were further supported by over 330 members from the private, public, and civil sectors, as well as from the academic and research community.

Events and Communications

In the past year, NALED organized a total of 167 events, including 83 training sessions for at least 1,000 representatives of the private and public sectors, covering key topics such as tax incentives, cashless payments, public procurement, smart cities, the eRegistry and eArchive systems, information security, the BFC standard for a favorable business environment, and waste collection and disposal.

In addition, NALED held 20 conferences and roundtables, six study visits to EU and regional countries, and numerous meetings, media and networking events, pitch sessions, fairs, and other smaller gatherings at the local, national, and regional levels.

Public awareness campaigns and PR activities generated more than 6,000 media reports in national and local outlets, while NALED's websites – including www.naled.rs, www.uzmiracun.rs, startech.org.rs, www.boljinacin.rs, and informator.preduzetnistvo.gov.rs – achieved over 4,3 million views.

Evidence Based Reforms

The previous period was marked by political and institutional instability, which slowed down the pace of reforms. Nevertheless, NALED continued to actively contribute to regulatory processes by participating in an additional 18 government working groups tasked with drafting legislation and by producing dozens of research studies, analyses, and monitoring reports. These include the Grey Book, the Grey Book of Innovation, Quarterly Reports on Regulatory Reform Status, the Serbian Regulatory Index, surveys of shadow economy and cashless payments, and ex-ante and ex-post regulatory impact assessments.

In 2024, two Grey Book recommendations were partially addressed: one concerning the digitalization and centralization of procedures for connecting prosumer energy facilities to the distribution network through the introduction of the active customer model; and the other related to the reduction of administrative and financial burdens for beekeepers.

11 additional recommendations are under way. Digitalization continues to serve as a catalyst for change through the launch of key reforms, such as the introduction of electronic consignment notes (eOtpremnica) for goods in transit, electronic sick leave (eBolovanje), and the unified electronic health record and resource registry. Accordingly, digitalization was positioned as a strategic priority in NALED's activities throughout the past year.

The reform of parafiscal charges regained prominence in 2024 as one of the longstanding Grey Book recommendations grounded in digitalization and cashless payments. Thanks to NALED's advocacy efforts, this recommendation was incorporated into the official Reform Agenda of the Republic of Serbia, meaning its importance has been recognized by both the Serbian Government and the EU Delegation.

The overarching goal is to ensure full transparency of non-tax charges in Serbia through electronic payment of all fees and charges, paving the way for further systemic improvements and the eventual elimination of parafiscal levies. NALED is working closely with the Ministry of Finance, the Office for IT and eGovernment, the Public Policy Secretariat, and other institutions on the implementation of this initiative.

In line with the recommendations of NALED's Grey Book of Innovation and the analysis of cross-border procedures for importing R&D materials, a new Law on the Export and Import of Dual-Use Goods was adopted in 2024, simplifying the import of such goods for research and development purposes.

In addition, in cooperation with the Ministry of Health and the Medicines and Medical Devices Agency, amendments were prepared to the Rulebook governing the import of unregistered medical devices. By the end of the year, some of the recommendations from the Study on Improving Public Property Management were also adopted, resulting in amendments to the Law on Public Property.

Shadow Economy and Cashless Payments

Efforts to fight against the shadow economy continued through the "Better Way" Initiative, supported by GIZ and companies Visa and Mastercard. Within this initiative, NALED provides support to the Government of Serbia in developing and implementing the Program and Action Plan for Suppressing the Shadow Economy. Last year, NALED has marked a decade of joint efforts in suppressing the informal economy with the Ministry of Finance and the Government's Coordination Body.

NALED also supported a new cycle of the Get the Receipt to Win prize game (Uzmi račun i pobedi), which in 2024 mobilized nearly 700,000 adults who submitted more than 211 million fiscal receipts – 20% of which were paid using cashless methods.

As part of the Better Way Initiative, NALED is implementing the POS subsidy program. In the first two years of implementation (March 2023 – March 2025), nearly 7,000 small retailers were supported to introduce cashless payments free of charge. These businesses conducted 4.8 million transactions with a total recorded turnover exceeding €61 million.

Public Procurements

With support from the Swedish International Development Cooperation Agency (SIDA), NALED continued its efforts to improve the public procurement system in Serbia. An additional five guidelines were developed for procurement of specific items where the application of green criteria is mandatory. These guidelines are available on the website of the Public Procurement Office (PPO), as well as on the free eLearning platform developed by NALED (www.lppp.rs).

Following numerous training sessions and awareness campaigns, the number of registered bidders increased to 18,100 – a 10% growth compared to the previous year. In 2024 alone, an additional 661 contracting authorities were trained in the proper implementation of the Public Procurement Law.

eGovernment and the Year of DigitAlization

In line with its Year of DigitAlization, NALED was particularly active in the field of developing eGovernment and eBusiness services. As a member of various Government working groups and through direct support to competent institutions, NALED contributed to preparing the Draft Law on Electronic Government, the Draft Amendments to the Law on Electronic Document, the Action Plan for the Implementation of the Information Society and Cybersecurity Development Strategy 2024–2026, the Artificial Intelligence Development Strategy 2025–2030, the Decree on Detailed Conditions for eID Schemes by Assurance Level, the Electronic Communications Strategy until 2027 with its Action Plan, the Rulebook on Technical Requirements for the Registration of Prepaid Users, and various guidelines aimed at facilitating the development of digital infrastructure.

Within the EBRD-financed Rural Broadband project, NALED is supporting the Ministry of Information and Telecommunications in implementing the national broadband infrastructure project. To date, 1,480 km of the planned network has been built, covering 12,576 households.

Through the implementation of marketing campaigns as part of the EDGE project and the Year of DigitAlization, NALED also contributed to the growth of the eGovernment Portal user base, which now includes nearly 2.6 million registered users.

Entrepreneurship and Innovation

As part of the StarTech support program for innovative businesses, financed by Philip Morris International (PMI), a total of 94 grants were awarded to startups and small and medium-sized enterprises across four calls, amounting to approximately USD 3.2 million. At the end of 2024, an additional 12 grants were awarded, with a total value of USD 500,000. The fifth StarTech public call was open from April until mid-May 2025, and in October, at least 10 more grants are expected to be awarded for the development of innovative solutions. With support from this project, a Pop-Up Export Hub was established in Niš in 2024 to assist startups in accessing foreign markets.

Under the PMInnovia project, four contracts were signed in 2025 with research teams for development projects aimed at promoting technology transfer through the concept of open innovation and supporting researchers in commercializing their products and services.

In late 2024, with the support of the British Embassy, NALED launched the Small and Powerfull project (“Snažne i važne”) aimed at empowering women entrepreneurs. As part of this initiative, the Council for Small Businesses was established, and five grants with a total value of GBP 50,000 will be awarded to women entrepreneurs, along with educational workshops, mentoring and networking activities.

After supporting the reform of freelance taxation and the development of the tax filing portal, NALED, in cooperation with the Ministry of Finance, the Tax Administration and the Republic

Health Insurance Fund, contributed to the automatic validation of health cards for freelancers, by interconnecting the IT systems of the Tax Administration and RHIF. Freelancers are no longer required to visit RHIF offices to validate their insurance.

In cooperation with the Ministry of Economy, NALED continued the maintenance and development of the [Small Business Info Portal](#) throughout 2024, and also launched an e-Bulletin featuring information on available support programs and educational materials for entrepreneurs and MSMEs.

Planning and Construction

In the past year, a total of 153,000 construction permit requests were submitted through the electronic permitting system developed with NALED's support. NALED continued to monitor the issuance of construction permits with the aim of promoting more responsible and efficient practices among competent authorities. The 2024 analysis showed that 59.3% of local governments (96 out of 162) issued permits within legally prescribed deadlines, while 40.7% (66 out of 162) failed to comply with statutory timelines.

As part of the project supported by the Swedish SILP program, "Citizens' Voice in Spatial Planning", a digital platform called "Be Part of the Plan" was developed in the city of Kragujevac to increase transparency and facilitate citizen participation in spatial planning processes. This platform serves as a potential pilot model for nationwide implementation. The city of Kragujevac received international recognition for this platform, winning awards at the Smart City Contest in Seoul, South Korea, and from the Regional School of Public Administration (ReSPA) in Skopje.

NALED presented the Ministry of Construction, Transport and Infrastructure with a comprehensive solution for addressing the issue of legalization, in the form of a Blueprint Analysis developed under the SIDA project. Further collaboration on implementation is expected.

Agriculture

At NALED's initiative, the Ministry of Agriculture, Forestry and Water Management established a Working Group on Regenerative Agriculture. Additionally, part of the recommendation on promoting regenerative practices, featured in NALED's Grey Book, was incorporated into the draft Environmental Protection Strategy. In 2024, a Guide to the Application of Regenerative Agricultural Practices was developed and distributed to agricultural producers. A study is currently underway to assess the nutritional value of products originating from regenerative agriculture systems compared to those from conventional farming.

NALED was appointed by the European Institute of Innovation and Technology (EIT) as the EIT Food Hub for Serbia. Throughout the year, four events and numerous meetings were successfully organized to connect key stakeholders and innovators in the food and agriculture sectors. A

scientific competition – Challenge Lab Regenerator – was held, attracting over 40 participants from six different faculties.

In 2024, a total of 17 innovators from Serbia applied to two EIT Food programs – TeamUp and EIT Jumpstarter, of which 12 submissions were assessed as successful.

Healthcare

In 2024, NALED continued to support the Ministry of Health in preparing by-laws necessary for the full implementation of the electronic health record (eKarton) system. In the first quarter of 2025, the Rulebook on Unified Methodological Principles, Standards and Procedures for Maintaining Health Records, Generating Reports and Submitting Data was adopted. The final draft of the rulebook regulating the conditions for establishing and maintaining the eRecord system – including content, updates and access to data – has also been completed. Full implementation of the eRecord system is scheduled for January 2026.

In addition to eRecord, NALED is working closely with the Ministry of Health on the introduction of electronic sick leave, one of the key recommendations of the Grey Book.

NALED also served as an active member of the working group for the development of the Artificial Intelligence Development Strategy 2025–2030, adopted by the Government of Serbia in January 2025. The strategy includes measures to promote the use of AI in healthcare. In parallel, by-laws are being developed under the Law on Health Records and Documentation to encourage wider use of anonymized data for scientific and research purposes through AI-based solutions.

In cooperation with the Centre for the Fourth Industrial Revolution (C4IR), NALED has prepared a draft Rulebook on Detailed Conditions and Methodology for Maintaining the Register of Genetic, Biomedical and Other Data of Importance for Research and Development in the fields of biotechnology, bioinformatics, bioeconomy, genetics and medicine. Its adoption is expected soon.

At NALED's initiative and based on proposals submitted by members of the Healthcare Alliance, the Rulebook on Clinical Trials of Medicinal Products in Human Medicine was amended in December 2024. NALED proposed the establishment of an electronic clinical trial registry under the competence of the Medicines and Medical Devices Agency of Serbia (ALIMS). As an interim measure, ALIMS now publishes information about all approved clinical trials on its website. In early 2025, NALED launched an analysis of the entire clinical trial approval process in Serbia.

Environment

NALED was actively involved in the consultative process for drafting the new Law on Packaging and Packaging Waste. The competent ministry has informally announced the introduction of a deposit refund system (DRS) for PET and aluminum packaging starting in 2027, while the formation of a working group for amending the law is expected following the establishment of

the new Government. The Decree on Determining the Packaging Waste Reduction Plan for 2025–2029 sets new national targets that support the implementation of the deposit system, an initiative that NALED has advocated for years.

NALED continues to support the Ministry of Environmental Protection in the development of six regional waste management centers. Since last year, we have been additionally engaged in the establishment of the Regional Waste Management Center for the region of the city of Novi Sad.

Through a cross-border project with Montenegro, 2,000 bins for separate collection of packaging waste were procured, of which 1,500 were allocated to the city of Novi Pazar. As an upgrade to the project, the city also received additional containers for glass packaging from its contracted extended producer responsibility (EPR) system operator. All containers are now in use, and the targeted 15% increase in separate collection was exceeded by an additional 5%, as confirmed by project indicators.

The total number of glass containers donated through a project implemented by NALED two years ago remains in use across 14 local governments, enabling the separate collection of glass packaging waste.

Certification of Cities and Municipalities

Thanks to the international Business Friendly Certification South East Europe (BFC SEE) program launched by NALED in cooperation with GIZ and institutional partners from the region, business conditions have been improved in 130 local governments across Southeast Europe. In 2024 alone, 53 local governments from the region and 11 from Serbia confirmed their participation in the program under the new fourth edition of the standard.

The Republic of Moldova has also expressed interest in joining the program. As a result, in 2024, NALED, with the support of GIZ, conducted an analysis of the capacities of local governments in Moldova to implement the BFC SEE standard. Discussions are currently underway on continuing the cooperation.

Regional Cooperation and the EU

The exchange of best regulatory practices and reforms across Southeast Europe continued through the CORE Partnership for a Competitive Region, which connects seven economies in the region and is coordinated by NALED. The third regional CORE Days conference was organized in Belgrade, focusing on ESG standards and a sustainable future. Regional cooperation is further advanced through EU-supported cross-border projects such as “Together for Cultural Tourism”, implemented in Serbia and Bosnia and Herzegovina.

In April 2024, NALED submitted a comprehensive contribution with recommendations for the 2025 European Commission’s Annual Report on Serbia. In addition, NALED contributes to the

work of the National Convention on the EU (NCEU) for several negotiation chapters. Specific input was provided for Chapter 22 through meetings with DG REGIO, as well as during consultations with DG NEAR on the EU ESG regulatory framework and project preparation under the MC IPA instrument. In 2024, a new working group was established within the NCEU to monitor the implementation of the Reform Agenda. Within this framework, NALED took on the role of coordinator of the sub-group for monitoring Pillar I: Business Environment and Private Sector Development. As of early 2025, implementation began for one of the Grey Book recommendations – the abolition of the POPDV form, which will reduce administrative burden for businesses and lower the cost of tax compliance. The Reform Agenda also includes electronic payment of fees and charges, another long-standing priority from NALED's Grey Book. This year's edition contains 23 recommendations bearing the EU badge.

Cooperation was also established with the European Institute of Innovation and Technology (EIT) through the launch of an EIT Food Hub in Serbia. Further expansion of this partnership into other areas is planned.