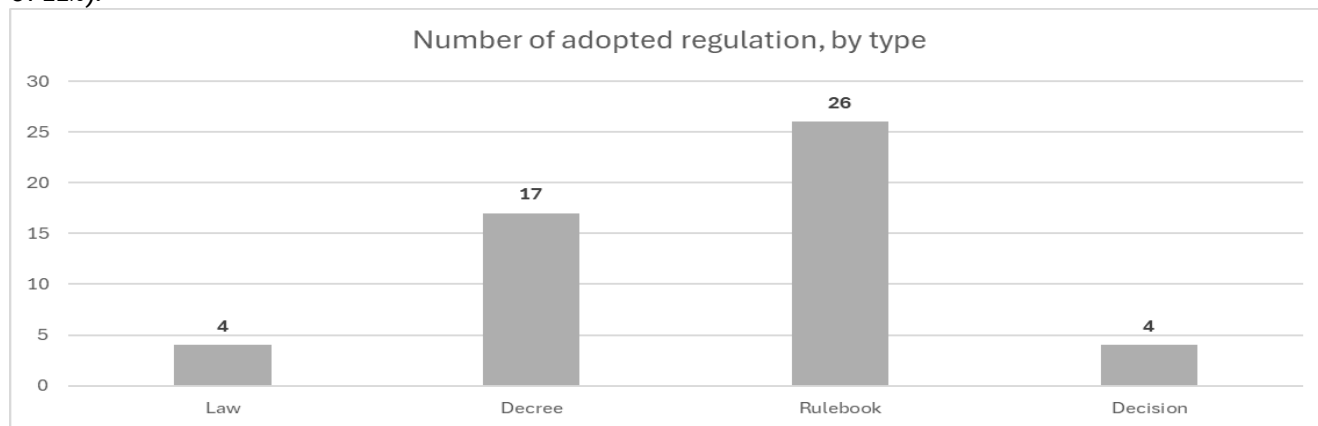
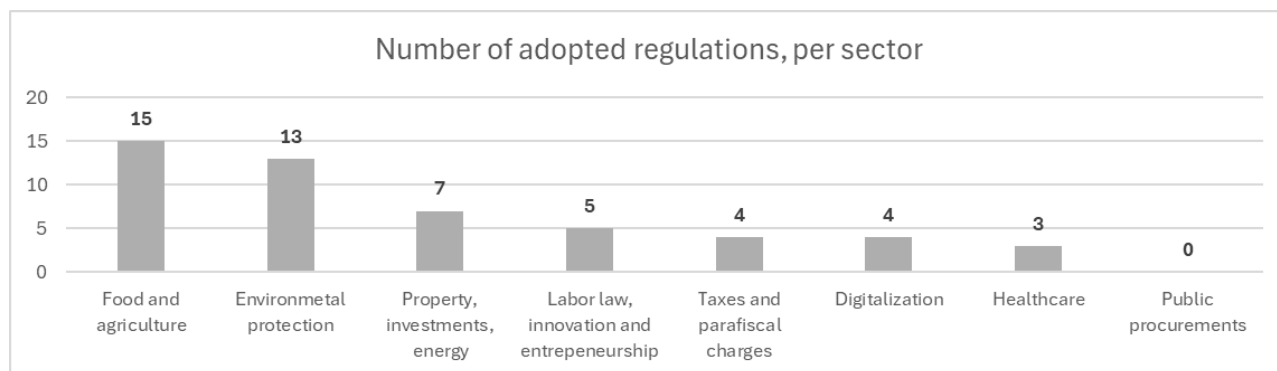




During the second quarter, a slowdown in regulatory activity was recorded, with 51 regulations adopted (four laws and 47 by-laws), compared to 65 regulations adopted in the first quarter of this year (a decrease of 22%).



On the other hand, 32 more regulations were adopted in the second quarter (an increase of 59%) compared to the same period last year, during which the Government was partially in a technical mandate following parliamentary elections until the new Government was formed in early May 2024. More than half of all adopted acts pertain to the areas of food and agriculture (15) and environmental protection (13).





II Quartely Report 2025



During the second quarter, NALED continued providing inputs and support to state institutions in the process of preparation and amendment of regulations whose adoption and implementation are expected to contribute to the partial or full resolution of more than 10 recommendations from the Gray Book 17. This would significantly improve the performance related to the resolution of recommendations from the Gray Book 16, considering that only two recommendations were resolved, and only partially, while in previous years an average of 12 recommendations were addressed.

The fifth revised National Program for the Adoption of the EU Acquis (NPAA) for the period 2024–2027 was adopted at the end of October 2024, resulting in changes to both the plan and the timeline for adopting regulations in 2024 and 2025 to align with the Reform Agenda adopted at that time. During the second quarter of this year, the NPAA foresaw the adoption of 35 regulations, the majority of which pertain to property, investment, energy, and digitalization. A total of 11 regulations planned for the second quarter were adopted, seven of which were adopted during the quarter itself and four ahead of schedule, in the first quarter of this year.

PARTICIPATION OF NALED IN LEGISLATIVE CHANGES

During the SECOND quarter of 2025, **representatives of the NALED Executive Office were appointed as members of three newly formed working groups**, with the simultaneous continuation of activities in the 13 working groups that were formed previously.



OVERVIEW OF REGULATORY ACTIVITIES

Taxes and Parafiscal Charges

Several meetings of the Working Group of the Ministry of Finance to support the development of the system architecture for electronic payment of non-tax revenues were held. This reform aims to resolve a decades-long issue faced by the business sector regarding the non-transparency of the non-tax charges (fees and levies) system at all levels of government. It also represents one of the commitments undertaken by the Republic of Serbia as part of the Reform Agenda. The reform is being implemented by the Ministry of Finance, in cooperation with the Office for IT and eGovernment, the Public Policy Secretariat of the Republic of Serbia, and with the support of NALED. Enabling electronic payment of all non-tax charges—while eliminating the need for proof of payment—will contribute to resolving one of NALED's longstanding Gray Book recommendations, primarily by reducing administrative and financial burdens on businesses and citizens, and by securing EU funding for the state.

Innovation and Entrepreneurship

During the second quarter of 2025, the NALED team, within the framework of the **StarTech project** and the **Pop-Up Export Hub initiative**, published two guides aimed at startups as well as other businesses, with the goal of encouraging expansion into foreign markets: **the Guide to Doing Business in the Far East** and **the Guide to Exporting to Nordic Markets**. These guides are concise manuals containing key information on how to place goods and services on the mentioned markets.

In cooperation with the Ministry of Science, Technological Development and Innovation, NALED developed **Guidelines for Implementing Cooperation Between Science and Industry in the Framework of Doctoral Studies – Industrial Doctorates**. The guidelines provide an overview of core models for science-industry cooperation during PhD studies and offer concrete answers to key practical questions, aiming to foster stronger ties between academia and business within doctoral education.



II Quartely Report 2025



NALED also continued working on the initiative to amend the Rulebook on the Import of Unregistered Medical Devices, and submitted a draft amendment to the Ministry of Health. These amendments aim to simplify the process for importing unregistered medical devices by innovative entities (such as research institutions, startups, and others in the health sector) intended for use in scientific or medical research and development

In June, the first session of the Small Business Council was held. Among the topics on the agenda were proposals from the Gray Book 17 aimed at improving the business environment for entrepreneurs.

Digitalization

The issuance of individual licenses for the use of the radio-frequency spectrum through a public auction procedure is further regulated by the Rulebook on the Minimum Conditions for Issuing Individual Licenses for the Use of the Radio-Frequency Spectrum Based on the Conducted Public Auction Procedure. This regulation enabled the Regulatory Agency for Electronic Communications and Postal Services (RATEL) to launch the public auction process on June 2 by. The licenses will be valid until 2047, with no extension option. The licenses will be awarded via public auction in accordance with the Law on Electronic Communications. This decision opens the door to the rollout of the 5G network across Serbia, enabling operators to access the spectrum necessary for developing and delivering modern 5G services.

The method of advertising, activation, and billing of value-added services (VAS), as well as the obligations of operators and VAS providers, is further regulated by the Rulebook on the Obligations of Operators Transmitting Value-Added Services and Providers of Value-Added Services.

Property, Investments and Energy

The holding of electronic public sessions of planning commissions in cases of high public interest was made possible by amendments to the Rulebook on the Content, Manner, and Procedure for Preparing Spatial and Urban Planning Documents, adopted in early June by the Ministry of Construction, Transport, and Infrastructure.



II Quartely Report 2025



The Minister of Justice, on behalf of the Republic of Serbia, signed the **Convention on the Establishment of the International Organization for Mediation (IOMed)**, aimed at improving the peaceful resolution of international disputes. The Convention, initiated by China, was signed during the Global Forum on International Mediation. In addition to the ministers of justice of China and Serbia, representatives from 30 other countries also signed the Convention.

During the second quarter, NALED representatives continued their work in the Working Group of the Ministry of Mining and Energy tasked with drafting the **Strategy for the Management of Mineral and Other Geological Resources of the Republic of Serbia for the period 2025–2040, with projections until 2050**. The final version of the Draft Strategy was agreed upon at the Working Group level and subsequently published on the eConsultation platform. A public consultation on the Draft Strategy was held from June 13 to July 2, during which NALED members submitted their comments and proposals.

Food and agriculture

Funds for direct payments, including the milk premium and seed subsidy, have been reduced from 93 to 89 billion dinars through the amendment of the **Decree on the Allocation of Incentives in Agriculture and Rural Development for 2025**. On the other hand, funds allocated for rural development, settlement of claims based on court decisions, improvement of competitiveness, and investments in the physical assets of farms have been increased by 500 million dinars, now totaling 3.7 billion dinars.

Precise labeling and separation of dairy products and products containing dairy components is mandated by the **Decree on Additional Requirements for Placing Products Containing Palm Oil, Palm Fat, or Other Vegetable Oils and Fats on the Market**. The Decree stipulates that products containing dairy components—such as cheeses, spreads, and margarines—must be clearly labeled with a warning in Cyrillic script and must be displayed separately from genuine dairy products. The Decree will enter into force on August 1, 2025.



Healthcare

Full implementation of the electronic health record system (e-Record) will begin on January 1, 2026. As a unified and centralized data system for each patient, it will enable easier documentation storage and better tracking of medical history, in accordance with the **Rulebook on the e-Record, Personal Health Identification Number, and Provision of Data at the Patient's Request**. The system will ensure better diagnostics and healthcare for patients and more efficient data use for medical professionals. It also includes data protection measures and access protocols, specifying who is authorized to view patient records.

During the second quarter, NALED continued its active participation in the Ministry of Health's working group tasked with drafting by-laws under the Law on Health Documentation and Records in the Healthcare Sector, as well as in meetings focused on developing e-health services: e-Sick Leave and e-Record. A pilot project was launched in four health centers in Belgrade, allowing citizens to submit electronic confirmations of temporary work incapacity and sick leave claims via the eHealth portal. The full implementation of the e-Sick Leave and e-Record systems will resolve two longstanding recommendations from NALED's Gray Book.

NALED, in cooperation with the BIO4 Campus, initiated the preparation of an Analysis of the Clinical Trial Process for Medicines and Medical Devices in Serbia, conducting consultations with relevant stakeholders, and compiling findings on the current state of the system along with recommendations for improving clinical trial procedures. Finalization of the findings is underway, and the presentation of the analysis and results is expected to take place shortly.



II Quartely Report 2025



Environmental Protection

The previous three air quality zones have been reclassified into first and second categories, and the concept of “tolerance values” has been completely abolished under the new **Law on Air Protection**. The new law specifies obligations and defines the competences of inspectors in more detail, along with the adoption of a **National Program for Air Pollution Control**. The goal of the new law is to improve the management, protection, and enhancement of air quality by meeting international commitments and further harmonizing with EU regulations.

The revised **Decree on the Water Management Program for 2025** allocates approximately 30% more funds, totaling 10.2 billion dinars, for riverbed regulation and flood protection in 2025. On the other hand, a significant decrease of around 56% in allocated funds is projected for areas related to the construction and reconstruction of water supply facilities for drinking water and hygiene purposes, including treatment plants, main pipelines, and associated reservoirs and devices.