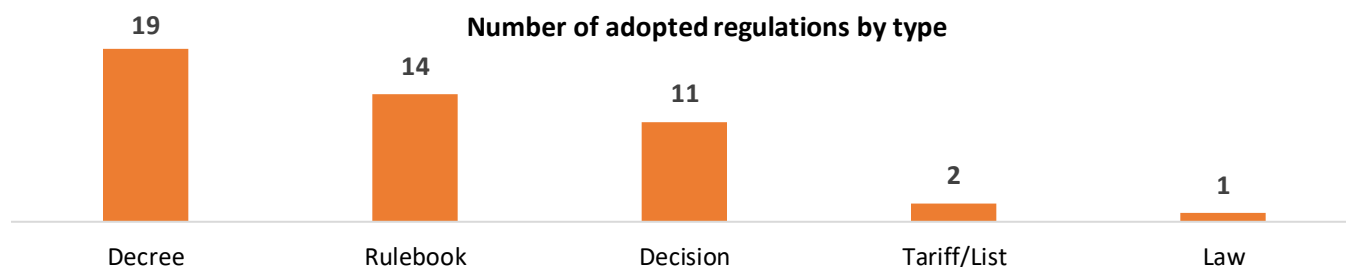


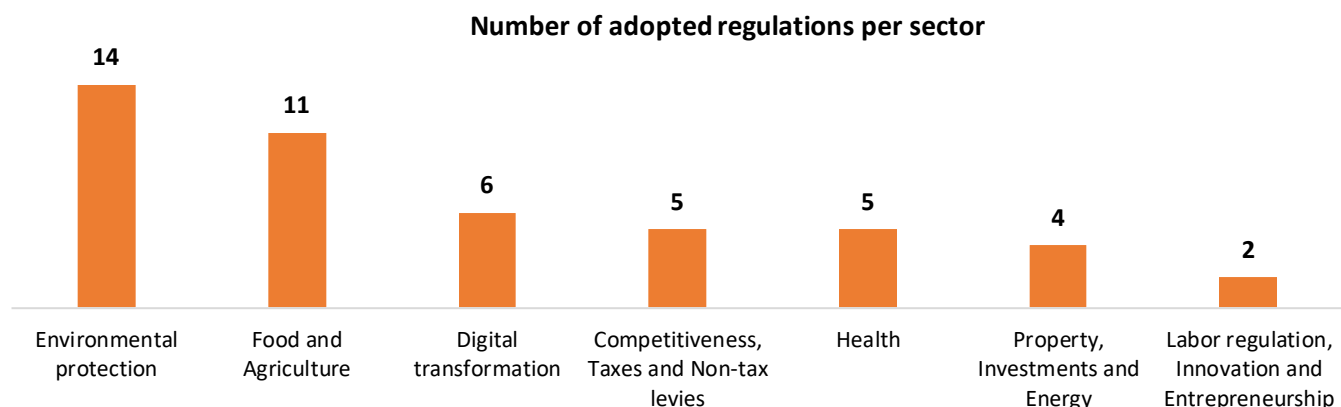


AN OVERVIEW OF REGULATORY ACTIVITY THE THIRD QUARTER OF 2025

During the third quarter, a slight slowdown in regulatory activity was recorded, with 47 regulations adopted (one law and 46 by-laws), compared to 51 regulations adopted in the second quarter of this year (four laws and 47 by-laws).



On the other hand, three more regulations were adopted in the third quarter compared to the same period last year. More than half of all adopted acts pertain to the areas of environmental protection (14) and food and agriculture (11).



During the third quarter, NALED, in cooperation with its members, carried out activities related to the preparation of inputs and contributions for amendments and the drafting of new regulations, whose adoption and implementation are expected to partially or fully resolve more than ten recommendations from the Grey Book 17. This would significantly improve the result of addressing recommendations from Grey Book 16, considering that only two recommendations were only partially resolved, while in previous years the average number of recommendations that were resolved was twelve.

We remind you that the collection of recommendations and initiatives for the new edition — Grey Book 18 — is currently underway, and you can submit your proposals by filling out the [Recommendation Proposal Form – Grey Book 18](#) no later than October 31.

The Fifth Revised National Programme for the Adoption of the EU Acquis (NPAA) for the period 2024–2027 was adopted at the end of October 2024, with an updated plan and timeline for the adoption of regulations



in 2024 and 2025, in order to align with the Reform Agenda. For the third quarter of this year, the NPAA envisaged the adoption of twelve regulations, the majority of which (eight in total) concern the area of food and agriculture. Only one regulation — a rulebook under the jurisdiction of the Ministry of Mining and Energy — was adopted earlier, in the first quarter.

During the third quarter of 2025, **representatives of the NALED Executive Office were appointed as members of five newly formed working groups**, with the simultaneous continuation of activities in the 10 working groups that were previously formed.

OVERVIEW OF REGULATORY ACTIVITIES AND PARTICIPATION OF NALED IN LEGISLATIVE CHANGES

Competitiveness, Taxes and non-tax duties

From October 1 to 21, the Ministry of Finance of the Republic of Serbia has been conducting a public consultation on the drafts of two new tax laws that are key to Serbia's green transition – the Draft Law on the Tax on Greenhouse Gas Emissions and the Draft Law on the Tax on the Import of Carbon-Intensive Products. The implementation of these laws is planned to begin on January 1 of next year, coinciding with the start of the EU's carbon levy collection under the Carbon Border Adjustment Mechanism (CBAM). The key innovations introduced by the draft laws include: the introduction of a greenhouse gas emission tax applicable to large industrial emitters (such as cement, fertilizers, iron and steel, aluminum, and energy sectors), and the introduction of a tax on the import of carbon-intensive products (iron, steel, cement, fertilizers, and aluminum). The tax rate is set at four euros per ton of emitted carbon dioxide, i.e. per ton of CO₂ equivalent. The amount of tax paid may be deducted or credited as a tax credit when paying the CBAM levy upon export to the EU.

Innovation and Entrepreneurship

The focus on preserving traditional crafts practiced by certified artisans and creating opportunities for these businesses to improve their operations and increase their market visibility has been supported through the Program for the Development of Traditional and Artistic Crafts and Home-Based Handicraft Activities for 2025, based on the [Decree on the Establishment of the Program for the Development of Traditional and Artistic Crafts and Home-Based Handicraft Activities for 2025](#). Holders of valid certificates can apply for non-refundable grants ranging from 80,000 to 300,000 dinars, which may be used for the purchase of new professional production equipment and for the procurement of raw materials.

To empower women who actively participate in the public and business life of Serbia, NALED launched a public call in August 2025, through the project Strong and Important, for [the Support Program for Small and Medium Enterprises Led by Women](#). The main goal of the Program is to create a sustainable impact by providing resources and support to women for business advancement and contribution to an inclusive economy. The Support Program is intended for female entrepreneurs and micro and small enterprises founded by women between January 1, 2018, and December 31, 2022. The maximum value of an individual



grant can be up to 1,339,495 dinars, and the funds may be used for the purchase of equipment and expenses related to training, certification, standardization, digitalization, and marketing (up to 20% of the total funds).

Digital transformation

Greater availability of broadband networks, encouragement of investment in areas lacking market interest, strengthening competition, and transparent use of public funds represent the main objectives of the new [Decree on the Conditions and Criteria for the Compliance of State Aid for Broadband Networks](#). The Decree defines transparency criteria, i.e. instruments for granting state aid for the development of fixed broadband infrastructure (4G and 5G mobile networks, backhaul networks), as well as eligible costs and the incentive effect.

Reducing construction costs and encouraging the development of digital infrastructure, more efficient use and sharing of existing resources, as well as greater transparency and legal certainty for operators and public institutions, are the main objectives of the [Draft Law on Measures to Reduce the Costs of Deploying Very High Capacity Electronic Communications Networks](#) (formerly known as the Law on Broadband Communication Infrastructure). The Draft Law was prepared within the narrower Working Group of the Ministry of Information and Telecommunications, of which NALED is a member.

Clarifying the services of electronic archiving and regulating the identification of signatories using foreign certificates in accordance with international standards, as well as extending deadlines for the implementation of certain provisions, represent the main suggestions made by NALED on the new Draft Law on Amendments to the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business.

During the third quarter, the work of the Ministry of Finance's Working Group for supporting the development of the electronic payment architecture for non-tax revenues was intensified, with NALED's significant contribution. At the Working Group level, amendments to the relevant regulations are planned to enable electronic payment of fees and charges, primarily through amendments to the [Law on the Register of Administrative Procedures](#), the [Law on Republic Administrative Fees](#), the regulations on e-Government, and the [Rulebook on the Conditions and Method of Managing Accounts for the Payment of Public Revenues and the Allocation of Funds from These Accounts](#). In addition, NALED is supporting the Working Group through activities aimed at matching administrative procedures, in order to align the [Register of Administrative Procedures of the Public Policy Secretariat](#) and the Catalogue of Administrative Procedures of the Office for IT and eGovernment. So far, more than 3,000 procedures from the jurisdiction of over 160 institutions have been matched.

Within the project ["Towards Next Generation eGovernment: Cashless Payments and Digital Identity Wallet,"](#) implemented by NALED in cooperation with VISA, an [Ex-Ante Analysis was prepared for the introduction of a digital identity wallet in the Republic of Serbia](#). Preparations are currently underway for a new LEI survey on the level of digitalization at the local level, through updates to the LEI software and the creation of a new LEI questionnaire to be completed by local self-governments. The activities are being implemented within the project "Efficient Public Procurement and Sustainable Supply Chains (ESG) for Enhanced Competitiveness," supported by the Swedish International Development Cooperation Agency (Sida).

In the third quarter of this year, according to the Fifth Revised National Programme for the Adoption of the



EU Acquis (NPAA) for the period 2024–2027, no adoption of regulations in the field of electronic communications and digital infrastructure was planned. Nevertheless, two rulebooks were adopted, even though their adoption had been planned for the first quarter of 2025. At the same time, there are still delays in the adoption of several key regulations in this field, namely: the Law on Amendments to the Law on eGovernment, the Law on Broadband Communication Infrastructure, i.e. the Law on Measures to Reduce the Costs of Deploying Very High Capacity Electronic Communications Networks, the Law on Amendments to the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business, and the Law on Information Security.

Public Procurement

Since the beginning of the year, 32 training sessions have been held for contracting authorities and bidders in public procurement procedures, as well as for key institutions within the public procurement system, under the project “More Efficient Public Procurement and Sustainable Supply Chains (ESG) for Enhanced Competitiveness,” supported by the Swedish International Development Cooperation Agency (Sida). Most of the training sessions focused on the application of green criteria in public procurement, with more than 250 contracting authorities trained, while over 170 contracting authorities received training in the areas of competition protection in public procurement and the use of various techniques and instruments.

With the support of the Sida project, a new website of the Public Procurement Office (www.ujn.gov.rs) has been operational since the third quarter of 2025, and all relevant documentation (action plans, guidelines, examples of tender documentation, materials required for public procurement officers, and similar content) is now more accessible, systematically organized, and user-friendly.

Property, Investments and Energy

All changes in ownership structure as of October 1 must be reported within 15 days, and the central register will be maintained by the Serbian Business Registers Agency (SBRA) in electronic form, in accordance with the amendments to the [Law on the Central Register of Beneficial Owners](#). Existing companies are required to enter and align their data with the amended law by November 30, while new business entities must register their ownership information immediately upon establishment.

All buildings constructed on the territory of the Republic of Serbia will be recorded using the latest digital technologies and subsequently registered in the real estate cadastre, according to the [Draft Law on Special Conditions for Recording and Registering Property Rights on Real Estate](#). The law proposes the establishment of a unified, centralized, and digitized system for registering ownership rights over buildings and the land beneath them, managed by the Agency for Spatial Planning and Urbanism and linked to the Republic Geodetic Authority (RGA), while local self-governments are responsible for entering and updating data within their jurisdictions. NALED, as a member of the Government’s working group, participated in the drafting of the law. It should be recalled that in 2023, following analyses and broad public-private dialogue, NALED developed the conceptual model of a universal real estate and ownership registration system ([Framework Proposal for a Comprehensive Reform of Real Estate Management and Administration in Serbia](#)), which served as the basis for certain solutions incorporated in the Draft Law.

According to the [Draft Amendments to the Law on Enforcement and Security](#), the subject of enforcement for the settlement of monetary claims cannot be the debtor’s only real estate in their exclusive ownership,



which serves to meet their housing needs. To ensure adequate protection of the acquired rights of mortgage creditors, in early September NALED submitted to the Ministry of Justice an initiative for the introduction of amendments to the Draft Law on Enforcement and Security.

The public consultation on the [Draft Strategy for the Management of Mineral and Other Geological Resources of the Republic of Serbia for the period 2025–2040, with projections to 2050](#), was completed in September. NALED's participation as a member of the Working Group was primarily focused on identifying innovative approaches in the field of environmental protection, particularly on the potential application of technology developed at the Faculty of Chemistry, University of Belgrade, which enables the processing of low-quality coal and ash using so-called "green chemistry," for the extraction of useful elements and the production of humic acids.

In mid-August, NALED submitted to the competent ministry an initiative to establish a working group to address the issue of de facto expropriation, following the completion of an [Analysis on the topic of de facto expropriation](#).

NALED has also started preparing an analysis of the level of state-owned registered property. Within the project "More Efficient Public Procurement and Sustainable Supply Chains (ESG) for Enhanced Competitiveness," supported by the Swedish International Development Cooperation Agency (Sida), the development of a new analysis has been launched, aimed at improving the management of public property in Serbia.

Food and Agriculture

A product declared by August 1, 2025, that does not meet the prescribed requirements may remain on the market until the end of its shelf life, but no later than December 31, 2025, according to the amended [Decree on Additional Requirements for Placing on the Market Products Containing Palm Oil, Palm Fat, or Other Vegetable Oils and Fats](#). The decree also prohibits the visual depiction of such products.

To raise the safety of domestic food products to a higher level and improve their positioning in foreign markets, the Ministry of Agriculture, Forestry and Water Management has launched a public consultation on the [Draft Law on Official Controls](#) and the [Draft Law on Food Safety](#). The drafts of these laws were presented at a session of the Food and Agriculture Alliance, where most member comments referred to the timeline for their entry into force (which, according to announcements, is planned for March 1, 2026), as well as the planned deadline for adopting approximately 30 accompanying by-laws that will follow these laws.

Although the Fifth Revised National Programme for the Adoption of the EU Acquis (NPAA) for the period 2024–2027 foresaw the adoption of eight regulations (three laws and five rulebooks) during the third quarter of this year, none have been adopted.

Health

Reducing the administrative burden on employees, speeding up procedures, and increasing legal certainty in the process of opening sick leave will be enabled through the digitalization of the procedure and the use of the software solution *e-Sick Leave – Employer*. In the third quarter, the drafting of the Law on the Exchange of Data, Documents, and Notifications in the Event of Temporary Incapacity for Work Using the



Software Solution “e-Sick Leave – Employer” began, with implementation planned for January 1, 2026, for employers and January 1, 2027, for entrepreneurs. Following the consultation process and submission of comments from interested stakeholders on the draft law, NALED, in cooperation with the Office for IT and eGovernment, organized the first of four public hearings.

Environmental Protection

To improve the quality of the waste management system in the Republic of Serbia, the Ministry of Environmental Protection has established a Working Group to draft the Law on Amendments to the Law on Waste Management. The starting points, in addition to clarifying existing terminology, also include the introduction of new terms into the law, such as “food waste” and “waste oil regeneration.” Furthermore, the draft envisages a more precise definition of the extended producer responsibility, the introduction of obligations for waste collectors, and the regulation of the management of specific waste streams. Amendments are also planned in the section concerning the expansion of the powers of inspectors in carrying out inspection supervision, the introduction of additional obligations for landfill operators, mandatory monitoring, and the obligation to notify competent permitting authorities of any significant environmental impact detected during inspections. Although NALED is not a member of the working group, the Environmental Protection Alliance is actively monitoring this process, and the collection and preparation of comments to be submitted to the competent ministry are currently underway.

A more detailed report on regulatory activity and NALED’s activities during the third quarter of 2025 can be found at the link **III Quarterly Report 2025** (Serbian version available only).