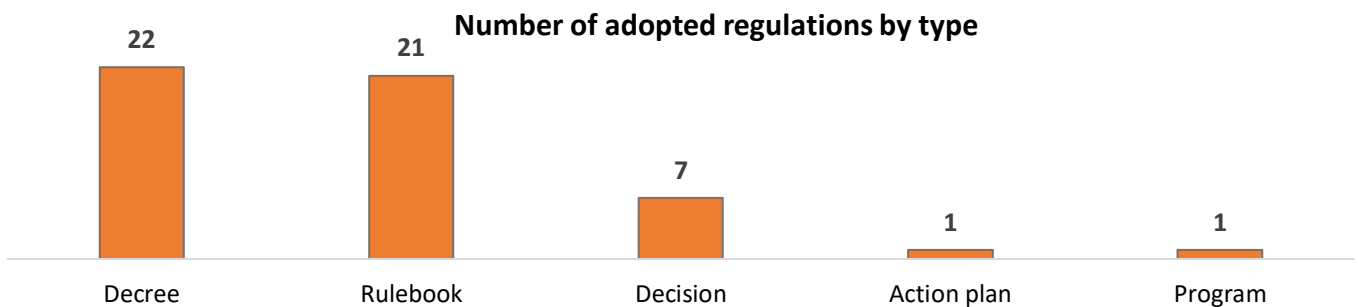


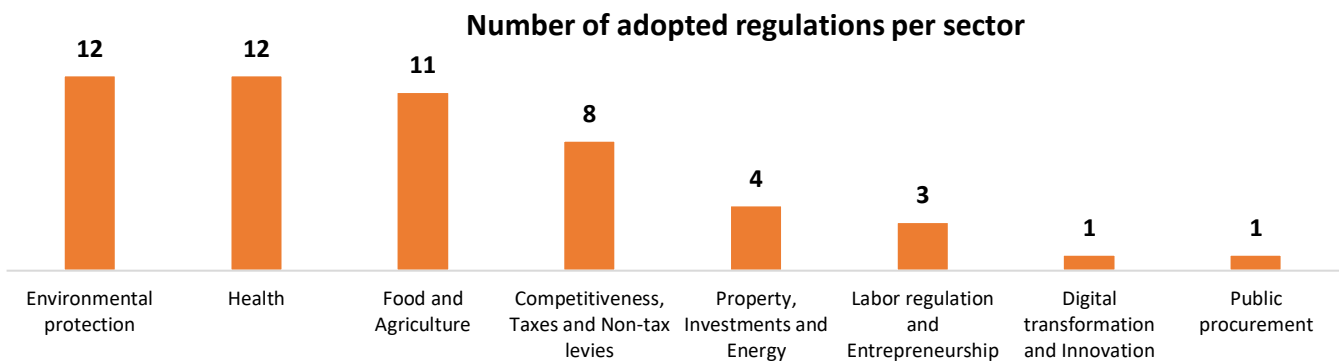


AN OVERVIEW OF REGULATORY ACTIVITY THE FIRST QUARTER OF 2026

During the first quarter, a slowdown of regulatory activity was recorded, with 52 regulations adopted (50 by-laws, one program and one action plan), compared to 67 regulations adopted in the fourth quarter of last year (33 laws and 34 by-laws).



In addition, 13 less regulations were adopted in the period January-March compared to the same period last year. Two-thirds (67%) of all adopted acts pertain to the areas of environmental protection (12), health (12) and food and agriculture (11).



NALED, in cooperation with its members, carried out activities throughout the previous year aimed at preparing contributions and inputs related to amendments to existing regulations and the drafting of new legislation. The adoption and implementation of these regulations since the beginning of this year have contributed to the full or partial resolution of recommendations from the Gray Book 17. As a result, three recommendations have been fully resolved, while five have been partially resolved.

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, introducing an amended legislative plan and timeline for 2024 and 2025 in order to align with the Reform Agenda. For the first quarter of this year, the National Programme envisaged the adoption of 23 regulations in the areas of environmental protection (15), agriculture (5), and



energy (3). Of these, two environmental protection regulations were adopted: the Rulebook on Public Inspection, Presentation and Public Consultation in Relation to Environmental Impact Assessment Studies and the Rulebook on the Operation of the Technical Commission.

With regard to the EU accession process, it should be noted that at the end of March the Government of the Republic of Serbia adopted amendments to two decrees: the Decree on Regulatory Impact Assessment and the Decree on the Methodology for Developing Public Policy Documents. The amendments introduced the possibility of exempting regulations and strategic documents prepared within the EU accession process, as well as those developed to fulfil other obligations towards international organizations in the context of this process, from the requirement to conduct impact assessments and public consultations. In practice, this means that for a large number of laws and public policies, their impact on citizens and businesses will no longer be assessed, nor will there be an obligation to conduct an open public debate on them, i.e. to apply the standard consultation procedures prescribed by the laws governing the planning system and public administration.

During the first quarter of 2026, **representatives of the NALED Executive Office were appointed as members of four newly formed working groups**, with the simultaneous continuation of activities in the 15 working groups that were formed previously.

OVERVIEW OF REGULATORY ACTIVITIES AND PARTICIPATION OF NALED IN LEGISLATIVE CHANGES

Competitiveness, Taxes and non-tax duties

The restriction on suppliers' invoice prices, namely the requirement that they could not exceed the level in force as of 1 August 2025, was abolished through amendments to the [Decree on Special Conditions for Trade in Certain Types of Goods](#). This amendment reinstated market-based formation of procurement prices, thereby easing pressure on manufacturers and distributors, while restrictions on retail margins remain in force until the expiry of the Decree on 1 March 2026. The amendment aims to gradually phase out administrative price controls and transition towards market-based pricing mechanisms, while maintaining control over final consumer prices in the short term.

The possibility of obtaining refunds of customs duties and extinguishing customs debt in cases where a shipment is not delivered to the recipient and subsequently leaves the customs territory of the Republic of Serbia was introduced through amendments to the [Decree on Customs Procedures and Customs Formalities](#). The amendments introduced electronic calculation of customs debt on a per-shipment basis, with the possibility of issuing a consolidated assessment in the name of the operator, as well as faster release of consignments where the pre-arrival manifest has been submitted electronically before the goods arrive and the shipment has not been selected for inspection. In addition, the amendments enabled expedited customs clearance of postal and express consignments, including certain samples used for research and development (R&D) purposes. This development represents a positive step towards the implementation of Recommendation 6.1 – Define the concept of samples relevant for research and development in order to simplify import procedures, from the Innovation Gray Book 3.0. Nevertheless, the recommendation remains relevant, as the Customs Law still does not recognize, as a separate category, samples imported for



laboratory testing or for research and development purposes. The implementation of the Decree is expected to contribute to greater efficiency of customs procedures, a reduction in administrative burdens, and a faster flow of goods through the customs system.

A key step towards modernizing the inspection system, aimed at enhancing efficiency, consistency, and legal certainty, as well as placing greater emphasis on a preventive and advisory approach towards businesses, is represented by the amendments to the Law on Inspection Oversight, which NALED has been advocating. The draft law addresses the key challenges of the existing system, including the shortage of inspectors, inconsistent enforcement practices, and the underutilization of the advisory capacity of inspection authorities, as well as the need to eliminate legal gaps that affect business predictability and the level of regulatory burden on the economy.

The exemption from customs duties and taxes for the import of samples intended for research and development has been incorporated into the Draft Law on Amendments to the Customs Law. Given that import duties have so far represented a significant financial burden, particularly for start-ups and other innovative businesses in the early stages of development, this amendment is expected to improve conditions for research and development, thereby resolving Recommendation 6.2 – *Exempt the import of samples relevant for research and development from customs duties and taxes*, from the Innovation Gray Book 3.0. NALED submitted comments on the Draft Law, recommending that amendments to the relevant secondary legislation be prepared in parallel with the adoption of the law.

The management and operation of the Unified Register of Non-Tax Revenues (JENP), aimed at creating a comprehensive inventory of all fees and charges for the use of public goods collected in Serbia, is regulated by the Draft Decree on the Management and Operation of the Unified Register of Non-Tax Revenues. The JENP system became operational in March 2026, while the deadline for entering non-tax revenues and recording and harmonizing all procedures in the Register of Administrative Procedures (RAP) is the end of June 2026 for national-level administrative fees, and the end of October 2026 for local administrative fees and charges for the use of public goods. Once all non-tax revenues are entered into JENP, the process of paying all fees and charges for the use of public goods by citizens and businesses will be automated, contributing to the fulfilment of one of the milestones under the Reform Agenda.

As in previous years, NALED traditionally organized its Macroeconomic Panel in mid-February, dedicated to the analysis of economic developments and expectations for the current year. The panel brought together representatives of international institutions, experts, and businesses to exchange views on key macroeconomic trends, including growth projections, inflation, investment, and foreign trade flows. The discussion focused on challenges within the business environment, the need for further improvement of the regulatory framework, and the importance of predictable and efficient procedures for businesses. The event once again confirmed NALED's role as a platform for dialogue between the public and private sectors and for identifying priorities to enhance the competitiveness of the domestic economy.

[The fifth revised National Programme for the Adoption of the EU Acquis \(NPAA\) for the period 2024–2027](#) did not envisage the adoption of any legislation in this area during the first quarter of this year.



Labor regulation and Entrepreneurship

Companies will be required to clearly indicate their legal status in business correspondence and on their websites (e.g. “in liquidation” or “in bankruptcy”), while persons who have been subject to a prohibition on carrying out business activities or holding management positions in the European Union will be barred from serving as members of the governing bodies of companies, pursuant to the [Draft Law on Companies](#).

Particular emphasis has been placed on strengthening legal certainty through the mandatory independence of auditors from any company participating in corporate restructuring transactions, the possibility of court-ordered injunctions to prevent the implementation of such transactions for the protection of creditors, and the exclusion of companies undergoing compulsory liquidation from these procedures. In addition, the Draft Law introduces a regulatory framework for gender equality in the governance of large publicly listed companies through mandatory quotas and greater transparency in the director selection process. At the same time, it establishes a comprehensive legal framework for cross-border mergers and acquisitions involving companies from the European Union, while strengthening the protection of shareholders and creditors and clarifying the procedures and legal consequences of such transactions.

One of the key priorities of the Small Business Council, improving the tax framework for entrepreneurs, has been translated into initiatives aimed at increasing the predictability and sustainability of the system.

The proposals include raising the turnover threshold for lump-sum taxation and aligning it with the VAT registration threshold, permanently limiting the growth of tax liabilities, and enabling a direct transition to the personal salary taxation regime upon exiting the lump-sum taxation system.

With the aim of improving the position of women entrepreneurs during pregnancy-related leave, maternity leave, and childcare leave, the Small Business Council launched an initiative towards the competent ministry. The proposed solutions include enabling business continuity during the entrepreneur’s absence through the appointment of a business manager, while preserving entitlement to full compensation, as well as ensuring a minimum level of compensation for women entrepreneurs during maternity leave that would not be lower than the statutory minimum wage. In addition, the Council proposed introducing a mechanism to ensure continuity of pension and social insurance service records during the leave period through the payment of contributions from the state budget, following the model already applicable to employed mothers. Data collection is currently underway to support an impact assessment of potential regulatory amendments in this area.

Digital transformation and Innovation

The abolition of roaming charges for citizens of the Republic of Serbia within European Union (EU) Member States under the “Roam Like at Home (RLAH)” regime is the primary objective of the [Draft Law on Amendments to the Law on Electronic Communications](#). The draft legislation regulates cooperation between the regulatory authority and the European Commission, the Body of European Regulators for Electronic Communications ([BEREC](#)), and other EU regulatory and expert bodies, including data exchange and reporting, the resolution of cross-border disputes, and the regulation of roaming and call termination charges in fixed and mobile networks.

Clarification of provisions relating to the status of operators, the definition of very high-capacity networks, the publication of information on types of civil engineering works through a single information point, and access to physical infrastructure constitute NALED’s key comments on the [Draft Law on Measures to Reduce the Cost of Deploying Very High-Capacity Electronic Communications Networks](#). During the public



consultation process, [four of NALED's proposals were accepted, while one was partially accepted](#). The adoption of this legislation forms part of NALED Gray Book Recommendation 11.3 – *Reduce the Costs of Deploying Broadband Infrastructure*.

The clear definition of criteria and procedures for the distribution of revenues to rights holders, the proportional determination of tariffs, the obligation to inform users about tariff negotiations, the clarification of the responsibilities of collective management organizations in conducting negotiations and monitoring the use of works, as well as the protection of user data as confidential business information, constitute NALED's main comments on the [Draft Law on Copyright and Related Rights](#). In addition, NALED submitted a proposal to amend the provision governing exceptions to database producers' rights, specifically with regard to the lawful extraction and re-use of substantial parts of a database for research and development purposes, including the development of artificial intelligence. The proposal specifies that such use should be permitted exclusively for non-commercial purposes during the pre-competitive phase, provided that it does not prejudice the legitimate interests of the database holder and that appropriate technical and organizational safeguards are implemented, including the protection of personal data and trade secrets. Adoption of this proposal would prevent database protection from becoming a barrier to innovation and the digital economy, while preserving the rights of database holders, ensuring alignment with EU law, and maintaining a balance between investment protection and the public interest.

NALED continued to strengthen the capacities of local government officials and business representatives through training programmes and promotional events aimed at showcasing the benefits of eGovernment and digital public services, while encouraging greater use of such services by citizens and businesses.

The first in a series of training sessions on the use of e-learning tools and the development of a learning culture was held within the framework of the "[Capital Innovation Point Serbia \(CIPS\)](#)" project. The training, entitled "[Learning Culture and E-Learning Tools](#)," brought together public sector officials, HR professionals, and team leaders from start-ups and small and medium-sized enterprises. Participants had the opportunity to learn how to develop their knowledge and effectively apply e-learning tools in their daily work.

In addition, **NALED participated in the "[Accelerating Autonomy with European Frontiers](#)" Summit in Warsaw, where it had the opportunity to connect with leading European Digital Innovation Hubs.** The summit facilitated the exchange of experiences in the fields of digital transformation, innovation ecosystems, and the application of emerging technologies, with the aim of improving the provision of high-quality services to small and medium-sized enterprises and start-ups in Serbia.

During the first quarter of 2026, NALED worked intensively with several local self-government units on the development of specialized Smart City plans through a combination of online meetings and in-person workshops. These activities enabled a detailed assessment of the current situation, the identification of key challenges, and the definition of concrete steps for the implementation of smart and sustainable solutions in cities and municipalities. In parallel, activities were carried out to procure and prepare smart equipment that will contribute to improving local infrastructure and the quality of life of citizens. The equipment includes systems for monitoring flow and pressure in public water supply networks, smart parking sensors, electric vehicle charging stations, and solutions for the management of green public spaces.



With the aim of advancing electronic payments and improving the delivery of services to citizens and businesses, a new project entitled “[Towards Next Generation eGovernment: Scaling Cashless Payments](#)” was launched in cooperation with Visa. The project focuses on the development and promotion of digital payments for public services, including the preparation of a cost-benefit analysis building on previous public administration digitalization reforms.

The second edition of the Local eGovernment Index (LEI) survey was launched, enabling the monitoring of the level of digitalization at the local level through comparison with the results from 2023, thereby providing a clearer picture of progress and identifying priority areas for further development.

The first meeting of the Working Group of the Government of the Republic of Serbia for the preparation of the [Draft Law on Amendments to the Law on Electronic Communications](#) was held on 5 March. Members were presented with the work plan, drafting timeline, and key directions for the proposed amendments. NALED’s comments submitted through the Working Group focused on call termination rates in public fixed and mobile networks for domestic traffic, the clarification of the respective competences of the ministry and the regulator, the harmonization of terminology, and the elimination of duplicative provisions.

[Serbia has gained its first generation of Innoleaders](#), comprising representatives of public institutions, academia, and innovation support infrastructure. The main objective of the Innoleaders Programme is to strengthen Serbia’s innovation ecosystem through the development of knowledge, skills, and competencies among key stakeholders. At the same time, the process of drafting a Law on Artificial Intelligence has been launched with the aim of aligning the domestic regulatory framework with the EU AI Act. The law will regulate the use of AI solutions, while research and development activities, as well as defence-related applications, are excluded from the scope of the draft legislation.

According to the National Programme for the Adoption of the EU Acquis (NPAA) for the period 2024–2027, no legislation in the field of electronic communications and digital infrastructure was scheduled for adoption during the first quarter of this year.

Public Procurement

Although no new legislation related to public procurement was adopted during the first quarter, it is important to highlight the key findings and results from the [Annual Public Procurement Report of the Republic of Serbia for 2025](#), published by the Public Procurement Office (PPO) at the end of March this year. The data presented in the Report confirm the continuation of positive trends initiated by the 2023 amendments to the Law on Public Procurement, which introduced green public procurement and restricted the use of price as the sole award criterion for certain categories of services.

During 2025, a total of 46,792 public procurement procedures were launched, with approximately 7.3% of them incorporating environmental considerations. This represents a continued increase compared to 2024, when the share stood at 6.9%. At the same time, the use of award criteria not based exclusively on price also continued to grow. The share of procedures in which quality or cost-effectiveness criteria were applied in addition to price increased from 9.78% in 2024 to 10.38% in 2025. With regard to social considerations, contracting authorities applied social criteria in 363 public procurement procedures in 2025, compared to 344 procedures in 2024. Social aspects were most frequently incorporated into technical specifications for



procurement procedures related to the construction and reconstruction of buildings, schools, and public infrastructure.

The continued development of green public procurement is the result of activities implemented by NALED through projects supporting the improvement of the public procurement system, with the support of the Swedish International Development Cooperation Agency (Sida). Through these projects, research and analyses were conducted on the possibilities of introducing mandatory environmental criteria without distorting market competition. NALED also provided support to public institutions in further improving the regulatory framework for sustainable public procurement, preparing analyses and model tender documentation incorporating environmental and social criteria, and developing practical guidelines for contracting authorities. Particular emphasis was placed on strengthening the capacities of contracting authorities through training programmes, the exchange of experience, and the promotion of good practices in the field of green and socially responsible public procurement.

Property, Investments and Energy

Financial support for energy efficiency improvement measures, including building renovation, heating system upgrades, and the installation of solar energy systems, is provided under the [Decree Establishing the Programme for Financing Energy Efficiency Improvement Activities and Measures in 2026](#). The funds allocated through the Programme are awarded as grants, primarily for projects implemented in public buildings owned by local self-government units, while the specific activities and the amounts allocated to each activity are defined within the Programme itself.

At the joint session of the Property and Investments Alliance and the BFC Club, held on 24 March at Nelt, key findings from the Analysis of Spatial and Urban Planning Coverage in Local Self-Government Units in Serbia were presented, together with the Statistics on Construction Permits Issued in 2025. The analysis was positioned as an important basis for the further development of the eSpace (eProstor) system and for identifying priorities in the field of spatial planning and land management. Through dialogue with representatives of public institutions and the business community, the need for further digitalization of procedures and improvements to planning documentation was additionally emphasized. Among the key findings of the construction permit statistics for the previous year were an increase in the number of applications for location conditions, as well as persistent challenges related to the timeliness and efficiency of construction permit issuance in a significant number of local self-government units.

In the field of energy, activities were launched to prepare an analysis of the regulatory framework for battery energy storage systems, as well as initiatives related to the development of energy communities and the enhancement of market mechanisms such as balancing services and system flexibility. Through the work of the Sustainable Energy Council and various project activities, NALED continued to support the improvement of the investment framework and the acceleration of the energy transition. Particular attention was given to identifying regulatory and market barriers to investments in renewable energy sources, including issues related to permitting procedures, grid connection, and project financing conditions.

[The fifth revised National Programme for the Adoption of the EU Acquis \(NPAA\) for the period 2024–2027](#) envisaged the adoption of three regulations (one law and two rulebooks) during the first quarter of this year. However, none of these regulations were adopted during the first quarter.



Food and Agriculture

The introduction of the voluntary graphic label “100% from Serbia”, together with clearly prescribed rules governing its display on products and in retail outlets, represents the key innovation introduced through the amendments to the [Rulebook on Food Labelling, Marking and Advertising](#). The amendments also introduce an additional obligation to identify the manufacturer in the case of milk and dairy products where the brand owner is not the producer, as well as more precise rules regarding labelling on outer packaging. Transitional provisions stipulate that products not compliant with the new requirements may remain on the market until 30 June 2026, while the key provisions of the Rulebook will become applicable as of 1 July 2026.

The concept of regenerative agriculture, which NALED has actively advocated in recent years, has been incorporated into the [Draft Strategy for Agriculture and Rural Development of the Republic of Serbia for the period 2026–2034](#).

Although the fifth revised National Programme for the Adoption of the EU Acquis (NPAA) for the period 2024–2027 envisaged the adoption of five regulations (one decree and four rulebooks) during the first quarter of this year, none had been adopted by the end of March.

Health

A new regulatory framework governing the organization of emergency medical services in detail has been established through the [Rulebook on the Method and Organization of the Provision of Emergency Medical Assistance](#). The Rulebook further prescribes the composition and types of emergency medical teams, procedures for receiving and triaging calls, and the responsibilities of healthcare professionals both in the field and within healthcare institutions. It also specifies the staffing, technical, and organizational requirements for service delivery, as well as coordination mechanisms between different levels of healthcare and other participants within the system.

NALED implemented a series of activities aimed at promoting and supporting the implementation of the “e-Sick Leave – Employer” system, which became operational at the beginning of the year. Through the “eGovernment Caravan” initiative, training sessions were organized in eight local self-government units, where local government officials and business representatives were introduced to the system’s functionality and its practical application.

As part of its publication database for members, NALED published the Analysis “*The Process of Conducting Clinical Trials of Medicinal Products and Medical Devices*”, providing a comprehensive overview of the regulatory and operational framework for conducting clinical trials in Serbia, while identifying the key barriers limiting the attraction of a larger number of studies. Although previous regulatory improvements have contributed to stabilizing the number of clinical trials, the analysis indicates that the greatest challenges remain in the early stages of sponsors’ decision-making processes (insufficient data transparency, high costs, and lengthy procedures), as well as within healthcare institutions themselves (inconsistent procedures and insufficient administrative capacities).

During the first quarter of 2026, the priorities of the Healthcare Alliance were redefined, with a particular focus placed on pharmaceuticals as one of the key topics for the upcoming period. To this end, a dedicated subgroup was established to initiate amendments to regulations relevant to the pharmaceutical sector, with



particular emphasis on improving access to therapies and further enhancing the [Rulebook on the List of Medicines Reimbursed through Mandatory Health Insurance Funds](#).

The National Programme for the Adoption of the EU Acquis (NPAA) for the period 2024–2027 did not envisage the adoption of any laws or secondary legislation during the first quarter of 2026. In addition, no regulations whose adoption had been planned for the previous year were enacted during the reporting period.

Environmental Protection

A decentralized approach to the continuous monitoring of air quality has been introduced through the new [Decree Establishing the Air Quality Monitoring Programme within the State Monitoring Network](#). In addition to the Environmental Protection Agency, this activity will now be carried out by 17 public health institutes and institutes of public health across the Republic of Serbia, as well as the Institute for Mining and Metallurgy Bor. The Decree also envisages an expanded list of monitored particulate matter and gases, including additional parameters relevant to public health and climate change. Combined with an increased number of monitoring stations within the state network, these measures will enable the availability of more comprehensive data and improved geographical coverage.

The introduction of a market-based model through an auction system founded on a competitive allocation procedure is envisaged by the new [Draft Decree on the Type, Criteria, Amount, Elements, Conditions and Method of Allocation of Incentive Funds to Operators Engaged in Waste Reuse and Recovery for the Purpose of Awarding Incentive Funds during the 2026–2028 period](#). This approach reflects NALED's recommendations from the Gray Book concerning the improvement of the extended producer responsibility system and the introduction of market-based mechanisms. However, under current conditions, a sudden transition to a fully market-based model would represent a significant challenge for the recycling sector. It is therefore necessary to ensure the continuity of the existing system during the transitional period in order to preserve the functionality of the overall waste management system. NALED submitted comments on the Draft Decree to the Ministry of Environmental Protection.

Although the fifth revised National Programme for the Adoption of the EU Acquis (NPAA) for the period 2024–2027 envisaged the adoption of 15 regulations during the first quarter of this year, only two regulations were adopted: the [Rulebook on the Procedure for Public Inspection, Public Presentation and Public Consultation, and the Preparation of the Report on the Conducted Public Consultation Regarding the Environmental Impact Assessment Study of a Project](#), and the [Rulebook on the Operation of the Technical Commission for the Evaluation of Environmental Impact Assessment Studies](#). The Rulebook on the Method of Informing the Public and Conducting Public Consultations on Draft Plans and Programmes and Strategic Environmental Assessment Reports was adopted in 2025.

A detailed overview of regulatory developments and NALED's activities during the first quarter of 2026 is available on the link [First Quarterly Report 2026](#) (currently available in Serbian only).