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Regulatory Index of Serbia

The Quality of the Regulatory Environment in Serbia 2025.

ABOUT THE DONOR

The Regulatory Index of Serbia 2024/2025 is prepared within the “Efficient public procurements and sustainable supply chains for improved competitiveness” project that is conducted by NALED with the support of the Swedish International Development Agency (SIDA).

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INTRODUCTION

Monitoring legislation and tracking regulatory changes are essential for businesses, as regulations define the rules governing market operations. A stable and predictable business environment that fosters economic growth requires the consistent implementation of legislation, an efficient public administration, open and transparent communication with public authorities, and an economic policy that is not subject to frequent and abrupt changes. Recognizing the importance of these elements for the functioning of the economy, NALED has developed the **Regulatory Index of Serbia (RIS) as a tool that enables its members and the broader public to gain a clearer understanding of the quality of the regulatory drafting and implementation process.**

RIS is a composite index consisting of six components. Each component covers a specific stage of the legislative process and is measured through a set of individual indicators (25 in total):

1. **Component 1: Predictability of Regulatory Changes –** Planning the adoption or amendment of legislation is a prerequisite for ensuring a predictable regulatory environment in the Republic of Serbia.
2. **Component 2: Quality of Regulatory Preparation –** Ex ante regulatory impact assessments contribute to evidence-based decision-making and support the adoption of regulations that achieve the best balance between costs and benefits.
3. **Component 3: Stakeholder Engagement –** The quality of stakeholder involvement reflects the level of transparency and openness of the regulatory drafting and adoption process.
4. **Component 4: Timeliness of Legislative Implementation –** The effectiveness of legislative implementation is primarily reflected in the timely adoption of secondary legislation necessary for the implementation of laws.
5. **Component 5: Institutional Responsiveness –** This component measures the openness of public institutions in addressing questions and resolving issues related to the implementation of legislation within their areas of responsibility.
6. **Component 6: Regulatory Burden** – This component assesses the effects of legislation, with a particular focus on the regulatory burden imposed on businesses.

METHODOLOGICAL OVERVIEW

The methodology of the **Regulatory Index of Serbia (RIS)** was originally developed in 2012. Over time, however, the regulatory environment has evolved, with some challenges being addressed while new ones have emerged. Since the first edition of the Index, the methodology underwent only minor adjustments until 2023, when a comprehensive revision was carried out under the project *Public Procurement and Good Governance for Greater Competitiveness*, implemented by NALED with the support of the Swedish International Development Cooperation Agency (Sida). The objective of the revised methodology was to align the indicators with legislative changes and shift their focus towards **measuring the quality of regulatory drafting and implementation**, rather than merely assessing whether public institutions had fulfilled their formal legal obligations.

The revised methodology also expanded the number of indicators included in RIS, enabling a more comprehensive assessment of Serbia's regulatory environment. This is the third annual report prepared under the revised methodology, allowing for direct comparison with the results from the previous two years. Comparisons with earlier editions of the Index should, however, be avoided due to methodological differences.

RIS consists of six components measured through 25 indicators, which monitor the full regulatory lifecycle of more than 200 pieces of legislation relevant to the business community. A significant share of these regulations is also important for Serbia's European Union accession negotiations. The detailed methodology is available on NALED's website, while the methodological annex to this report explains the calculation method for each individual indicator.

SUMMARY OF RESULTS

The overall Regulatory Index of Serbia (RIS) score for 2025 stands at 50 out of a maximum of 100 points, unchanged from the previous year. The scores of two components remained virtually unchanged (Institutional Responsiveness and Regulatory Burden), while three components recorded a decline (Quality of Regulatory Preparation, Predictability of Regulatory Changes, and Timeliness of Legislative Implementation). The remaining component (Stakeholder Engagement in Regulatory Drafting) recorded an improvement compared to the previous year.

Figure 1: RIS Index values by components, 2025 - 2024. godina

Vrednosti komponenti i indikatora RIS-a	2024 (0 - 100)	2025 (0 - 100)
Component 1: Predictability of Regulatory Changes	**44**	**42**
1. Fulfilment of the Legislative Activity Plan	13	18
2. Share of planned regulations among adopted regulations	34	42
3. Fulfilment of the Government Programme	48	40
4. Frequency of amendments to legislation	82	69
Component 2: Quality of Regulatory Preparation	**64**	**60**
1. Coverage of Regulatory Impact Assessments	100	100
2. Content of Regulatory Impact Assessments	52	65
3. Quantification of Regulatory Effects	30	28
4. Quality of Exolanations of Key Legal Principles	73	47
Component 3: Stakeholder Engagement	**45**	**56**
1. Coverage of Public Consultations and Hearings	64	82
2. Quality of Public Consultation Reports	60	80
3. Transparency of the Legislative Drafting Process	28	20
4. Quality of Parliamentary Debate on Laws	29	41
Component 4: Timeliness of Legislative Implementation	**27**	**22**
1. Share of Adopted Implementing By-laws	8	4
2. Delays in Adopting Implementing By-laws	2	0
3. Timeliness in Issuing Opinions on Legal Provisions	71	64
Component 5: Institutional Responsiveness	**72**	**73**
1. Communication between Institutions and Citizens/Businesses	65	68
2. Information Provided through Websites and Social Media	80	79
Component 6: Regulatory Burden	**46**	**45**
1. Administrative Costs as a Share of GDP	70	77
2. Administrative Burden of a Typical Enterprise	57	50
3. Share of the Ten Largest Non-tax Charges in GDP	12	7
Overall RIS Score	**50**	**50**

Although the overall RIS score declined by only one index point in 2025, this modest decrease should be viewed in the broader context of both domestic and international developments. Domestically, the year was marked by the Government's resignation at the beginning of the year, followed by a four-month caretaker mandate, the appointment of a new Government with a full mandate in May, and the continuation of large-scale political protests. Internationally, geopolitical uncertainty persisted due to the ongoing conflicts in the Middle East and Ukraine. Nevertheless, it should be noted that the current score remains significantly below the 55 points recorded two years ago.

Weak legislative planning, the slow adoption of secondary legislation, and the persistently high regulatory burden on businesses remain the main factors behind the regulatory framework receiving the same overall assessment as in the previous year.

The relatively low RIS score is primarily driven by several structural weaknesses. The first is inadequate legislative planning. For the second consecutive year, the Government Work Plan for the current year was not adopted, with the last such document having been approved in 2023. Poor planning of legislative activities significantly undermines the subsequent stages of the regulatory process, including regulatory impact assessments, public consultations, preparation of draft legislation, and the timely adoption of regulations.

Given the limited administrative capacity of public institutions, inadequate planning further constrains their ability to prepare high-quality legislation and ensure meaningful stakeholder participation throughout the drafting process, which is reflected in the scores of the corresponding RIS indicators. In addition, the National Assembly held only seven sittings in 2024 (five regular, one extraordinary, and one special sitting). This compares with eight sittings in 2025, while the annual average over the previous decade was as high as 24 sittings.

The National Assembly has continued the practice of adopting a large number of laws on the same day. For example, 50 laws were adopted on 3 December, 39 on 22 October, and 34 on 6 March. Such a legislative pace is not conducive to high-quality law-making, as it requires public institutions to prepare draft legislation and complete the entire legislative process within very short timeframes. Beyond drafting the legal text itself, this process includes conducting regulatory impact assessments, engaging stakeholders through public consultations, organizing public hearings, preparing the necessary secondary legislation, and completing other procedural requirements. Compressing these activities into such short deadlines may adversely affect the quality of the proposed regulatory solutions, increasing the likelihood of implementation challenges, frequent legislative amendments, or failure to adequately address the underlying policy issue. At the same time, the accelerated adoption of legislation leaves businesses with limited time to adjust to and comply with new regulatory requirements. This may increase both the costs of adapting business operations and the overall costs of regulatory compliance.

The highest-scoring RIS components in 2025 were Institutional Responsiveness (Component 5), with a score of 73, and Quality of Regulatory Preparation (Component 2), with 60 index points.

- Direct communication between public institutions and businesses and citizens received a slightly higher assessment in 2025, increasing by three index points. At the same time, the informativeness of ministry websites declined by one index point, resulting in an overall increase in the component score from 72 to 73 index points compared with the previous year.

- Ministry websites often contain updated versions of important documents, such as regulations within the ministries' remit, organizational charts, lists of ongoing projects, and regularly updated news. However, although ministries respond within the prescribed deadlines to requests for access to information of public importance in the majority of cases (84%), their response rate to letters and requests submitted by citizens and businesses outside the formal procedure established by the Law on Free Access to Information of Public Importance is significantly lower, standing at only 44%. This represents a notable decline compared with the previous two years.

- The score of **Component 2: Quality of Regulatory Preparation** decreased by four index points (from 64 to 60 points) compared with the previous RIS edition. As in previous years, all new laws and amendments for which the **Public Policy Secretariat (PPS)**, as the competent institution, determined that a **Regulatory Impact Assessment (RIA)** was required were formally accompanied by such assessments. The quality of their content also improved compared with the previous year, as a larger share contained a comprehensive assessment of regulatory effects (65 points compared with 52 points in the previous year). However, this improvement was offset by a decline in the indicator measuring the quality of explanations of the underlying legal principles (a decrease of 26 index points, from 73 to 47). The main reason is that a large number of explanations accompanying amendments to existing legislation or the adoption of new regulations contain only copied provisions of the articles being amended or introduced, without an adequate explanation of the rationale behind these changes. Out of 44 new regulations for which an RIA was deemed necessary, 22 assessments were evaluated as complete, while the remaining 22 were assessed as partial. In addition, 26 out of the 44 RIAs prepared did not include a quantification of regulatory effects. Only eight contained a complete quantification of the costs imposed by the new regulation on both the private and public sectors, while 10 included an assessment covering only one of the two sectors.

The components with the lowest scores in 2025 were Timeliness of Legislative Implementation (Component 4) and Predictability of Regulatory Changes (Component 1), scoring 22 and 42 index points, respectively.

- In 2025, the long-standing trend of weak timeliness in legislative implementation continued, leaving Component 4 as the lowest-scoring RIS component. This points to the persistent problem of failing to adopt secondary legislation, as well as significant delays (often lasting several years) in its adoption. To ensure the implementation of 52 selected laws relevant to the business community in 2025, the adoption of 210 pieces of secondary legislation was required. However, only eight were adopted (4%). A further concern is that none of these eight acts was adopted within the prescribed deadline, while the average delay in their adoption during 2025 amounted to 727 days.

- One of the fundamental weaknesses of the legislative process in 2025 was the low predictability of regulatory changes, primarily caused by the failure to adopt the Government Work Plan for 2025. Although Articles 76 and 77 of the Government Rules of Procedure prescribe the obligation to adopt the Government Work Plan for the following year by the end of the current year, this document was not adopted for 2025 (as was also the case in 2024), significantly undermining the predictability of the regulatory environment. In such circumstances, it would be expected that the Government would continue adopting regulations from the previous plan, in this case the 2023 Work Plan. However, only 18% of the remaining laws and amendments envisaged by the 2023 Plan were actually adopted. Almost three-fifths of regulations adopted during 2025 were not included in the Government Work

Plan, while two-fifths (42%) were planned. While political instability in the form of early parliamentary elections held in December 2023 may have provided a justification for delays in adopting the annual Government Work Plan, this cannot explain the failure to adopt this key strategic document over the following two years, particularly given that the Governments formed in May 2024 and April 2025 maintained political continuity with the previous administrations.

The assessment of Stakeholder Engagement in Regulatory Drafting (Component 3) improved significantly in 2025 compared with the previous year, increasing from 45 to 56 points.

- Stakeholder involvement in the regulatory process, particularly through public consultations, received a significantly higher assessment compared with the previous year. This was also the RIS component with the largest improvement compared with 2024. The increase was primarily driven by a higher share of new laws and amendments for which public consultations were organized in accordance with the legally prescribed duration, as well as by improvements in the quality of consultation reports. Of the 41 adopted laws affecting the business community in 2025, 16 were new laws and 25 were amendments to existing legislation. Public consultations were organized for all 16 new laws, while consultations were held for 16 out of the 25 amendments. However, public consultations did not always last the required 20 days prescribed by the Government Rules of Procedure. In addition, consultation reports were not always publicly available (in two cases) or were not published on the eConsultation portal (in four cases). Furthermore, the public hearing mechanism for new laws in the National Assembly is practically not used.

RECOMMENDATIONS

Improving the quality of the regulatory environment requires, above all, the consistent implementation of the existing regulatory framework rather than the introduction of new procedures. The results of the Regulatory Index of Serbia (RIS) show that the most significant constraints remain concentrated in legislative planning, the implementation of adopted legislation, and the quality of regulatory drafting. To improve Serbia's RIS performance, the following measures are needed:

1) Regularly adopt the Government Annual Work Plan in a timely manner and ensure its consistent implementation. Legislative planning provides the foundation for high-quality regulatory impact assessments, the timely involvement of stakeholders, and the preparation of implementing legislation. At the same time, the practice of adopting a large number of laws within short timeframes should be reduced, as it undermines the quality of legislative drafting and limits the ability of businesses to adapt to new regulatory requirements.

2) Establish a systematic mechanism for monitoring deadlines for the adoption of implementing legislation, with clear accountability of line ministries for ensuring its timely adoption. The failure to adopt implementing legislation, or delays extending over several years, remains one of the key sources of legal uncertainty and directly affects the practical implementation of laws.

3) Improve the quality of regulatory drafting. Although regulatory impact assessments are now formally prepared for all regulations where required, their substantive quality should be further strengthened, particularly through the consistent quantification of costs and benefits for businesses and the public sector, as well as more robust justification of the rationale for adopting or amending individual legislative provisions.

4) Increase the transparency of the regulatory process. Information on the initiation of legislative drafting, the composition of working groups, contact persons, and draft legislation should be made publicly available in a timely manner. In addition, reports on public consultations should consistently include information on all comments received and how they were considered. These are essential preconditions for building stakeholders' trust in the legislative process.

I REGULATORY INDEX OF SERBIA – RIS 2025/26

Component 1: Predictability of Regulatory Changes

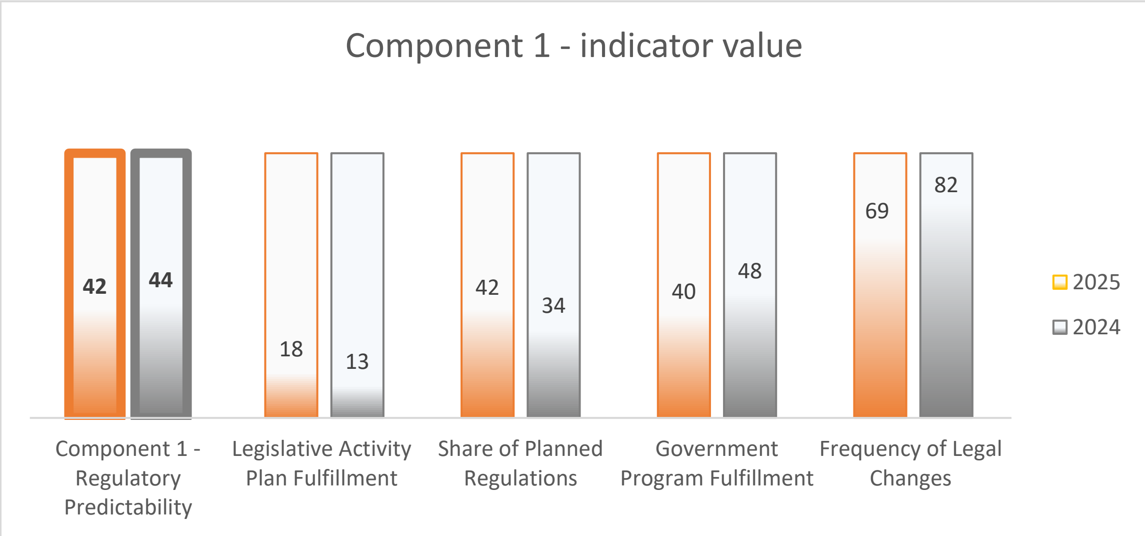
For businesses, a predictable business environment is of crucial importance, as it enables more reliable planning and more stable management of operations. When companies have a clear understanding of when and how the regulatory framework will change, they can adjust their strategies in a timely manner, allocate resources effectively, and make long-term investment decisions. Achieving such stability requires a planned approach to regulatory changes and their timely announcement. The first component of the **Regulatory Index of Serbia (RIS)** assesses precisely the degree of planning and timeliness of regulatory changes.

The overall score of Component 1 in 2025 was 42 out of a maximum of 100 points, indicating that the predictability of legislative activity remains relatively low. In addition, this score represents a decrease of two index points compared with the previous year.

This component consists of four individual indicators, the values of which are presented in Figure 2: Component 1 – Indicator scores in 2025 and 2024:

1. Fulfilment of the Legislative Activity Plan;
2. Share of planned regulations among adopted regulations;
3. Fulfilment of the Government Programme;
4. Frequency of amendments to legislation.

Figure: Component 1 – Indicator value in 2025 and 2024



Major issue contributing to the decline in the value of this component is the fact that the Government of the Republic of Serbia did not adopt the **Government Work Plan for 2025**. According to the Law on the Planning System, the Government is required to adopt, by the end of the current year, a work plan for the following year containing the regulations planned for adoption during that year. This obligation was not fulfilled for 2025. This represents a continuation of the situation from the previous year, considering that the last such document was adopted in 2023. This means that the Government of Serbia has conducted its regulatory activities for two consecutive years without this overarching planning document. A positive development is that the

Government Work Plan for 2026 was adopted within the prescribed deadline, which creates the basis for this indicator to receive a higher score in the next edition of RIS.

The timely adoption of the Government Work Plan is an important mechanism for ensuring the predictability of the regulatory environment for businesses, as it provides an overview of planned regulatory changes expected during the year.

However, the existence of the Government Work Plan represents only a necessary, but not sufficient, step towards predictability, as it is equally important to ensure its implementation and compliance with the planned regulatory agenda.

When the Government Work Plan for the following year is not adopted, it is assumed that the Government will continue implementing regulations planned under the previous plan, i.e. regulations from the latest adopted plan that were not adopted during the year for which they were originally planned. Accordingly, it was expected that during 2025 the Government of the Republic of Serbia would continue adopting laws included in the 2023 Government Work Plan that had not been adopted in 2023 or 2024. These data were used as the basis for calculating the values of the first two indicators of this component for 2025.

The Government Work Plan for 2023 envisaged the adoption of a total of 346 laws. Of these, 114 were adopted during 2023 and 91 during 2024, leaving 141 laws remaining for adoption in 2025.

During 2025, only 18% of the regulations planned under the Government Work Plan were adopted. In other words, fewer than one in five laws remaining from the Plan were adopted during the year. Specifically, 25 laws from the remaining legislative agenda were adopted in 2025, while 141 laws would have needed to be adopted for the Plan to be fully implemented. Accordingly, the value of the indicator *Fulfilment of the Legislative Activity Plan* within this component amounts to only 18 index points, representing a slight increase of five index points compared with the previous year.

Of the total of 60 laws adopted during 2025, 35 (58%) were not included in the Government Work Plan. In other words, almost three-fifths of laws adopted during 2025 were not planned, while two-fifths were included in the legislative agenda. This resulted in a score of 42 index points for the second indicator of this component, *Predictability of the Regulatory Framework*, which is eight index points higher than in the previous year.

Monitoring the implementation of the Government Programme Action Plan (APSPV) is also an important mechanism for assessing the predictability of the regulatory environment. Therefore, in addition to monitoring the fulfilment of the Legislative Activity Plan, RIS also tracks the fulfilment of the Government Programme through the APSPV as the third indicator within this component.

Out of 22 public policy documents planned under the Government Programme Action Plan for adoption during 2025 (including those that were not adopted in 2024), nine were adopted, representing 40%. This indicator monitors both the adoption of regulations and the adoption of public policy documents (strategies, programmes, and action plans) relevant for achieving the Government's priority objectives. In addition to adoption itself, it is important that regulations are adopted within the prescribed deadlines, which is why RIS also monitors delays in their adoption. Of the nine adopted documents, eight were adopted within the planned deadlines, while one was adopted with a delay. Ultimately, the value of the indicator *Fulfilment of the Government Programme* for 2025 amounted to 40 points out of a maximum of 100, representing a decrease of eight index points compared with the previous year.

A predictable business environment requires avoiding frequent legislative changes that make it more difficult for businesses to adapt and ensure compliance with the regulatory framework. The frequency of legislative amendments is calculated by monitoring a sample of 77 systemic laws relevant to the business sector. However, it should be taken into account that certain regulations need to be amended due to economic, technological, and social developments, as well as the process of harmonization with EU legislation. Therefore, RIS assumes that the optimal annual level is to amend or supplement up to 10 out of the 77[1] monitored laws, while each additional amendment proportionally reduces the value of this indicator.

Finally, during 2025, 31 amendments to these 77 business-relevant laws were adopted (40%), resulting in a score of **69** for the final indicator of this component, *Frequency of Amendments to Legislation*. This represents a decrease of 13 index points compared with the previous year.

[1] It is assumed that, over a three-year period, 40% of the regulations will be amended or supplemented, primarily to align with EU policies. In other words, over the course of three years, 30 out of the 77 monitored regulations are expected to be amended or supplemented, which corresponds to 10 regulations per year. Further details, including a comprehensive explanation of the indicator calculation, are provided in the methodological annex.

Component 2: Quality of Regulatory Preparation

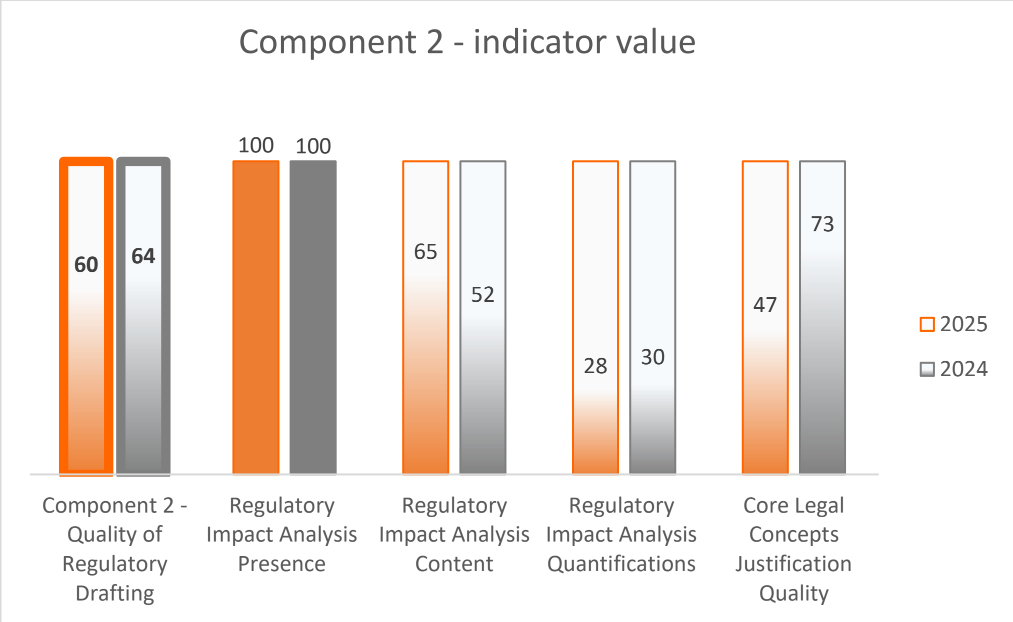
In order to ensure that adopted regulations achieve the intended effects, including the improvement of the business environment and citizens’ well-being, the **Law on the Planning System** and accompanying secondary legislation prescribe the obligation to conduct **Regulatory Impact Assessments (RIAs)**. A Regulatory Impact Assessment represents a structured process of regulatory development that begins with the precise identification of the problem and objectives, as well as the consideration of possible regulatory options and their expected consequences. Where circumstances allow, this process also includes the quantitative assessment of costs and benefits. The more evidence-based and consistently conducted the assessment is, the higher the quality of the regulation itself is expected to be. In other words, the quality of the Regulatory Impact Assessment can be viewed as a reliable indicator of the overall level of preparation and consideration behind the proposed regulation.

The overall score of Component 2 in 2025 amounted to 60 index points, representing a decrease of four index points compared with the previous year, when the score was 64.

This component consists of four individual indicators, the values of which are presented in Figure 3: Component 2 – Indicator scores in 2025 and 2024:

1. Coverage of Regulatory Impact Assessments;
2. Content of Regulatory Impact Assessments;
3. Quantification of Regulatory Effects; and
4. Quality of Explanations of Key Legal Principles.

Figure 3. Component 2 – Indicator Value in 2025 and 2024



A more detailed analysis of individual indicators shows that ministries formally submit **Regulatory Impact Assessments (RIAs)** in almost all cases where such assessments have been deemed necessary. However, the quality and content of the submitted assessments remain questionable, with the main shortcoming being the insufficient assessment of the costs of implementing regulations.

During 2025, RIAs were conducted for all laws for which the **Public Policy Secretariat (PPS)**, as the competent institution, assessed that such an analysis was required. Namely, the first indicator of this component measures the share of adopted regulations accompanied by an RIA among all regulations for which, according to the **Regulation on the Methodology for Public Policy Management**, an RIA was required.

In 2025, the PPS determined that RIAs were required for 44 laws that were subsequently adopted, and assessments were prepared and submitted for each of these laws. This result is identical to the previous year. In other words, for three consecutive years RIAs have been prepared for all adopted laws for which the competent institution determined that such an assessment was necessary. As a result, the indicator *Implementation of Regulatory Impact Assessments* remains the highest-rated indicator within the entire RIS.

The second indicator of this component is calculated based on the assessment of the quality of submitted RIAs, which is conducted by the PPS as the competent institution. **Half of the prepared RIAs (22 assessments) were assessed as complete, while the remaining half were assessed as partial**. This represents an improvement compared with the previous year, when complete assessments were available in only one-fifth of cases. Consequently, the score for the indicator *Content of Regulatory Impact Assessments* reached 65 points, representing an increase of 13 points compared with the previous year.

One of the key questions when adopting legislation with a significant impact on the business environment is whether, and to what extent, new regulations create costs for businesses and the public sector. These costs should be identified and quantified through the Regulatory Impact Assessment, which is measured by the third indicator of this component.

The data show that only eight RIAs, or fewer than 20%, contain a full quantification of regulatory implementation costs. An additional 10 assessments contain partial quantification, covering only the public sector (eight assessments) or the private sector (two assessments). However, as many as 26 assessments, or 60%, do not include such cost quantification.

For each adopted law for which an RIA was deemed necessary, the relevant sections of the assessment concerning key financial and economic issues were analyzed to determine whether they quantify impacts on businesses and the public sector. If effects are quantified for both sectors, the draft law receives a score of 100 for this

indicator; if effects are quantified for only one sector, the score is 50 points; while no quantification results in a score of 0.
Compared with the previous RIS edition, there was a slightly higher share of RIAs containing full quantification, but also a higher share of assessments containing no quantification at all. As a result, the final score of the indicator *Quantification of Regulatory Effects* amounted to 28 points, which is two points lower than in the previous assessment.

In addition, explanations accompanying draft laws must contain adequate descriptions of the legal principles and concepts introduced or amended through the adoption of new regulations. This aspect is monitored through the indicator *Quality of Explanations of Key Legal Principles*.
For almost one-third of newly introduced or amended legal provisions, the accompanying explanations were prepared adequately and contained quality descriptions of the amended provisions. However, in the remaining two-thirds of cases, explanations merely reproduced the wording of the relevant articles from the draft laws, preventing a proper understanding of the reasons behind the proposed regulatory changes.
This represents a decline of 26 index points compared with the previous year and marks the largest decrease among all indicators within this component.

In March 2026, the ***Regulation on Regulatory Impact Assessment*** *and the* ***Regulation on the Methodology for Public Policy Management*** *were amended, reducing the obligations related to conducting consultations with stakeholders during the preparation of regulations and public policy documents.*

Unlike the previous framework, consultations are no longer a mandatory element of the preparation of RIAs in all cases, but their implementation is now largely left to the discretion of the proposing authority. This reduces the opportunity for businesses, civil society organizations, and the expert community to participate in shaping regulatory solutions at the earliest stage of the process, when there is the greatest potential for considering alternative options and improving the quality of regulations.

Component 3: Stakeholder Engagement in Regulatory Drafting

The third component of the Regulatory Index of Serbia (RIS) focuses on one of the key aspects of a high-quality regulatory framework – the level and quality of stakeholder engagement in the process of drafting and adopting regulations, particularly those relevant for the business community.

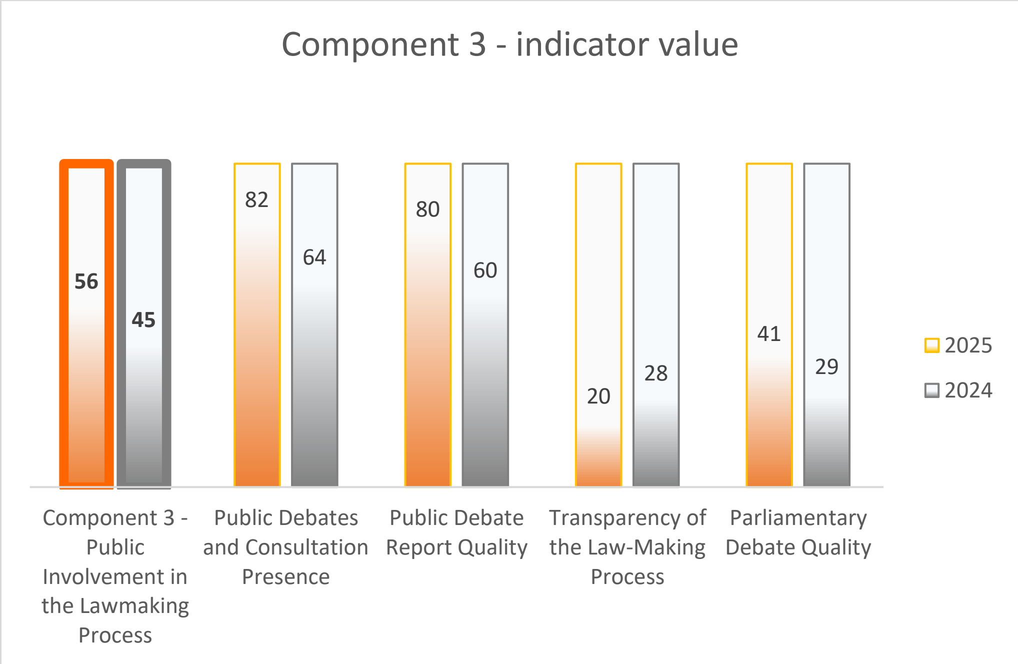
According to the assessment of the Public Policy Secretariat (PPS), a total of 91 laws were adopted during the observed period, of which 28 were identified as requiring the preparation of a Regulatory Impact Assessment (RIA). Accordingly, it can be assumed that these laws are likely to have a more significant impact on citizens and businesses.

The overall score of Component 3 for 2025 was 56 points. This represents an increase of 11 points compared with 2024, when this component scored 45 points.

This component consists of four individual indicators, the values of which are presented in Figure 4: Component 3 – Indicator scores in 2025 and 2024:

1. Coverage of Public Consultations;
2. Quality of Public Consultation Reports;
3. Transparency of the Drafting Process;
4. Quality of Parliamentary Debate on Legislation.

Figure 4. Component 3 – Indicator Value in 2025 and 2024



The weakest-performing indicators are those related to the transparency of the legislative drafting process and the quality of parliamentary debate on legislation. Indicators related to public consultations and the quality of public consultation reports achieved higher scores, exceeding the results recorded in the previous year.

According to Article 41 of the Rules of Procedure of the Government of the Republic of Serbia, the proposer is required to conduct a public consultation when preparing laws that substantially change the regulation of a particular issue or regulate matters of particular public interest. Public consultations may also be conducted during the preparation of certain strategic documents or secondary legislation, such as development strategies, regulations, and decisions.

Public consultations are one of the mechanisms for ensuring transparency in the work of public authorities and aim to increase the democratic participation of citizens and their representatives in the process of drafting laws and secondary legislation adopted by public authorities. The practice of organizing public consultations is also highly important in the fight against corruption, as it enables experts in specific fields to identify problematic provisions or provisions that favor the interests of individuals or groups at the expense of the public interest.

The indicator *Public Consultations and Stakeholder Engagement* was assessed with 82 points, representing an increase of 18 index points compared with the previous year's results. Specifically, out of 44 adopted laws affecting the business community, public consultations were organized for 26, while this was not the case for the remaining 18.

The amendments to the Government Rules of Procedure adopted in November 2025 concerning the framework for consultations and public consultations included - alongside the changes envisaged under the Reform Agenda - a new Article 41a. This provision enables the Government, upon the proposal of the authorized proponent and based on the report on the consultations conducted, to adopt a conclusion exempting a draft regulation from the public consultation process if it determines that all outstanding issues have been resolved during the consultations. Rather than narrowing the discretion to exempt draft regulations from public consultation, this solution expands it.

These proposed amendments were submitted for adoption despite written objections from civil society representatives serving on the working group and without providing an opportunity for the European Commission and SIGMA/OECD to express their views. SIGMA/OECD subsequently issued a predominantly negative opinion, including a recommendation that Article 41a be deleted or amended to ensure its alignment with the Law on State Administration.

In addition to conducting public consultations, it is essential that reports from completed consultations are publicly available and provide all necessary information to ensure transparency of the consultation process. According to businesses, previous years have shown cases where public consultations were organized merely as a formality, where comments received during consultations were often not taken into account, or where consultations were organized “too late”.

The indicator *Quality of Public Consultation Reports* is based on the assumption that if an institution invests effort into preparing a comprehensive consultation report, this indicates that it has genuinely considered the received comments and explained why certain suggestions were accepted or rejected.

An analysis of publicly available consultation reports showed that **20 reports from conducted public consultations met the established criteria for a quality consultation process (77%)**. A total of 21 reports were available to the public through the eConsultation portal, while four were published on individual ministry websites. Among these consultation reports, two fulfilled all established criteria, while an additional 18 fulfilled five out of the six criteria:

a) Whether the report lists the submitted proposals;

b) The number of accepted proposals or which proposals were accepted;

c) The number of rejected proposals or which proposals were rejected;

d) Whether explanations are provided for accepting/rejecting proposals;

e) Whether the names or organizations of participants in public consultations are listed;

f) Whether the names or organizations of members of the working group are listed.

The value of this indicator amounted to 80 points in 2025, representing an increase of 20 percentage points compared with the previous RIS edition.

The transparency of the legislative drafting process is an important indicator within this component, as it reflects the openness of public authorities and the accessibility of information for citizens, businesses, and other stakeholders. This indicator assesses

the date of publication and availability of draft laws, as well as information on the working group responsible for drafting legislation, including its composition and contact details.
Regarding the **indicator Transparency of the Legislative Drafting Process, the score decreased by eight points, reaching 20 points**. None of the monitored laws fulfilled all four established criteria, while only one law fulfilled three criteria:
a) Whether the start of drafting a new law was publicly announced;
b) Whether the draft law was publicly available;
c) Whether the composition of the working group drafting the law was published;
d) Whether the contact person representing the working group was publicly identified.

Out of 44 monitored laws, 30 (68%) fulfilled only one criterion – the draft law was publicly published before adoption. The composition of the working group and the contact person representing the working group were not published for any of the monitored laws.
For parliamentary debate and the legislative adoption procedure to be of high quality, several prerequisites must be fulfilled. The first is the organization of a public hearing. Its purpose is to enable committee members and other Members of Parliament to obtain relevant information, expert opinions, and stakeholder comments regarding draft legislation under parliamentary consideration, the implementation of adopted laws, and issues within the committee's area of responsibility.
During the previous year, no public hearing was organized for any of the laws adopted during the observed period.
The second prerequisite is that the parliamentary procedure (the period from the submission of a draft law to Parliament until its adoption) should be neither excessively long nor too short, ensuring sufficient time for consideration of comments, suggestions, deadlines, and proposals. Laws for which the parliamentary procedure lasted longer than 30 days receive the maximum number of points, while shorter procedures receive fewer points.

For 28 laws, the parliamentary procedure lasted more than 30 days; for 15 laws, it lasted between 15 and 30 days; while for one law it lasted less than 15 days (the Law on Amendments to the Law on the Prevention of Money Laundering and Terrorist Financing).

Finally, the indicator *Quality of Parliamentary Debate* on Legislation received a score of 41 points in 2025, representing an increase of 12 points compared with the previous year. This improvement resulted from the fact that, for the majority of laws adopted, the parliamentary procedure lasted longer than 30 days.

Component 4: Timeliness of Legislative Implementation (Regulatory Barometer)

Reports on the quality of the regulatory environment have consistently shown over many years that one of the major challenges in the legislative process is the implementation of laws, particularly the failure to adopt and delays in adopting secondary legislation necessary for the effective implementation of laws.

An additional challenge is the practice whereby the expiry of a law or its amendments are not followed by the timely alignment of secondary legislation previously adopted based on earlier versions of the regulatory framework. Such inconsistencies create legal uncertainty for all businesses affected by these regulations.

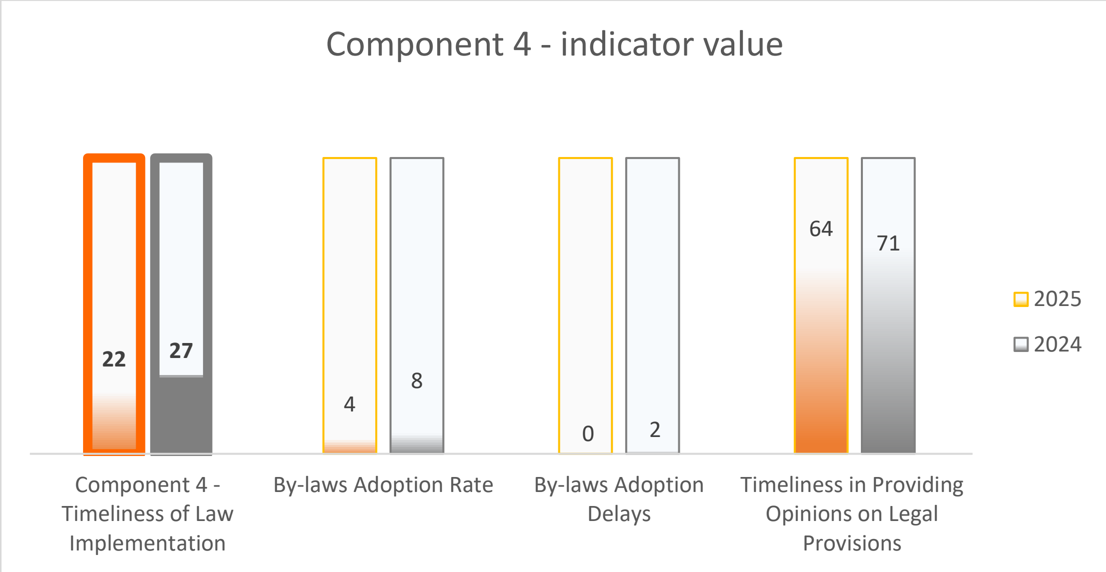
The efficiency and timeliness of competent ministries in adopting and aligning secondary legislation with the legislative framework are monitored through Component 4 of the Regulatory Index of Serbia (RIS).

The overall score of Component 4 for 2025 was 22 out of a possible 100 points. This component has consistently been among the lowest-scoring RIS components, demonstrating that delays in adopting secondary legislation and the failure to adopt necessary secondary legislation represent persistent structural problems in Serbia's legislative process. In addition, this score decreased by a further five index points compared with the previous year.

This component consists of three individual indicators, the values of which are presented in Figure 5: Component 4 – Indicator scores in 2025 and 2024:

1. Coverage of Adopted Secondary Legislation;
2. Delays in the Adoption of Secondary Legislation;
3. Timeliness of Providing Opinions on Legislative Provisions.

Figure 5. Component 4 – Indicator Value in 2025 and 2024



Out of the 210 by-laws that were due for adoption in 2025, only 8 were adopted (just 4%). More specifically, the By-law Barometer monitors a total of 38 laws and 923 by-laws (government decrees, rulebooks, and decisions) that were or are still required to ensure the effective implementation of those laws. Over the past 23 years, a total of 718 by-laws have been adopted, leaving 205 by-laws still outstanding. As a result, the value of the Adopted By-laws indicator stands at only 4, representing the second-lowest value ever recorded for an individual indicator within the Regulatory Implementation Scoreboard (RIS).

All eight by-laws adopted from the monitored set during 2025 were adopted after their statutory deadlines. The average delay in their adoption amounted to 727 days. The shortest delay, 129 days, was recorded for the Rulebook on Ensuring the Availability of Certain Electronic Communications Services and Related Terminal Equipment for End-users with Disabilities (adopted pursuant to the Law on Electronic

Communications), while the longest delay was recorded for the Rulebook on Technical Inspection Controllers (adopted pursuant to the Law on Road Traffic Safety), which was adopted 2,207 days late - more than six years after the prescribed deadline. As a consequence of such prolonged delays in adopting implementing legislation, the value of the Delay in Adopting By-laws indicator for 2025 is 0, the lowest score ever recorded for any indicator within the RIS.

Given the implementation challenges arising from delays in adopting by-laws, ministries seek to partially address these shortcomings by issuing official opinions on the interpretation of legal provisions within their respective areas of competence. This mechanism is primarily used in situations where legal or implementing provisions are unclear to businesses or citizens, thereby aiming to reduce legal uncertainty in practice.

However, this represents only a partial solution. Ministry opinions are generally not legally binding (with the exception of opinions issued by the Ministry of Finance that are binding on the Tax Administration), there is no public register of issued opinions, and opinions concerning legislation that falls under the shared jurisdiction of multiple ministries may differ. In addition, obtaining an official opinion requires both financial and time resources, as applicants must pay a national administrative fee of RSD 16,920 for legal entities and wait for the opinion to be issued, with the Law on State Administration prescribing a deadline of up to 30 days.

To assess the efficiency of individual ministries in issuing legal opinions, all ministries were requested to provide information on the number of opinions they issued on laws during 2025, as well as the time required to issue them. Based on the average time taken to issue opinions, the value of the third indicator under Component 4 of the RIS was calculated. Out of 25 ministries, only 13 provided the requested information. Their responses revealed that ministries generally do not maintain up-to-date records on the issuance of legal opinions. Many reported that they do not track the time required to issue opinions, nor do they distinguish whether opinions were issued to natural persons or legal entities.

The 13 ministries that responded issued a total of 1,577 opinions on legal provisions within their jurisdiction during 2025. Only the Ministry of Justice, the Ministry of Tourism and Youth, the Ministry of Sport, and the Ministry of Health issued opinions within an average period of less than 15 days. However, these ministries issued relatively few opinions (for example, the Ministry of Health issued only two). By contrast, the Ministry of Finance, the Ministry of Environmental Protection, and the Ministry of Construction, Transport and Infrastructure each issued more than 100 opinions, while the Ministry of Public Administration and Local Self-Government was by far the most active, issuing as many as 836 opinions. As a rule, ministries do not publish the opinions they issue, with the exception of the Ministry of Finance, which publishes them in its regular bulletin available on its website. Consequently, the overall score for the *Timeliness in Issuing Legal Opinions on Legislative Provisions* indicator amounts to 64 points, representing a slight decline compared with last year's score of 71 points.

Component 5: Institutional Responsiveness – Availability of Information

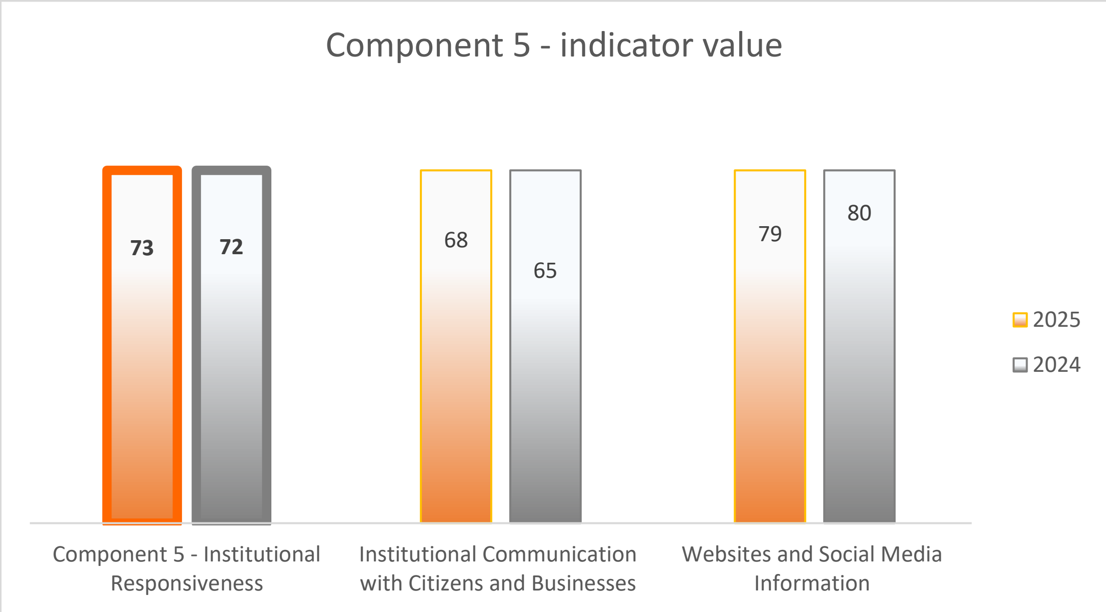
The availability of information and the openness of public institutions are essential for businesses to ensure compliance with the existing regulatory framework. Component 5 measures the responsiveness of public institutions in providing, either directly or indirectly, the information necessary for the proper implementation of regulations.

The overall score for Component 5 in 2025 amounts to 73 out of a possible 100 points, representing a result almost identical to last year's score of 72 points. As in the previous year, this component achieved the highest score among all components of the Index.

Component 5 consists of two composite indicators comprising a total of seven individual indicators, presented in Figure 6: Component 5 – Indicator Scores in 2024 and 2025.

1. Composite Indicator 1: Communication between Institutions and Businesses/Citizens
    a. Direct communication with an unknown stakeholder via email
    b. Direct communication with an unknown stakeholder by telephone
    c. Direct communication with a known stakeholder via email
    d. Availability of information of public importance
2. Composite Indicator 2: Information Provided through Websites and Social Media
    a. Quality of website content
    b. Clarity and accessibility of information on websites
    c. Timeliness of social media accounts

Figure 6. Component 5 – Indicator Value in 2025 and 2024



According to the collected data, ministries were equally proactive, accessible, and responsive in their indirect communication as they were in the previous year. The score of the sub-indicator measuring direct communication by ministries increased slightly from 65 to 68 points, while the sub-indicator measuring indirect communication recorded a score of 79 points.

The value of the first indicator, *Communication between Institutions and Businesses/Citizens*, which measures the quality of direct communication with users, amounts to 65 points in 2025. The highest response rate was recorded for requests for access to information of public importance (84%), followed by responses to telephone inquiries (80%). Response rates were somewhat lower for emails sent by known businesses or business associations (64%) and by unknown businesses or business associations (44%).

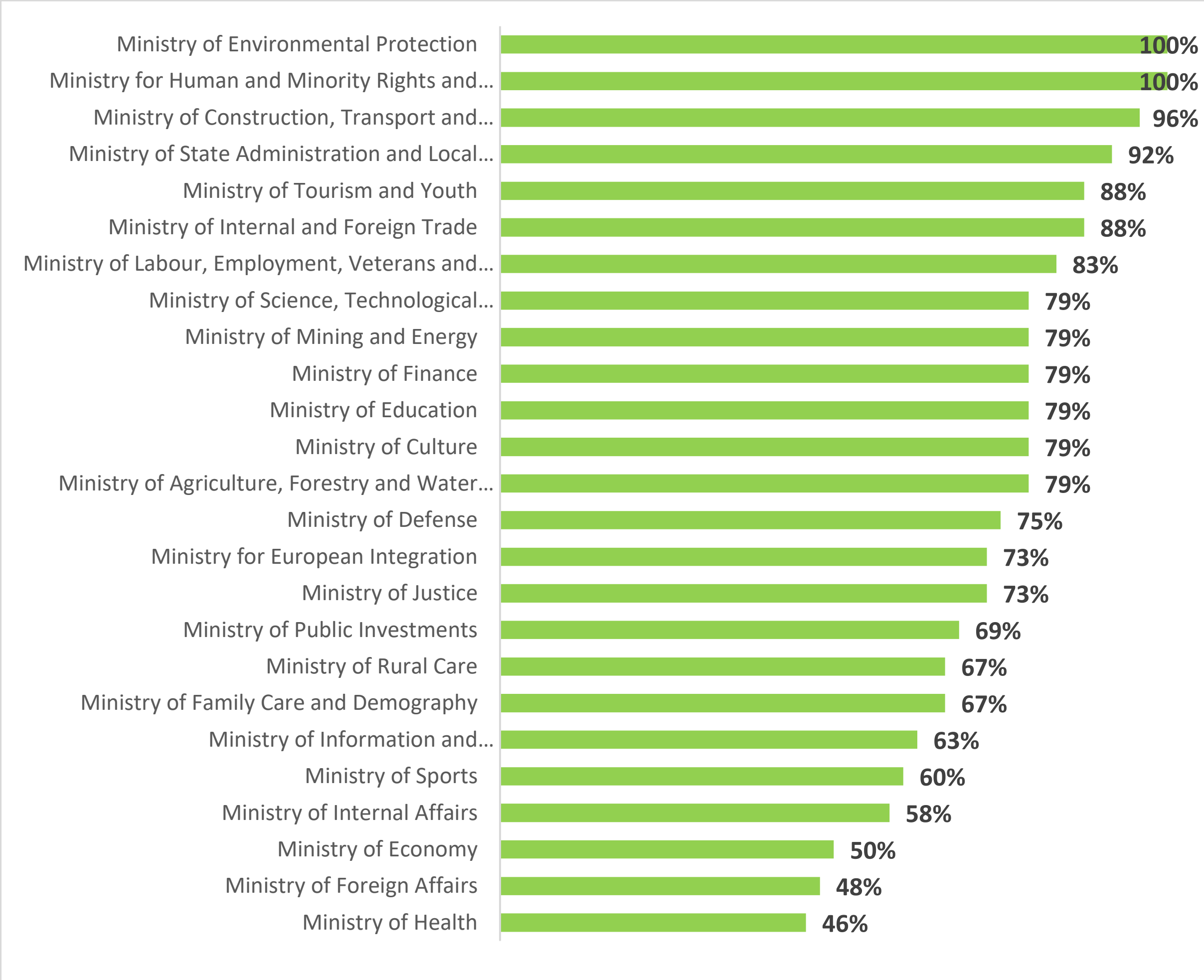
The value of the second indicator, *Information Provided through Websites and Social Media*, which assesses the quality of ministries' indirect communication with citizens and businesses, stands at 79 points in 2025. In practice, ministry websites and social media accounts have proven to be important channels for indirect communication with both citizens and the business community. The assessment of website quality is based on two groups of criteria:

a) Website content, including the availability of up-to-date legislation, institutional information booklets, information on current projects, and appropriate contact details for additional inquiries; and
b) Website usability, referring to the ease with which users can locate the above-mentioned information and documents.

The share of ministries maintaining up-to-date websites remained unchanged from the previous year, with 84% of ministries keeping their websites and social media accounts regularly updated. While all ministry websites were assessed as being of high overall quality, somewhat lower compliance was observed with regard to publishing up-to-date legislation, regulations, and news (54%), as well as maintaining lists of ongoing projects (52%).

Looking at the overall performance under Component 5, four ministries stood out as the highest performers. The Ministry for European Integration and the Ministry of Information and Telecommunications each achieved 95% of the maximum possible score, followed by the Ministry of Defense and the Ministry of Culture, each with 93%. The lowest-performing institutions were the Ministry for Public Investment, with only 41%, and the Ministry of Health, with 54% of the indicators fulfilled.

Figure 7: Component 5 across Ministries



Component 6: Regulatory Burden

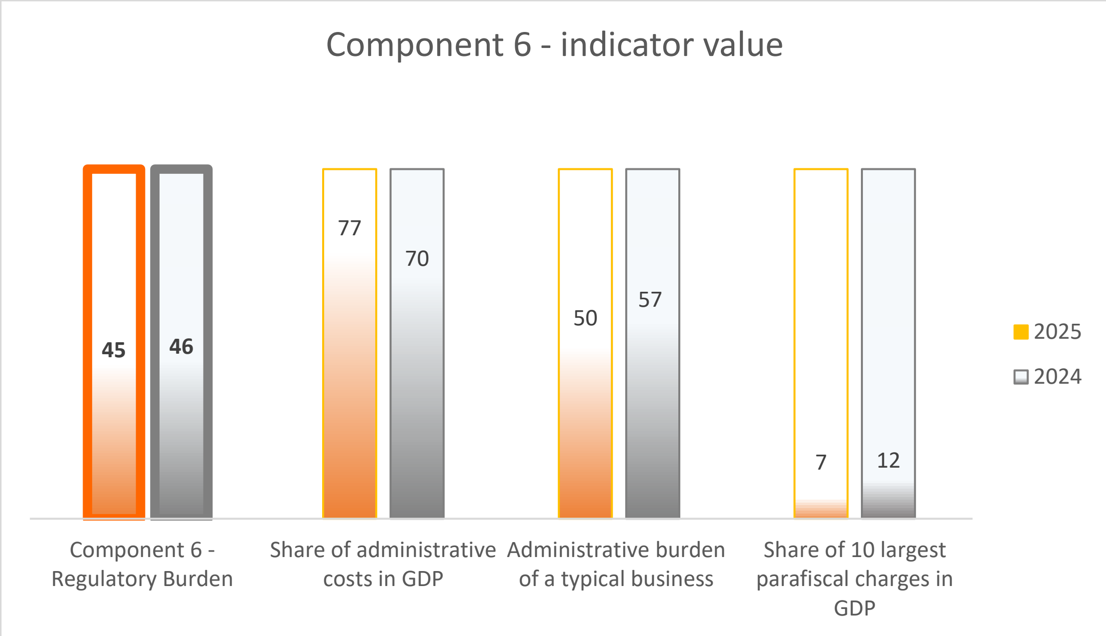
Creating a business environment that fosters economic growth and competitiveness requires a regulatory framework that does not impose unnecessary administrative costs on businesses. Accordingly, Component 6 of the Regulatory Implementation Scoreboard (RIS) measures the level of direct and indirect compliance costs imposed by regulations through three indicators, reflecting the overall administrative burden faced by the business community. Administrative burdens not only generate explicit costs for businesses but also require companies to devote valuable time to fulfilling administrative obligations, reducing the time available for their core business activities.

The overall score for Component 6 in 2025 amounts to 45 out of a possible 100 points, virtually unchanged from the previous year's result. This indicates that businesses in Serbia continue to face a significant administrative burden, highlighting the need for further measures to reduce unnecessary regulatory costs.

Component 6 consists of three individual indicators, the values of which are presented in Figure 8: Component 6 – Indicator Scores in 2024 and 2025:

1. Administrative costs as a share of GDP
2. Administrative burden of a typical enterprise
3. Share of the ten largest non-tax charges in GDP

Figure 8. Component 6 – Indicator Value in 2025 and 2024



The first indicator under Component 6 is based on the estimate of administrative costs as a share of GDP prepared by the Public Policy Secretariat of the Republic of Serbia (PPS). **During this year, the PPS published a new estimate, according to which administrative costs account for 2.7% of GDP.** The value of this indicator is inversely related to the level of administrative costs: the lower the share of administrative costs in GDP, the higher the score. Under the RIS methodology, an administrative cost share of 2% of GDP or less corresponds to the maximum score of 100 points, while a share of 5% or more corresponds to 0 points. Values between 2% and 5% are converted proportionally. Based on this methodology, the indicator score amounts to 77 points, representing an increase of 7 points compared with the previous year, reflecting a reduction in the administrative burden equivalent to 0.2 percentage points of GDP.

The second indicator, Administrative Burden of a Typical Enterprise, is calculated on the basis of a quantitative survey conducted among a sample of 200 businesses and 50 accounting firms, collecting data on the most frequently performed administrative procedures that businesses undergo each year. The estimated administrative burden is then converted into index points according to the RIS methodology. The survey was most recently conducted in 2024, and the results were used to determine the value of this indicator for the current edition of the Regulatory Index of Serbia, with the underlying values adjusted using the GDP deflator. **For a typical enterprise in Serbia, the administrative burden associated with only the ten most common administrative procedures amounts to 2.75% of annual business revenue, corresponding to a score of 50 points.**

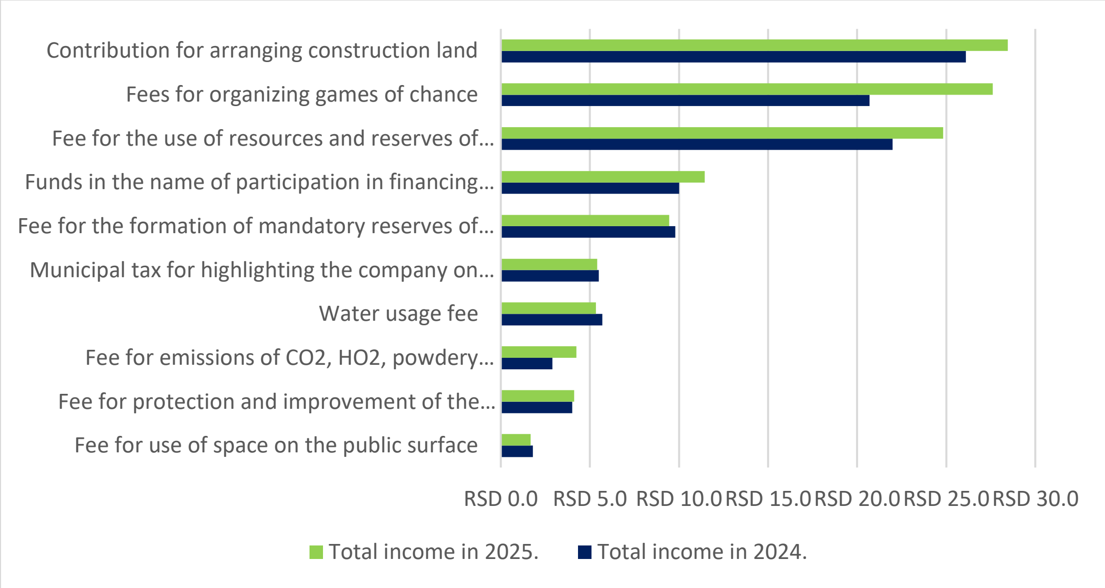
The administrative burden varies significantly depending on the size of an enterprise. Micro and small enterprises typically bear a proportionally higher burden because they generally lack dedicated staff responsible for regulatory compliance. For this reason, the RIS measures the burden borne by a typical enterprise, defined as a micro-enterprise with up to ten employees, registered for value-added tax (VAT), and issuing approximately 500 invoices per year. In addition, a list of the ten most frequently performed administrative procedures that such enterprises are required to complete annually has been established. Based on a survey of 50 accounting firms, each serving an average of around 30 micro-enterprises, the average annual compliance costs incurred by a typical micro-enterprise were estimated. The indicator score is then derived from the estimated share of administrative costs in the enterprise's annual business revenue using the RIS scoring scale, where 2% or less corresponds to 100 points, 3.5% or more corresponds to 0 points, and intermediate values are calculated proportionally.

The total administrative costs are assessed relative to the average annual revenue of a micro-enterprise, which amounted to RSD 17,090,749 (slightly more than EUR 145,000) in 2025. Consequently, administrative costs account for 2.75% of total business revenue. **According to the RIS methodology, the Administrative Burden of a Typical Enterprise indicator therefore receives a score of 50 out of a possible 100 points.**

ADMINISTRATIVE REQUIREMENT	Average Anual Cost (RSD)
Bookkeeping services (annaul)	175,150
Preparation of annual financial statements	19,895
VAT calculation and filing of VAT returns	102,752
Corporate income tax calculation and filing of the tax return	23,208
Corporate status changes (2 changes per year)	11,119
Employee registration and deregistration (6 times per year)	6,009
Issuing and receiving invoices through the Electronic Invoicing System (SEF) (500 invoices per year)	37,628
Environmental fee filing (once per year)	6,384
Preparation of documentation for reimbursement claims related to temporary incapacity for work (4 times per year)	34,401
PPP-PD individual tax return on calculated taxes and social security contributions	53,644
TOTAL	470,190

Finally, the share of the ten largest non-tax charges paid by businesses in GDP amounted to 1.18% of GDP in 2025, remaining virtually unchanged from the previous year's level of 1.13% of GDP. The largest non-tax charges paid by the business sector were the construction land development contribution (RSD 28.5 billion), fees for organizing games of chance (RSD 27.6 billion), and the fee for the use of mineral resources and reserves (RSD 24.8 billion). Public revenues generated from these charges are presented in Figure 9. According to the RIS methodology, the value of this indicator amounts to 7 points, representing a decline of 5 points compared with the previous year.

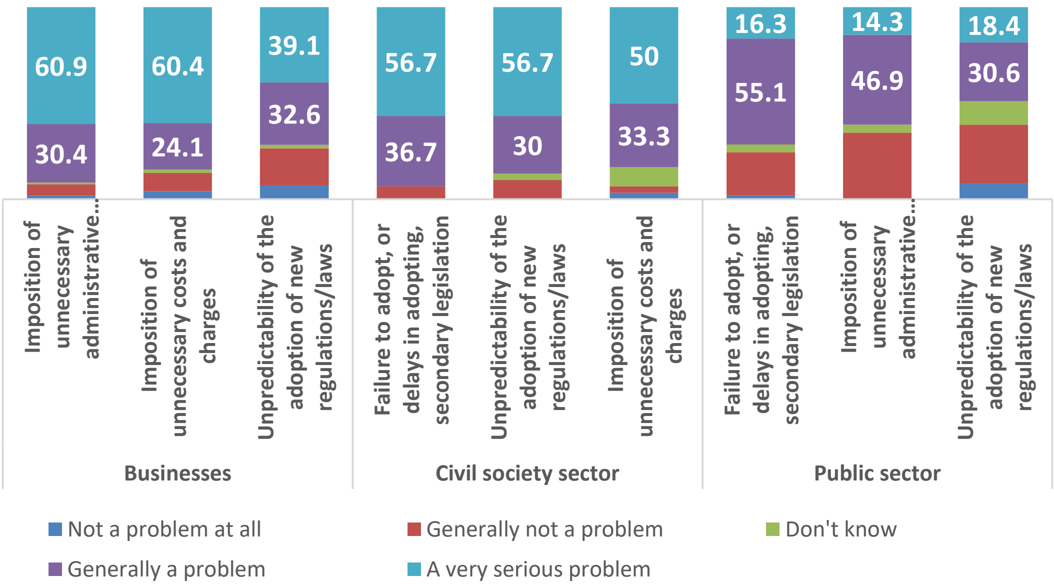
Figure 9. Total Public Revenue Collected from the 10 Largest Non-Tax Charges, in RSD Billions, in 2025 and 2024



BUSSINESS PERCEPTIONS OF THE REGULATORY ENVIRONMENT

Since 2019, NALED, in cooperation with IPSOS, has conducted an annual survey among representatives of the business community, public institutions, and civil society organizations to assess the quality of public-private dialogue and the legislative process. The purpose of the survey is to provide insight into the current state of affairs, identify key challenges, and propose measures to improve both the quality of dialogue between the public and private sectors and the regulatory process. This year's survey was conducted between April and June 2026 on a representative sample of 253 business representatives, supplemented by surveys of 30 representatives of civil society organizations and 49 representatives of public sector institutions.

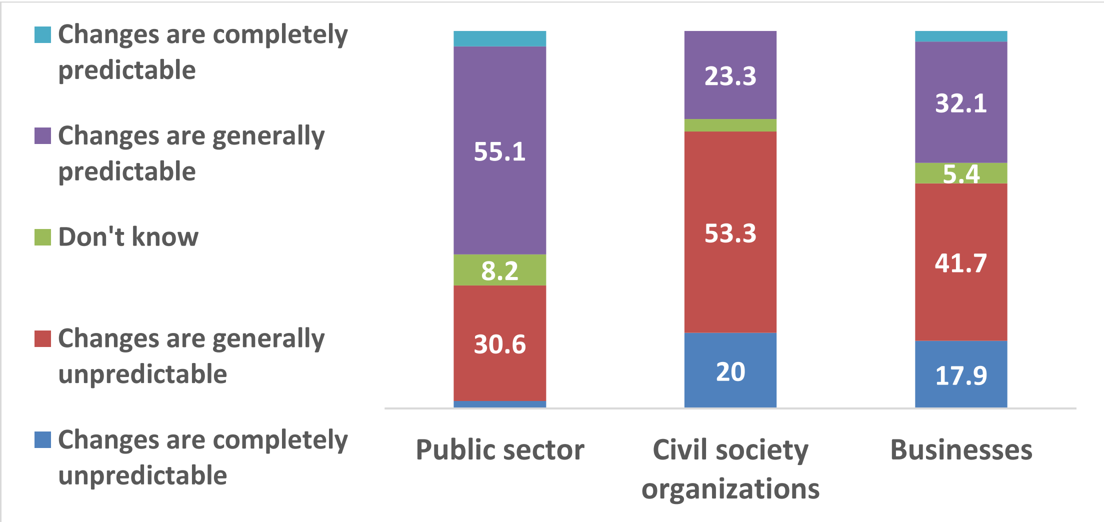
Figure 10. What are the biggest challenges in Serbia's regulatory environment? (%)



As in the previous survey round, businesses identify excessive administrative burden (91%) as the greatest challenge in Serbia's regulatory environment, followed by the imposition of unnecessary compliance costs (85%). Civil society organizations primarily point to the failure to adopt, or delays in adopting, implementing legislation (93%) and the unpredictability of adopting new regulations (87%) as the most significant challenges. The public sector falls between these two groups, with 71% of respondents identifying the failure to adopt, or delays in adopting, implementing legislation as a key issue, while 61% cite excessive administrative burden.

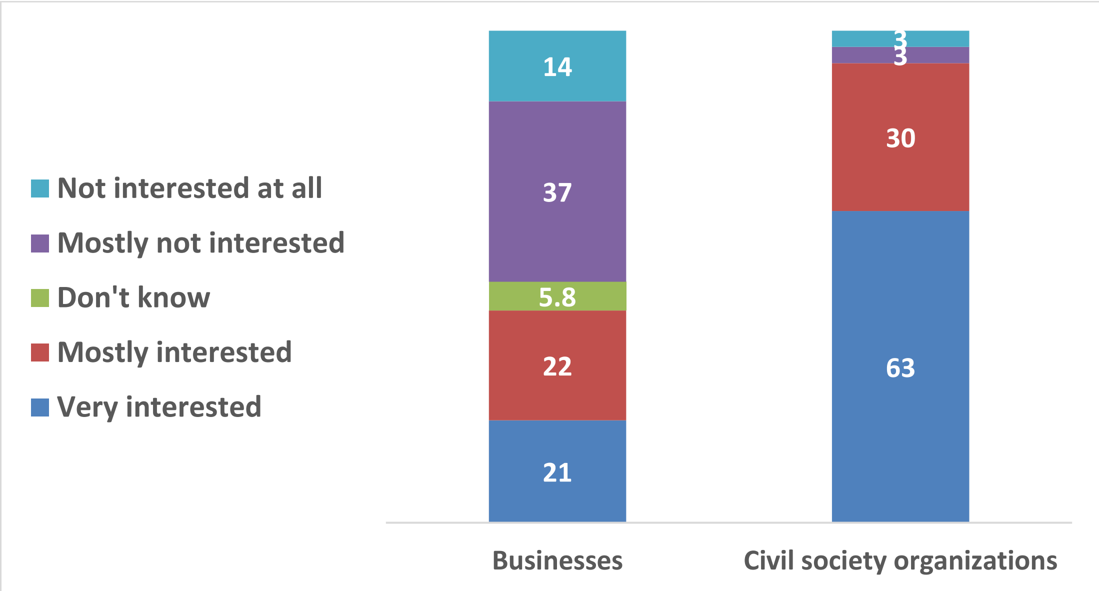
With regard to the predictability and transparency of the regulatory drafting process, a majority of businesses (59%) and civil society organizations (73%) consider regulatory changes to be largely or completely unpredictable, while this view is shared by only one-third of public sector representatives.

Figure 11. To what extent do you consider the adoption and amendment of regulations/laws affecting the business environment to be predictable? (%)



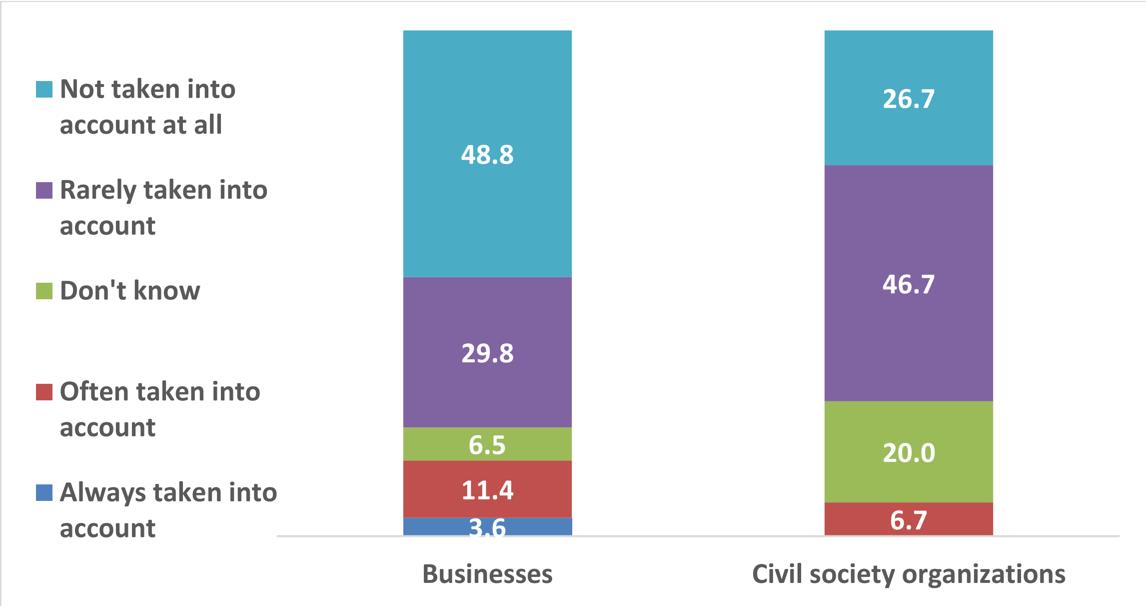
Almost all representatives of civil society organizations (93%) expressed an interest in engaging in dialogue with public institutions during the drafting of legislation. By contrast, the level of interest among businesses was considerably lower, with only 42% indicating a strong willingness to participate directly in the process. This represents a slight decline compared with the previous year. Given that the representative business sample consists of 02% micro-enterprises, which often lack the capacity to engage actively in dialogue with public authorities, this finding is not unexpected.

Figure 12. To what extent are you interested in engaging in dialogue with public institutions during the drafting of regulations affecting the activities of your company/association? (%)



Businesses and civil society organizations agree that, during the adoption of regulations **in 2025, little or no consideration was given to the costs imposed on businesses**. Fewer than 15% of business respondents, and none of the civil society respondents, expressed the opposite view.

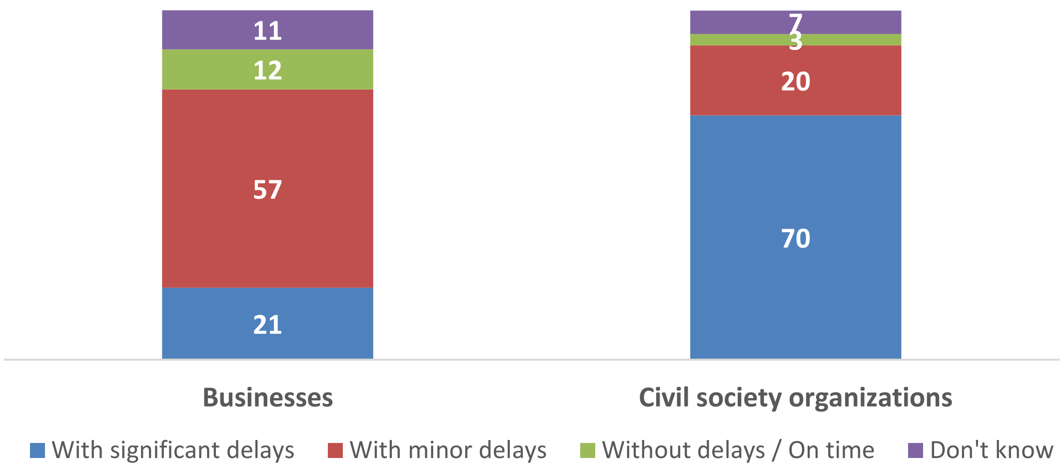
Figure 13. Are the costs imposed on businesses taken into account when drafting regulations? (%)



The majority of businesses and civil society organizations believe that implementing legislation is adopted with significant delays.

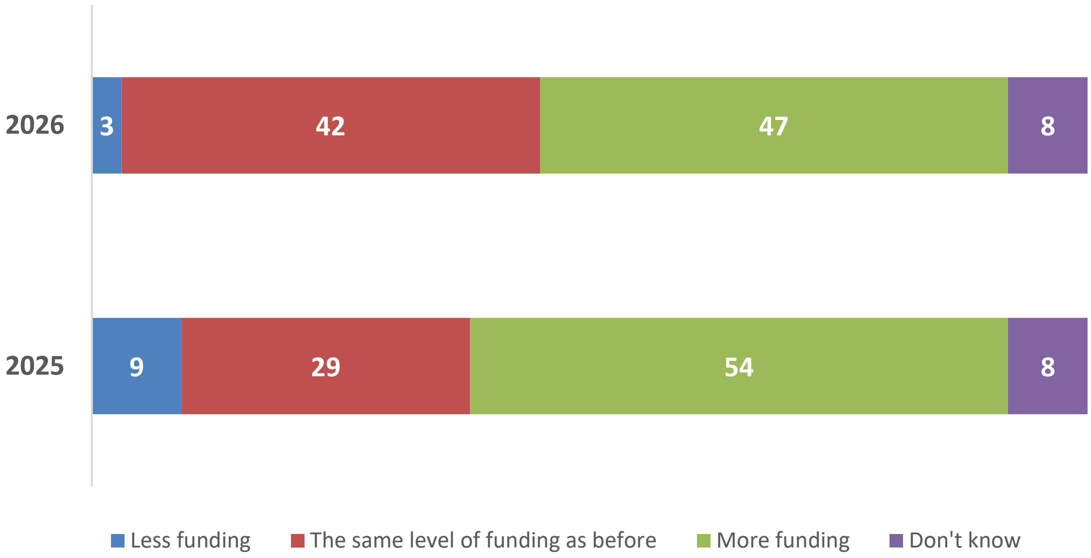
Civil society representatives are considerably more critical of delays in the adoption of implementing legislation necessary for the enforcement of laws, with 70% believing that such legislation is adopted with significant delays, compared with 21% of business respondents. Nevertheless, only 12% of business respondents believe that implementing legislation is adopted with only minor delays or in a timely manner.

Figure 14. Are the bylaws (secondary legislation) necessary for the implementation of laws in your area adopted... (%)



With regard to trends in regulatory implementation costs, business respondents hold mixed views on whether these costs increased or decreased over the previous year. **Nearly half (47%) believe that the financial costs of complying with regulations increased compared with the previous year, while a similar share (42%) consider them to have remained unchanged. Only 3% believe that these costs declined.**

Figure 15. Assessment of changes in explicit compliance costs (financial costs) in 2026 compared to 2025 (%)



ANNEX 1: OVERVIEW OF RIS COMPONENT SCORES BY MINISTRY

The table below presents the scores of the RIS components for each ministry, providing an indicative overview of the quality of regulatory drafting, adoption, and implementation across ministries. Component 6 is not assessed at the ministry level; therefore, its score is not included in the table.

Ministries	**Component 1**	**Component 2**	**Component 3**	**Component 4**	**Component 5**
Ministry of Finance	38,0	59,4	48,0	N/A	79,2
Ministry of Economy	68,0	50,0	43,8	N/A	50,0
Ministry of Agriculture, Forestry and Water Management	75,0	50,0	71,9	N/A	79,2
Ministry of Environmental Protection	55,0	56,3	68,8	50,0	100,0
Ministry of Construction, Transport and Infrastructure	67,5	37,5	54,2	50,0	95,8
Ministry of Mining and Energy	33,5	N/A	62,5	50,0	79,2
Ministry of Internal and External Trade	100,0	75,0	N/A	N/A	87,5
Ministry of Justice	54,2	75,0	40,6	100,0	72,9
Ministry of Public Administration and Local Self-Government	66,7	N/A	68,8	50,0	91,7
Ministry for Human and Minority Rights and Social Dialogue	N/A	N/A	N/A	50,0	100,0
Ministry of the Interior	N/A	80,0	N/A	N/A	58,3
Ministry of Defence	66,7	N/A	59,4	N/A	75,0
Ministry of Foreign Affairs	N/A	100	N/A	N/A	47,9
Ministry for European Integration	0,0	N/A	81,3	N/A	72,9
Ministry of Education	100,0	N/A	N/A	N/A	79,2
Ministry of Health	50,0	N/A	N/A	68,5	45,8
Ministry of Labour, Employment, Veteran and Social Affairs	100,0	N/A	N/A	50,0	83,3
Ministry for Family Welfare and Demography	N/A	N/A	N/A	N/A	66,7
Ministry of Sport	N/A	N/A	N/A	N/A	60,4
Ministry of Culture	N/A	N/A	N/A	N/A	79,2

Ministry for Rural Care	N/A	N/A	N/A	N/A	66,7
Ministry of Science, Technological Development and Innovation	N/A	N/A	N/A	N/A	79,2
Ministry of Tourism and Youth	100,0	N/A	N/A	100,0	87,5
Ministry of Information and Telecommunications	66,9	87,5	68,8	26,4	62,5
Ministry for Public Investment	N/A	N/A	N/A	N/A	68,8

ANNEX 2: EU COMPONENT – REGULATIONS RELEVANT TO THE EU ACCESION PROCESS

Since the previous edition, the Regulatory Implementation Scoreboard (RIS) has devoted special attention to the Government's commitments related to the adoption of legislation required for Serbia's EU accession process and the alignment of the national regulatory framework with the EU acquis and other strategic EU initiatives. This section of the RIS is presented as a separate annex in order to preserve the comparability of RIS scores over time, avoiding the methodological disruption that would result from introducing a new component dedicated exclusively to EU-related legislation.

This annex monitors the adoption of legislation envisaged in the National Programme for the Adoption of the EU Acquis (NPAA) 2024–2027 and the Reform Agenda. The fifth revised NPAA, together with the Reform Agenda—a new public policy document setting out the Government's commitments in the EU accession process—was adopted at the end of October 2024. In addition to a range of policy measures, both documents identify numerous regulatory reforms requiring either the adoption of new legislation or amendments to existing laws and secondary legislation. The NPAA was subsequently amended and updated on 7 August 2025.

Although both the NPAA and the Reform Agenda encompass a broad range of commitments, this assessment focuses exclusively on legislative measures—that is, the adoption of new regulations and amendments to existing ones—as well as on the timeliness of their adoption. This approach was chosen for two reasons. First, it ensures methodological consistency with the other RIS components, which also assess measurable legislative outputs. Second, it enables a straightforward comparison between planned and actual implementation, which would be considerably more difficult for the "soft" measures contained in these documents, such as strengthening administrative capacity through additional staffing or organizing employee training.

The timeliness of legislative adoption is assessed by measuring delays relative to the planned adoption schedule. Each regulation adopted receives one point, while every quarter of delay reduces the score by 0.1 points.

The fifth revised NPAA envisaged the adoption of 82 regulations during 2024 and 162 regulations during 2025 (covering the third and fourth quarters of the programme), amounting to 244 regulations in total. During 2025, 48 regulations from this list were adopted, representing 20% of those scheduled for adoption. In addition, 10 regulations planned for adoption in 2025 had already been adopted ahead of schedule during 2024. **After applying the timeliness adjustment (a deduction of 0.1 points for each quarter of delay), the Adoption of NPAA Legislation indicator achieved a score of 21 out of a possible 100 points.**

With regard to the Reform Agenda, 24 regulations were scheduled for adoption during 2025. Of these, only 9 regulations (or 38%) were adopted. **After accounting for delays in adoption, the Adoption of Reform Agenda Legislation indicator received a score of 32 points.**

The overall EU Component therefore achieved 27 out of a possible 100 points. This represents a significant improvement compared with the previous year's score of only 9 points, which reflected the limited number of regulations adopted under both policy documents. Nevertheless, the result continues to indicate that Serbia's alignment of its regulatory framework with the EU acquis remains slow.

ANNEX 3: METHODOLOGICAL ANNEX

The Regulatory Index of Serbia (RIS) consists of 25 indicators grouped into six components:

1. Predictability of the Regulatory Process
2. Quality of Regulatory Preparation
3. Stakeholder Involvement in Regulatory Preparation
4. Timeliness of Law Implementation
5. Institutional Responsiveness – Availability of Information
6. Regulatory Burden

Each of the six components contains between two and four individual indicators that describe a specific segment of the regulatory process or a particular aspect of the regulatory environment. The data sources used for calculating RIS values include the website of the National Assembly of the Republic of Serbia, ministry websites and social media accounts, the Government of the Republic of Serbia website, data provided by the Public Policy Secretariat of the Republic of Serbia and the Treasury Administration, as well as the eConsultations portal. The methodology for calculating indicator scores, including notes on methodological changes introduced in this year's edition, is presented in the tables below.

COMPONENT 1: REGULATORY PREDICTABILITY

Indicators	Parameters	Formula
1. Legislative Activity Plan Fulfillment	A – Total number of laws and amendments planned for adoption in the current year B – Number of adopted laws and amendments that were planned for adoption in the current year	B/A*100
2. Share of Planned Regulations	A – Total number of laws and amendments adopted in the current year B – Number of adopted laws and amendments in the last two years that were not planned	100 - B/A*100
3. Government Program Fulfillment	A – Number of adopted regulations B – Delay coefficient = 1 – 0.1 × number of delayed quarters C – Weight = Number of adopted regulations / Number of regulations scheduled for adoption by the observed quarter	∑A x B x C

4. Frequency of Legal Changes	A – Number of law amendments in one year B – Number of law amendments considered necessary; B = 10 C – Unpredictability coefficient; C = 1.49	100- (A-B)*C

COMPONENT 2: QUALITY OF REGULATORY DRAFTING

Indicators	Parameters	Formula
1. Regulatory Impact Assessment Presence	A – Number of laws and amendments adopted in the current year B – Number of adopted laws accompanied by a RIA	B/A*100
2. Regulatory Impact Assessment Content	A – Number of draft laws submitted for RSPP opinion B – Number of those drafts with a complete RIA C – Number of those drafts with a partial RIA	0.3*(C/A)*100 + (B/A) *100
3. Regulatory Impact Assessment Quantification	A – Number of draft laws submitted for RSPP opinion B – Number of RIAs with quantified impacts for both public and private sectors C – Number of RIAs with quantified impacts for only one sector	0.5*(C/A)*100 + (B/A) *100
4. Core Legal Concepts Justification Quality	Ai – For each law (i), justification is rated: - If ≥2/3 of articles are copy-pasted = 0 - If between 1/3 and 2/3 = 50 - If <1/3 = 100	Average Ai

COMPONENT 3: PUBLIC INVOLVEMENT IN THE LAWMAKING PROCESS

Indicators	Parameters	Formula
1. Transparency of the Law-Making Process	For each law (i), it is determined whether it meets the following criteria: Ai – Whether the initiation of drafting a new law was publicly announced (Yes – 25 points; No – 0 points); Bi – Whether the draft law is publicly available (Yes – 25 points; No – 0 points); Ci – Whether the composition of the working group for drafting the law is publicly announced/available (Yes – 25 points; No – 0 points); Di – Whether information on the contact person representing	Average (Ai+Bi+Ci+Di)

	the working group is publicly available (Yes – 25 points; No – 0 points);	
2. Public Debates and Consultation Presence	A – Total number of laws adopted by the National Assembly that affect the business environment B – Total number of adopted amendments to laws by the National Assembly that affect the business environment C – Total number of public debates lasting at least 20 days in relation to the number of adopted laws affecting the business environment D – Total number of public debates lasting at least 20 days in relation to the number of adopted amendments to laws affecting the business environment	0.5(C/A)*100+ 0.5(D/B/2)*100
3. Public Debate Report Quality	A – Total number of public debates held during the year; B – Sum of quality assessment scores of public debates; Criteria for assessing quality: 1. Whether the report includes the proposals received; 2. The number of accepted proposals or specification of which proposals were accepted; 3. The number of rejected proposals or specification of which proposals were rejected; 4. Whether explanations for the acceptance/rejection of proposals are provided; 5. Whether the names or organizations of participants in the public debates and consultations are listed; 6. Whether the names or organizations of the working group members are listed. If the report contains more than 2/3 of the listed elements, it receives a positive quality rating. If it contains at least 1/3 of the elements, it receives a partial quality rating. If it contains less than 1/3 of the elements, it receives a rating of not of satisfactory quality.	B/A*100
4. Parliamentary Debate Quality	For each law (i), the following criteria are evaluated: Ai – Whether a public hearing on the law was organized = 50 points; Bi – Duration of the period between the law entering procedure and its adoption:	Average (Ai + Bi)

	1. Less than 15 days = 0 points 2. Between 15 and 30 days = 25 points 3. More than one month = 50 points	

COMPONENT 4: TIMELINESS OF LAW IMPLEMENTATION

Indicators	**Parameters**	**Formula**
1. By-Law Adoption Rate	A – Number of by-laws that were supposed to be adopted in the current year B – Number of by-laws adopted in the current year	B/A*100
2. By-Law Adoption Delays	A – Number of by-laws that were supposed to be adopted in the current year B – Number of by-laws adopted within the legally prescribed deadline in the current year C – Number of by-laws adopted in the current year with a delay of less than 3 months	0.3*(C/A)*100 +(B/A)*100
3. Timeliness in Providing Opinions on Legal Provisions	Ai – For each ministry (i), the timeliness of issuing individual opinions on the application of legal provisions is monitored according to the following criteria: 1. Opinion issued in less than 15 days = 100 points 2. Opinion issued within 15 to 30 days = 50 points 3. Opinion not issued within the legal deadline or not issued at all = 0 points .	Average Ai

COMPONENT 5: INSTITUTIONAL RESPONSIVENESS

Indicators	**Parameters**	**Formula**
1. Institutional Communication with Citizens and Businesses		
PI1: Direct Communication - mystery shopper (via e-mail)	A – Total number of ministries that received an inquiry from an unidentified business entity B – Number of duly received responses from ministries to the inquiry of an unidentified business entity	B/A*100
PI2: Direct Communication – mystery shopper (via phone)	A – Total number of ministries contacted by an unidentified business entity B – Number of duly received responses from ministries to the inquiry of an unidentified business entity	B/A*100

PI3: Public Information Availability	A – Total number of ministries that received a request for access to information of public importance B – Number of duly received responses from ministries based on submitted requests	B/A*100
PI4: Direct communication with a known interlocutor (via e-mail)	A – Total number of ministries that received a request from a business association B – Number of duly received responses from ministries to the request of the business association	B/A*100
2. WEBSITE AND SOCIAL MEDIA INFORMATION		
PI5: Website Content Quality	Ai – Evaluation of each ministry (i) based on the following criteria: 1. Whether the website contains downloadable regulations (Yes – 25 points; Partially – 12.5 points) 2. Whether the “Information Booklet” (Informator o radu) on the website has been updated within the past year (Yes – 25 points) 3. Whether the website includes a list of current projects (Yes – 25 points) 4. Whether the website provides adequate contact information (Email contacts available at the cabinet and department level – 25 points; General email and/or contact form only – 12.5 points)	Average Ai
PI6: Transparency and Availability of Website Information	Ai – Evaluation of each ministry (i) based on the following additional criteria: 1. Whether key content (regulations, contact, projects, Information Booklet) is visible and accessible (within one scroll and no more than two clicks). 2. All content within visible field – 50 points 3. Requires 2–3 scrolls/clicks – 25 points Whether the website is up to date (latest versions of regulations available, news section regularly updated): 1. Everything is up to date – 50 points 2. Either regulations or news not updated – 25 points	Average Ai
PI7: Regularity of Social Media Accounts	Ai – Evaluation of ministries’ (i) accounts on Facebook and Instagram based on the following criteria:	Average Ai

1. The ministry has accounts on both platforms and has published at least 24 posts (i.e., 2 per month) over the past year – 100 points
2. The ministry has only one account, or both accounts but with limited activity (1–2 posts per month, 12–24 annually) – 50 points
3. The ministry has one or both accounts, but with low activity (fewer than 12 posts in the year) – 25 points
4. The ministry has no accounts – 0 points

COMPONENT 6: REGULATORY BURDEN

Indicators	Parameters	Formula
1. Share of Administrative Costs in GDP	A – Total percentage of administrative costs in GDP according to defined intervals: Up to 2% = 100 points 5% and above = 0 points In the range between 2% and 5%, a proportional score is applied.	A
2. Administrative Burden of a Typical Business	A – Percentage of administrative costs for 10 procedures in relation to average total business revenues: Up to 2% = 100 points 3.5% and above = 0 points In the range between 2% and 3.5%, a proportional score is applied.	100 – A
3. 3. Share of 10 largest Parafiscal Charges in GDP	A – Percentage of the sum of the 10 most burdensome non-tax charges in GDP according to defined intervals: Up to 0.25% = 100 points 1.25% and above = 0 points In the range between 0.25% and 1.25%, a proportional score is applied.	A

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