National Convention
on the European Union

Book of Recommendations 2026

National Convention on the European Union

Belgrade, 2026

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FOREWORD

Dear Members, Colleagues, and Partners of the National Convention on the European Union,

We are publishing the 2026 Book of Recommendations at a moment that can, without exaggeration, be called historic. In the early parliamentary elections held in Serbia on 25 October, turnout reached around 69 per cent, the highest since 1992, and citizens voted out a government that had ruled Serbia for more than a decade. That change did not begin at the polling stations. It began on 1 November 2024, under the canopy of the railway station in Novi Sad, and continued through two years of blockades, protests and civic organising on a scale Serbia had never seen. People who for years believed that nothing could change showed that change is not only possible, but that its strength comes from the citizens themselves.

To understand what this moment brings, we must first recall the year we are leaving behind.

A Year of Stagnation

We published our previous Book of Recommendations at the end of 2025. Even then, we warned that Serbia was moving away from European standards faster than it was approaching them. Amendments to criminal legislation were adopted without any genuine public debate. The new Council of the Regulatory Authority for Electronic Media (REM) was appointed in breach of the law. Warnings from civil society, experts and citizens went unanswered.

In January 2026, amendments to the judicial laws further narrowed the independence of the special prosecution offices. That same month, the European Commission approved only three of the seven payment conditions under the Growth Plan. Since then, Serbia has not received a single new euro from this instrument.

Cluster 3 remained closed. In July, the European Commission once again assessed that the technical conditions for opening it had been met, but eight Member States continue to oppose it. The 2026 Rule of Law Report points to increased political pressure on the judiciary and the prosecution service, serious concerns about political and economic influence over the media, the deteriorating safety of journalists and growing pressure on civil society organisations. The European Parliament openly stated that Serbia's accession process has effectively come to a standstill. The political crisis culminated in the resignation of the President of the Republic and the dissolution of the National Assembly on 9 September.

A Year of Pressure on Civil Society

Over the past year, the Convention has worked in conditions it has not experienced since its founding. There was practically no formal dialogue with the State, while campaigns in pro-government media became systematic, with the involvement of senior state officials. Our member organisations and working group coordinators came under attack, and I was personally targeted as well. Anyone who spoke about European integration in a way that departed from the official narrative was labelled a "foreign mercenary", part of the "NGO hydra", or someone obstructing Serbia's European integration. The claim that only state bodies can be legitimate interlocutors of the European Union was heard more and more often. Many of us began to choose our words and public appearances more carefully than ever before.

This pressure was not aimed only at individuals and organisations. Its purpose was to call into question the very legitimacy of civil society's participation in European integration and to narrow the space for critical thinking. That is precisely why it matters that the working groups never stopped working.

This Book of Recommendations shows what criticism grounded in argument, rather than in day-to-day politics, looks like. It also shows that civil society's participation in the accession process is not a privilege to be granted or withdrawn, but a European standard. It does not depend on the goodwill of those in power, just as the State's obligation to carry out reforms does not depend on how much it likes those who remind it of that obligation.

The Reform Agenda and the New Multisectoral Working Group

The most important novelty in the Convention's work this year is the Multisectoral Working Group for Monitoring the Implementation of the Reform Agenda. Coordinated by the European Policy Centre, it held its first plenary session on 13 November 2025. In less than a year, it has become one of the most important independent sources of data on how Serbia is meeting the obligations linked to the EUR 1.586 billion available under the Reform and Growth Facility.

The Group submitted its First Independent Monitoring Report to the Monitoring Committee on 24 April 2026 and published it in June. According to the report, only six of the 34 reform steps due by the end of 2025, or 18 per cent, had been fulfilled. In the area of the rule of law, only one of thirteen steps had been fulfilled. The precondition concerning the existence of effective democratic mechanisms had not been met, nor had the condition on budget transparency and oversight. In 2024 alone, public investments worth EUR 5.7 billion were contracted outside the regular system of budget planning and public procurement. This kind of work delivers results: after a year of pressure, the Government began publishing its payment requests.

The draft Second Independent Monitoring Report, prepared in October, shows that the quality of the process has not improved. Of the 47 steps whose deadlines expired by June 2026, 15 have been achieved. Of the ten steps due in June, only one has been achieved, and the Commission has yet to assess three payment requests with a total value of EUR 625 million.

This year, the Multisectoral Working Group is contributing to the Book of Recommendations for the first time. In addition, all working groups monitored the implementation of the Government's Plan for the Fulfilment of the Most Important Obligations under the Accession Negotiations by the End of 2026. As a result, the negotiation process, the reform steps and the funds earmarked for their implementation have been brought together in one place for the first time. This matters not only for tracking obligations, but also for establishing clearly who is responsible for fulfilling them and what the consequences are when they are not fulfilled.

What the Numbers Show

The Convention's working groups assessed the status of 130 recommendations from the previous Book. Eight have been fulfilled. Sixty-one have been partially fulfilled, and the same number have not been fulfilled at all. Some recommendations we have been repeating for eight or ten years. This does not mean that we lack new ideas, but that no one has yet responded to the old ones.

"Partially fulfilled" is the most common assessment in this Book, and perhaps the one that best describes how reforms have been implemented so far. A law is adopted but not applied. A strategy is adopted, but there is neither the money nor the capacity to implement it. Consultations are held, but they are too short, take place during holidays or cover several laws at once. The form is respected; the substance is not.

This is the problem that runs through almost every area of European integration. Serbia's problem is not only the pace of reform, but its purpose and the way it is implemented. European integration cannot be reduced to adopting regulations, completing administrative steps and writing reports. Its purpose is to change the way institutions work and how they treat citizens.

An Opportunity for a Reset

The social change Serbia has experienced opens the possibility of resetting all processes, including European integration. A reset, however, does not mean starting from scratch. The EU acquis does not change with a change of government. Most of the work described in this Book, from quality infrastructure to customs and financial control, remains to be done regardless of who does it. A reset means that this work will finally begin to be done properly.

Above all, this requires restoring the trust of the Member States through genuine rather than simulated reforms. It requires re-establishing the negotiating structure and a permanent, measurable and transparent mechanism for cooperation between the State and civil society, as well as seizing a geopolitical moment that is more favourable to enlargement than it has been in a long time. Finally, the European Union must be discussed honestly, without the double game of saying one thing in Brussels and another at home.

The new government has received a legitimacy that is rarely granted, but also a legacy that no one would wish for. After more than a decade of captured institutions, the transition cannot be reduced to replacing people in office. It entails rebuilding every part of the system that for years served those in power rather than citizens: the judiciary and the prosecution service, regulatory bodies, public service media and the public administration. This cannot be done overnight. We therefore believe that the new government deserves a period of trust, both in Serbia and among our European partners.

That period should not be burdened from the outset with the most difficult political issues. The normalisation of relations with Kosovo and alignment with the EU's foreign policy, including its policy towards Russia, remain Serbia's obligations, and no one can bypass them. However, if they are put on the table on day one, we risk jeopardising precisely what Serbia needs most: the rebuilding of institutions without which no agreement will be sustainable.*

We are encouraged that, according to the information currently available to us, the backbone of the future government's programme is precisely where Serbia has lagged furthest behind: an independent judiciary, the fight against corruption, electoral legislation and media freedom. These are the foundations of Cluster 1, they account for most of the unfulfilled steps of the Reform Agenda, and they are the issues on which trust between Serbia and the European Union has been breaking down for years. If the future government remains consistently committed to these priorities, recognition of progress in European integration will follow.

Yet that progress will only be credible when citizens feel it in their daily lives: when courts deliver judgments within a reasonable time, when contracts are won on the quality of the bid rather than on connections, and when journalists can ask questions without fear. Brussels is convinced by change, not by reports.

The Convention's role in this process does not depend on who is in power. We have been, and remain, part of the State's broader institutional and social capacity: a guardian of the knowledge, experience and institutional memory built up through the European integration process.

At this very moment, that role takes on even greater significance. The Convention is one of the few bridges connecting the course of European integration to date, the institutions and expertise developed during the negotiation process, the incoming government and our European partners. Our responsibility is to preserve the continuity of the process, while also ensuring that the experience and knowledge gained are translated into a new and credible reform policy. We believe that the continuity of the State must not depend on electoral cycles.

To the new government, we offer what we offered its predecessor: expertise, honest criticism and a readiness to work together, as well as support in carrying the heavy and painful burden that no government since 2000 has been able to shed. We do not ask that it always agree with us, but that it consider our arguments, take responsibility for its decisions and inform the whole of society about them accurately and in a timely manner, however difficult that may sometimes be. The only difference is that this time, we hope someone will actually accept the offer.

Acknowledgements

This Book is the result of many months of work by the coordinators and members of the working groups. They did this work alongside their regular commitments, in a year when doing so was neither easy nor safe. I thank everyone who invested their knowledge, time and courage in it. I also thank the Programme Council for its trust, as well as the partners who support the work of the Convention.

In Conclusion

This year, the citizens of Serbia have shown that change is not a matter of luck, but of persistence. The same holds true for European integration. The new government inherits everything its predecessor left undone, but it also receives a roadmap that has already been written. That roadmap contains obligations and recommendations, mistakes that must not be repeated and experience that must not be discarded.

That roadmap is now before you. It is up to us to insist that the journey along it finally begins.

In Belgrade, 5th November 2026



Bojana Selaković
Coordinator of the National Convention on the European Union

WORKING GROUP FOR CHAPTER 1
FREE MOVEMENT OF GOODS

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**3**
Partially fulfilled	**3**
Number of new recommendations	**3**

Of the three recommendations from the 2025 Book of Recommendations of the National Convention on the European Union (NCEU), none has been fully implemented. Two recommendations have been partially implemented, while one remains unfulfilled. For 2026, three new or substantially revised recommendations have been proposed, reflecting current challenges in Chapter 1, in particular, the need to complete the strategic framework and meet the opening benchmarks, improve market surveillance, and accelerate preparations for the Agreement on Conformity Assessment and Acceptance of Industrial Products (ACAA).

Objectives

The objective of Negotiating Chapter 1 – Free Movement of Goods is to eliminate technical barriers to trade and align national legislation with the EU acquis by strengthening the quality infrastructure (QI), which encompasses accreditation, metrology, standardisation, conformity assessment, and effective market surveillance. This is intended to enable the free placement of domestic products on the EU single market, while simultaneously ensuring consumer protection and safeguarding the public interest.

State of Play

Serbia is **moderately prepared in the area of free movement of goods**. The quality infrastructure (QI) system is established and covers standardisation, accreditation, metrology, and conformity assessment, with a coordinating role played by the Ministry of Economy and the participation of the Accreditation Body of Serbia (ATS), the Directorate of Measures and Precious Metals (DMDM), the Institute for Standardisation of Serbia (ISS), and the competent market surveillance authorities. Although Serbia is largely aligned with the EU acquis, further progress requires more complete alignment with the EU acquis, strengthening of administrative capacity, improved coordination, and more effective enforcement. During the reporting period, ISS continued to adopt European standards, ATS continued to accredit conformity assessment bodies, and DMDM continued to carry out its tasks in the field of metrology. A high degree of alignment between national and European standards has been achieved, and the number of accredited conformity assessment bodies has further increased.

Some progress has been made in the area of technical legislation, including the adoption of the Regulation on Machinery (*Official Gazette of the Republic of Serbia*, No 2/26), as well as in the field of metrology, with the adoption of new regulations. At the same time, the legislative framework has not yet been fully aligned with the latest EU acquis, particularly in the areas of accreditation, market surveillance, general product safety, and certain sector-specific regulations.

Progress has been made in meeting the opening benchmarks for Chapter 1. The strategic framework for alignment with the EU acquis was revised following comments from the European

Commission, re-adopted at a Government session in April 2026, and submitted to the European Commission. Preparations for a new Quality Infrastructure Development Strategy for the period 2026–2031 are under way.

Key challenges remain **insufficient administrative and financial capacity, particularly in the area of market surveillance, inadequate coordination, inconsistent enforcement, and the need to enhance IT capacity and broaden the use of digital tools**. The European Commission specifically highlights the need for further alignment of the market surveillance system with the EU acquis, strengthening the capacity of the market inspectorate, and improving strategic planning and coordination of supervisory activities.

Preparations for the conclusion of the **Agreement on Conformity Assessment and Acceptance of Industrial Products (ACAA)** are ongoing. An analysis of the quality infrastructure system has been completed and priority sectors have been identified, while the assessment of legislative alignment continues in four areas: low-voltage equipment, electromagnetic compatibility, machinery, and personal protective equipment.

In the period ahead, priorities should include **completing the strategic and legislative framework, strengthening the capacity and coordination of quality infrastructure and market surveillance institutions, enhancing digital capacities and existing solutions such as the TEHNIS/Product Info portal, and intensifying ACAA preparations**. Particular attention should be paid to the practical application of legislation and to the involvement of the business community and other stakeholders in this process.

How to Unblock the Process? / Priority Steps to Unblock the Process

Chapter 1 requires a range of reforms and structural changes; however, accelerating the process depends primarily on the implementation of the following priority and time-critical measures:

1. Intensify efforts to fully align sector-specific technical regulations as well as regulations in the field of quality infrastructure (QI) (*NCEU recommendation from 2016*);
2. Further strengthen the administrative and financial capacity of institutions directly dealing with Chapter 1 issues, with appropriate professional and sectoral support from all relevant actors, including ministries, the Government, ATS, DMDM, ISS, and the market inspectorate (*NCEU recommendation from 2018*);
3. Ensure that the Ministry of Economy's TEHNIS/Product Info portal acquires an active component, namely a team of experts directly engaged in providing support to businesses with regard to the application of technical regulations (*NCEU recommendation from 2020*);
4. Complete the strategic framework by adopting the Quality Infrastructure Development Strategy for the period 2026-2031 (*new recommendation for 2026*);
5. Improve the coordination and effectiveness of market surveillance and ensure consistent enforcement of regulations (*new recommendation for 2026*);
6. Accelerate preparations for the conclusion of the Agreement on Conformity Assessment and Acceptance of Industrial Products (ACAA) in priority sectors — low-voltage equipment, electromagnetic compatibility, machinery, and personal protective equipment (*new recommendation for 2026*).

Link to the Reform Agenda

Chapter 1 is not directly covered by a specific measure of the Reform Agenda; however, certain measures are of indirect relevance to its implementation, particularly in the areas of improving the business environment and digitalisation.

Reform Agenda Measure	Status / Deadline	Relevance to Chapter 1
6.2.1. Improving investment and development opportunities for entrepreneurs and the private sector	Ongoing; part of the state aid activities has been implemented during 2026, while the remaining alignment is planned by 2027	Continue removing regulatory barriers to doing business and facilitate market access for economic operators
7.2.1. Development of secure and sustainable digital infrastructure	Partially implemented; the legislative framework was adopted in 2026, with further implementation planned by 2027	Develop interoperable digital systems for the exchange of data relevant to technical regulations, certification, and market surveillance
7.2.2. Further digitalisation of public services and administrative procedures for businesses and citizens	Ongoing	Continue digitalisation of procedures and services relevant to products, technical regulations, and conformity assessment
7.1.7. Implementation of the Ecodesign Directive and energy labelling regulations	Ongoing; deadline: 2026	Ensure effective application of technical requirements and improve market surveillance of products covered by these regulations

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Chapter 1 has not yet been opened; however, the Plan defines measures and deadlines for fulfilling both opening benchmarks. The table below follows the structure of the Plan.

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
1. The Republic of Serbia should present to the European Commission an Action Plan for alignment with Articles 34 to 36 of the Treaty on the Functioning of the European Union (TFEU), with key measures for an internal review of domestic legislation and administrative capacity; for the introduction of a mutual recognition clause; and for the necessary legislative amendments related thereto.	Plan for the non-harmonised area for the alignment of the legislation of the Republic of Serbia with Articles 34-36 TFEU	Ministry of Economy	Q4 2026	Adopted on 3 October 2024	
	51 regulations planned				- Due by 30 September: 1 - Adopted: 0 - Due by Q4 2026: 47 - Adopted /amended: 3 - Still to be adopted: 48
	Law on Plant Nutrition Products and Soil Conditioners (*Official Gazette*	Ministry of Agriculture, Forestry and Water Management	Q4 2026	Deadline has not expired	

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
	of the Republic of Serbia, Nos 41/09 and 17/19)				
	4 regulations planned in total		Q4 2026	Deadline has not expired	- Due by 30 September: 0 - Due by Q4 2026: 4 - Adopted: 0 - Still to be adopted: 4
	Law on Chemicals (*Official Gazette of the RS*, Nos 36/09, 88/10, 92/11, 93/12 and 25/15)	Ministry of Environmental Protection	Q3 2026	Deadline has not expired (at the time of preparation of this annex)	
	8 regulations and orders planned in total	Ministry of Mining and Energy	Q4 2026	Deadline has not expired	- Due by 30 September: 0 - Due by Q4 2026: 8 - Adopted: 0 - Still to be adopted: 8
2. The Republic of Serbia should present to the European Commission a strategy and action plan with key measures for the implementation of European legislation under this chapter. These documents should cover both vertical (New and Old Approach) and horizontal legislation, as well as the relevant horizontal institutions for standardisation, accreditation, metrology, and market surveillance. It should also be set out how and within what timeframe the Republic of Serbia	The Ministry of Economy, in cooperation with other competent institutions, has prepared: the Strategic Plan, the Plan for the Harmonised Area, and the Plan for the Harmonised Area for Emissions from Motor Vehicles and Non-Road Mobile Machinery. The strategic documents were adopted at a Government session on 3 October 2024 and forwarded to the EC.	Ministry of Economy	Q2 2026	Yes	Due to the revision of deadlines, they were amended and re-adopted at a Government session in April 2026
	Market Surveillance Law on Market Surveillance	Ministry of Internal and Foreign Trade	Q4 2026	Deadline has not expired	

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
will remove trade barriers for products covered by this chapter, in particular with regard to additional border controls or other types of controls. These documents should define clearly designated responsibilities for adoption and effective implementation.	1 Regulation on Machinery planned	Ministry of Economy	Q4 2026	Deadline has not expired	- Due by 30 September: 0 - Due by Q4 2026: 1 - Adopted: 0 - Still to be adopted: 1
	Construction Products Law Amending and Supplementing the Law on Construction Products	Ministry of Construction, Transport and Infrastructure	Q4 2026	Deadline has not expired	
	59 regulations planned	Ministry of Construction, Transport and Infrastructure			- Due by 30 September: 21 - Due by Q4 2026: 37 - Adopted: 1 - Still to be adopted: 58
	Ecodesign 18 regulations in total	Ministry of Mining and Energy			- Due by 30 September: 5 - Due by Q4 2026: 2 - Adopted: 11 - Still to be adopted: 7
	Chemicals Law transposing Implementing Regulation (EC) No 1907/2006 (REACH)	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Law transposing Implementing Regulation (EC) No 1272/2008 (CLP)	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Law transposing Implementing Regulation (EC) No 648/2004 on detergents	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Cableways Law on Cableway Installations Designed to Carry Persons	Ministry of Construction, Transport and Infrastructure	Q4 2025	No	
	Motor Vehicles 4 regulations in total	Ministry of Construction, Transport and Infrastructure	Q4 2026	Deadline has not expired	- Due by 30 September: 0 - Due by Q4 2026: 4

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
					- Adopted: 0 - Still to be adopted: 4
	Fertilisers Law on Fertilising Products	Ministry of Agriculture, Forestry and Water Management	Q4 2026	Deadline has not expired	
	1 regulation planned	Ministry of Agriculture, Forestry and Water Management	Q4 2026	Deadline has not expired	- Due by 30 September: 0 - Due by Q4 2026: 1 - Adopted: 0 - Still to be adopted: 1
	Explosives for Civil Use and Pyrotechnic Articles Law on Explosive Materials	Ministry of Internal Affairs (MIA)	Q4 2025	No	
	Number of implementing acts not yet defined	Ministry of Internal Affairs (MIA)	Q4 2026	Deadline has not expired	Following the adoption of the Law on Explosive Materials, the number and exact titles of the implementing acts will be determined
	Firearms Law on the Testing, Hallmarking and Marking of Weapons, Devices and Ammunition	Ministry of Internal Affairs (MIA)	Q4 2026	Deadline has not expired	
	2 regulations planned	Ministry of Internal Affairs (MIA)	Q4 2026	Deadline has not expired	- Due by 30 September: 0 - Due by Q4 2026: 2 - Adopted: 0 - Still to be adopted: 2
	Ministry of Health Law Amending and Supplementing the Law on Precursors Used in the Illicit Manufacture of Narcotic Drugs	Ministry of Health	Q4 2026	Deadline has not expired	

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
	and Psychotropic Substances				
	Law on Medicinal Products	Ministry of Health	Q4 2026	Deadline has not expired	

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	13	2 (15.38%)	0	11 (84.62%)
Secondary legislation	148	27 (18.24%)	15 (10.14%)	106 (71.62%)

Conclusion

Serbia remains **moderately prepared** in the area of free movement of goods, **with limited progress**. Although the quality infrastructure system is largely aligned with the EU acquis and some progress has been made in the areas of metrology and technical legislation, further progress continues to be constrained by incomplete horizontal legislation, insufficient administrative capacity, weak coordination, and inconsistent enforcement, particularly in the area of market surveillance.

A particular concern is the fact that the **opening benchmarks for Chapter 1 have not yet been met**. It is necessary to complete without delay the revision and adoption of the strategic documents and accompanying annexes required for fulfilling the benchmarks and to submit them to the European Commission, as well as to adopt the Quality Infrastructure Development Strategy for the period 2026-2031. At the same time, market surveillance must be improved, the coordination and capacity of the competent institutions strengthened, and preparations for the conclusion of the Agreement on Conformity Assessment and Acceptance of Industrial Products (ACAA) accelerated.

The transition from formal alignment to consistent application of the EU acquis, and the creation of conditions for the opening of Chapter 1, depends on the effective implementation of these measures.

WORKING GROUP FOR CHAPTER 2
FREEDOM OF MOVEMENT FOR WORKERS

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**2**
Partially fulfilled	**1**
Number of new recommendations	**0**

Objectives

Chapter 2 governs one of the fundamental freedoms guaranteed by European Union law (Article 45 of the Treaty on the Functioning of the European Union): the right of EU citizens to move, reside, and work freely in other Member States without discrimination on grounds of nationality. The EU acquis also covers the coordination of national social security systems, including health and pension insurance, unemployment insurance, and family benefits.

State of Play

Negotiating Chapter 2 forms part of Cluster 2 – Internal Market. Chapter 2 has not yet been opened. Serbia's negotiating position was adopted on 17 July 2018 and submitted to the Council of the EU on 23 July 2018. No opening benchmarks have been established for this chapter. According to the EU's Draft Common Position of 2018, one closing benchmark was proposed, stipulating that "Serbia should demonstrate that it will have established adequate structures and capacity for the proper application of the EU acquis by the time of accession".

Of the 2025 recommendations, two remain unfulfilled: **to align legislation with the EU acquis in the area of free movement of workers, in accordance with the content and timeline set out in the National Programme for the Adoption of the Acquis (NPAA) (a recommendation repeated since 2019); and to develop a unified database and website covering job vacancies, job applications, and candidates' CVs**. The recommendation concerning the **strengthening of administrative capacity for accession to the EURES network** has been partially fulfilled.

The Plan for Fulfilling the Most Important Obligations Arising from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026 sets Q4 2026 as the deadline for most key measures under this chapter. By the end of September 2026, the planned legislative alignment package had not been adopted in its entirety.

Negotiations on expanding the network of bilateral social security agreements continued, particularly with Portugal; however, no new agreement had been concluded by the end of September 2026. Technical work on the implementation of existing agreements and electronic data exchange continued in parallel.

Partial but concrete progress has been made in preparations for participation in the European network of employment services – EURES. Since 17 March 2025, a twinning project entitled "Support for Improving Working Conditions and Preparing the Republic of Serbia for Participation in EURES" has been under way, encompassing an assessment of legal, institutional, and technical needs and capacity-

building for the competent institutions. Serbia has not yet, however, fulfilled all the conditions for full participation in the network.

By the end of September 2026, there is insufficient publicly available evidence that a dedicated institutional process of preparations for accession to the European Labour Authority has been established. In the area of health insurance, the bilateral application of the European Health Insurance Card has continued, but no public information is available on the basis of which Serbia's level of technical readiness for full participation in the European Health Insurance Card system and electronic exchange of social security data could be reliably assessed.

How to Unblock the Process? / Priority Steps to Unblock the Process

The following recommendations represent reformulated and consolidated recommendations already defined in the previous period. The priorities under Chapter 2 are:

1. Complete the alignment of the legal framework with the EU acquis, in particular with Regulation 492/2011 on freedom of movement for workers, Regulation 2016/589 on EURES, and Regulations 883/2004, 987/2009, and 1231/2010 on the coordination of social security systems, while continuing to conclude social security agreements with the remaining EU Member States (*NCEU recommendation on legislative alignment, repeated since 2019*);
2. Accelerate the legal, institutional, and technical preparations for participation in EURES and initiate clearly structured preparations for accession to the European Labour Authority (*NCEU recommendation on strengthening capacity for participation in EURES, repeated since 2018, while accession to the European Labour Authority was identified as a priority in the 2025 Book of Recommendations*);
3. Initiate measurable preparations for full participation in the European Health Insurance Card system and develop the administrative and IT capacity for the electronic exchange of social security data (*NCEU recommendation on preparations for the European Health Insurance Card, repeated since 2019*).

Link to the Reform Agenda

The Government's Plan for Fulfilling the Most Important Obligations by the End of 2026 formally states that there is no link to the Reform Agenda. However, the NCEU 2025 Book of Recommendations identified a substantive connection between Chapter 2 and Reform 8.1.1 in the area of the labour market, particularly in the context of preparations for EURES and the European Labour Authority. It is therefore justified to retain this link within the NCEU's independent monitoring, with a clear note that this constitutes an analytical, rather than a formal, connection as established in the Government's Plan.

Reform Agenda Measure	Status / Deadline	Relevance to Chapter 2
8.1.1. Improving labour market conditions, including ensuring adequate financial and institutional resources and capacity for activation in the areas of employment and social policy	Ongoing; relevant activities are planned for the period 2025-2027	Continue preparations for EURES and ensure a clear institutional plan for preparations for accession to the European Labour Authority

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
Adoption of legislation to apply from the date of EU accession	Law Amending and Supplementing the Law on Civil Servants	Ministry of State Administration and Local Self-Government	Q4 2026	No	The amendments published in the *Official Gazette of the Republic of Serbia*, No 80/2026, did not remove the Serbian citizenship requirement under Article 45, and thus the planned alignment with Regulation 492/2011 has not been achieved.
	Law on Pension and Disability Insurance	Ministry of Labour, Employment, Veteran and Social Affairs	Q4 2026	Deadline has not expired	Consultations and a public hearing on the draft amendments have been conducted. The law had not been adopted by 30 September 2026.
	Law Amending and Supplementing the Law on Financial Support for Families with Children	Ministry of Family Care and Demography	Q4 2026	Deadline has not expired	
	Law Amending and Supplementing the Law on Employment and Unemployment Insurance	Ministry of Labour, Employment, Veteran and Social Affairs	Q4 2026	Deadline has not expired	
	Law on Health Insurance	Ministry of Health	Q4 2026	Deadline has not expired	
Administrative capacity	Establishment of a European Integration Group within the Social Insurance Institute	Social Insurance Institute	No later than two years before accession	No data available	The Plan envisages a group of five staff members and further strengthening of IT capacity. No publicly available data confirming that the group had been established by 30 September 2026.
	Strengthening capacity for labour market access, EURES, and coordination of social security systems	Ministry of Labour, Employment, Veteran and Social Affairs / National Employment Service and other competent institutions	Q4 2026	Partially fulfilled	A twinning project to prepare Serbia for participation in EURES has been under way from March 2025 to 2027. It covers legal, institutional, and technical prerequisites, as well as capacity-building.
Institutional preparation	Accession to the European Labour Authority	Competent institutions	Q4 2026	No evidence	By 30 September 2026, no publicly available evidence of a dedicated, structured institutional process of preparations for accession

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
					to the Authority had been found.
Social security coordination	Conclusion of the greatest possible number of social security agreements	Competent ministries and liaison bodies	Q4 2026	Partially fulfilled	Negotiations with Portugal resumed in May 2026, but no new agreement with an EU Member State had been concluded by the end of September 2026.

Conclusion

By the end of September 2026, progress under Chapter 2 remains limited and uneven. The most visible advancement has been made in preparations for EURES, through the twinning project and the strengthening of legal, institutional, and technical prerequisites. By contrast, the key legislative package provided for in the Government's Plan had not been adopted by 30 September 2026, although the deadline for its adoption has not yet expired. No new social security agreement has been concluded with an EU Member State, and there is insufficient publicly available evidence of measurable institutional progress in preparations for the European Labour Authority and EESSI. Without accelerated legislative alignment and the development of administrative and IT capacity, Serbia will not be able to reach the level of convergence necessary for the smooth application of the right to free movement of workers and the coordination of social security systems at the time of accession to the EU.

WORKING GROUP FOR CHAPTER 3
RIGHT OF ESTABLISHMENT AND FREEDOM TO PROVIDE SERVICES

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**2**
Partially fulfilled	**1**
Number of new recommendations	**3**

Of the three priority recommendations from the NCEU 2025 Book of Recommendations, one recommendation has been fulfilled and replaced with a new recommendation for 2026. The remaining two recommendations have been retained with additions and corrections, while **three new recommendations** have been added due to new obligations and observed shortcomings in the implementation of the acquis. Thus, the 2026 Book of Recommendations for Chapter 3 contains a total of **six priority recommendations: one new replacing the fulfilled recommendation, two revised, and three new recommendations**.

Objectives

The objective of Negotiating Chapter 3 is to achieve full alignment of national legislation with European Union standards in the area of freedom to provide services and the recognition of professional qualifications, to enhance the legal and institutional framework in the postal services sector, to increase transparency and efficiency in regulated professions (including crafts), and to strengthen the capacity of relevant institutions for the implementation and supervision of legislation. This will contribute to greater freedom to provide services, facilitated mobility of professionals, and a more competitive and higher quality services market for citizens and the economy.

State of Play

Negotiations under Chapter 3 have not yet been opened, although the Strategy with an action plan for fulfilling the benchmarks was adopted in 2019. Serbia has made moderate progress in the area of the right of establishment and the freedom to provide services, particularly in the services and postal services sectors. At the end of 2024, **the Law on Services was adopted**, transposing Directive 2006/123/EC, and on 6 March 2025, a **new Law on Postal Services was enacted**. Preparation of a new **Postal Services Development Program for the period 2026 to 2030** is ongoing through the PLAC IV project. In the area of recognition of professional qualifications, partial alignment with EU standards has been achieved, as a large part of sectoral legislation still awaits harmonization, and the list of regulated professions has not yet been adopted.

According to the Harmonization Plan, in April 2026, a **Regulation was adopted establishing a Single Electronic Contact Point (SECP)** and information exchange between public authorities and the competent ministry via the SECP, thus fulfilling the NCEU recommendation on preparing for the establishment of this mechanism. On the other hand, the **Regulation with the list of 50 regulated professions** (Ministry of Education) was not adopted by the deadline (Q1 2026), nor was the announced detailed **analysis and alignment of educational programs for seven professions** in the automatic recognition system completed, also by the same deadline. Additionally, the obligation to define measures and timelines for removing citizenship requirements for access to service activities

(deadline: Q1 2026) has not been fulfilled. The National Convention assesses this measure as poorly defined, both in terms of its scope and the competent institutions involved.

How to Unblock the Process? / Priority Steps to Unblock the Process

Chapter 3 requires the implementation of a series of reforms and structural steps. As the recommendation on preparing the SECP has been fulfilled, it is replaced with a new recommendation for 2026, while the remaining two recommendations from 2025 are repeated:

1. Adopt an updated action plan for the full alignment of sectoral legislation with relevant EU directives on mutual recognition of qualifications – Directive 2005/36/EC, Directive 2013/55/EU, and Directive (EU) 2018/958 on proportionality, including the alignment of study programs for seven professions in the automatic recognition system (*NCEU recommendation from 2024, repeated in 2025 and 2026 – deadline Q1 2026 has already been missed*);

2. Intensify the completion and adoption of the List of Regulated Professions, in accordance with the requirements of the Law on Regulated Professions and the Recognition of Professional Qualifications (*NCEU recommendation from 2021, repeated in 2025 and 2026 – deadline Q1 2026 has already been missed*);

3. Review and remove unjustified citizenship requirements for access to regulated professions and service activities, in accordance with EU acquis, while defining specific measures, competent institutions, and deadlines for their implementation. The deadline Q1 2026, provided for in the Plan to define measures and deadlines, has expired, and the activity has not been fully realized (*new recommendation for 2026*);

4. Establish and ensure full functionality and practical application of the Single Electronic Contact Point (SECP) by the end of 2027, in accordance with the Law on Services and the Regulation on the procedure for information exchange via the SECP, including the availability of up-to-date and complete information on the conditions and procedures for establishment and service provision, as well as electronic access to relevant forms, documents, and administrative procedures (*new recommendation for 2026*);

5. Continue the alignment of sectoral legislation with the Law on Services and Directive 2006/123/EC, while identifying and removing remaining barriers to the freedom of establishment and provision of services (*new/modified recommendation for 2026*);

6. Continue the alignment of the regulatory framework in the area of postal services with the acquis and ensure full implementation of postal market rules, including the implementation of relevant provisions of the new Law on Postal Services and measures provided for in the Postal Services Development Program for the period 2026-2030, along with continuously improving capacity for market oversight and quality of universal postal service provision (*new recommendation for 2026*).

Link to the Reform Agenda

Chapter 3 is not directly covered by the Reform Agenda. However, certain measures have an indirect impact on areas relevant to this chapter, particularly regarding the business environment, digitalization of public services, and administrative procedures, as well as horizontal monitoring, control, and evaluation mechanisms for implementing the Reform Agenda.

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 3
7.2.2. Further digitalization of public services and administrative procedures for businesses and citizens	Ongoing, deadline: 2027 The measure foresees, among other things, at least 30 new business episodes for digital public services – 20 G2B and 10 G2C – by December 2027, as well as the development of a digital identity and trust services framework. (MEI)	Ensure full functionality and practical application of the SECP, including the availability of complete and up-to-date information on the conditions and procedures for establishment and provision of services, as well as electronic access to relevant forms, documents, and administrative procedures. Continue connecting relevant authorities and interoperability of systems. The SECP is not explicitly mentioned in the original text of RA 7.2.2; this link represents an indirect connection identified by NCEU for the purposes of Chapter 3.
7.2.3. Strengthening adult education, training, and relevant opportunities for improving digital skills and literacy	Deadline June 2026 has expired. The measure focuses on strengthening digital skills and adult education. Annual adult education plans, including the 2026 Plan, continue to be published on the Ministry of Education's website. (Education)	Continue developing digital skills relevant for entrepreneurs, service providers, and employees applying digital public services and cross-border procedures.
Chapter 14 – Monitoring, Reporting, and Evaluation	Mechanism established and functioning. The first meeting of the Monitoring Committee for the Reform and Growth Instrument was held on 2 October 2025, and the second meeting on 3 June 2026. Institutions from Serbia, the European Commission, Member States, international financial institutions, and civil society are participating in the work. (MEI)	Ensure continuous, transparent, and timely monitoring of the implementation of the Reform Agenda and the availability of relevant data and documentation to civil society. For Chapter 3, this is horizontally relevant for monitoring the implementation of measures that have an indirect impact on the chapter.
Chapter 15 – Control and Audit	The management, control, and audit system of the Instrument has been established and is further developing. The government has established monitoring and auditing mechanisms for the implementation of reforms and fund management, while their functioning is monitored through the Monitoring Committee. (MEI)	Continue to strengthen the internal control, audit, and risk management system in the implementation of the Reform Agenda and ensure transparency of control and audit results. The link to Chapter 3 is horizontal and relates to monitoring accountability for the implementation of reforms.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Chapter 3 has not yet been formally opened; however, the Plan defines measures and deadlines for all four benchmarks envisaged for provisional closure. The table below follows the structure of the Plan.

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
1. Future closing benchmark No. 1 – Serbia adopts the horizontal Law on Services transposing the Services Directive 2006/123/EC and demonstrates further	Regulation on the establishment of the SECP and information exchange between public authorities and the competent ministry via the SECP	Ministry of Internal and Foreign Trade	Q4 2026	Adopted (April 2026)	

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
progress in the alignment of sectoral legislation[1]	Law on Veterinary Medicine	Ministry of Agriculture	Q4 2026	Deadline has not expired	
	Law on Animal Welfare	Ministry of Agriculture	Q3 2026	Deadline has not expired	
	Law on Food Safety	Ministry of Agriculture	Q4 2026	Deadline has not expired	
	Law Amending and Supplementing the Law on the Bar	Ministry of Justice	Q4 2026	Deadline has not expired	
	Law on Court Experts	Ministry of Justice	Q4 2026	Deadline has not expired	
	Law on Court Interpreters and Translators	Ministry of Justice	Q4 2026	Deadline has not expired	
	Law Amending and Supplementing the Law on Chambers of Health Professionals	Ministry of Health	Q1 2026	No	
	Secondary legislation based on the Law on Healthcare[2]	Ministry of Health	Q1 2026	No	
	Law on Chemicals	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Regulation on the Chemical Safety Adviser and the Conditions for Training and Testing of Chemical Safety Advisers	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
2. Future closing benchmark No. 2 – Serbia adopts and presents to the European Commission a list of regulated professions within the meaning of the relevant EU acquis, indicating the activities covered by each profession and the justification for regulation	Regulation with the list of 50 regulated professions	Ministry of Education	Q1 2026	No	
3. Future closing benchmark No. 3 – Serbia aligns all study programmes through which qualifications for regulated professions are obtained in Serbia with the requirements of Directive	Detailed analysis and alignment of educational programmes for all seven professions covered by the automatic recognition of qualifications system, through the development of new study programmes and	Ministry of Education	Q1 2026	No	

[1] The Law on Services was adopted in November 2024, prior to the adoption of the Plan.
[2] It is not clear from the Plan how many subordinate legislative acts are expected under the Law on Healthcare.

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
2005/36/EC and its relevant amendments	their accreditation (the measure is an analysis, counted as a subordinate legislative act)				
4. Future closing benchmark No. 4 – Serbia adopts amendments to its national legislation to remove all nationality requirements for access to and pursuit of service activities, except for nationality requirements that are justified and proportionate under Article 51 TFEU; the amendments should be applicable no later than the date of accession	Defined measure: deadlines for the removal of this requirement are to be defined in cooperation with the institutions competent for the individual laws in which this requirement remains in force	Defined measure: institutions competent for the individual laws	Q1 2026	Not fulfilled	Poorly defined measure, both in terms of scope and competent institutions

Statistics

	Total planned 11.4.2025 – 1.12.2026	Due by 15.9.2026[3] (% of total)	Adopted (total and %)	Due by 31.12.2026 (as % of total)
Laws	9	2 (22%)	0	7 (78%)
Secondary legislation	5	4 (80%)	1 (25%)	1 (20%)

Conclusion

Due to a significant standstill in the process of consultations and approval of the negotiating position by the European Commission, which has lasted for almost six years, a reduced intensity of work and insufficient commitment on the part of individuals involved in the work of the negotiating group remain evident. The adoption of the SECP Regulation in April 2026 represents a concrete step forward; however, the remaining three benchmarks under the Harmonization Plan – the list of regulated professions, the alignment of study programmes, and the removal of nationality requirements – have deadlines that have already expired (Q1 2026). This requires urgent action by the competent institutions (the Ministry of Education and the institutions responsible for regulated professions) in order to avoid further delays in the process.

[3] The cut-off date used by the Working Group is 30 September 2026.

WORKING GROUP FOR CHAPTER 4
FREE MOVEMENT OF CAPITAL

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**0**
Partially fulfilled	**3**
Number of new recommendations	**2**

With regard to the three priority recommendations from the NCEU 2025 Book of Recommendations, all three remain relevant but have been revised in line with progress made during 2026. In particular, SEPA is no longer viewed as a reform yet to be achieved: Serbia is within the SEPA geographical scope and has been operationally applying the SEPA Credit Transfer payment scheme since May 2026. The focus therefore shifts to completing regulatory alignment and ensuring full practical application. In the area of AML/CFT, the focus further shifts from the formal strengthening of capacity to demonstrating the effectiveness of the system, taking into account the findings of MONEYVAL.

Objectives

The objective in the area of free movement of capital is the full alignment of the national system with the EU acquis, which entails the removal of all unjustified restrictions on the transfer of capital and payments, enabling the free movement of investments, acquisition of real estate, and transactions in financial instruments, as well as the establishment of effective mechanisms for the prevention of money laundering and the abuse of financial flows, along with strengthening the capacity of institutions responsible for financial supervision and ensuring the transparency and stability of the financial system, with the ultimate goal of integration into the single European financial market.

State of Play

Serbia is between moderately and well prepared in the area of free movement of capital and has made some progress, particularly in the areas of payment services and AML/CFT.

In the area of capital movements, an institutional framework has been established, but the legal framework has not yet been fully aligned with the EU acquis. Remaining restrictions relate, inter alia, to short-term credit and deposit operations with foreign countries, transactions in financial derivatives, as well as restrictions arising from regulations on insurance and voluntary pension funds. Administrative burdens on entities operating in the area of foreign exchange transactions remain. EU citizens also do not enjoy equal treatment with regard to the acquisition of real estate and agricultural land, which remains relevant for closing benchmark No. 1. The 2025 amendments to the Law on Foreign Exchange Operations represent a step forward, but have not removed all the restrictions identified by the European Commission. Therefore, the mere adoption of the law does not constitute full fulfilment of benchmark No. 1.

In the area of payment services, significant progress has been made. On 22 May 2025, Serbia was included in the SEPA geographical scope, and from 5 May 2026, the National Bank of Serbia and 18 of the 19 banks operating in Serbia have been operationally applying the SEPA Credit Transfer (SCT) payment scheme. This represents an important step in Serbia's integration into the European payments area. Nevertheless, regulatory alignment has not been completed. In June 2026, the National Bank of

Serbia prepared a Draft Law Amending and Supplementing the Law on Payment Services to further align with Regulation (EU) 2024/886, the rules on cross-border payments, the SEPA framework, and settlement finality rules. Further alignment of the Law on Interchange Fees and Special Business Rules for Card-Based Payment Transactions is also required.

In the area of AML/CFT, the legal and institutional framework is largely aligned with the relevant standards. Following the updated National Risk Assessment and the adoption of the Strategic and Operational Plan for 2025–2029, the results of the MONEYVAL evaluation published in February 2026 showed seven positive ratings out of 11 immediate outcomes. At the same time, the European Commission has pointed to the need for further strengthening of institutional capacity, including the capacity of the Administration for the Prevention of Money Laundering. The focus should therefore be on maintaining and demonstrating the effective application of the system through concrete results.

The key obstacles to provisional closure remain the full removal of remaining capital movement restrictions, equal treatment of EU citizens in the acquisition of real estate and agricultural land, completion of regulatory alignment of the payment system, and demonstrating the effectiveness of the AML/CFT system.

How to Unblock the Process? / Priority Steps to Unblock the Process

Chapter 4 requires a series of reforms and structural steps; however, the priority and time-critical measures that would enable the continuation of the process are:

1. Continue the liberalisation of capital movements and the removal of remaining restrictions, including restrictions related to short-term credits and deposits, financial derivatives, insurance, and voluntary pension funds, while ensuring equal treatment of EU citizens in the acquisition of real estate and agricultural land (*NCEU recommendation from 2020/2025 – revised*);

2. Remove remaining restrictions and administrative barriers in the area of foreign exchange operations and ensure full alignment of the cross-border payments regime with the EU acquis (*NCEU recommendation from 2020/2025 – revised*);

3. Continue the full alignment of the payment services regulatory framework with the EU acquis, including the adoption and implementation of the amendments to the Law on Payment Services prepared in 2026, as well as the alignment of rules on cross-border payments, SEPA schemes, and settlement finality (*new recommendation for 2026*);

4. Continue strengthening administrative capacity and inter-institutional cooperation in the AML/CFT system, with a focus on maintaining and demonstrating effectiveness through concrete results in supervision, financial intelligence, investigations, prosecution, and asset confiscation (*NCEU recommendation from 2020/2025 – significantly revised*);

5. Ensure the full practical application of the relevant SEPA schemes and the further inclusion of domestic payment service providers in the relevant SEPA schemes (*new recommendation for 2026*).

Link to the Reform Agenda

The link to the Reform Agenda is predominantly indirect; the measures set out below may contribute to the fulfilment of obligations under this chapter.

Reform Agenda Measure	Status / Deadline	Relevance to Chapter 4
6.1.1. Management of public investments and state-owned enterprises	Deadline: 2027; review: December 2026	Indirect: fiscal risks and financial stability
7.2.2. Digitalisation and open data	2024–2027	Indirect: digitalisation of financial flows and data availability
Chapters 6 and 7 – statistical reforms	2025–2027	Indirect: quality and alignment of capital flows statistics

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

The table tracks the measures from the Plan relevant to the provisional closing benchmarks and the status of their implementation based on available data for September 2026.

Benchmark	Planned measure	Competent Institution	Planned deadline	Status	Comment
1. Serbia should complete alignment with the EU acquis and remove remaining restrictions on capital movements and payments	Law on Agricultural Land	Ministry of Agriculture, Forestry and Water Management	Q4 2025	Not fulfilled	The issue of equal treatment of EU citizens needs to be resolved
	Law Amending and Supplementing the Law on Foreign Exchange Operations	Ministry of Finance, Financial System Sector	Q4 2026	Fulfilled / Law adopted in 2025 (*Official Gazette of the RS*, No 19/2025)	Adoption of the Law does not constitute full fulfilment of the benchmark; remaining restrictions still exist
	Law on Insurance	National Bank of Serbia	Q4 2026	Deadline has not expired	Further alignment with benchmark No. 1 is required
	Law on Voluntary Pension Funds and Pension Plans	National Bank of Serbia	Q4 2026	Deadline has not expired	Relevant to remaining capital movement restrictions
2. Serbia should demonstrate the ability to fully and effectively apply Directive (EU) 2015/2366 and relevant Level 2 measures, as well as Regulation (EC) 924/2009 and Regulation (EU) 260/2012	Law on Payment Services	National Bank of Serbia	Q4 2026	Deadline has not expired	A draft of the amendments was prepared during 2026; its adoption and implementation are required
3. Serbia should complete alignment with legal and international standards in the area of anti-money laundering and countering the financing of terrorism	AML/CFT measures and strengthening of administrative capacity	Competent institutions / Administration for the Prevention of	Q1 2026	Partially fulfilled	MONEYVAL has shown progress, but further demonstration of the effectiveness of

Benchmark	Planned measure	Competent Institution	Planned deadline	Status	Comment
and demonstrate effective implementation through strengthening of capacity, supervision, financial intelligence, investigations, and prosecution		Money Laundering			the system is required

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	5	1 (20%)[4]	1 (20%)[5]	3 (60%)
Secondary legislation	0	0 (0%)	0 (0%)	0 (0%)

Conclusion

Serbia has made significant progress under Chapter 4 in payment services and AML/CFT, including the operational application of SEPA Credit Transfer from May 2026 and positive findings from the MONEYVAL evaluation. However, in order to fulfil the provisional closing benchmarks, it is necessary to complete the remaining liberalisation of capital movements, ensure equal treatment of EU citizens in the relevant areas, complete the regulatory alignment of payment services, and demonstrate the effective application of the AML/CFT system.

[4] The Law on Agricultural Land has not been adopted.
[5] The Law Amending and Supplementing the Law on Foreign Exchange Operations was adopted in 2025, ahead of the planned deadline.

WORKING GROUP FOR CHAPTER 5
PUBLIC PROCUREMENT

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**10**
Partially fulfilled	**0**
Number of new recommendations	**0**

Note: *Four recommendations in this year's report represent thematically consolidated recommendations from the previous report, which contained ten. The consolidation of the number of recommendations does not constitute an assessment of their implementation, nor does it indicate progress achieved; rather, it is the result of grouping recommendations by related themes and the measures required. All recommendations from the previous report remain represented within the new structure.*

Objectives

The objective of Chapter 5 is alignment with EU rules, so that public procurement of goods, services, and works in Serbia is transparent and open to all companies, with respect for equal treatment and the prohibition of discrimination. The improvement of the public procurement system in the context of EU accession, if the potential of the accession process is fully utilised, would enable Serbia to achieve savings in public funds through free competition among tenderers, economic growth, the development of economic operators active in the open market of Serbia and the EU, the use of standard procedures, learning from the experience of EU Member States and other accession candidates, as well as the strengthening of systems for the prevention of corruption and the suppression of other irregularities in public procurement and public-private partnerships.

State of Play

Within the Negotiating Position for Chapter 5, Serbia accepted the EU acquis and committed to its full implementation by the time of accession. The Public Procurement Development Programme in the Republic of Serbia for the period 2024 to 2028[6] is in force, as is the Action Plan for 2026[7]. The three benchmarks envisaged for the provisional closure of the chapter have not been fulfilled in this period either. The first benchmark requires full alignment of the legal framework, which, in addition to laws, includes "international agreements exempting certain works from public procurement rules." The second benchmark relates to the establishment of adequate capacity and the adoption of measures to ensure the proper implementation and application of the law. Particular emphasis is placed on strengthening the capacity of the Public Procurement Office, training for all stakeholders at all levels, the preparation of administrative rules and standard contract documentation, the strengthening of control mechanisms, detailed monitoring and greater transparency in the contract execution phase, systematic risk assessment, an effective system of legal protection, and measures to prevent and combat corruption and conflicts of interest. The third benchmark requires evidence of a fair and transparent public procurement system that ensures value for money, competition, and safeguards against corruption.

[6] See: https://www.ujn.gov.rs/wp-content/uploads/2024/08/2.-Uzjn-Program-razvoja-2024-2028-KONACNO.pdf.
[7] See: https://www.ujn.gov.rs/wp-content/uploads/2026/03/PR-18-KJN-AKCIONI-PLAN-AP-KJN-2026.pdf.

In its 2025 Report on Serbia[8], the European Commission noted that Serbia is moderately prepared in the area of public procurement and that limited progress has been made through amendments to the Public Procurement Law (PPL), for the purpose of further alignment with the EU acquis, as well as through improvements to the Public Procurement Portal. The overall assessment of preparedness has not changed since the opening of negotiations in this chapter, i.e. since the European Commission's Report for 2015.

The 2025 Report on Serbia states that Serbia continues to have a tendency to circumvent the law through intergovernmental agreements and special laws, including those relating to EXPO 2027. As noted, "the Law on Special Procedures for the Realisation of the International Specialised Exhibition EXPO 2027 and the accompanying regulation exempt projects from the application of the PPL and continue to raise concerns regarding compliance with the EU acquis, including with regard to remedies and deadlines for the submission of tenders". According to analyses by Transparency Serbia, the total value of contracts concluded by special "EXPO companies" under these rules (including framework agreements) by 20 September 2026 exceeded 70 billion dinars (approximately €600 million), while a significant portion of costs related to this event was contracted on the basis of intergovernmental agreements. The European Commission recalls that the Regulation on the Selection of a Strategic Partner for Solar Power Plants, which provides for a different procedure from that under the Law on Public-Private Partnerships, remains in force. The European Commission assesses the transparency of projects contracted based on intergovernmental agreements as "improved but limited". In practice, the increase in transparency is negligible – a list of such projects is available, updated irregularly, but not the contracts themselves, and in some cases not even their value.

Although the Government's Plan for 2026 formally provides for the alignment of special exemptions from the application of the PPL with the EU acquis, it does not elaborate specific steps for addressing this issue. The international agreements to be reviewed, the measures for remedying non-compliance, and the deadlines for individual activities are not specified. In this way, the Plan fails to address one of the key issues continuously highlighted by the European Commission, nor does it provide for specific measures, deadlines, or responsible parties for its resolution.

During the summer, the Ministry of Economy prepared a Draft new Law on Public-Private Partnerships and Concessions[9]. The public consultation was opened in breach of the rules – no prior consultations on the concept were held, and the explanatory memorandum was incomplete – and lasted until 20 August 2026. The report on the public consultation had not been published even after the expiry of the statutory 15-day deadline. The Draft introduces certain improvements, but key issues remain unresolved. Among other things, the Draft does not introduce an obligation to establish why a public-private partnership is more cost-effective in the long term than an alternative method of project implementation, while transparency remains significantly lower than in public procurement.

The Public Procurement Office, in its Annual Report[10], states that contracts worth 1,761,045,975,484 dinars (€15.01 billion) were concluded in 2025. The value of contracts concluded following conducted public procurement procedures amounts to 932,756,438,962 dinars (€7.95 billion), while the value of contracts concluded based on exemptions recognised by the PPL amounts to 828,289,536,522 dinars (€7.06 billion). The value of exempted procurements is in reality even higher, as it does not include exemptions based on special laws. According to these data, almost half (47%) of the total value of contracts concluded in 2025 was realised outside the standard, competitive public procurement

[8] Source: European Commission Annual Progress Report on Serbia for 2025, see: https://www.mei.gov.rs/upload/documents/eu_dokumenta/2025/serbia_2025_report_sr.pdf.
[9] e-Consultations Portal, see: https://ekonsultacije.gov.rs/topicOfDiscussionPage/743/4.
[10] Annual Public Procurement Report of the Public Procurement Office, see: https://jnportal.ujn.gov.rs/annual-reports-ppo-public.

procedure, while 53% relates to exemptions or the negotiated procedure. The share of public procurement in gross domestic product in 2025 was 8.98%. In 2025, 46,792 public procurement procedures were initiated. The average number of tenders per procedure was 2.5, the same as in 2024, while in 47.05% of public procurement procedures conducted under the PPL only one tender was submitted. This problem is even more pronounced in procurements exempted from the application of the PPL, such as those related to EXPO 2027, where as many as 86% of procedures were conducted with only one admissible tender[11].

Statistical indicators of the Republic Commission for the Protection of Rights in Public Procurement Procedures[12] show that there were no significant changes in the use of this mechanism. Of 953 requests submitted against contracting authorities, more than half were assessed as well-founded, and the procedure was annulled in full (63) or in part (437). In approximately 30% of procedures (294), interested companies challenged the tender documentation and the conduct of the contracting authority prior to the adoption of a decision.

The State Audit Institution[13] identified irregularities in the operations of budget beneficiaries in 2025 amounting to 71.9 billion dinars, of which 69.68 billion dinars (96%) relate to irregularities in public procurement. The total value of audited public procurement from the standpoint of regularity of operations amounted to 510 billion dinars, and the identified irregularities related to 13.5% of that sample. Of the identified irregularities relating to public procurement, 59% relate to the failure to conduct a procedure.

The Commission for the Protection of Competition initiated one procedure during 2025 and 2026 relating to the conclusion of a restrictive agreement in the area of public procurement.[14]

There has been no progress regarding the prosecution of abuses in public procurement – a total of six first-instance convictions were handed down in 2025. The criminal offence under Article 228[15] of the Criminal Code has not been amended, although this was envisaged in the Draft Amendments[16].

The Government has not abandoned the practice of concluding contracts without applying the Public Procurement Law, nor have already concluded contracts for infrastructure projects been published. Although these issues are recognised in the Reform Agenda[17], this has not contributed to their resolution, inter alia due to the use of ambiguous formulations regarding publication and the setting of excessively long deadlines for abandoning the practice of exemption from the application of general rules. By contrast, in July 2026, the Ministry of Energy published a call[18] for the design and construction of the "Đerdap 3" hydroelectric power plant, intended exclusively for companies from the United States, based on a misinterpretation of the intergovernmental agreement with that country. In November 2025, a special law was adopted for the "General Staff"[19], which, among other things,

[11] See: https://integritywatchserbia.org.rs/expo2027.php?l=sr.
[12] Annual Report of the Republic Commission for the Protection of Rights in Public Procurement Procedures, see: https://kjn.rs/wp-content/uploads/Izveštaj-o-radu-Republičke-Komisije-za-2025-godinu.pdf.
[13] Annual Report on the Work of the State Audit Institution, see: https://www.dri.rs/godisnji-izvestaji-o-radu
[14] See: https://kzk.gov.rs/kzk/wp-content/uploads/2025/12/Sidro-Westom-Global-CCC-industrial-zakljucak-o-pokretanju-postupka.pdf.
[15] Ministry of Justice: Statistics on corruption-related criminal offences, see: https://mpravde.gov.rs/statistika-koruptivnih-krivicnih-dela-za-2025-godinu.
[16] e-Consultations Portal, see: https://ekonsultacije.gov.rs/topicOfDiscussionPage/528/4.
[17] See: https://eukonvent.org/statement-by-the-nceu-intersectoral-working-group-for-monitoring-the-implementation-of-the-reform-agenda-of-the-republic-of-serbia/.
[18] See: https://rs.usembassy.gov/wp-content/uploads/sites/77/2026/06/EOI_Pumped-Storage-Hydropower-Plant-Derdap-3-PSHP-Derdap-3.pdf.
[19] See: https://www.paragraf.rs/propisi/zakon-realizacija-projekta-revitalizacije-razvoja-lokacije-generalstab.html.

aimed to legalise a joint venture (PPP) agreement in that area, unjustifiably concluded without the application of the law[20].

Numerous examples of breaches of rules in cases where the Public Procurement Law was formally applied have gone without a response from state authorities, such as, for example, the case of the procurement of partitions for extraordinary elections[21] or the offsetting of municipal utility debts against the performance of works for a municipality, without any competitive tendering[22].

Priority Measures

1. **Align the legal framework and public policy documents with the actual needs of practice and EU standards**. Adopt a law on public-private partnerships and concessions that would introduce an obligation to demonstrate the long-term cost-effectiveness of PPPs compared to alternative problem-solving models for all forms of PPP and increase transparency. Revise existing and adopt new public policy documents in the areas of European integration, public procurement, public-private partnerships, and anti-corruption, including the expansion of the scope of EU evaluation to encompass an analysis of the significance of collected statistical indicators (e.g. performance in detecting and sanctioning irregularities, levels of competition and efficiency).

2. **Return all procurements to the regular, transparent procedure and prevent further circumvention of the PPL through special laws and intergovernmental agreements**. Discontinue the practice of contracting public procurements and public-private partnerships without competition and transparency on the basis of intergovernmental agreements; repeal all provisions of laws other than the PPL and the LPPP that currently govern the implementation of individual public procurements and public-private partnerships. Introduce a control mechanism and provide citizens with additional information on the implementation of contracts concluded on the basis of intergovernmental agreements. Subject all contracts concluded under these models to audit.

3. **Strengthen capacities and instruments for the proactive detection of irregularities and effective criminal prosecution, including remaining open cases from previous periods**. Amend the provisions of Article 228 of the Criminal Code to cover all the most serious forms of breaches of public procurement and public-private partnership rules. Enable the proactive detection of irregularities in public procurement and public-private partnerships, as well as the remedying of the harmful consequences of improperly planned, conducted, and executed public procurements. Ensure more active participation of the Commission for the Protection of Competition in detecting restrictive agreements in public procurement. Continue the practice of performance audits conducted by the State Audit Institution in the area of public procurement and monitor follow-up on previously published audits; strengthen the internal audit system and publish information on its effects in the area of public procurement. Publish all information on procurements related to the COVID-19 pandemic and conduct an audit of those procurements.

4. **Ensure that existing reporting and data publication obligations are consistently observed and substantively improved**. Increase the quantity and quality of information published on the Public Procurement Portal and link the Portal to the databases of other state authorities. Expand the scope of information in the annual reports of contracting authorities to cover all relevant aspects of conducted procedures.

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[20] See: https://www.transparentnost.org.rs/sr/aktivnosti-2/saoptenja/12951-autenticno-tumacenje-zakona-o-generalstabu-trostruko-pravno-nasilje.
[21] See: https://transparentnost.org.rs/sr/aktivnosti-2/saoptenja/13079-nezakonit-postupak-nabavke-paravana.
[22] See: https://www.transparentnost.org.rs/sr/aktivnosti-2/pod-lupom/13071-kompenzacije-umesto-javnih-nabavki.

Link to the Reform Agenda

Reform Agenda Measure (relevant to Chapter 5)	Status / Deadline	Urgent for Chapter 5
6.2.1. Improving investment and development opportunities for entrepreneurs and the private sector	Deadline: June 2025; Status: not fulfilled	Increase the transparency of projects contracted under international agreements by publishing information on specific projects on the website of the ministry responsible for their implementation (for all completed, ongoing, and new public procurement contracts under international agreements). From December 2024, all contracts concluded under international agreements will be published, with information on: the name of the project, basic data on the public procurement contract, the contracting authority, the main contractor, and the public procurement procedure applied.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
1. Serbia should fully align its national legal framework with the EU acquis in all areas of public procurement, including its legislation on concessions and international agreements exempting certain works from public procurement rules.	The Government plans to continue the alignment of the public procurement system with the EU acquis, with a particular focus on reviewing and aligning special exemptions from the application of the Public Procurement Law, especially exemptions arising from international agreements, which under EU rules are permitted only exceptionally. Prior to EU accession, a review and, where necessary, amendment of international agreements is envisaged to ensure their compliance with EU rules. Within the existing system, the application of the 2019 Public Procurement Law, its 2023 amendments, the Public Procurement Development Programme for the period 2024-2028, and the accompanying action plan continues. An amendment of the Law on Public-Private Partnerships and Concessions is also planned for the purpose	Public Procurement Office, Ministry of Finance, Ministry of Economy	Q4 2026	No	Although the Government's Plan for 2026 envisages the alignment of special exemptions from the application of the Public Procurement Law with the EU acquis, including the review and revision of international agreements, no concrete steps have been taken to limit this practice. The international agreements to be reviewed are not specified, nor have specific amendments, deadlines, and methods of implementation been established. At the same time, the practice of contracting outside the PPL continued during 2026, including the use of intergovernmental agreements and special laws, while contracts concluded on that basis are largely not publicly available in their entirety. This is particularly significant given that the European Commission continuously highlights the need to align these exemptions with the EU acquis. Therefore, the mere announcement of a review of international agreements cannot be considered

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
	of aligning it with EU law, with the drafting, public consultations, and submission to the European Commission envisaged, as well as the adoption of the law during 2025.				progress in fulfilling the closing benchmarks for Chapter 5, without concrete changes to the legal framework and practice. The Ministry of Economy prepared a Draft new Law on Public-Private Partnerships and Concessions during 2026, thereby initiating the process of improving the legal framework. However, the public consultation was conducted with shortcomings regarding prior consultations and the explanatory memorandum, and the report on the public consultation had not been published even after the expiry of the statutory deadline. The Draft does not resolve some of the key problems of the existing system, including the absence of an obligation to demonstrate the long-term cost-effectiveness of a PPP compared to alternative models of project implementation and an insufficiently high level of transparency compared to public procurement. The preparation of the Draft itself represents an initial step towards improving the legal framework but does not yet constitute its full alignment with the requirements of the chapter's closing benchmarks.
2. Serbia should establish adequate administrative and institutional capacity at all levels and take appropriate measures to ensure the proper implementation and application of national legislation in this area in good time before accession. This includes in particular: a) implementation of the Public	The Government plans to continue implementing the Public Procurement Development Programme 2024-2028 through strengthening the capacity of institutions and participants in procedures, improving electronic methods and the Public Procurement Portal, training and practical guidance,	Public Procurement Office	Q4 2025	Partially	The Public Procurement Development Programme and the accompanying action plans are being implemented in accordance with the envisaged timeline. However, the Development Programme failed to identify some of the key challenges in the public procurement system, such as the frequent use of exemptions from the application of the PPL for the most valuable

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
Procurement Development Strategy 2014-2018 to improve Serbia's administrative capacity, in particular by strengthening the capacity of the Public Procurement Office and providing adequate training at all levels for all stakeholders; b) preparation of practical implementation and monitoring tools (including administrative rules, manuals, and standard contract documentation); c) strengthening of control mechanisms, including detailed monitoring and increased transparency in the contract execution phase and systematic risk assessment with prioritisation of controls in sensitive areas and procedures; d) effective functioning of the remedies system; e) measures relating to the prevention and combating of corruption and conflicts of interest in public procurement, both at central and local level.	strengthening inter-institutional cooperation, monitoring and controls – particularly for procurements to which the PPL does not apply – as well as improving contract management and transparency of public procurement data.				infrastructure projects through intergovernmental agreements and special laws. According to official data from the PPO, the annual value of all exemptions is almost at the same level as the value of public procurements conducted through the PPL, which indicates the extent to which exemptions from the application of the Law are used in Serbia. The Annual Public Procurement Report has been published on the Public Procurement Portal.
3. Serbia should demonstrate a track record of a fair and transparent public procurement system that ensures value for money, competition, and strong anti-corruption safeguards.	The Government plans to ensure public availability of data on the implementation of public procurement and monitoring of the achievement of the objectives of the Public Procurement Development Programme through the publication of annual monitoring reports, the Programme and accompanying action	Public Procurement Office	Q4 2026	Yes	The PPO's report on public procurement monitoring is publicly available on the website of the National Assembly, while reports on the implementation of action plans are published on the website of the Public Procurement Office. This ensures the formal public availability of information on the monitoring and tracking of the implementation of planned activities. However, in

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
	plans on the websites of the Public Procurement Office and the National Assembly.				order to assess the effectiveness of this measure, it is also necessary to consider whether the findings lead to concrete corrective measures and improvements to the public procurement system.

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	1	0	0	1
Secondary legislation	0	0	0	0

** The Government of Serbia has in its Plan envisaged the adoption of the Law Amending and Supplementing the Law on Public-Private Partnerships and Concessions for the purpose of its alignment with EU Directive 2014/23.*

Conclusion

The gap between the declaratory commitment to European integration and the actual conduct of state authorities in the area of public procurement has not narrowed during 2026, but has widened further. The Constitutional Court has not, during 2026 either, ruled on the initiative submitted by Transparency Serbia in January 2024 to assess the constitutionality of the provision excluding the application of the PPL for EXPO, while the value of contracts concluded on the basis of that exemption has further increased. Three ministries (MF, MCTI, MEE) publish certain information on these projects, but not the contracts themselves, and in some cases not even their value, thereby rendering meaningless the step envisaged in the Reform Agenda. Instead of abandoning the practice of avoiding the application of public procurement rules through special laws and intergovernmental agreements, the number of such laws and agreements has increased. Conditions for more effective control and sanctioning of the most serious cases of breaches of rules have still not been created, including amendments to the Criminal Code and the introduction of obligations for proactive action by the prosecution and supervisory bodies. The procedure for amending the Law on Public-Private Partnerships and Concessions has finally been opened, but the procedure was not conducted in accordance with the rules, and the draft does not resolve some of the key problems in that area.

WORKING GROUP FOR CHAPTER 8
COMPETITION POLICY

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**3**
Partially fulfilled	**4**
Number of new recommendations	**2 new, 1 recommendation from 2025 deleted**

Of the seven priority recommendations in the NCEU 2025 Book of Recommendations, four have been partially fulfilled, while three have not been fulfilled. Six recommendations have been retained, with additions and adjustments reflecting the progress achieved and the outstanding obligations. One recommendation, concerning the Law on Interchange Fees and Specific Operating Rules for Card-Based Payment Transactions, has been deleted. Two new recommendations have been added for 2026, so that Chapter 8 now contains a total of eight priority recommendations: six revised recommendations from the previous period and two new ones.

Objectives

The objective of negotiating Chapter 8 – Competition Policy is to ensure the alignment of the national system with EU rules and practice in the areas of antitrust, state aid control and market liberalisation. This creates the conditions for free and fair market competition, for preventing the distortion of competition through abuse of a dominant position and prohibited agreements, for establishing a transparent and effective system of state aid monitoring and control, and for opening up the market and ensuring its functioning on an equal footing in line with EU internal market rules.

State of Play

Within negotiating Chapter 8, the European Commission (EC) has set six opening benchmarks in the area of state aid. Serbia remains moderately prepared in the area of competition policy. Some progress has been made, but overall progress has been limited, and key challenges remain in the area of state aid, in particular as regards the alignment of existing schemes, transparency and enforcement.

In the area of antitrust, the Law on Protection of Competition is largely aligned with Articles 101 and 102 of the Treaty on the Functioning of the European Union (TFEU) and with the Stabilisation and Association Agreement (SAA). In 2025 and 2026, four secondary legislation were adopted, further aligning the rules on vertical agreements, technology transfer and agreements in the motor vehicle sector, as well as in rail and road transport. Alignment with the more recent EC rules, guidelines and notices should continue, including amendments related to digitalisation and e-commerce.

The Commission for Protection of Competition (CPC) is operationally independent, but additional staff and continuous professional training are needed. Of the 87 posts provided for in the job classification, 57 have been filled. The CPC continued to enforce competition rules, and in 2025 and 2026 it adopted 54 decisions in simplified merger control procedures and two decisions establishing an infringement of competition, while one procedure concerning restrictive agreements was initiated. At the same time, no sector inquiries were conducted, which limits the CPC's proactive action, particularly in sectors that have experienced pronounced price increases.

Transparency and competition advocacy need to be further improved, including a more active presence in the media and on social networks, as well as better targeting of activities towards the business community, local self-government units and civil society. The CPC's participation in the drafting of legislation has improved, but is not yet systematic, in particular in urgent legislative procedures. Its involvement in relevant working groups and consultations should be ensured, especially with regard to sectoral regulation and public enterprises.

The area of state aid continues to present the greatest challenges in terms of meeting the opening benchmarks. The Law on State Aid Control is largely aligned with the EU acquis, and in 2025 and 2026 significant progress was made in adopting secondary legislation concerning regional and horizontal state aid, services of general economic interest (SGEI), *de minimis* aid, reference rates and broadband infrastructure. Further alignment is planned by the end of 2026.

Existing state aid schemes, in particular fiscal schemes, were further aligned with the EU acquis through the adoption of a package of laws at the session of the National Assembly held on 31 August 2026. The amendments to the **Corporate Income Tax Law** (*Official Gazette of the Republic of Serbia*, No 80/2026) provide for the gradual phasing out of certain tax incentives and the introduction of explicit conditions deriving from state aid control rules. The amendments to the **Personal Income Tax Law** (*Official Gazette of the Republic of Serbia*, No 80/2026) further align tax relief for employment with state aid rules, including the conditions that beneficiaries must meet and caps on the total amount of support. The amendments to the **Law on Free Zones** (*Official Gazette of the Republic of Serbia*, Nos 62/2006 and 80/2026) provide for the gradual phasing out of certain customs exemptions and preferential treatment, which will cease to apply on 1 January 2032. This brings existing schemes further into line with EU state aid rules. The inventory of schemes is being updated, and the list of non-aligned schemes is regularly maintained. However, the Action Plan for their alignment has not yet been adopted. Its adoption is planned under the Reform Agenda by the end of 2027. The plan should contain clear deadlines, an allocation of responsibilities and coordination mechanisms between the Commission for State Aid Control (CSAC), the Government and state aid grantors.

The regional aid map has not yet been adopted, although the new regulations have established a methodological framework for its preparation. Furthermore, no centralised electronic register of state aid and *de minimis* aid have been set up. Data on *de minimis* aid for 2025 are published in Excel format, which limits the transparency and accessibility of the data.

As regards the institutional framework, the operational independence of the CSAC needs to be further confirmed and its effectiveness improved. The new President of the CSAC took office in July 2025, but additional recruitment and continuous professional training are needed. Consistent compliance with the notification and standstill obligation needs to be ensured, and the enforcement record needs to be improved.

The annual report on state aid granted in 2024 has not yet been published, while the State Aid Inventory for the period 2017-2026 has been adopted, together with an accompanying Action Plan setting deadlines for the alignment of non-aligned state aid schemes. Annual reports should be adopted in a timely manner, the transparency of decisions and data increased, and the CSAC's proactive communication improved. Awareness of the rules among state aid grantors remains uneven, which is why additional training is needed, particularly for local self-government units and the committees deciding on the granting of aid.

In the area of liberalisation, the application of competition rules to public enterprises needs to be stepped up and the rules on the financing of services of general economic interest further aligned.

There is no evidence of the existence of state monopolies of a commercial character within the meaning of Article 37 TFEU.

During the reporting period, the European Policy Centre (CEP), as coordinator of the Working Group of the National Convention on the European Union (NCEU) for Chapter 8, continued to monitor developments in the areas of competition protection and state aid, organised meetings, and prepared and presented proposals for improving the legal framework in the areas of consumer protection and competition.

How to Unblock the Process? / Priority Steps to Unblock the Process

Chapter 8 requires a series of reforms and structural steps in order to meet all the opening benchmarks set. Nevertheless, priority should be given to time-critical measures whose implementation would make it possible to unblock the process:

1. Adopt the Action Plan for the alignment of existing state aid schemes, in particular fiscal schemes, with clearly defined deadlines, an allocation of responsibilities between the Government, the CSAC and state aid grantors, as well as solutions for acquired rights and any transitional periods (*NCEU recommendation from 2023 and 2024 – revised for 2026*);
2. Adopt the regional aid map on the basis of the new regulatory framework and ensure its application in all relevant regional aid schemes (new recommendation for 2026);
3. Ensure consistent compliance with the notification and standstill obligation for all state aid measures, including measures granted by local self-government units, and establish a reliable system for monitoring and controlling compliance with these obligations (*NCEU recommendation from 2023 and 2024 – revised for 2026*);
4. Establish a functional centralised electronic register of state aid and *de minimis* aid, with up-to-date and publicly available data on the aid granted, beneficiaries and schemes (*new recommendation for 2026*);
5. Continue aligning the remaining legislation and existing state aid schemes with the EU acquis, and adopt the remaining secondary legislation provided for in the National Programme for the Adoption of the EU Acquis (NPAA) for 2026 (*NCEU recommendation from 2023 – revised for 2026*);
6. Strengthen the administrative capacity of the CSAC and the CPC, including filling vacant posts, continuous professional training and building capacity to handle complex cases, carry out monitoring and enforce competition and state aid rules (*NCEU recommendation from 2024 – revised for 2026*);
7. Ensure the systematic involvement of the CPC in the drafting of legislation relevant to the protection of competition and the operation of public enterprises, as well as the systematic consideration of its opinions. To that end, the Government's Rules of Procedure should be amended to make consultation of the CPC mandatory when drafting legislation affecting the application of competition rules (*NCEU recommendation from 2018 – revised for 2026*);
8. Improve competition policy enforcement and advocacy, including resuming sector inquiries, systematically publishing CPC decisions, stepping up communication with the business community, local self-government units and civil society, and strengthening the capacity of the judiciary to handle complex competition cases (*NCEU recommendation from 2019 – revised for 2026*).

Link to the Reform Agenda

Chapter 8 is not directly covered by the Reform Agenda, but certain measures have an indirect impact on competition policy, in particular in the areas of state aid control, the digitalisation of state aid monitoring systems and horizontal monitoring, control and audit mechanisms.

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 8 (indirect impact on Chapter 8)
6.2.1. Improving investment and development opportunities for entrepreneurs and the private sector – state aid	Partially implemented; deadline for full alignment of the remaining schemes: December 2027. The adoption of an action plan with clear deadlines for aligning state aid schemes with the EU acquis, based on the final inventory and approved by the European Commission, was envisaged for June 2025.	Implement the Action Plan for the alignment of non-aligned state aid schemes, including the review and alignment of the remaining fiscal and other schemes with EU rules, with regular monitoring of the set deadlines. Ensure complete and up-to-date recording of state aid and transparent application of the notification and standstill rules.
7.2.2. Digitalisation of public services	Ongoing; implementation period 2024–2027	Continue developing and upgrading the electronic register of state aid and the register of *de minimis* aid, ensure that they are complete, up to date and interconnected, and ensure public access to data on state aid granted, in line with EU transparency requirements.
Chapter 14 – Monitoring, reporting and evaluation	Monitoring mechanism established; implementation ongoing	Ensure regular monitoring of, and public reporting on, the implementation of Reform Agenda activities relevant to Chapter 8, in particular the implementation of the Action Plan for the alignment of state aid schemes and compliance with the set deadlines.
Chapter 15 – Control and audit	Control and audit system established; implementation ongoing	Continue strengthening capacity for state aid control and monitoring and ensure effective mechanisms for verifying the regularity and compatibility of state aid granted, including monitoring the implementation of the Action Plan for the alignment of non-aligned state aid schemes.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Chapter 8 has not yet been opened, but the Plan sets out measures and deadlines for meeting the opening benchmarks. The table below follows the structure of the Plan.

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
The Republic of Serbia should supplement and amend its state aid legislation in order to fulfil the obligations stemming from the Stabilisation and Association Agreement.	Continue aligning national state aid legislation with further amendments to the EU acquis and with the relevant provisions of the TFEU and the SAA. Continue communication with the European Commission on the compliance of national legislation transposing the EU acquis.	Commission for State Aid Control (CSAC)	Q4 2026	Deadline has not expired	Ongoing activity

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
	Decree on the Rules and Conditions for Granting *De Minimis* Aid	Ministry of Finance / CSAC	Q2 2025	Yes	*Official Gazette of the RS*, No 17/2025
	Decree on the Rules and Conditions for Granting *De Minimis* Aid for the Provision of Services of General Economic Interest	Ministry of Finance / CSAC	Q2 2025	Yes	*Official Gazette of the RS*, No 17/2025
	Decree on the Conditions and Criteria for the Compatibility of Regional State Aid	Ministry of Finance / CSAC	Q2 2025	Yes	*Official Gazette of the RS*, No 17/2025
	Decree on the Conditions and Criteria for the Compatibility of State Aid for the Development of Broadband Networks (Infrastructure)	Ministry of Finance / CSAC	Q2 2025	Yes	*Official Gazette of the RS*, No 77/2025
	Guidelines on the Assessment of the Compatibility of Regional State Aid	CSAC	Q2 2025	Yes	*Official Gazette of the RS*, No 42/2025
	Decree on the Conditions and Criteria for the Compatibility of Horizontal State Aid	CSAC	Q4 2025	Yes	*Official Gazette of the RS*, No 62 of 17 June 2021, No 77 of 5 September 2025 – other decree, No 32 of 3 April 2026 – other decree
	Guidelines on the Assessment of the Compatibility of State Aid for Research, Development and Innovation	CSAC	Q4 2025	Yes	*Official Gazette of the RS*, No 55/2026
	Decree on the Conditions and Criteria for the Compatibility of State Aid for Environmental Protection and Energy	CSAC	Q4 2026	Deadline has not expired	
	Decree on the Conditions and Criteria for the Compatibility of State Aid for Risk Finance	CSAC	Q4 2026	Deadline has not expired	
2. The Republic of Serbia should ensure that the Commission for State Aid Control is operationally independent and has the powers and resources necessary for the proper and full enforcement of state aid rules.	Establish transparent monitoring of and reporting on the work of the CSAC, providing a clear overview of the consistent and effective application of state aid rules.	Commission for State Aid Control (CSAC)	Q4 2026	Deadline has not expired	

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
3. The Republic of Serbia should complete its inventory of existing state aid schemes within the meaning of Article 73(6) of the SAA and define an action plan, approved by the Commission, with a clear timeline for aligning all remaining state aid schemes and equivalent measures found to be incompatible with the obligations under the SAA.	The draft inventory of schemes, prepared in line with the comments received, was submitted to the European Commission on 29 November 2024. The European Commission sent its reply on 17 December 2024. The next step is the drafting of the Action Plan with set deadlines for aligning the schemes.	CSAC and all institutions responsible for non-aligned state aid schemes	Q4 2026	Deadline has not expired	No official confirmation received from the European Commission
4. The Republic of Serbia should fulfil its obligations under Article 73(5) and Protocol 5 of the SAA and provide the European Commission with complete information on cases of individual state aid, so that the European Commission can assess and monitor the compatibility of these state aid measures with the obligations undertaken by Serbia under the SAA.	Ensure timely submission of complete information on individual state aid awards to the European Commission. Ensure consistent compliance with the obligations under Article 73(5) and Protocol 5 of the SAA, so as to enable the European Commission to monitor and assess the compatibility of the aid granted with Serbia's obligations.	Responsible institution not yet specified	Q4 2026	Deadline has not expired	At the request of the European Commission, a list of all state aid granted in the Republic of Serbia from 2017 until the date of submission, including individual aid and aid granted under state aid schemes, was submitted in early March 2026. Further steps depend on specific requests from the European Commission concerning individual cases.

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	0	(0%)	0	(0%)
Secondary legislation	9	7 (77.78%)	7 (77.78%)	2 (22.22%)

Conclusion

Serbia has made some progress in implementing competition policy, in particular through further legislative alignment, the adoption of secondary legislation and the strengthening of the capacity of the competent institutions. However, **the opening benchmarks for Chapter 8 have not yet been met**. Although progress has been made under the first benchmark of the Plan, urgent work is needed to fulfil the remaining obligations, especially as regards the operational independence and capacity of the CPC and the CSAC, the alignment of existing state aid schemes and the adoption of an action plan with clearly defined deadlines and responsibilities. Further priorities include the adoption of the regional aid map, the establishment of a centralised electronic register, consistent compliance with the notification and standstill obligation, and the timely submission to the European Commission of

complete information on individual state aid. At the same time, competition enforcement needs to be further strengthened, including by improving the capacity of the CPC, involving it systematically in the drafting of legislation, conducting sector inquiries and applying competition rules to public enterprises. Priority action by the Ministry of Finance, the CSAC, the CPC and other competent institutions is essential to avoid further delays in opening negotiations on Chapter 8.

WORKING GROUP FOR CHAPTER 9
FINANCIAL SERVICES

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**0**
Partially fulfilled	**3**
Number of new recommendations	**3**

The three priority recommendations from the NCEU 2025 Book of Recommendations remain relevant, but have been revised to reflect the progress made during 2026. Three new recommendations are introduced for 2026, directly addressing the outstanding regulatory obligations in the areas of banking, insurance and payment services. SEPA is no longer a matter of its introduction, but of the full practical application of the relevant SEPA schemes and further regulatory alignment.

Objectives

The objective of Chapter 9 is to align with the EU acquis in order to ensure financial stability and the protection of consumers, investors, and policyholders. This involves establishing rules in the areas of banking, insurance, pension funds, capital markets, and supervision of financial institutions, as well as applying the principles of the single passport and home country control. Such alignment enables the free provision of financial services across the EU, accompanied by clear and comprehensive information for investors.

State of Play

Serbia is moderately prepared in the area of financial services. Progress was made in the regulatory framework during 2025 and 2026, but alignment with the EU acquis has not yet been completed.

In the area of banking, the regulatory framework has been improved, and a Draft Law on Credit Institutions and a Draft Law on Financial Conglomerates were prepared during 2026. Alignment with the relevant EU rules (the CRR/CRD and BRRD rules) on capital requirements, prudential supervision and bank resolution needs to continue, and their effective implementation, including bank resolution and deposit protection, needs to be ensured.

In the area of insurance and voluntary pension funds, the NBS prepared draft new laws during 2026, including a Draft Law on Insurance and a Draft Law on Voluntary Pension Funds and Pension Plans. Alignment with Solvency II, the Insurance Distribution Directive and the IORP framework need to be completed, as does further alignment in the area of compulsory motor insurance.

Regulatory progress was made **in the area of capital markets**. The 2025 amendments to the Law on Capital Market and the Law on Alternative Investment Funds entered into force in December 2025. During 2026, the Ministry of Finance held a public consultation on the Draft Law Amending the Law on Capital Market, which covers alignment of the rules on public offers and prospectuses, reporting and transparency, trading venues, derivatives, trade repositories, sustainability, and access to data through the European Single Access Point. Capital market development remains limited. Although the first primary issue of corporate bonds in a long time took place in 2025, the economy still relies

predominantly on bank financing, while non-bank financial institutions and venture capital remain underdeveloped.

Important progress was made **in the area of payment services**: Serbia has been part of the geographical scope of SEPA since May 2025, and since 5 May 2026 the NBS and 18 of the 19 banks have been operationally applying the SEPA Credit Transfer scheme. At the same time, in June 2026 the NBS prepared a Draft Law Amending the Law on Payment Services with a view to further alignment with the EU acquis.

The recommendations for 2026 should therefore focus on concrete regulatory and institutional steps that directly contribute to meeting the five closing benchmarks for Chapter 9.

How to Unblock the Process? / Priority Steps to Unblock the Process

Chapter 9 requires continued alignment in all key areas of financial services. It is particularly important that the NCEU recommendations now focus on **meeting the five closing benchmarks** for the chapter, which cover banking and financial conglomerates, insurance and voluntary pension funds, financial market infrastructure, securities markets and investment services, and the capacity and independence of the regulatory and supervisory authorities.

Priority recommendations for 2026:

1. Improve the regulatory and institutional framework for the **development of the non-bank segment of the financial market**, including insurance, voluntary pension funds, alternative investment funds and venture capital (*NCEU recommendation from 2020 – revised*);
2. Continue aligning **capital market infrastructure** with the EU acquis, including MiFID II/MiFIR, derivatives, trade repositories, and clearing and settlement, while strengthening the capacity of the Securities Commission (*NCEU recommendation from 2018 – revised*);
3. Continue **developing the capital market and alternative sources of financing, in particular for micro, small and medium-sized enterprises**, including corporate bonds, an SME growth market, investment funds and venture capital (*NCEU recommendation from 2020 – revised*);
4. Continue full alignment of the **regulatory framework for banking and financial conglomerates** with the latest EU acquis, including the CRR/CRD and BRRD rules, as well as further alignment of the deposit guarantee scheme and the bank resolution framework (*new recommendation for 2026*);
5. Adopt and begin implementing the new regulatory framework **for insurance, voluntary pension funds and compulsory motor insurance**, in line with Solvency II, IORP and the relevant EU acquis, while strengthening supervisory capacity (*new recommendation for 2026*);
6. **Continue the practical application of the SEPA schemes** and further regulatory alignment of the national payment services framework with the EU acquis, including PSD2, cross-border payments and the relevant SEPA schemes (*new recommendation for 2026*).

Link to the Reform Agenda

Reform Agenda Measure	Status / Deadline	Relevance for Chapter 9
6.1.1. Management of public investment and of state-owned enterprises of the Republic of Serbia	Deadline: 2027; review: December 2026	Indirect: fiscal risks and financial sector exposure

Reform Agenda Measure	Status / Deadline	Relevance for Chapter 9
7.2.2. Digitalisation and open data	2024-2027	Indirect: digital financial services, e-licensing and open data
Chapters 6 and 7 – statistical reforms	2025-2027	Indirect: financial stability statistics and harmonisation with ECB/ESA standards

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

The table tracks the measures from the Plan that are relevant to the benchmarks for the provisional closure of the chapter, and the status of their implementation based on data available for September 2026.

Benchmark	Planned measures	Competent Institution	Planned deadline	Status	Comment
1. Serbia demonstrates an advanced level of alignment with the EU acquis in the area of banking and financial conglomerates, notably as regards capital requirements, supervision of financial conglomerates, deposit protection and the reorganisation and winding-up of credit institutions, and demonstrates that it will be ready to implement the acquis upon accession	Law on Banks	NBS	Q4 2026	Deadline has not expired	Draft prepared during 2026; adoption required
	Law on Financial Conglomerates	MoF/NBS	Q4 2026	Deadline has not expired	Adoption and establishment of appropriate supervision required
	Law Amending the Law on Deposit Insurance	MoF/Deposit Insurance Agency	Q4 2026	Deadline has not expired	Relevant for benchmark 1
	Law on Bankruptcy and Liquidation of Banks and Insurance Companies	NBS	Q4 2026	Deadline has not expired	Relevant for the resolution and liquidation of credit institutions
2. Serbia demonstrates an advanced level of alignment with the acquis in the area of insurance and occupational pensions, notably as regards life insurance, reinsurance, insurance mediation, motor insurance, Solvency II and the Directive on the activities and supervision of institutions for occupational retirement provision	Law on Insurance	MoF/NBS	Q4 2026	Deadline has not expired	Draft prepared; adoption and implementation required
	Law on Voluntary Pension Funds and Pension Plans	MoF/NBS	Q4 2026	Deadline has not expired	Alignment with the IORP framework required
	Law on Compulsory Traffic Insurance	MoF/NBS	Q4 2026	Deadline has not expired	Planned regulatory measure
	Two pieces of secondary legislation: Decision on the Content and Form of Financial Statement Forms for Insurance	MoF/NBS	Q4 2026	Deadline has not expired	- Planned by 30 September: 0 - Planned by Q4 2026: 2 - Adopted: 0

Benchmark	Planned measures	Competent Institution	Planned deadline	Status	Comment
(IORP), and demonstrates that it will be ready to implement the acquis upon accession	Companies, and Decree Establishing the Minimum Amount of Insurance Cover for Motor Vehicle Owners' Third-Party Liability Insurance				
	Law on Bankruptcy and Liquidation of Banks and Insurance Companies	MoF/NBS	Q4 2026	Deadline has not expired	Repeated measure, already listed under benchmark 1
3. Serbia demonstrates an advanced level of alignment with the acquis in the area of financial market infrastructure, notably as regards settlement finality and financial collateral arrangements, and demonstrates that it will be ready to implement the acquis upon accession	Law Amending the Law on Capital Market	MoF/NBS	Q4 2026	Deadline has not expired / Partially fulfilled	The 2025 amendments have already been adopted; the new 2026 draft is being finalised
	Law Amending the Law on Payment Services	MoF/NBS	Q4 2026	Deadline has not expired	Draft prepared during 2026
4. Serbia demonstrates an advanced level of alignment with the EU acquis in the area of securities markets and investment services, notably as regards the Markets in Financial Instruments Directive (MiFID), prospectuses, transparency and market abuse, and demonstrates that it will be ready to implement the acquis upon accession	Law Amending the Law on Capital Market	MoF/NBS/Securities Commission	Q4 2026	Fulfilled for the 2025 amendments; new cycle not completed	*Official Gazette of the RS*, No 109/2025; further alignment required in line with the new draft
	Law Amending the Law on Alternative Investment Funds	MoF/NBS	Q4 2026	Fulfilled	Amendments published in the *Official Gazette of the RS*, No 109/2025
	Law Amending the Law on Open-Ended Investment Funds with a Public Offering	MoF/NBS	Q2 2026	Not fulfilled according to the Plan	The planned deadline has expired; status needs to be updated
5. Serbia demonstrates the stability and independence of its regulatory and supervisory	Law on the National Bank of Serbia	MoF/NBS	Q4 2026	Fulfilled according to the Plan	The applicable framework includes the 2025 amendments (*Official Gazette*

Benchmark	Planned measures	Competent Institution	Planned deadline	Status	Comment
institutions, with adequate administrative capacity to implement and enforce the acquis in the area of financial services					*of the RS*, Nos 72/2003, 55/2004, 85/2005 – other law, 44/2010, 76/2012, 106/2012, 14/2015, 40/2015 – Constitutional Court decision, 44/2018 and 19/2025)
	Law on Capital Market	MoF/NBS/Securities Commission	Q4 2026	Fulfilled for the applicable amendments; further alignment ongoing	*Official Gazette of the RS*, Nos 129/2021 and 109/2025; to continue work on the new draft and secondary legislation

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	14	1 (7.14%)	4 (28.57%)	9 (64.29%)
Secondary legislation	2	0 (0%)	0 (0%)	2 (100%)

Conclusion

Serbia has made progress in regulatory alignment under Chapter 9, in particular through amendments to the legislation on capital markets and alternative investment funds, the preparation of new legislation in the areas of banking, insurance and voluntary pension funds, and its operational inclusion in SEPA Credit Transfer. Nevertheless, the five closing benchmarks for the chapter require alignment to be completed and the capacity to implement the acquis effectively to be demonstrated. The priorities for 2026 should therefore be completing the regulatory framework in the areas of banking and insurance, further aligning market infrastructure and capital markets, strengthening supervisory capacity, developing non-bank financing, and achieving full practical application and further regulatory alignment of payment services.

WORKING GROUP FOR CHAPTER 10
DIGITAL TRANSFORMATION AND MEDIA

Status of the 2025 Recommendations

Fulfilled	**3**
Unfulfilled	**2**
Partially fulfilled	**1**
Number of new recommendations	**0**

Objectives

The objective of Chapter 10 is the successful digital transformation of society, the economy and organisations, and ensuring the functioning and freedom of the media in line with European Union standards. Digital transformation is a key prerequisite for the modernisation and democratisation of Serbia and for its successful accession to the EU.

State of Play

Serbia is undergoing an accelerated digital transformation across all areas of the economy and society. Total exports of ICT services are expected to exceed EUR 5 billion in 2026, after reaching a previous record of EUR 4.552 billion in 2025. Some 110,000 highly qualified professionals are employed in the IT sector, which represents significant development potential for the country. Digital transformation is becoming a leading business trend that helps raise the quality of products and services. The eGovernment portal (eUprava) has around 2.5 million registered users and offers more than 150 electronic services. Based on its IT performance, Serbia has moved into the category of moderately developed IT countries, with average annual growth of around 10%.

The rollout of ultra-fast broadband communications infrastructure in rural areas has continued, as has support for the digitalisation of the education system. A particular contribution comes from skilled professionals in leading development companies and from continuous investment in state-of-the-art equipment and software for education, eGovernment and the State Data Centre. However, Serbia still lags behind the EU average in terms of total investment in information technology.

During the public consultation on the Reform Agenda, the NCEU Working Group for Chapter 10 supported all activities under sub-area “7.2 Digitalisation”, with particular interest in improving digital identification, the electronic identity card, the qualified electronic signature, two-factor authentication, the digital wallet and the “digital corner”. A specific task for Serbia is the notification of its national eID (electronic identification) scheme to the European Commission. However, the current social and institutional crisis is slowing down work on digital transformation and the development of the media sector.

How to Unblock the Process? / Priority Steps to Unblock the Process

The priority and time-critical measures that would allow the process to continue are:

1. Adopt the key laws: the Law on Artificial Intelligence, the Law on Broadband Infrastructure and the Law on Electronic Documents, Electronic Identification and Trust Services;

2. Strengthen the capacity of the Ministry of Information and Telecommunications, the REM, RATEL, and the Office for Information Technologies and eGovernment;
3. Ensure the functional and financial independence of the regulatory bodies REM and RATEL, in line with the applicable legislative framework;
4. Focus on implementing the existing media laws and on effective regulatory oversight.

Link to the Reform Agenda

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 10
Electronic ID card with a chip	Enables a qualified electronic signature and access to the eGovernment portal	Promotion and wider use of the eID card in everyday services
7.2.1. Development of a secure and sustainable digital infrastructure, including rural broadband and 5G roll-out	Preparation and adoption of the Law on Broadband Infrastructure by the end of 2025; system development by June 2027	Implementation of the "one-stop shop" principle through a unified information system and application of relevant legislation
7.2.2. Digital identity and trust services compliant with the EU Digital Identity Regulation and eIDAS Regulation (Digital Wallet)	Under development until the end of 2026; alignment with EU rules on digital identity (eIDAS 2.0)	Implementation planned for 2026 – for ID cards, driver's licenses, health cards, etc.
7.2.3. Digital Corner and Lifelong Learning	Under development in the period 2025–2027; digital corners to be set up in more than 50 municipalities during 2026	Adult education for the use of new digital services and improvement of digital skills

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Chapter 10 has not yet been formally opened, but the Plan sets out measures and deadlines for the envisaged benchmarks for provisional closure. The table below follows the structure of the Plan.

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
Future closing benchmark No 1 — Serbia aligns its legislation with the EU acquis in the area of electronic communications, including the provisions on the independence of the national regulatory authority for electronic communications (RATEL)	Law on Electronic Communications	Ministry of Information and Telecommunications	Q4 2026	Adopted (June 2026)	
	Law Amending the Law on Electronic Media	Ministry of Information and Telecommunications	Q1 2026	Adopted (September 2026)	
	Law on Information Security	Ministry of Information and Telecommunications; Ministry of the Interior	Q4 2026	Adopted (October 2025)	
	Law on Artificial Intelligence	Ministry of Information and Telecommunications	Q4 2026	Deadline has not expired	
	Law on Electronic Documents, Electronic Identification and Trust Services	Ministry of Information and Telecommunications; Ministry of Public Administration and Local Self-Government; Office for Information Technologies and eGovernment	Q4 2026	Deadline has not expired	Draft prepared

Benchmark	Planned measures	Competent Institution	Planned deadline	Fulfilled yes/no	Comment
	Law on Broadband Communications Infrastructure	Ministry of Information and Telecommunications	Q4 2026	Deadline has not expired	

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	6	4 (67%)	3 (50%)	1 (17%)
Secondary legislation	2		1 (50%)	1 (50%)

Conclusion

The Government of the Republic of Serbia and the competent authorities – the Ministry of Information and Telecommunications, the Ministry of European Integration and the Office for Information Technologies and eGovernment – need to carry out the planned activities under the Reform Agenda, as this creates key conditions for Serbia's accession to the European Union and for the accelerated modernisation and digital development of society as a whole. Failure to implement the proposed measures could lead to technological and economic stagnation and hamper cooperation with EU Member States.

The Working Group for Chapter 10 continues to monitor and actively participate in the implementation of the obligations under this chapter, as well as the activities under the Reform Agenda, in particular in sub-area "7.2 Digitalisation".

WORKING GROUP FOR CHAPTER 11
AGRICULTURE AND RURAL DEVELOPMENT

Status of the 2025 Recommendations

Fulfilled	**1**
Unfulfilled	**0**
Partially fulfilled	**3**
Number of new recommendations	**1**

Objectives

Chapter 11 prepares the Republic of Serbia for participation in the Common Agricultural Policy of the European Union. The objective is to establish a system of direct payments, market interventions and rural development that is legally aligned, administratively sustainable, subject to financial control, and capable of enabling domestic producers to participate on an equal footing in the EU single market.

At the same time, the reform should contribute to food security, the competitiveness and income stability of producers, the sustainable management of natural resources, climate change adaptation and an improved quality of life in rural areas. Alignment is therefore not merely a legislative task: it requires a functioning Integrated Administration and Control System (IACS) and Land Parcel Identification System (LPIS), reliable registers, a Directorate for Agrarian Payments with adequate administrative capacity, a functioning control and audit system, and a predictable national agricultural policy.

State of Play

Chapter 11 has not yet been opened. Serbia has formally met both opening benchmarks: the Action Plan was adopted in 2018 and submitted to the European Commission, while the request for entrustment of budget implementation tasks for IPARD II was submitted in 2015. In 2019, the European Commission sent the Council its report on the fulfilment of the opening benchmarks, but no decision on opening the chapter has been taken.

In its 2025 Report, the European Commission assessed that Serbia has some level of preparation and has made limited progress. It cited the revision of the Action Plan and the development of the LPIS software as positive steps. At the same time, it pointed to the slow establishment of the IACS, staff shortages, the absence of legislation on the common market organisation and quality policy, delays in IPARD III, and the low absorption of IPARD II funds.

Of the four priority recommendations set out in the 2025 Book of Recommendations, one was fulfilled and three were partially fulfilled during 2026:

- **The recommendation on adopting the Agriculture and Rural Development Strategy is assessed as formally fulfilled**. On 13 August 2026, the Government adopted the Agriculture and Rural Development Strategy of the Republic of Serbia for the period 2026-2034, published in the *Official Gazette of the RS*, No 74/2026. The broader recommendation, which also entails the operational implementation of the Strategy, cannot be considered fully fulfilled, as the Action Plan for the period 2026–2028, national programmes, performance indicators and a stable multiannual financial framework have not yet been fully established;

- **The recommendation on updating and implementing the Action Plan for Chapter 11 is assessed as partially fulfilled**. The Action Plan has been revised and submitted to the European Commission, but its implementation remains uneven, particularly in the areas of the common market organisation, the IACS/LPIS, quality policy and the strengthening of administrative capacity;
- **The recommendation on more effective use of IPARD funds is assessed as partially fulfilled**. Under IPARD III, calls for applications have been launched and ranking lists published for Measures 1 and 3. In the coming period, it is necessary to speed up the conclusion of contracts and the payment of approved funds, to make Measure 7 operational through appropriate calls for applications, to complete the national accreditation procedures for Measures 4, 5 and 6, and to meet the conditions for the European Commission to adopt a decision entrusting budget implementation tasks for these measures;
- **The recommendation on strengthening the administrative and technical capacity of the competent institutions, in particular the Ministry of Agriculture, Forestry and Water Management, is assessed as partially fulfilled**. Digital infrastructure is being developed and LPIS software is in place, but the Agricultural Policy Department, the Directorate for Agrarian Payments and the IPARD Managing Authority still lack the required number of staff and the staffing structure envisaged in the Action Plan.

The most significant strategic development in 2026 was the adoption of the Agriculture and Rural Development Strategy of the Republic of Serbia for the period 2026-2034. Its assessment should distinguish between formal adoption, the quality of its strategic choices and the creation of conditions for operational implementation, as shown in the table below.

Element of assessment	Status	Finding and implications for Chapter 11
Formal adoption	Fulfilled, with delay	The Strategy was adopted on 13 August 2026 and published in the *Official Gazette of the RS*, No 74/2026. The delay in adoption after the expiry of the previous strategy reduced the time available for carrying out activities in the first year of implementation.
Quality of strategic directions	Positive, with certain reservations	The document takes a more realistic view of low productivity, the fragmentation of agricultural holdings, the decline of livestock farming and the limited development impact of some support payments. The development directions covering investment, innovation, producer cooperation, digitalisation and climate resilience are well defined.
Operational framework	Not yet established	Implementation depends on the Action Plan for the period 2026–2028, national programmes, annual budgets and secondary legislation. According to publicly available information, there was no public confirmation by 2 October 2026 that the Action Plan had been adopted. The 90-day deadline expires on 11 November 2026.
Link with EU accession	Partially developed	There is a general orientation towards the EU Common Agricultural Policy, but national measures are not precisely linked to specific obligations, deadlines and institutional requirements under Chapter 11.
Main implementation risks	High	The risks include uncertain multiannual funding, limited administrative capacity, a politically sensitive reform of the support system, the possible marginalisation of small

Element of assessment	Status	Finding and implications for Chapter 11
		holdings and holdings with weaker digital capacity, and the risk that climate objectives remain declaratory without appropriate incentives and control mechanisms.
Public participation	Formally carried out, with limited direct outreach	The public consultation was held from 10 to 30 March 2026, with comments accepted via the eConsultations portal, by email and by post. A round table was held on 25 March 2026 at the Palace of Serbia, while an earlier round table, as part of the consultations on the draft Strategy, was held on 29 December 2025. According to publicly available data, no regional public consultations were held outside Belgrade, which indicates that the direct outreach of the consultations was geographically limited.

The Agriculture and Rural Development Strategy of the Republic of Serbia for the period 2026–2034 shows a high degree of substantive alignment with the general and specific objectives of the EU Common Agricultural Policy (CAP) for 2023-2027. The six specific objectives of the Strategy cover income stability, competitiveness, strengthening the position of producers in the value chain, rural development, climate resilience, sustainable management of natural resources, food safety, generational renewal, innovation and digitalisation. However, this alignment is, for the time being, primarily strategic and declaratory. Full operational alignment will depend on the adoption of the Action Plan for the period 2026-2028, the adoption of national programmes, securing stable multiannual funding, the establishment of the IACS and LPIS, strengthening the capacity of the Directorate for Agrarian Payments, and the introduction of conditionality, eco-schemes and measurable result indicators modelled on the EU CAP. The Strategy can therefore be assessed as significantly, but not fully, aligned with the EU CAP.

Another important development was the adoption of the Law on Organic Production (*Official Gazette of the RS*, No 109/2025), which has applied since 1 June 2026. The Law establishes a more modern framework for the registration of producers, and for the control, certification, labelling, import and marketing of organic products. However, its full implementation depends on the timely adoption of the secondary legislation planned for 2026 and on ensuring a sufficient number of trained staff and adequate capacity of the control bodies.

Progress in the area of the common market organisation has been slower. The Plan envisaged amendments to the Law on Spirit Drinks by the third quarter of 2025 and the adoption of a new Law on Wine by the fourth quarter of 2025, but these deadlines had not been met by the cut-off date. The public consultation on the Draft Law on Wine was held in May and June 2026. Amendments to the Law on Incentives were planned for the third quarter of 2026, but their adoption had not been confirmed by the cut-off date. The adoption of the Law on Quality Schemes and the accompanying rulebooks is planned for the fourth quarter of 2026.

The IPARD III programme has moved from the preparatory phase to the project selection phase. Accreditation has been formally renewed for Measures 1, 3, 7 and 9, and their implementation is covered by decisions entrusting budget implementation tasks. However, calls for applications aimed at beneficiaries have been carried out only for Measures 1 and 3. Final ranking lists have been published, including the ranking list for Measure 3 in June 2026, but the key indicators of progress remain the number of contracts concluded, the amount of payments made, the speed of processing applications and the entrustment of budget implementation tasks for additional measures. Consolidated data on applications submitted, contracts concluded, payments, withdrawals and reasons

for rejection should be published regularly. Although Measures 7 and 9 are formally covered by the IPARD III implementation system, Measure 7 has not yet been made operational through calls for applications, while Measure 9 is being implemented as technical assistance for programme management. At the same time, the national accreditation procedures for Measures 4, 5 and 6 have not yet been completed, nor has the European Commission adopted a decision entrusting budget implementation task for their implementation. As a result, these measures are not yet operational: no calls for applications have been launched and funds are not available to potential beneficiaries.

Administrative capacity remains the greatest systemic risk. The Plan of the Government of the Republic of Serbia states that, in line with the Action Plan, the Directorate for Agrarian Payments should have 1,050 staff at central and regional level, whereas at the time the Plan was drawn up it had approximately 310 staff, with approval for an additional 50 posts. The Plan envisages the establishment of 35 regional offices and a substantial increase in staff numbers. Without a realistic staffing, budgetary and time plan, it will not be possible to establish the IACS reliably, accredit the regional units or process applications for support in a timely manner.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. **Operationalise the Agriculture and Rural Development Strategy for the period 2026-2034**. Adopt the Action Plan for the period 2026-2028 and the national programmes within the statutory deadline, defining measurable targets, responsible institutions, deadlines, performance indicators and a multiannual financial framework, and establishing clear links with the Action Plan for Chapter 11 and the rules of the EU Common Agricultural Policy (*the NCEU recommendation from 2025 was formally implemented through the adoption of the Strategy, but remains unfulfilled as regards its operational implementation, and is therefore repeated in a more specific form*).

2. **Speed up the implementation of the Action Plan for Chapter 11**. Adopt the overdue legislation in the areas of the common market organisation, wine, spirit drinks, producer organisations, marketing standards, direct payments and quality policy, with public monitoring of deadlines and of alignment with the EU acquis (*NCEU recommendation from 2025 – partially fulfilled; made more specific*).

3. **Ensure measurable progress in the implementation of the IPARD III programme**. Speed up the conclusion of contracts, payments, the entrustment of budget implementation tasks for additional measures and the processing of applications. Publish data on programme implementation regularly, on a quarterly basis, together with a corrective action plan to reduce the risk of losing available funds (*NCEU recommendation from 2025 – partially fulfilled; repeated*).

4. **Adopt a staffing and institutional plan for establishing the IACS and strengthening the Directorate for Agrarian Payments**. The plan should cover the required number of staff and their professional profiles, the recruitment timeline, the establishment of regional offices, training, IT infrastructure, budgetary needs, staff retention measures and indicators of system functionality (*NCEU recommendation from 2025 – partially fulfilled; repeated*).

5. **Establish a public system for monitoring the alignment of national agricultural support with EU rules**. Publish an overview of all support schemes, their legal bases, categories of beneficiaries and budgetary amounts, showing how they relate to the objectives of the EU Common Agricultural Policy, together with a plan for gradual alignment by the time of Serbia's accession to the EU (*new priority recommendation for 2026*).

Link to the Reform Agenda

Chapter 11 is directly linked to the reforms in the areas of agricultural competitiveness, rural infrastructure, state aid and the digitalisation of public services.

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 11
6.2.1. Enhanced investment and development opportunities for entrepreneurs and private sector	Ongoing; deadline: by 2027	Align state aid schemes in agriculture with the Stabilisation and Association Agreement (SAA) and the EU acquis, with a publicly available alignment plan.
6.3.1. Enhance the competitiveness of the agricultural sector – Land consolidation	Adoption of the law was planned for June 2026. A public consultation was held in July 2026, but the law had not been adopted by the reporting cut-off date.	Adopt the law with clear safeguards for the rights of owners, then adopt secondary legislation, ensure expert supervision and carry out pilot projects.
6.3.1. Enhance the competitiveness of the agricultural sector – Rural infrastructure	The annual target is the implementation of at least 10 water supply and road construction projects financed from the national budget.	Publish an overview of projects for 2025 and 2026, including the selection criteria, project values, contracting status and results achieved.
7.2.2. Further digitalisation of public services and administrative procedures for businesses and citizens	Ongoing; period 2024-2027	Connect eAgrar, the LPIS, registers, the IACS and the payment and control systems, while ensuring interoperability and data protection.
Monitoring, control and audit	Systems under development	Ensure an audit trail, risk management and the prevention of irregularities, as well as publicly available evaluations of IPARD programme measures.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

This section assesses the status of activities under the Plan of the Government of the Republic of Serbia on the basis of publicly available data up to 2 October 2026. An assessment of "no" or "not confirmed" does not necessarily mean that no preparatory work has been done, but rather that completion of the activity has not been confirmed by an adopted act or a public report.

Completed activities

Area	Planned measure	Planned deadline	Fulfilled yes/no	Comment
Opening benchmarks	Action Plan and entrustment of budget implementation tasks for IPARD II	Earlier	Yes	Both benchmarks have been formally met. The European Commission's 2019 report is pending before the Council of the EU.
Strategic framework	Agriculture and Rural Development Strategy	European Commission recommendation	Yes	The Strategy for the period 2026-2034 was adopted on 13 August 2026. The formal obligation has been met, but operational implementation depends on the adoption of the

Area	Planned measure	Planned deadline	Fulfilled yes/no	Comment
				Action Plan for the period 2026-2028.
Organic production	Law on Organic Production	Q4 2025	Yes	The Law was adopted in December 2025 and has applied since 1 June 2026. The secondary legislation is still being finalised.

Activities not completed and activities in progress

Area	Planned measure	Planned deadline	Fulfilled yes/no	Comment
Operational implementation of the Strategy	Action Plan for the period 2026–2028 and national programmes	Approximately 11 November 2026	Deadline has not expired	Adoption had not been publicly confirmed by 2 October 2026. The deadline has not yet expired, but the first year of the planning period is drawing to a close.
Wine	Law on Wine and Other Grape Products	Q4 2025	No	A public consultation was held in 2026, but adoption of the law had not been confirmed by the cut-off date.
Spirit drinks	Amendments to the Law on Spirit Drinks	Q3 2025	No	Adoption of the planned amendments has not been confirmed in the register of legislation in force.
Incentives	Amendments to the Law on Incentives in Agriculture and Rural Development	Q3 2026	No	The deadline expired on 30 September 2026, but adoption of the amendments had not been publicly confirmed by 2 October 2026.
Quality policy	Law on Quality Schemes and accompanying rulebooks	Q4 2026	Deadline has not expired	No confirmation of completion had been reported by the cut-off date.
Market organisation	Package of decrees and rulebooks	Q1-Q4 2025-2026	Partially fulfilled	Some deadlines have expired. There is no consolidated public overview of the acts adopted and data on their implementation.
IPARD III	Contracting, payments and entrustment of budget implementation tasks for additional measures	Ongoing	Partially fulfilled	Ranking lists have been published, but consolidated data on contracts and payments, and on the status of the entrustment of budget implementation tasks for additional measures, need to be published.
Directorate for Agrarian Payments	Increasing staff numbers and establishing regional offices	2025-2026	Not confirmed	No public confirmation is available that the planned staff numbers have been reached or that the 35 regional offices have been established.
IACS and LPIS	Establishment of a functioning system	By EU accession	Partially fulfilled	The LPIS software has been developed, but human resources, equipment, training and full

Area	Planned measure	Planned deadline	Fulfilled yes/no	Comment
				integration with the IACS are still needed.

Summary overview of implementation

The Plan for Chapter 11 comprises an extensive package of laws, decrees and rulebooks. Owing to differing deadlines and the grouping of measures, the statistics below cover the key laws and strategic acts that directly affect the opening and functioning of Chapter 11.

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 2.10.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Strategy 2026-2034	1	1	1 (100%)	0
Action Plan 2026-2028[23]	1	0	0	1 (100%)
Laws	5	3 (60%)	1 (20%)	2 (40%)
Secondary legislation	38	21 (55%)	4 (11%)	17 (45%)

Conclusion

During 2026, formal strategic and legislative progress was made under Chapter 11 through the adoption of the Agriculture and Rural Development Strategy for the period 2026-2034 and the start of application of the Law on Organic Production. The strategic directions are broadly appropriate and take a more realistic view of the sector's weaknesses, but there is not yet sufficient evidence that they have been translated into operational measures, stable funding and measurable results.

The recommendation concerning the adoption of the Strategy has been formally fulfilled, while its operational implementation has not yet been completed.

The progress achieved is not yet sufficient for Serbia's agricultural system to be considered ready to apply the EU Common Agricultural Policy (CAP). Adoption of the Action Plan for the period 2026–2028 and of the national programmes had not been publicly confirmed by 2 October 2026. Legislation on market organisation and quality policy is delayed, the IACS is not yet fully functional, and the staffing and regional capacity of the Directorate for Agrarian Payments does not fully meet the needs of the system. Particular attention should be paid to small agricultural holdings, the digital accessibility of services, data management and translating climate objectives into concrete support and control rules.

The measure of success is therefore not only the number of documents adopted, but also Serbia's ability to turn the Strategy into a predictable agricultural policy, implement the Action Plan for Chapter 11, speed up the implementation of IPARD III, and build a reliable payment and control system that protects EU funds and ensures a level playing field for agricultural producers.

[23] Adoption of the Action Plan had not been publicly confirmed by 2 October 2026.

WORKING GROUP FOR CHAPTER 12
FOOD SAFETY, VETERINARY AND PHYTOSANITARY POLICY

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**2**
Partially fulfilled	**1**
Number of new recommendations	**2**

Objectives

Chapter 12 covers food and feed safety, official controls, animal health and welfare, veterinary policy, animal by-products, plant health, plant protection products, seed and plant propagating material, and genetically modified organisms (GMOs). The objective is to ensure a high level of protection of public health, animal and plant health, and consumer interests throughout the entire food chain, from farm to fork.

Alignment with the EU acquis requires a clear division of competences, risk-based controls, competent inspection services and laboratories, reliable traceability, surveillance and contingency plans, and the responsibility of all food business operators. Formal transposition of legislation is not sufficient without adequate financial and human resources to ensure its consistent implementation.

State of Play

Chapter 12 has not been opened. Serbia needs to meet three opening benchmarks: to adopt an aligned legislative framework and clearly allocate competences; to adopt a comprehensive national strategy with an action plan for the transposition, implementation and enforcement of the EU acquis; and to present a classification of food production and processing establishments and of animal by-product establishments, as a basis for their upgrading.

In its 2025 Report, the European Commission assessed that Serbia is moderately prepared in this area and has made limited progress. A legal and institutional framework is in place, but it is not yet fully aligned with the EU acquis, and administrative capacity needs to be significantly strengthened. The Commission pointed in particular to the need to adopt the framework laws, draw up a strategy for raw milk, upgrade establishments, improve the management of animal by-products, strengthen rabies surveillance, align the permitted level of aflatoxins in milk with EU rules, and make progress in the area of genetically modified organisms.

Of the three priority recommendations set out in the 2025 Book of Recommendations, one has been partially fulfilled, while two remain unfulfilled:

- **The recommendation to speed up the alignment of the legislation of the Republic of Serbia with the EU acquis under Chapter 12 and to ensure its full implementation is assessed as partially fulfilled**. During 2025 and 2026, four of the total of 16 framework laws were formally adopted or amended, and public consultations were launched on a number of draft laws and regulations. However, the European Commission assessed that the Law on Official Controls is only partially aligned with the EU acquis, and a new draft was therefore prepared during 2026. Most of the framework laws have still not been adopted;

- **The recommendation to adopt a national strategy, including an action plan with specific deadlines, as a basis for the transposition, implementation and enforcement of the EU acquis is assessed as not fulfilled**. A draft strategy with an action plan has been prepared and consultations on it have been held with the European Commission, but its adoption has not been publicly confirmed;
- **The recommendation to strengthen administrative capacity is assessed as not fulfilled**. The European Commission continues to point to insufficient administrative and staffing capacity of the competent authorities, in particular the Veterinary Directorate and the Plant Protection Directorate. These shortcomings limit the implementation of legislation and the performance of official controls in the areas of food and feed safety, veterinary public health, animal health and welfare, import controls, animal disease surveillance, plant health and phytosanitary policy.

The Law on Official Controls (*Official Gazette of the RS*, No 109/2025) was adopted on 3 December 2025 and has applied since 1 June 2026. However, the Law was adopted before the European Commission delivered, on 23 December 2025, its opinion on the draft submitted to it in June of the same year. The Commission services assessed that the text is only partially aligned with the EU acquis and that, in its current form, it is not sufficient to meet the obligations under the Reform Agenda and the opening benchmarks for Chapter 12.

The Commission's key comment concerned the need for the structure of the national law to follow the structure of Regulation (EU) 2017/625. The Commission did not accept as an appropriate method of transposing the acquis the approach whereby the table of concordance, instead of referring to the relevant provisions of the Law itself, cites provisions of other national legislation on the grounds that they cover certain requirements of the Regulation.

In February 2026, Serbia submitted to the European Commission a translation of the adopted Law, a new table of concordance and responses to the comments. Following a consultation meeting held on 5 June 2026, it was decided that, instead of partial amendments, a new law would be prepared whose structure and content would follow Regulation (EU) 2017/625. The public consultation on the new draft was held from 7 to 27 September 2026. The draft sets out in more detail the distinction between official controls and other official activities, the coordination of competent authorities, the delegation of tasks, multiannual planning, risk-based controls, food fraud, transparency, laboratories and border controls. The proposed date of application of the new law is 1 June 2027.

In October 2025, the Law on Seed and Planting Material of Agricultural and Ornamental Plants (*Official Gazette of the RS*, No 91/2025) was adopted. Together with the amendments to the Law on Forest Reproductive Material and the Law on the Recognition of Agricultural Plant Varieties from March 2025, this represents visible progress in the area of seed, planting material and related phytosanitary issues. It was established that no amendments were needed to the Law on the Protection of Plant Breeders' Rights. However, the new laws on plant health and plant protection products have not yet been adopted.

During 2026, public consultations were held or launched on the draft laws on food safety, plant health and animal welfare, and consultations were also conducted on the draft law on animal feed. This indicates renewed legislative activity, but does not alter the fact that the deadlines set in the Plan of the Government of the Republic of Serbia, under which most of the framework laws were to be adopted in the third quarter of 2025, have been significantly exceeded. The laws on animal health, animal by-products, animal breeding, bottled water and genetically modified organisms (GMOs), in particular, remain outstanding.

The benchmark concerning the adoption of a strategy with an action plan, as a basis for the transposition, implementation and enforcement of the EU acquis under Chapter 12, has still not been met. The Plan envisaged the adoption of the strategy with an action plan by the fourth quarter of 2025. The draft was previously discussed in consultations with the European Commission, but its updating depends on the final content of the framework laws. The strategy with an action plan had not been adopted by the reporting cut-off date.

According to the Plan of the Government of the Republic of Serbia, categorisation has been completed for 503 establishments handling food of animal origin and 170 animal by-product establishments. This provides an important basis for further improvement of the system. However, the upgrading of establishments, monitoring changes in their categories and building a system for the collection, storage and processing of animal by-products remain ongoing obligations. Aggregated data on the progress of establishments towards meeting EU standards should be published regularly.

Administrative capacity remains a critical weakness. New legislation increases the workload in the area of official controls and laboratory testing, while the Veterinary Directorate and the Plant Protection Directorate face long-standing staff shortages. Without a staffing plan, staff retention measures, continuous training, an adequate laboratory network and stable funding, there is a risk that the adoption of legislation will not translate into the effective performance of official controls.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. **Adopt the remaining framework laws for Chapter 12**. Priority should be given to the laws on food safety, animal feed, animal health, animal welfare, animal by-products, animal breeding, plant health, plant protection products, bottled water and genetically modified organisms (GMOs). Transparent tables of concordance should be ensured and realistic deadlines set for the adoption of secondary legislation (*NCEU recommendation from 2025 – not fulfilled; repeated and made more specific*).

2. **Adopt and implement a national strategy with an action plan for the transposition, implementation and enforcement of the EU acquis under Chapter 12**. The document should be updated in line with the laws adopted, should set out the necessary financial and human resources, deadlines and performance indicators, and implementation reports should be published regularly (*NCEU recommendation from 2025 – not fulfilled; repeated*).

3. **Adopt a new, fully aligned Law on Official Controls and ensure the conditions for its implementation**. The new text should incorporate the European Commission's comments, align the structure of the Law with Regulation (EU) 2017/625, and be accompanied by an updated table of concordance. At the same time, it is necessary to prepare secondary legislation and a multiannual official control plan, regulate the authorisation of bodies and laboratories, ensure data exchange, improve border controls and the coordination of competent authorities, and secure adequate human and financial resources for the implementation of the Law (*new priority recommendation for 2026*).

4. **Adopt a national programme for improving the quality of raw milk**. The programme should set deadlines for meeting quality standards, and establish the organisation of laboratory testing, support measures for producers, the alignment of the permitted level of aflatoxins with EU rules, and a system for monitoring the results achieved (*new priority recommendation for 2026, based on the recommendations of the European Commission*).

5. **Speed up the upgrading of establishments and of the system for managing animal by-products**. An updated categorisation of establishments should be published, together with an

investment plan and deadlines for upgrading establishments that do not meet the prescribed standards, with targeted use of IPARD funds (*NCEU recommendation from 2025 – expanded in scope*).

6. **Adopt a binding staffing plan for the competent authorities and services**. The plan should set out the required number of staff and their professional profiles in the Veterinary Directorate, the Plant Protection Directorate, inspection services and laboratories, as well as recruitment deadlines, training programmes, staff retention measures and the necessary budgetary resources (*NCEU recommendation from 2025 – not fulfilled; repeated*).

Link to the Reform Agenda

The most direct link with the Reform Agenda is through reform 6.3.1, which provides for the adoption and entry into force of all framework laws required for the opening of Chapter 12 by June 2027.

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 12
6.2.1. Enhanced investment and development opportunities for entrepreneurs and private sector	Ongoing; deadline: by 2027	Link the modernisation of food production and processing establishments, laboratories and animal by-product management systems with the IPARD programme and other investment instruments.
6.2.2. Further development of the science and innovation ecosystem for a knowledge-based economy	Ongoing; period 2025-2027	Strengthen the capacity of national reference laboratories, improve data exchange and encourage the use of research results in risk assessment and disease surveillance.
6.3.1. Enhance the competitiveness of the agricultural sector – Legislative framework for Chapter 12	Ongoing; final deadline: June 2027	Adopt the remaining framework laws and secondary legislation, together with tables of concordance and an assessment of implementation capacity.
7.2.2. Further digitalisation of public services and administrative procedures for businesses and citizens	Ongoing; period 2024-2027	Connect registers, laboratory results, veterinary and phytosanitary controls and rapid alert systems, while ensuring secure data exchange.
Monitoring, control and audit	Being implemented	Regularly publish indicators of the implementation of legislation, the results of official controls, audit recommendations and information on the implementation of corrective measures.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

The implementation status has been assessed on the basis of publicly available data up to 2 October 2026. As the Plan envisaged the adoption of most of the framework laws in the third quarter of 2025, a public consultation on a draft law or its publication is not considered to fulfil the obligation to adopt the law.

Benchmark or area	Planned measure	Planned deadline	Fulfilled yes/no	Comment
Benchmark 1	Adopt 16 framework laws aligned with EU law	Q3 2025	Partially fulfilled	Four laws have been formally adopted or amended. However, the Law on Official Controls has not been assessed as fully aligned with EU law. One existing law was

Benchmark or area	Planned measure	Planned deadline	Fulfilled yes/no	Comment
				assessed as not requiring amendment, while other laws remain to be adopted or amended.
Official controls	Adopt a law aligned with Regulation (EU) 2017/625	Q3 2025	Partially fulfilled	The Law, published in the *Official Gazette of the RS*, No 109/2025, is being applied, but the European Commission has assessed it as partially aligned. Following the meeting held on 5 June 2026, a new draft law was prepared, and a public consultation on it was held from 7 to 27 September 2026.
Seed and planting material	Adopt a new law	Q3 2025	Yes	The Law was published in the *Official Gazette of the RS*, No 91/2025.
Forest reproductive material and plant varieties	Adopt amendments to two laws	Q3 2025	Yes	The amendments were adopted in March 2025.
Food safety	Adopt a new law	Q3 2025	No	A public consultation was held in March 2026, but the law had not been adopted by the cut-off date.
Animal feed	Adopt a new law	Q3 2025	No	Consultations have been documented, but adoption of the law has not been confirmed.
Animal health and welfare	Adopt two new laws	Q3 2025	No	A public consultation on the Draft Law on Animal Welfare was held in 2026. Neither of the two laws had been adopted by the cut-off date.
Animal by-products and animal breeding	Adopt two new laws	Q3 2025	No	Adoption of the laws has not been confirmed.
Plant health and plant protection products	Adopt two new laws or amend the existing laws	Q3 2025	No	The draft law on plant health was subject to public consultation, but adoption of the law has not been confirmed.
Articles of general use and bottled water	Adopt two laws falling within the competence of the Ministry of Health	Q3 2025	No	No publicly available confirmation of the adoption of the laws was found.
GMOs	Align legislation with EU law	Not defined	No	The Plan points to the need for a political decision, while the European Commission continues to note a lack of progress in this area.
Benchmark 2	Adopt a strategy, including an action plan with specific deadlines, to serve as a basis for the transposition, implementation and enforcement of the EU acquis in the areas of	Q4 2025	No	The text of the strategy has been prepared and consultations on it have been held, but its adoption has not been publicly confirmed.

Benchmark or area	Planned measure	Planned deadline	Fulfilled yes/no	Comment
	food safety, veterinary and phytosanitary policy			
Benchmark 3	Carry out the categorisation of establishments and continuously upgrade them	Ongoing	Partially fulfilled	The categorisation of establishments has been completed. Monitoring and the upgrading of establishments and of animal by-product management systems are continuing.
Administrative capacity	Strengthen the capacity of the competent authorities	Ongoing	No	The European Commission continues to point to a serious lack of capacity in the Veterinary Directorate and the Plant Protection Directorate.

Summary overview of implementation

Of the 16 laws identified under Benchmark 1, four acts have been formally adopted or amended, while one existing law was found not to require amendment (as at 2 October 2026).[24] The number of acts formally adopted or amended does not automatically correspond to the number of fully aligned laws. The Law on Official Controls is included in the formal total, but the European Commission has pointed to the need to adopt a new law with a higher degree of alignment.

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 2.10.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	15[25]	15 (100%)	3 (20%)[26]	0

Conclusion

During 2025 and 2026, some legislative progress was made under Chapter 12 through the adoption of the Law on Seed and Planting Material of Agricultural and Ornamental Plants, the amendment of two laws in the phytosanitary field and the preparation of several draft laws. The Law on Official Controls has been formally adopted and is being applied, but the obligation cannot be considered fully met, as the European Commission has assessed the Law as only partially aligned with Regulation (EU) 2017/625.

The decision to prepare a new Law on Official Controls during 2026 indicates that the previous procedure did not achieve a satisfactory level of alignment with EU law. The new draft provides an opportunity to remedy the shortcomings identified, but at the same time it postpones the substantive

[24] The four acts formally adopted or amended are: the Law on Official Controls; the Law on Seed and Planting Material of Agricultural and Ornamental Plants; the amendments to the Law on Forest Reproductive Material; and the amendments to the Law on the Recognition of Agricultural Plant Varieties. The existing Law on the Protection of Plant Breeders' Rights was found not to require amendment. The Law on Official Controls cannot be considered a substantively completed obligation until the new law has been adopted and its alignment with EU law has been confirmed.

[25] Although 16 laws were originally planned, it was established that the existing Law on the Protection of Plant Breeders' Rights did not need to be amended. The table therefore lists 15 laws that need to be adopted or amended.

[26] The Law on Official Controls has been formally adopted, but the European Commission has not assessed it as fully aligned with EU law. Since work on a new law has begun, this obligation is considered unfulfilled in the overview of substantive implementation.

fulfilment of the obligation at least until the new parliamentary procedure is completed and the conditions for applying the law, planned from 2027, are in place.

The opening benchmarks for Chapter 12 have not been met: the Law on Official Controls is not fully aligned with EU law, most of the other framework laws have not been adopted, and the national strategy with an action plan for the transposition, implementation and enforcement of the EU acquis has not yet been adopted. The legislative backlog is accompanied by long-standing staff shortages and underdeveloped systems for milk quality control, animal by-product management, laboratory support and the upgrading of establishments.

Success is measured not only by the number of laws adopted, but also by the ability of institutions to ensure risk-based controls, reliable laboratory support, consistent management of animal diseases and plant pests, traceability, crisis preparedness, and the genuine compliance of establishments and products with EU standards. Without these elements, Chapter 12 remains insufficiently prepared for opening, in both legislative and operational terms.

WORKING GROUP FOR CHAPTER 13
FISHERIES

Status of the 2025 Recommendations

Fulfilled	**1**
Unfulfilled	**1**
Partially fulfilled	**1**
Number of new recommendations	**3**

Objectives

Chapter 13 covers fisheries and aquaculture management, the market organisation for fishery products, structural support, data collection, control and inspection, the prevention of illegal, unreported and unregulated fishing, and international cooperation.

Although it is landlocked, Serbia must apply those parts of the EU Common Fisheries Policy that are relevant to its competences and specific circumstances, including the management of inland fisheries and aquaculture. The objective is the sustainable use of fish stocks, reliable product traceability, the alignment of market rules, the establishment of effective controls and the preparation of the sector for the future use of funds from the European Maritime, Fisheries and Aquaculture Fund.

State of Play

Chapter 13 was opened on 25 June 2018 with one closing benchmark: Serbia is to prepare an action plan ensuring full alignment with EU law by the time of accession, in particular in the areas of market organisation, aquaculture, data collection, control and the prevention of illegal, unreported and unregulated (IUU) fishing. The Action Plan was adopted in December 2024 and submitted to the European Commission in February 2025, thereby meeting the formal part of the benchmark.

In its 2025 Report, the European Commission assessed that Serbia is moderately prepared in this area and noted some progress, primarily owing to the adoption of the Action Plan. However, the legal and institutional framework still has significant shortcomings. Legislation on market policy is not aligned with the EU acquis, the application of the rules on catch certification and the prevention of IUU fishing has been repeatedly postponed, official controls on products intended for export to the EU need to be further aligned, and the strategic plan for aquaculture has not yet been adopted.

Of the three priority recommendations set out in the 2025 Book of Recommendations, one has been fulfilled, one partially fulfilled and one remains unfulfilled:

- **The recommendation to adopt and submit the action plan is assessed as fulfilled**. The Government of the Republic of Serbia adopted the Action Plan for the Transposition, Implementation and Enforcement of the EU Acquis in the Area of Fisheries and Aquaculture on 20 December 2024, and submitted it to the European Commission on 14 February 2025;
- **The recommendation to strengthen the administrative capacity of the competent authorities is assessed as not fulfilled**. The European Commission continues to point to a serious shortage of staff in the authorities responsible for policy development, market and structural measures, data collection and the control of illegal, unreported and unregulated (IUU) fishing, including border controls;

- **The recommendation on continuous consultation with stakeholders is assessed as partially fulfilled**. Consultations were held during the preparation of the action plan and of technical assistance projects, but no regular and publicly documented mechanism for dialogue on the implementation of the plan, market policy, aquaculture and controls has been established.

The Plan of the Government of the Republic of Serbia shifts the focus from the formal fulfilment of the benchmark to the practical implementation of obligations. By Q4 2026, it envisages the adoption of the Law on Structural Support and Market Organisation in Fisheries, rulebooks on data collection and producer organisations, the Multiannual National Strategic Plan for Aquaculture, the Operational Programme and rulebooks for the implementation of its measures. As these deadlines fall after the cut-off date, these activities cannot be considered delayed. However, no public confirmation that any of these documents had been adopted was found by the cut-off date.

The Plan also envisages the recruitment during 2026 of two officials for market policy, seven for structural measures and one for inspection and IUU fishing control, while additional recruitment in the areas of data collection, aquaculture and inspection is planned for 2027. There is no confirmation that the recruitment planned for 2026 has taken place. This is particularly important because the implementation of the new law, the Operational Programme and the data collection system requires appropriately qualified staff and effective coordination between the Ministry of Agriculture, the Veterinary Directorate, the Ministry of Environmental Protection, and the customs and border authorities.

EU technical assistance and the project for the further development of national fisheries legislation have provided a basis for preparing the strategic plan for aquaculture and the Operational Programme. However, for sustainable implementation, these documents must be subject to public consultation, be based on realistic budget estimates, and be linked to the data collection and control systems, state aid rules and environmental protection requirements.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. **Implement the Action Plan for Chapter 13 with public monitoring of its implementation**. Publish reports at least every six months on the implementation of activities, deadlines, responsible institutions, the adoption of legislation, available capacity and results achieved, rather than assessing progress solely on the basis of formal fulfilment of the closing benchmark (*NCEU recommendation from 2025 – the formal part has been fulfilled; the new recommendation concerns the consistent implementation of the Action Plan*).

2. **Adopt the legislative and programming package planned for Q4 2026**. Adopt the Law on Structural Support and Market Organisation in Fisheries, the rulebooks on data collection and producer organisations, the Multiannual National Strategic Plan for Aquaculture, the Operational Programme and the rulebook for the implementation of its measures. Ensure public consultation and publish tables of concordance with the EU acquis (*new priority recommendation for 2026*).

3. **Establish a reliable system for the control of illegal, unreported and unregulated (IUU) fishing and for catch certification**. Align the legal framework, improve border and market controls, ensure product traceability and data exchange, clearly define the responsibilities of the competent authorities and regularly publish aggregated control results (*European Commission recommendation, included among the priorities for 2026*).

4. **Implement a plan for the recruitment and retention of qualified staff**. Strengthen staffing capacity for market policy, structural measures, data collection, aquaculture, inspection and border controls. Regularly publish data on the planned number of posts, the number of staff employed

and the pace at which vacancies are filled (*NCEU recommendation from 2025 – not fulfilled; repeated*).

5. **Establish a permanent mechanism for consultation with stakeholders**. At least twice a year, involve producers, fish farm operators, processors, scientific institutions, nature conservation organisations and civil society organisations in monitoring the Action Plan and preparing legislation and programmes (*NCEU recommendation from 2025 – partially fulfilled; made more specific*).

Link to the Reform Agenda

The Reform Agenda does not contain a specific reform step directly related to Chapter 13, but there are significant horizontal links with improving the competitiveness of the agricultural sector, investment, innovation, digitalisation and control of the use of public funds.

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 13
6.2.1. Enhanced investment and development opportunities for entrepreneurs and private sector	Ongoing; deadline: by 2027	Align state aid and future structural measures in fisheries with EU rules and ensure transparency in the granting and use of funds.
6.2.2. Further development of the science and innovation ecosystem for a knowledge-based economy	Ongoing; period 2025-2027	Link research and the monitoring of fish stocks, health status and aquaculture production with the decision-making process.
6.3.1. Enhance the competitiveness of the agricultural sector – Competitiveness of the agricultural sector	Ongoing	Include aquaculture and the processing of fishery products in measures to improve competitiveness, develop rural infrastructure and provide investment support.
7.2.2. Further digitalisation of public services and administrative procedures for businesses and citizens	Ongoing; period 2024–2027	Develop interconnected registers and systems for electronic traceability, and for the collection and exchange of data on production, catches, imports, exports and controls.
Monitoring, control and audit	Being implemented	Establish an adequate audit trail for the future Operational Programme and mechanisms for the protection of the EU's financial interests.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

The status has been assessed on the basis of publicly available data up to 15 September 2026. All new legislative and programming measures under the Plan have a deadline in Q4 2026 and are therefore marked as "not yet due" rather than as not fulfilled.

Area	Planned measure	Planned deadline	Fulfilled yes/no	Comment
Closing benchmark	Adoption and submission of the Action Plan	2024/2025	Yes	The Action Plan was adopted on 20 December 2024 and submitted to the European Commission on 14 February 2025.
Market and structural policy	Law on Structural Support and Market Organisation	Q4 2026	Not yet due	Adoption had not been confirmed by the cut-off date.

Area	Planned measure	Planned deadline	Fulfilled yes/no	Comment
Data	Rulebook on the collection, management and use of data	Q4 2026	Not yet due	Adoption had not been confirmed by the cut-off date.
Producer organisations	Rulebook on producer and interbranch organisations	Q4 2026	Not yet due	Adoption had not been confirmed by the cut-off date.
Aquaculture	Multiannual National Strategic Plan for Aquaculture	Q4 2026	Not yet due	The document has been prepared with EU support, but its adoption had not been confirmed by the cut-off date.
Structural measures	Operational Programme	Q4 2026	Not yet due	Adoption had not been confirmed by the cut-off date.
Structural measures	Rulebook on the implementation of measures under the Operational Programme	Q4 2026	Not yet due	Adoption depends on the prior establishment of an appropriate legal and programming framework.
Administrative capacity	Recruitment of two officials for market policy, seven for structural measures and one for the control of illegal, unreported and unregulated (IUU) fishing	2026	Not confirmed	No publicly available data on the implementation of the recruitment plan were found.
Implementation of the Action Plan	Market, data, aquaculture, controls and IUU fishing	Ongoing	Partially fulfilled	The Action Plan has been adopted, but the key legislation and programmes, as well as the necessary administrative capacity, have not yet been fully established.

Summary overview of implementation

The summary overview covers six legislative and programming measures under the Plan that relate to Chapter 13 and whose deadlines are set for Q4 2026.

Statistics

Type of measure	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026	Adopted by 15.9.2026	Due by 31.12.2026 (% of total)
Strategies and programmes	2	0	0	2 (100%)
Laws	1	0	0	1 (100%)
Secondary legislation	3	0	0	3 (100%)

Conclusion

By adopting the Action Plan on 20 December 2024 and submitting it to the European Commission on 14 February 2025, the Republic of Serbia fulfilled the national and procedural part of the obligation relating to the closing benchmark for Chapter 13. In its 2025 Report on Serbia, the European Commission welcomed the adoption of this document, but did not publicly state that the closing benchmark had been formally met, nor did it propose the provisional closure of the chapter. Further progress depends on the assessment of the content and implementation of the Action Plan, in particular in the areas of market organisation, aquaculture, data collection and the control of illegal, unreported and unregulated (IUU) fishing, as well as on a unanimous decision of the EU Member States. The focus of the negotiation process is thus shifting from the adoption of the plan to its practical implementation.

The key test lies ahead in Q4 2026, when the law on market and structural policy, two key rulebooks, the Multiannual National Strategic Plan for Aquaculture, the Operational Programme and the rules for the implementation of its measures fall due. Their adoption should be accompanied by the provision of staff and budgetary resources, the establishment of a data collection and management system, the application of the catch certification scheme, improved control of IUU fishing and coordination between the competent authorities, including those responsible for veterinary and phytosanitary matters, market surveillance, customs and environmental protection.

Success in Chapter 13 is measured not only by the formal fulfilment of the obligation under the closing benchmark, but also by building a sustainable and verifiable system that protects fish stocks, enables the development of competitive aquaculture and processing, ensures product traceability and prepares Serbia to apply the rules and use the financial instruments of the EU Common Fisheries Policy.

WORKING GROUP FOR CHAPTER 14
TRANSPORT POLICY

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**2**
Partially fulfilled	**15**
Number of new recommendations	**0**

Objectives

The objective of Chapter 14 – Transport Policy is to align national legislation and its implementation with European Union rules in the areas of road, rail, inland waterway, air and multimodal transport. The common rules cover technical and safety standards, social conditions, market access, state aid, passenger rights and environmental protection. Their implementation should contribute to safer, more accessible, more efficient and more sustainable transport of people and goods.

State of Play

Chapter 14 was opened on 14 December 2021. According to the European Commission's 2025 Report on Serbia, the strategic framework for transport needs to be completed, administrative capacity strengthened, and alignment with and implementation of the EU acquis continued. Work on the National Transport Strategy for the period 2027-2034 has begun, but it had not been confirmed by the cut-off date that the document had been finalised and adopted. The General Transport Master Plan also needs to be updated and linked to capital budgeting, with transparent consultation and an assessment of environmental and social impacts.

Some legislative progress has been made in road transport, in particular through amendments to the legislation on fees for the use of public goods, crew working time and tachographs. However, Benchmark 1 remains open: the adoption of a new Law on Roads has not been confirmed, nor has that of several laws relating to market access, passenger rights, alternative fuels and clean vehicles. The preparation and publication of draft legislation do not constitute fulfilment of the obligation to adopt it. In particular, road maintenance, the control of overloaded heavy goods vehicles and a financing system based on the "user pays" and "polluter pays" principles need to be improved.

The NCEU Working Group for Chapter 14 points to the insufficient availability and quality of public transport, particularly in remote local self-government units, and to the need to draw up sustainable urban mobility plans. The selection of infrastructure projects and contractors should be transparent and based on economic viability, safety, and climate and environmental objectives. Particular attention should be paid to bypasses, the cumulative impacts of projects, habitat protection, and the impact of traffic on air quality and noise levels.

In the area of rail, the Working Group points to problems concerning the lawfulness of infrastructure construction procedures and the neglect of lower-category lines compared with the main corridor. Of particular concern is the insufficient maintenance of lines connecting major industrial centres, including Niš, Kostolac, Zrenjanin, Kikinda, Prahovo, Bor, Šabac and Loznica, given the risk of derailment of wagons carrying dangerous goods. Maintenance, supervision and safety on these rail routes need to be improved. According to the Government's report, the new Law on Railways was not

adopted within the planned deadline, while the draft amendments to the legislation on contracts in rail transport require further work. Existing alignment with the previous passenger rights regime does not release Serbia from the obligation to align with Regulation (EU) 2021/782.

In air transport, the basic legal framework is in place, but the Government's report confirms that only those provisions of Regulation (EC) No 1008/2008 relating to the first transitional period of the Agreement on the establishment of a European Common Aviation Area (ECAA) have been transposed. Alignment with the remaining provisions remains an obligation under Benchmark 2. Under Benchmark 3, alignment in the areas of inland waterway and air transport is already reported in the Plan, while alignment with the passenger rights regime for bus and rail transport remains outstanding.

Border crossing continues to be a serious problem, particularly for freight transport. In addition to long waiting times at border crossings, the Working Group points to the unequal position of domestic carriers as regards the conditions for operating in the EU. These are related but distinct issues: the first requires more efficient border procedures, while the second involves addressing the obstacles that domestic carriers face on the EU market. Serbia is committed to establishing "green lanes" between the EU and the Western Balkans by improving the operation of border crossings with EU Member States, expanding the capacity of crossings along the main corridors, including parking capacity, and encouraging the use of electronic consignment notes. Activities under the green lanes and digital data exchange represent progress, but do not confirm that the target of border waiting times of up to 30 minutes is being systematically achieved.

Implementation of the Road Traffic Safety Strategy for the period 2023–2030 and the accompanying action plans needs to continue, including a more systematic use of road safety tools. Data exchange with the European Commission in line with the EU CARE protocol should also continue. The social rules and market access rules in road transport should be fully transposed into national legislation. The adoption of amendments to the legislation on crew working time and tachographs represents important legislative progress, while the transition to smart tachographs and the consistent application of the rules on driving times, breaks and rest periods remain important steps in their implementation.

How to Unblock the Process? / Priority Steps to Unblock the Process

Taking into account the links between Chapter 14 and other sectoral and cross-cutting chapters, as well as the multi-year analyses of the chapter itself and its links with other areas carried out by the National Convention as a whole and by organisations working specifically and systematically on transport policy, the Working Group for Chapter 14 has identified ten priority recommendations. Their wording and content do not always fully match the findings in the table of obligations, but they point to problems which the organisations of the National Convention consider would, if resolved, lead to significant progress in the transport sector.

The ten priority recommendations from 2025 remain relevant and are repeated in 2026, taking into account the individual steps forward made in the meantime. The recommendations for 2026 are as follows:

1. Complete and adopt the transport strategy through a transparent and inclusive process, and link it to road safety, capital budgeting, climate objectives and nature protection. Take into account indicators of emissions, pollution and noise, energy efficiency and cumulative impacts when selecting projects;

2. Ensure reliable, accessible and affordable public transport in cities and in intercity transport. Link contracts and public-private partnerships to measurable obligations regarding service quality, transparent financing and user protection;

3. Complete the alignment of road transport legislation, including the rules on market access, working time, tachographs and passenger rights, while strengthening enforcement and the protection of drivers. Speed up activities under the eFTI and ITS initiatives, as well as the digitalisation of border procedures;
4. Plan the deployment of alternative fuels and the decarbonisation of transport in line with overall development, energy and environmental objectives. Extend impact assessment to the use of resources and land, biodiversity and the actual emission effects of switching to alternative fuels;
5. Give priority to the maintenance and development of regional and industrial railway lines, in particular those leading to eastern Serbia and industrial centres. Improve multimodal connections, the safety of the transport of dangerous goods and the transparency of infrastructure investment;
6. Improve the safety and maintenance of the road network, the planning of bypasses and the control of overloading. Base proposals to restrict freight traffic and change the road toll model on an assessment of safety, costs and compliance with EU rules;
7. Introduce into road reconstruction plans an obligation to build bypasses around settlements with more than 1,000 inhabitants located along main and regional roads;
8. Draw up a national plan for the construction of wildlife bridges and other wildlife crossings over or under road and rail infrastructure;
9. Establish a system for issuing and handing over documents and permits to international carriers at border crossings, with the aim of keeping waiting times to no more than 30 minutes;
10. Align charging for the use of transport infrastructure with the "user pays" and "polluter pays" principles and Directive 2011/76/EU, taking into account the impact on pollution, vehicle weight, climate factors and traffic congestion.

Link to the Reform Agenda

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 14
7.1.4. Alternative fuels infrastructure: establishment of a national policy framework and measures in line with Regulation (EU) 2023/1804	Partially fulfilled; deadline: December 2026	Complete the adoption of legislation and the national framework for the development of alternative fuels infrastructure.
7.2.5. ITS: Application of the framework and standards for intelligent transport systems in road and rail transport	Partially fulfilled; deadline: December 2026	Complete the adoption and ensure the implementation of the intelligent transport systems (ITS) programme, as well as system interoperability.
7.2.5. eFTI: Alignment with Regulation (EU) 2020/1056 on electronic freight transport information	Partially fulfilled; deadline: June 2026 – expired	Adopt the law and establish the legal and technical framework for the electronic exchange of freight information.
7.2.5. e-CMR: Ratification of the Additional Protocol to the CMR Convention concerning the electronic consignment note	Fulfilled according to the draft submitted; ratification registered on 4 August 2026	Ensure the use of the electronic consignment note and its connection with the eFTI system.
7.2.5. Traffic information systems: Data collection and operational information for road users	Partially fulfilled; deadline: December 2026	Ensure the full operability of the system and data exchange in line with EU standards.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

The Plan contains three closing benchmarks for Chapter 14.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
1. Serbia aligns its legislation with the EU acquis on road charging, the social acquis in road transport, vehicle weights and dimensions, and access to the occupation of road transport operator, to the international road haulage market and to the international market for coach and bus services	Full alignment with Directive 2008/96/EC on road infrastructure safety management	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	
	Full alignment with Directive 2004/54/EC on minimum safety requirements for tunnels in the Trans-European Road Network, Directive (EU) 2019/520 on the interoperability of electronic road toll systems, and Directive 2010/40/EU on the framework for the deployment of Intelligent Transport Systems in the field of road transport and for interfaces with other modes of transport	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	
	Amendments to the laws on road transport of goods and passengers to align access to the occupation of road transport operator and access to the international road haulage market and coach and bus services market with Regulations (EC) No 1071/2009, (EC) No 1072/2009, (EC) No 1073/2009, (EU) 2020/1055 and (EU) No 361/2014. Cabotage remains excluded until EU membership	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	
	Amendments to the Rulebook on the Classification of Motor and Trailer Vehicles and Technical Requirements in order to fully align the permitted vehicle dimensions and weights with Directive 96/53/EC	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	The amendments were published in the *Official Gazette of the RS*, No 54/26. The Rulebook has been amended and contains relevant provisions on permitted vehicle masses, but full alignment with Directive 96/53/EC has not been confirmed.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	Amendments to the Law on Fees for the Use of Public Goods to align infrastructure charging for heavy goods vehicles with Directive 1999/62/EC. The initiative by the Ministry of Construction, Transport and Infrastructure to the Ministry of Finance was planned for Q1 2025.	Ministry of Construction, Transport and Infrastructure	Q1 2026	Yes	The planned amendments to the Law were adopted and published in the *Official Gazette of the RS*, No 109/25. This confirms the adoption of the legislation, but not necessarily full alignment with Directive 1999/62/EC.
	Adoption of the Law on Road Traffic Safety to fully align the technical and safety conditions of traffic with EU rules	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	The amendments to the existing Law, published in the *Official Gazette of the RS*, No 19/25, do not constitute fulfilment of this planned measure.
	Full alignment of the legislation on the inland transport of dangerous goods with Directive 2008/68/EC	Ministry of Construction, Transport and Infrastructure	Q1 2026	Yes	
	Alignment with Regulation (EU) 2020/1056 on electronic freight transport information (eFTI) through the Law on Contracts for Carriage in Road Transport. Reform Agenda deadline: June 2026	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	The draft law was subject to public consultation from 8 to 27 May 2026.
	Adoption of a law to align with Directive 2009/33/EC on the promotion of clean and energy-efficient road transport vehicles.	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	
	Adoption of a law to align with Regulation (EU) 2023/1804 on the deployment of alternative fuels infrastructure (deadline: Q4 2025)	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	The draft law was subject to public consultation from 5 to 25 June 2026.
	Alignment of the rules on working time, driving times, rest periods and the enforcement of social rules with Directives 2002/15/EC and 2006/22/EC and Regulation (EC) No 561/2006, through the Law on Working Hours of Vehicle Crews in Road Transport and Tachographs.	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	The amendments to the Law have been adopted (*Official Gazette the of RS*, No 96/25), but full alignment with Directives 2002/15/EC and 2006/22/EC and Regulation (EC) No 561/2006 has not been confirmed.
	Alignment with Mobility Package I: the amendments to the Law on Working	Ministry of Construction,	Q1 2026	No	The amendments to the Law have been adopted, but they do

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	Hours of Vehicle Crews in Road Transport and Tachographs were planned to transpose Regulations (EU) 2020/1054 and (EU) No 165/2014. Alignment with the remaining three acts (2020/1057, 2020/1055 and 2021/2179) has not yet been planned	Transport and Infrastructure			not cover all the EU acts making up Mobility Package I.
	Adoption of the Law on Roads	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	According to the Government's report, the draft was submitted to the European Commission for its opinion, but the adoption of the Law has not been confirmed.
	Adoption of four rulebooks on intelligent transport system (ITS) services: on real-time traffic information, multimodal travel, safety-related traffic information, and parking places for trucks and buses	Ministry of Construction, Transport and Infrastructure	Q3 2026	No	
	Adoption of a rulebook on electronic toll collection and amendments to the decree on the European Electronic Toll Service	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	
	Adoption of two rulebooks on minimum safety requirements for tunnels	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	
	Amendments to the rulebook on tachograph workshops and the rulebook on the use of tachographs	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	
	Adoption and amendment of rulebooks on driver training, driving tests, examiners, roadworthiness testing of vehicles and traffic control, in accordance with Form 2 of the Plan	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	
2. Serbia implements Regulation (EC) No 1008/2008 on common rules for the operation of air services in the Community, as incorporated into the ECAA Agreement	Implementation of Regulation (EC) No 1008/2008 on air services. The Rulebook on Operating Licences and Public Air Transport transposed the provisions for the first transitional period (Article 2(7), (10), (11), (13), (14),	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	The provisions for the first transitional period have been transposed. The transposition and implementation of the remaining provisions of Regulation (EC) No 1008/2008 had not

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	(18) and (19), and Articles 22 to 24 and 26). The remaining provisions are to be transposed by the end of the second transitional period.				been confirmed by the cut-off date.
	Amendments to the Law on Air Transport to align with Regulation (EC) No 1008/2008	Ministry of Construction, Transport and Infrastructure / Civil Aviation Directorate	Q1 2026	No	
	Amendments to the Rulebook on Operating Licences and Common Rules for the Operation of Public Air Transport	Civil Aviation Directorate	Q1 2026	No	
	Repeal of the Rulebook on Operating Licences, the decree on the operation of air services under public service obligations, and the corresponding decision designating routes subject to public service obligations	Civil Aviation Directorate / Government, depending on the act concerned	Q1 2026	No	
	Amendments to the Rulebook on the Conditions for Performing Air Transport to align with Article 13 of Regulation (EC) No 1008/2008	Civil Aviation Directorate	Q1 2026	No	
3. Serbia aligns its legislation with the acquis on passenger rights in all modes of transport	Adoption of the Law on the Rights of Passengers in Bus and Coach Transport to fully align with Regulation (EU) No 181/2011. The method of alignment is under consideration.	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	
	Alignment of rail passenger rights: alignment with Regulation (EC) No 1371/2007 has been achieved, while alignment with Regulation (EU) 2021/782 requires the adoption of a new Law on Railways (deadline: Q4 2024, missed) and amendments to the Law on Contracts in Rail Transport (deadline: Q1 2026)	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	The previous passenger rights regime has been transposed, but alignment with Regulation (EU) 2021/782 had not been confirmed by the cut-off date.

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026[27] (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	13	13 (100%)	2 (15.4%)	0 (0%)
Secondary legislation[28]	25	21 (84%)	1 (4.8%)[29]	4 (16%)

Conclusion

Individual legislative and institutional progress has been made under Chapter 14, but none of the 2025 recommendations of the NCEU Working Group for Chapter 14 has been fully fulfilled. The adoption of certain amendments to laws, the preparation of the transport strategy and digitalisation activities provide a basis for further progress, while the deadlines for implementing the remaining measures under the Plan have since expired. The adoption of the remaining legislation needs to be speeded up, capacity for its implementation strengthened, and more accessible and safer public transport, better maintenance of the road and rail networks and more effective protection of passenger rights ensured. Strategic transport planning and financing should be linked to climate and environmental objectives, transparent project selection and regular public monitoring of results.

[27] The cut-off date used by the NCEU Working Group for Chapter 14, as in the example in the methodological guidelines.
[28] This covers 20 pieces of secondary legislation under the first benchmark and five under the second benchmark, including three planned repeals. The four rulebooks on ITS services fall due on 30 September 2026, after the cut-off date.
[29] One confirmed adoption of planned amendments has been counted – the Rulebook on the Classification of Motor and Trailer Vehicles and Technical Requirements (*Official Gazette of the RS*, No 54/26). Fulfilment of the other planned secondary legislation measures has not been confirmed.

WORKING GROUP FOR CHAPTER 15
ENERGY

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**0**
Partially fulfilled	**3**
Number of new recommendations	**0**

Objectives

The objective of negotiating Chapter 15 is full alignment with the EU acquis in the area of energy and its effective implementation. The chapter covers security of supply, including emergency oil stocks and measures to safeguard the security of gas and electricity supply; the establishment of a competitive and non-discriminatory internal electricity and gas market based on the unbundling of system operators, regulated third-party access and an independent regulator; integration into the EU internal energy market; increasing the share of renewable energy sources (RES) and improving energy efficiency, including the energy performance of buildings, eco-design and energy labelling; and the preparation, implementation of and reporting on the Integrated National Energy and Climate Plan (INECP), in accordance with Regulation (EU) 2018/1999 on the Governance of the Energy Union and Climate Action.

As a Contracting Party to the Treaty establishing the Energy Community, Serbia is in parallel taking on obligations whose requirements are being gradually aligned with the EU acquis, including the Electricity Integration Package and elements of the Clean Energy Package. Chapter 15 is part of Cluster 4 – Green Agenda and Sustainable Connectivity and was opened on 14 December 2021. Its closure is conditional on meeting three benchmarks: emergency oil stocks; the internal energy market, including unbundling and the regulatory regime for Gastrans; and renewable energy sources (RES), energy efficiency and the INECP.

State of Play

According to the European Commission's 2025 Report on Serbia, the most recent annual report published by the cut-off date, Serbia is **moderately prepared** (score 3) in the area of energy, and **some progress** (score 3) has been made on the previous year's recommendations, an improvement on the assessment of "limited progress" in 2024.[30] For the coming year, the Commission recommends speeding up the implementation of the Integration Package, including the calculation and allocation of cross-border capacity on all interconnections, including the interconnection between the EMS and KOSTT operators; completing the unbundling of Srbijagas, ensuring effective and transparent third-party access at all entry points, certifying the Banatski Dvor underground gas storage facility, and aligning with the regulations on gas storage and security of gas supply; as well as adopting legislation on the energy performance of buildings and establishing a just transition governance system. The Energy Community Secretariat assessed Serbia's overall implementation of the acquis at 63%, the best

[30] European Commission, *Serbia 2025 Report*, SWD (2025) 755 final, 4 November 2025, pp. 16-17 (summary) and 92-93 (Chapter 15). Available at: https://enlargement.ec.europa.eu/document/download/6e68ce26-b95b-48e1-921a-c60c12da8f00_en?filename=serbia-report-2025.pdf.

result in the Western Balkans, but its score in the area of energy security is considerably lower (35%), particularly as regards security of gas supply.[31] The National Assembly was dissolved on 9 September 2026 and elections were called for 25 October 2026, so laws whose adoption deadlines under the Plan expire by the end of 2026 cannot be adopted before the newly elected Assembly is constituted.

None of the three priority recommendations of the National Convention from 2025 has been fully fulfilled, but partial progress has been made in each of the areas covered. Greenhouse gas emissions pricing has been introduced, but the work of the inter-ministerial working group on CBAM is still not public (recommendation 1). The Electricity Integration Package has been transposed and Transportgas Srbija has been certified, while functional integration with the EU market and effective third-party access to the gas network are still lacking (recommendation 2). The Programme for the Implementation of the Energy Sector Development Strategy for the period 2026-2028 and the Just Energy Transition Plan have been adopted, but the investment cycle in the area of RES has slowed, while the security of gas and oil supply still depends on short-term arrangements (recommendation 3). All three recommendations are therefore repeated in a reworded form.

Electricity market. The transposition of the Electricity Integration Package has been formally completed. The 2024 amendments to the Energy Law and the Decree on Transmission Capacity Allocation and Congestion Management (*Official Gazette of the RS*, No 102/24) were supplemented by five further decrees, adopted between May and August 2025, which transpose the rules on forward capacity allocation, transmission system operation, balancing, emergency and restoration, and risk preparedness.[32] The decree on guidelines for trans-European energy infrastructure has not yet been adopted. On 22 October 2025, Serbia became the first Contracting Party to enter the procedure for verifying transposition for the purposes of market coupling. This procedure is a prerequisite for coupling with EU markets and for the exemption of electricity from CBAM. The Energy Community Secretariat submitted its assessment to the Commission on 16 December 2025, and on 14 May 2026 the Commission issued an opinion with recommendations, which did not confirm full alignment.[33] Given that a positive opinion is followed by a contractual and technical preparation phase lasting around 18 months, market coupling can be expected in 2028 at the earliest.

Implementation still lags behind transposition: the terms, conditions and methodologies provided for in the system operation and balancing guidelines have not been fully established, and the requirement to make at least 70% of capacity available for cross-border trade is not applied. A 15-minute imbalance settlement period has applied since 1 January 2025, and the new Market Rules, adopted by AERS in December 2025, introduced balancing capacity auctions. EMS is an operational member of IGCC, the European imbalance netting platform, and an observer in the MARI platform, but has not joined the MARI, PICASSO and TERRE platforms or the regional coordination centre responsible for the borders with the EU. In May 2026, SEEPEX introduced negative prices and harmonised its price limits with the EU, but the compliance of its designation as a nominated electricity market operator has not

[31] Energy Community Secretariat, *Annual Implementation Report 2025 – Serbia*, 1 November 2025, p. 2 (overview and recommendations), pp. 3-6 (electricity), 7–8 (gas), 9-13 (decarbonisation) and 14-15 (energy security). Available at: https://www.energy-community.org/dam/jcr:5b4ff2d5-5672-4989-ad81-d7fd9e27a7f7/Serbia_IR25CP.pdf.
[32] Energy Agency of the Republic of Serbia (AERS), "Podzakonski akti – uredbe Vlade" [*Secondary legislation – Government decrees*]. Available at: http://www.aers.rs/podzakonski-akti. For the Decree on Risk Preparedness in the Electricity Sector, see also: *Official Gazette of the RS*, No 42/2025. Available at: https://www.paragraf.rs/glasila/rs/sluzbeni-glasnik-republike-srbije-42-2025.html.
[33] Energy Community Secretariat, "Electricity Integration Package: Transposition and Verification". Available at: https://www.energy-community.org/topics/electricity/market/transposition.html.

yet been confirmed. Capacity on the EMS–KOSTT interconnection is still not available for commercial exchange, and the proceedings before the Energy Community on this issue remain open.[34]

Gas market and security of supply. On 21 March 2025, the Energy Agency of the Republic of Serbia (AERS) issued a certificate to Transportgas Srbija as an independent system operator, and on 31 March 2026 it established that the subsequently verified conditions concerning the legal and functional unbundling of ownership of the transmission network had been met.[35] For this purpose, Gas Infrastruktura Ltd, a subsidiary of Srbijagas, was established as the owner of the transmission system.[36] Transportgas subsequently obtained a transmission licence and in May 2026 joined the Regional Booking Platform (RBP). From July 2026, capacity allocation on this platform is envisaged at the Horgoš and Kalotina–Dimitrovgrad points, as well as at the interconnection point with Gastrans.[37] In September 2026, a memorandum on joining the Vertical Gas Corridor was signed.

Available and new capacity is offered through auctions on the RBP, including the Gastrans incremental capacity process (from gas year 2027/28, with third-party access) and an auction under the Vertical Gas Corridor, announced for November 2026.[38] On 3 December 2025, the National Assembly adopted a new Law on Gas, a Law on Oil and a Law on Emergency Stocks of Oil, Petroleum Products and Natural Gas (*Official Gazette of the RS*, No 109/2025). These laws separate the oil and gas sectors from the Energy Law, introduce the certification of gas storage system operators and regulate the measures applicable in the event of supply disruptions. Effective third-party access, however, is still lacking. Annual capacity at gas interconnections for gas years 2026-2030 was allocated in July 2025 on the basis of calls for the conclusion of contracts rather than through auctions.[39] According to the Energy Community Secretariat, capacity was allocated to incumbent suppliers in a non-transparent manner, the Serbia–Bulgaria interconnector has been fully booked by Srbijagas, Jugorosgaz-Transport and the Banatski Dvor underground gas storage facility have not been certified, and third-party access to storage is limited. Gastrans was certified despite objections from the Secretariat, which also considers that Regulations (EU) 2017/1938 and (EU) 2022/1032 have not been transposed, while the assessment of the compliance of the new Law on Gas has not yet been published.

Gastrans, owned by Gazprom (51%) and Srbijagas (49%), has been operating since 1 January 2021 on the basis of an AERS exemption decision of 5 March 2019. Under that decision, around 90% of capacity was exempted for a period of 20 years from the obligation to provide third-party access, the application of regulated tariffs and the ownership unbundling requirement. Only the part of capacity not covered by the exemption (around 14% at the exit towards Transportgas) is offered on the RBP, and only on a short-term basis. Since 2024, AERS has been able to impose fines of up to 15% of annual turnover (*Official Gazette of the RS*, No 94/2024), and the Law on Gas (Articles 32 and 33)

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[34] Energy Community Secretariat, *Annual Implementation Report 2025 – Serbia*, pp. 3–6. Available at: https://www.energy-community.org/dam/jcr:5b4ff2d5-5672-4989-ad81-d7fd9e27a7f7/Serbia_IR25CP.pdf.

[35] Energy Agency of the Republic of Serbia (AERS), press release on the issuance of a certificate to Transportgas Srbija as an independent system operator; Decision of the AERS Council No 311.01-1/2024-C-I of 21 March 2025. Available at: https://www.aers.rs/агенција-за-енергетику-републике-србије/аерс-транспортгасу-србија-сертификат-као-независном-оператору-система-0.

[36] Danas, "Vlada usvojila predloge zakona o nafti i gasu i osnovala novo preduzeće 'Gas infrastruktura'" [*Government adopts draft laws on oil and gas and establishes new company 'Gas infrastruktura'*], November 2025. Available at: https://www.danas.rs/vesti/ekonomija/vlada-usvojila-predloge-zakona-o-nafti-i-gasu-i-osnovala-novo-preduzece-gas-infrastruktura/.

[37] Energy Community Secretariat, press release published on 6 April 2026. Available at: https://www.energy-community.org/news/Energy-Community-News/2026/4/6.html.

[38] Gastrans, *Project Design – Incremental Capacity IP Serbia*, January 2026. The document provides for new capacity from gas year 2027/2028, with third-party access. Available at: https://gastrans.rs/wp-content/uploads/2026/01/Incremental-capacity_2025_Project-Design_IP-SERBIA_ENG.pdf.

[39] Gastrans, *Demand Assessment Report for Incremental Capacity at IP Serbia*, October 2025. Available at: https://gastrans.rs/wp-content/uploads/2025/10/Demand-Assessment-Report_IP-SERBIA_ENG.pdf.

introduced rules on certification in relation to control by persons from third countries. Supply still relies on the contract with Gazprom, which since May 2025 has been extended by annexes of three months each. On 30 September 2026, Srbijagas announced that the contract had been extended until 31 December 2026 under the same conditions. The interconnector with Bulgaria allows deliveries of Azerbaijani gas, but their volume is small relative to total consumption.

Emergency oil stocks. The legal framework is aligned with Directive 2009/119/EC, the Directorate for Energy Reserves operates as the central stockholding entity, and Serbia is the only Contracting Party that submits all the reports required under this Directive. In June 2025, emergency stocks stood at 43.96 days of average daily net imports.[40] According to the Government's report, a level of 61.51 days was reached in the first quarter of 2026. Almost a third of the quantities needed to reach the level of 90 days of net imports, envisaged in the Plan by the end of 2026, is still missing. Under Article 8 of the Law on Emergency Stocks of Oil, Petroleum Products and Natural Gas, the greater of two values applies: 90 days of net imports or 61 days of consumption. The Government is to establish the calculation methodology by December 2026. Given the small share of domestic production in consumption, the Working Group considers the net imports criterion to be the relevant one.[41] The level of stocks expressed in days of consumption has not been officially published, as the Government, the Ministry of Mining and Energy and the Energy Community Secretariat report only the number of days of net imports. The Law does not set a deadline for reaching the full level of stocks, the stockholding programmes have not yet been published, and the Fiscal Council has warned that funding for emergency stocks in the 2026 budget has been significantly reduced.[42] Uncertainty is further increased by the position of NIS: US sanctions took effect on 9 October 2025, and the transaction concerning the change of ownership in favour of MOL, for which a shareholders' agreement with the Government was signed on 16 June 2026, had not been completed by the cut-off date. On 30 September 2026, OFAC again extended the licences for NIS's operations and for the transport of crude oil via JANAF, this time until 30 October 2026.

Renewable energy sources. In two rounds of market premium auctions, held in 2023 and 2024/2025, premiums were awarded for a total of around 850 MW of wind and solar capacity. The third round, announced for the second half of 2025, had not been launched by the cut-off date. According to the Ministry of Mining and Energy, the two auction rounds covered 17 power plants with a total capacity of around 1.2 GW. The installed capacity of wind and solar power plants exceeded 1.3 GW in September 2026 and is expected to reach around 1.5 GW by the end of the year, as also envisaged in the Reform Agenda. However, the deadlines for connecting new projects have been postponed until September 2029.[43] The single point of contact for strategic projects within the Ministry of Mining and Energy, established by a cooperation agreement between three ministries, has only an information and coordination role, so applicants must still deal with several authorities, which is not in line with Article 16 of the RED II Directive. The framework for designating renewables acceleration areas was not adopted within the envisaged deadline, which expired in June 2026. Amendments to the Law on the

[40] Energy Community Secretariat, *Annual Implementation Report 2025 – Serbia*, pp. 14-15 (data on the level of emergency stocks in June 2025). Available at: https://www.energy-community.org/dam/jcr:5b4ff2d5-5672-4989-ad81-d7fd9e27a7f7/Serbia_IR25CP.pdf.

[41] Law on Emergency Stocks of Oil, Petroleum Products and Natural Gas, *Official Gazette of the RS*, No 109/2025, Articles 8 and 36.

[42] Fiscal Council, "Ocena Predloga zakona o budžetu za 2026. godinu" [*Assessment of the Draft Law on the 2026 Budget*], 21 November 2025, p. 5. Available at: https://www.fiskalnisavet.rs/doc/ocene-i-misljenja/2025/fiskalni-savet_ocena-predloga-zakona-o-budzetu-za-2026.-godinu.pdf.

[43] Ministry of Mining and Energy, "Đedović Handanović: Na dobrom smo putu da do 2030. godine imamo 3,5 gigavata novih kapaciteta iz obnovljivih izvora energije" [Đedović Handanović: We are on track to have 3.5 gigawatts of new renewable energy capacity by 2030]. Available at: https://www.mre.gov.rs/vest/17557/djedovic-handanovic-na-dobrom-smo-putu-da-do-2030-godine-imamo-35-gigavata-novih-kapaciteta-iz-obnovljivih-izvora-energije.php.

Use of Renewable Energy Sources are at the stage of preparing the starting points, on which consultations were completed on 7 July 2026.[44] The certification of installers of small-scale RES installations is regulated by Chapter XIIb of the Energy Law, introduced by the 2024 amendments. The deadline for adopting secondary legislation expired in June 2025, and according to the Government's report for the first quarter of 2026, four draft rulebooks have been prepared, none of which has been adopted.

Energy efficiency. Alignment with the Energy Performance of Buildings Directive has not been completed. Legislation on minimum energy performance requirements and the energy performance certification of buildings has not been adopted, and the Energy Community Secretariat reports no progress in this area. Heat billing based on metered consumption is applied in around a quarter of the total of 58 district heating systems, while there are no rules on the allocation of heating costs. The Law on Planning and Construction has been amended twice since the adoption of the Plan (*Official Gazette of the RS*, Nos 91/2025 and 80/2026), but these amendments did not introduce provisions transposing Directive 2010/31/EU. The August 2026 amendments, like the 2025 amendments, were adopted under the urgent procedure. The problem lies not only in the absence of provisions from the Directive, but also in the pattern of amending planning and construction legislation without public participation. Amendments to the Law on Energy Efficiency and Rational Use of Energy that would transpose Directive (EU) 2023/1791, which is not yet part of the Energy Community acquis, have neither been published nor put to public consultation. The Directorate for Financing and Promoting Energy Efficiency has continued to launch public calls for households and public buildings, but data on the building renovation rates achieved, which are a target of the Reform Agenda and the INECP, are not publicly available.

INECP and strategic planning. The Integrated National Energy and Climate Plan (INECP) up to 2030, with projections up to 2050 (*Official Gazette of the RS*, No 70/24), envisages a 40.3% reduction in greenhouse gas emissions compared with 1990, a 33.6% share of RES in gross final energy consumption and a 45% share of RES in electricity generation. In 2025, Serbia submitted its first integrated progress report, covering 16 of the 17 required sections. Greenhouse gas emission projections were not submitted, and the reports on policies and measures were submitted late. Amendments to the Rulebook on the INECP to transpose Implementing Regulation (EU) 2022/2299 and the start of work on a new plan are envisaged by the end of 2026. In its first assessment of the NECPs, in August 2026, the Energy Community Secretariat pointed out that Serbia's plan does not set out a coal phase-out trajectory, does not establish a carbon price, and does not quantify measures or sources of financing. The draft of the new plan, with a time horizon up to 2040, is to be submitted by 1 January 2028, but work on it has not been formally launched.[45] On 5 March 2026, the Government adopted the Programme for the Implementation of the Energy Sector Development Strategy up to 2040 for the period 2026-2028, one quarter later than the deadline set in the Plan. The long-term framework still does not include a climate neutrality target, and the plans for new gas-fired power plants and the development of nuclear energy, following the lifting of the ban on the construction of nuclear power plants at the end of 2024, are not accompanied by publicly available analyses of how they fit with the INECP objectives.

[44] Paragraf, news item of 23 June 2026 on consultations on the starting points for amendments to the Law on the Use of Renewable Energy Sources. Available at: https://www.paragraf.rs/dnevne-vesti/230626/230626-vest4.html.
[45] Energy Community Secretariat, *NECP Assessment Report*, August 2026. Available at: https://www.energy-community.org/dam/jcr:98276fa9-0be0-45ed-b01c-d272e8fa4b3e/ECS_NECP_Assessment_Report.pdf. See also *Q&A – NECP Regulation Assessment Report* for further clarification of the deadlines for preparing the drafts of new plans. Available at: https://www.energy-community.org/dam/jcr:b74a614b-d571-46ad-8368-f570129812b2/Q%26A_NECP_R_Assessment_Report.pdf.

Just transition. At its session held on 24 July 2025, the Government adopted the Just Energy Transition Plan of the Republic of Serbia up to 2030 (Just Transition Action Plan), with estimated costs of EUR 75.4 million, around 97% of which relates to industrial zone infrastructure and incentives for entrepreneurship. The measures for workers provided for in the draft were left out of the adopted plan, and the Ministry itself describes the plan as "an introduction to the process". The plan analyses only the closure of the Kolubara A and Morava thermal power plants, does not set a deadline for the coal phase-out, and postpones the analysis of redundancies and reintegration measures to the period 2027-2030, without a cost estimate.[46] The regulations on governing the implementation of the plan and monitoring its results have not been adopted, and the Just Transition Fund, envisaged as a Reform Agenda step with a deadline of December 2025, has not been established. The Decision on the Establishment of the Inter-Ministerial Government Committee (*Official Gazette of the RS*, No 118/2025) requires the committee to report regularly to the Government, but not to publish its reports. The deadline of 31 August 2026, set in the Just Transition Plan for legislative amendments establishing governance mechanisms and a monitoring framework, has been missed, and there are no public data on the establishment of the Just Transition Unit within the Ministry. The inter-departmental working group, which includes representatives of civil society, held its first meeting on 5 June 2026, while there is no publicly available information on the work of the Government's inter-ministerial committee. According to the Plan, the pilot retraining projects at the PE PEU Resavica and in Kostolac depend on the prior adoption of the EPS decarbonisation plan, which is not publicly available.

MRVA, CBAM and carbon pricing. The framework for monitoring, reporting, verification and accreditation (MRVA) has been established by the Law on Climate Change and secondary legislation. Permits and monitoring plans are issued via the eGHG platform, and the first verifiers have been accredited by the Accreditation Body of Serbia. On 3 December 2025, the National Assembly adopted the Law on the Greenhouse Gas Emissions Tax and the Law on the Tax on Imports of Carbon-Intensive Products, which have applied since 1 January 2026.[47] The tax of EUR 4 per tonne of emissions above the reference level covers the production of electricity, cement, iron and steel, aluminium and fertilisers, and its rate is many times lower than the price in the EU Emissions Trading System (EU ETS). The draft laws were subject to public consultation in October 2025, but the composition of the inter-departmental working group on CBAM, its minutes and analyses have not been published, so it is not publicly known on the basis of which assessments the price level and trajectory were set. The August 2026 amendments (*Official Gazette of the RS*, No 80/2026) aligned the tax credit for electricity producers with state aid rules, while the rate of EUR 4 per tonne and the reference levels remained unchanged. The Fiscal Council estimates that CBAM costs for electricity amount to EUR 200-300 million per year, almost ten times higher than the estimate in the Fiscal Strategy.[48]

Energy poverty and tariffs. In 2024, around 174,000 households had the status of vulnerable electricity customer, while coverage of gas customers is negligible. Around 9.3% of the population is unable to keep their home adequately warm. Regulated prices were adjusted during 2025, but the Energy Community Secretariat considers the scope of guaranteed supply to be broader than permitted

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[46] Government of the Republic of Serbia, materials from the 18th session of the Government, 24 July 2025. Available at: https://www.srbija.gov.rs/prikaz/897802. See also Ministry of Mining and Energy, *Plan for Just Energy Transition for Serbia up to 2030*, adopted in July 2025. Available at: https://www.mre.gov.rs/extfile/sr/12123/PLAN%20FOR%20JUST%20ENERGY%20TRANSITION%20FOR%20SERBIA%20UP%20TO%202030%20ADOPTED%20JULY%202025.pdf.

[47] Law on the Greenhouse Gas Emissions Tax, *Official Gazette of the RS*, No 109/2025. Available at: https://www.paragraf.rs/propisi/zakon-o-porezu-na-emisije-gasova-sa-efektom-staklene-baste.html.

[48] Fiscal Council, "Klimatsko-energetska tranzicija Srbije i javne finansije: hoće li CBAM biti okidač promena?" [*Serbia's Climate and Energy Transition and Public Finances: Will CBAM Trigger Change?*], 2025. Available at: https://www.fiskalnisavet.rs/doc/analize-stavovi-predlozi/2025/fs_klimatsko-energetska-tranzicija-srbije-i-javne-finansije-hoce-li-cbam-biti-okidac-promena_16102025.pdf.

under Directive (EU) 2019/944.[49] The Reform Agenda step concerning the introduction of cost-reflective electricity prices for households, with a deadline of December 2026, has not been fulfilled. Measures addressing the causes of energy poverty, such as the energy renovation of the homes of the most vulnerable households, are not linked to the vulnerable customer protection programme.

How to Unblock the Process? / Priority Steps to Unblock the Process

The key obstacle in Chapter 15 is no longer the transposition of legislation, but its implementation. All three recommendations have been reworded so that each has a clearly identified addressee, a specific action and a deadline linked to the constitution of the new Government and National Assembly following the elections of 25 October 2026.

1. **Publish the CBAM impact assessment and, on that basis, adopt a roadmap for including electricity generation in the EU ETS by September 2027** (*NCEU recommendation from 2025 – reworded*)

   Since 1 January 2026, CBAM has also applied to electricity exports from Serbia. The exemption under Article 2(7) of Regulation (EU) 2023/956 may be granted to countries whose electricity market is coupled with the EU market and which, among other things, have set in law a climate neutrality target by 2050 and, by 1 January 2030, have introduced an emissions trading system for electricity with a price equivalent to that in the EU ETS. Under the general approach of the Council of the EU on the amendments to the Regulation, adopted on 12 June 2026, the Commission would, by means of a memorandum of understanding with a country that has fully transposed the electricity market acquis, set deadlines for applying the exemption and introducing such a carbon price. The legislative procedure is ongoing. Apart from the verification referred to in recommendation 2, Serbia has not prepared a position on the other conditions either. The assessment of the impact of CBAM on electricity generation, carried out by the Ministry of Mining and Energy in 2025, has not been published. Within the first 60 days of its term, the new Government should publish the act establishing the working group, its composition and minutes, as well as the said assessment, supplemented by a comparison of CBAM costs with the costs of different models and timelines for introducing a carbon price for EPS and consumers. On that basis, by September 2027 and in agreement with the European Commission, the Government should adopt a roadmap for including the electricity system in the EU ETS, so that it can be incorporated into the draft new INECP. The model chosen depends on the agreement with the EU. Possible options are a national system linked to the EU ETS through an agreement under Article 25 of Directive 2003/87/EC, as in the case of Switzerland, or the transposition of the Directive on the basis of an international agreement, as in the case of Iceland, Liechtenstein and Norway. If a national system is introduced, it should be designed from the outset to allow linking with the EU ETS, rather than as a separate system that, after the transitional period, would continue to operate separately until EU accession. The roadmap should serve as the basis for negotiating the memorandum, including transitional arrangements and support mechanisms modelled on the transitional free allocation of allowances for the modernisation of electricity generation and the Modernisation Fund (Articles 10c and 10d of the Directive). This would spread the costs for EPS and consumers over time. At the same time, amendments to the Law on Climate Change should set a climate neutrality target by 2050, to which Serbia committed in the 2020 Sofia Declaration, since meeting this condition for the exemption entails no direct costs.

[49] Energy Community Secretariat, *Annual Implementation Report 2025 – Serbia*, pp. 3-6 (retail market, guaranteed supply and energy poverty; data for 2024). Available at: https://www.energy-community.org/dam/jcr:5b4ff2d5-5672-4989-ad81-d7fd9e27a7f7/Serbia_IR25CP.pdf.

2. **Remedy the shortcomings identified in the European Commission's opinion of 14 May 2026 and allocate available gas capacity exclusively through transparent auctions** (*NCEU recommendation from 2025 – repeated and reworded*)

   The Ministry of Mining and Energy should publish the Commission's opinion and an action plan with deadlines, and the new Government should, within the first six months of its term, adopt the necessary legislative amendments, including the Decree on guidelines for trans-European energy infrastructure, so that the verification can be completed and the technical preparation phase for market coupling can begin by mid-2027 at the latest. EMS should start allocating capacity on the EMS–KOSTT interconnection, ensure participation in a regional coordination centre in accordance with Energy Community Ministerial Council Decision 2022/03, and publish a plan for joining the MARI and PICASSO platforms. AERS should adopt the remaining terms, conditions and methodologies provided for in the balancing and system operation guidelines, and confirm the compliance of the designation of SEEPEX as a nominated electricity market operator. In the gas sector, AERS should ensure that Transportgas Srbija offers all unbooked capacity at Horgoš, Kalotina–Dimitrovgrad and the interconnection point with Gastrans exclusively via the RBP, with the results of the auctions published. By the end of 2026, AERS should publish an assessment of the capacity allocation procedure of July 2025 and of the Gastrans regime in accordance with Articles 32 and 33 of the Law on Gas. In addition, the certification of Jugorosgaz-Transport and the Banatski Dvor underground gas storage facility, as well as the unbundling of Srbijagas's distribution activities, should be completed.

3. **Ensure a strategically coherent and predictable framework for energy investment: set a coal phase-out trajectory, ensure the continuity of RES auctions and base decisions on gas and nuclear energy on the INECP** (*NCEU recommendation from 2025 – reworded*)

   During 2027, the Ministry of Mining and Energy should formally launch the preparation of the new INECP, the draft of which is to be submitted by 1 January 2028, with publicly available scenarios and cost-benefit analyses for coal, gas, nuclear energy and RES. The new plan should include a deadline and trajectory for the coal phase-out, linked to the EPS decarbonisation plan and the Just Transition Plan, the implementation of which should be further operationalised. Until the new plan is adopted, decisions on new gas and nuclear capacity should be based on publicly available analyses of their consistency with the INECP. As regards nuclear energy, before deciding to launch a programme, the Government should hold broad public consultations on the capacity needed, the costs and the justification for using nuclear energy in Serbia. Continuity of investment in RES requires the launch of a third auction round in the first half of 2027, together with an auction calendar up to 2030. It is also necessary to adopt amendments to the Law on the Use of Renewable Energy Sources establishing a legal framework for the single point of contact, designating renewables acceleration areas and regulating the position of prosumers, and to publish a network development plan to eliminate delays in the connection of new projects.

Link to the Reform Agenda

By decision of 12 January 2026, the European Commission assessed as fulfilled the step under measure 7.1.1 (2.1.1 in the Commission's numbering) concerning the implementation of the Electricity Integration Package, with a deadline of December 2024. The Commission noted, however, that further obligations would be continuously monitored. The table below shows the status of each measure and the steps whose implementation is urgent for progress in Chapter 15.

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 15
7.1.1. Implementation of the Third Energy Package for gas and transposition and implementation of the electricity integration package (2.1.1 in the EC numbering)	The step with a December 2024 deadline has been assessed as fulfilled. However, on 14 May 2026 the European Commission issued an opinion with recommendations concerning the transposition of legislation required for market coupling. The step with a June 2025 deadline, concerning third-party access, has not been fulfilled, while the step with a June 2026 deadline has been only partially fulfilled (SCC Belgrade, IGCC and observer status in MARI).	Implement the measures under recommendation 2; ensure that EMS and SEEPEX are ready for intraday market coupling by December 2026.
7.1.2. Gradual tariff adjustments to cost recovery levels accompanied with measures to address energy poverty if and when needed	Regulated prices were adjusted during 2025. The national programme for reducing energy poverty has not been adopted, and household prices are not cost-reflective.	By December 2026, draw up a plan for achieving cost-reflective prices, with targeted protection of vulnerable customers; narrow the scope of guaranteed supply in line with Directive (EU) 2019/944; link subsidies to the energy renovation of residential buildings.
7.1.3. Implementation of the Just Transition Action Plan	The Just Energy Transition Plan was adopted on 24 July 2025. The Just Transition Fund, which was to be established by December 2025, has not been set up.	Establish the coordination body and the Just Transition Fund and adopt regulations for monitoring the implementation of the plan. The preparation of the EPS decarbonisation plan is a prerequisite for launching the pilot projects in Resavica and Kostolac by June 2027.
7.1.4. Ensuring Transparent and Competitive Procedures for the Development of Renewable Energy	The installed capacity of wind and solar power plants exceeds 1.3 GW. The third auction round had not been launched by September 2026. The draft law on alternative fuels infrastructure was subject to public consultation from 4 to 25 June 2026, but the bill has not yet been finalised by the Government.	Enable the connection of around 0.2 GW of additional capacity by December 2026; launch the third auction round and publish a multiannual auction calendar; finalise the bill and the national policy framework for alternative fuels by December 2026.
7.1.5. Implementation of the Renewable Energy Directive (Permitting, Guarantees of Origin, Prosumers)	The system of guarantees of origin for electricity is functioning. The single point of contact for strategic projects within the Ministry of Mining and Energy (MME) has only an information role and is not in line with Article 16 of the RED II Directive. The framework for designating renewables acceleration areas, due by June 2026, has not been established. Amendments to the Law on the Use of RES are at the stage of preparing the starting points.	Amend the Law on the Use of RES to establish a single point of contact regulated by law and to designate renewables acceleration areas; adopt the rulebooks on the certification of installers, whose statutory deadline expired in June 2025; establish a system of guarantees of origin for gas and heat; regulate the rules for prosumers.
7.1.6. Implementation of MRVA	The MRVA framework is functioning, including the eGHG system and accredited verifiers. A total of 97 permits with monitoring plans have been issued. The deadline for submitting verified reports was 31 March, but information on this process is not publicly available.	Publish data on the number of verified reports submitted so that it can be assessed whether the full MRVA cycle has been completely and adequately implemented.
7.1.7. Implementation of the Energy Efficiency Directive, the Energy Performance of Buildings Directive, Eco-design, and Energy Labelling Legislation	Legislation on the energy performance of buildings has not been adopted, nor has a new methodology for calculating energy consumption in buildings, although the deadline was December 2025.	Adopt legislation on the energy performance of buildings and a new methodology for calculating building emissions; adopt rules on the allocation of heating costs ensuring that 40% of billing is based on consumption; improve market surveillance of the eco-design of solid fuel

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 15
		appliances; publish data on building renovation rates. The deadline for these steps is December 2026.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Chapter 15 was opened on 14 December 2021, and the Plan sets out measures for meeting all three closing benchmarks for the chapter. The table follows the structure of the Plan and is based on its content, the Government's implementation report and verification of data in official sources.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
1. Serbia completes legal alignment with the EU acquis on emergency oil stocks, establishes an administrative structure for stock management and continues to increase actual stocks in line with the action plan.	Alignment with Directive 2009/119/EC[50]	Ministry of Mining and Energy		Yes	The new Law on Emergency Stocks of Oil, Petroleum Products and Natural Gas was adopted on 3 December 2025 (*Official Gazette of the RS*, No 109/2025).
	Establishment of an administrative structure for the management of emergency stocks	Directorate for Energy Reserves		Yes	
	Building up emergency stocks equivalent to at least 90 days of average daily net imports or 61 days of consumption, whichever is greater	Directorate for Energy Reserves	Q4 2026	Deadline has not expired	In the first quarter of 2026, stocks corresponded to 61.51 days of average daily net imports, compared with 41 days at the time the Plan was adopted.
2. Serbia aligns with the EU acquis on the internal energy market, including unbundling in the gas sector in line with the action plan, and fully aligns the regulatory regime for Gastrans with EU law.	Adoption of five decrees under the Electricity Integration Package (EU 2019/941, 2016/1719, 2017/2196, 2017/1485 and 2017/2195)	Ministry of Mining and Energy	Q2 2025	Yes (August 2025)	Decrees were adopted on risk preparedness (*Official Gazette of the RS*, No 42/2025), forward capacity allocation (No 44/2025), emergency and restoration (No 46/2025), transmission system operation (No 65/2025, July) and electricity balancing (No 74/2025, August). The last two decrees were adopted after the planned deadline.

[50] Alignment with Directive 2009/119/EC and the establishment of an administrative structure for the management of emergency stocks, including the Directorate for Energy Reserves, were completed before the adoption of the Plan, as noted in the Plan itself.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	Alignment with Regulation (EU) 2022/869 on guidelines for trans-European energy infrastructure	Ministry of Mining and Energy	Q2 2025	No	According to the Government's report for the first quarter of 2026, alignment is ongoing.
	Unbundling in the electricity sector	Ministry of Mining and Energy; AERS		Yes	EMS was certified under the ownership unbundling model by AERS decision of 26 January 2017. Since 1 November 2023, it has been controlled by the Republic Commission for Energy Networks. Elektrodistribucija Srbije is legally and functionally unbundled.
	Unbundling of Srbijagas and certification of the transmission system operator Transportgas Srbija	AERS; Srbijagas; Transportgas Srbija	Q2 2025	Yes	The certificate was issued on 21 March 2025, and the conditions were confirmed on 31 March 2026. The network owner is Gas Infrastruktura Ltd, established at the end of 2025.
	Unbundling of Jugorosgaz	Ministry of Mining and Energy; AERS	Q2 2025	No	Jugorosgaz-Transport has not been certified.
	Adoption of the Law on the Gas Market, in line with Regulation (EU) 2017/1938	Ministry of Mining and Energy	Q4 2025	Yes (3 December 2025)	The law was adopted under the title Law on Gas (*Official Gazette of the RS*, No 109/2025).
	Adoption of decrees establishing the emergency plan and the preventive action plan for ensuring the security of natural gas supply	Ministry of Mining and Energy	Q2 2025	Yes (5 June 2025)	The decrees were published in the *Official Gazette of the RS*, No 49/2025.
	Opening of the gas market and ensuring non-discriminatory third-party access; capacity allocation at Horgoš and on the Serbia–Bulgaria interconnector	Ministry of Mining and Energy; AERS; Transportgas Srbija	Q2 2025	No	The status remains "No" owing to the lack of effective third-party access. The capacity allocated in 2025 is tied up for several gas years, the results of auctions on the RBP have not been published, Srbijagas and NIS are the only active wholesale suppliers, and Srbijagas's distribution has not been unbundled.[51]

[51] Gastrans, *Project Design – Incremental Capacity IP Serbia*, January 2026. The document provides for new capacity from gas year 2027/2028, with third-party access. Available at: https://gastrans.rs/wp-content/uploads/2026/01/Incremental-capacity_2025_Project-Design_IP-SERBIA_ENG.pdf.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	Alignment of the regulatory regime for Gastrans with EU legislation and exercise of AERS's supervisory powers	AERS	Q4 2026	Deadline has not expired	By 30 September 2026, no data were publicly available on the exercise of these powers by AERS, or on the initiation of a review of the certificate or the exemption.
	Reform Agenda step 7.1.1: participation of EMS in regional coordination centres and fulfilment of the conditions for joining EU balancing platforms	EMS; AERS; Ministry of Mining and Energy	June 2026	No	The deadline has expired, and the step has been only partially fulfilled.
	Reform Agenda step 7.1.1: fulfilment by EMS and SEEPEX of all requirements of the Electricity Integration Package for joining intraday market coupling with the EU[52]	EMS; SEEPEX; AERS; Ministry of Mining and Energy	December 2026	Deadline has not expired	Given that a positive opinion is followed by a contractual and technical preparation phase lasting around 18 months, fulfilment of this step by December 2026 is not realistic.
3. Serbia aligns with the EU acquis on energy efficiency and renewable energy sources (RES), adopts a national energy and climate plan in line with Regulation (EU) 2018/1999 and provides evidence of its implementation.	Adoption of amendments to the Law on the Use of RES to align with Directive (EU) 2018/2001	Ministry of Mining and Energy	Q4 2026	Deadline has not expired	From June to 7 July 2026, the MME held consultations on the starting points for amending the law. A total of 94 comments were received from 15 contributors. The draft law has not been published, and it cannot be adopted by the end of 2026, as the newly elected National Assembly has yet to be constituted.
	Adoption of the Law on the Deployment of Alternative Fuels Infrastructure, in line with Regulation (EU) 2023/1804	Ministry of Construction, Transport and Infrastructure	Q4 2025	No	The public consultation on the draft law was held from 4 to 25 June 2026. As at 30 September 2026, the Government had not finalised the bill. Following the dissolution of the National Assembly (*Official Gazette of the RS*, No 85/2026), the law cannot be adopted before the newly elected Assembly is constituted.
	Establishment of a legal and institutional framework for renewables acceleration areas and	Ministry of Mining and Energy	Q2 2026	No	The single point of contact for strategic projects within the MME is not in line with Article 16 of the RED II Directive, and renewables

[52] The Reform Agenda steps under measure 7.1.1 (2.1.1 in the European Commission's numbering), Annex VII, Annex 1 to Commission Decision C(2024) 7375, are listed in the Plan and monitored in this table, but are not included in the statistics, which count only laws and secondary legislation.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	the permit-granting procedure				acceleration areas have not been regulated. The draft amendments to the Law on the Use of RES had not been published by 30 September 2026.
	Adoption of amendments to the Law on Planning and Construction to align with Directive 2010/31/EU	Ministry of Construction, Transport and Infrastructure	Q4 2025	No	The law has been amended twice since the adoption of the Plan, but neither amendment achieved alignment with Directive 2010/31/EU.
	Adoption of amendments to the Law on Energy Efficiency and Rational Use of Energy to align with Directive (EU) 2023/1791[53]	Ministry of Mining and Energy	Q4 2026	Deadline has not expired	As at 30 September 2026, no draft had been published and no public consultation had been launched. Following the dissolution of the National Assembly, adoption of the law by the end of 2026 is not realistic.
	Adoption of 18 rulebooks on ecodesign and energy labelling[54]	Ministry of Mining and Energy	Q1 2025 – Q4 2026	Partially	Of the 18 rulebooks planned, 16 have fallen due so far. Ten rulebooks have been adopted, representing 62.5% of those due. The remaining two rulebooks fall due in the fourth quarter of 2026.
	Amendment of the Rulebook on the Content of the INECP and Reporting to align with Implementing	Ministry of Mining and Energy	Q4 2026	Deadline has not expired	The first integrated progress report was submitted in 2025. The Rulebook (*Official Gazette of the RS*, No 49/2022) has not been

[53] European Commission, *Energy Efficiency Directive*. Available at: https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficiency-targets-directive-and-rules/energy-efficiency-directive_en.

[54] Form 2 of the Plan lists 18 rulebooks on ecodesign and energy labelling, with deadlines from the first quarter of 2025 to the fourth quarter of 2026, while Form 1 lists 22 EU acts. The figure from Form 2 has been used for the calculation. According to the Register of Regulations in Force of the Legal Information System (PIS), consulted on 3 October 2026, rulebooks on ecodesign requirements have been adopted for: light sources and separate control gears (*Official Gazette of the RS*, No 20/2025, 7 March 2025, before the adoption of the Plan); glandless standalone circulators (*Official Gazette of the RS*, No 42/2025); external power supplies (*Official Gazette of the RS*, No 65/2025); ventilation units (*Official Gazette of the RS*, No 62/2025, 11 July 2025); electric motors and variable speed drives, and computers (*Official Gazette of the RS*, No 103/2025); refrigerating appliances with a direct sales function (*Official Gazette of the RS*, No 100/2025, 13 November 2025); welding equipment (*Official Gazette of the RS*, No 18/2026); water heaters and hot water storage tanks (*Official Gazette of the RS*, No 45/2026); and household tumble driers (*Official Gazette of the RS*, No 67/2026, 23 July 2026).

Rulebooks on the energy labelling of tumble driers (*Official Gazette of the RS*, No 31/2025) and of refrigerating appliances with a direct sales function (*Official Gazette of the RS*, No 100/2025), which are not listed in Form 2, have also been adopted. For six rulebooks whose deadlines have passed – on fans, water pumps, professional refrigerated storage cabinets, air heating and cooling products, servers and data storage products, and tyre labelling – no publicly available evidence of publication has been identified. The deadlines for the rulebooks on space heaters and combination heaters, and on smartphones, fall in the fourth quarter of 2026. Sources for the published rulebooks: *Official Gazette of the RS*, No 62/2025: https://www.paragraf.rs/glasila/rs/sluzbeni-glasnik-republike-srbije-62-2025.html; *Official Gazette of the RS*, No 100/2025: https://www.paragraf.rs/glasila/rs/sluzbeni-glasnik-republike-srbije-100-2025.html; *Official Gazette of the RS*, No 67/2026: https://www.paragraf.rs/glasila/rs/sluzbeni-glasnik-republike-srbije-67-2026.html; *Official Gazette of the RS*, No 103/2025: https://www.paragraf.rs/glasila/rs/sluzbeni-glasnik-republike-srbije-103-2025.html.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	Regulation (EU) 2022/2299, and establishment of a system for reporting on INECP implementation; start of preparation of the draft new INECP				amended to transpose Implementing Regulation (EU) 2022/2299, and the next report is due on 15 March 2027. As at 30 September 2026, no Government decision or decision establishing a working group had been published that would formally launch the preparation of the new plan. The only publicly visible activity is an EU technical assistance project worth around EUR 1 million, implemented by NTU International since 2025, which supports the MME in monitoring, reporting and preparing the second version of the plan.
	Adoption of the Just Transition Action Plan	Ministry of Mining and Energy	Q2 2025	Yes (24 July 2025)	The Just Energy Transition Plan of the Republic of Serbia up to 2030 was adopted at the 18th session of the Government, one quarter after the planned deadline.
	Adoption of regulations on governing the implementation and monitoring of the Just Transition Action Plan	Ministry of Mining and Energy	Q4 2025	No	Only the Decision on the Establishment of the Inter-Ministerial Government Committee for Managing the Just Energy Transition Process has been adopted (*Official Gazette of the RS*, No 118/2025).
	Establishment of the Just Transition Coordination Body	Government; Ministry of Mining and Energy	Q4 2026	Deadline has not expired	The deadline has not expired, but no significant progress has been made towards establishing a functioning coordination body.
	Support for the retraining and upskilling of employees in companies undergoing transformation	Ministry of Mining and Energy; EPS	Q4 2026	Deadline has not expired	According to the Plan, implementation of this measure depends on the adoption of the EPS decarbonisation plan, which as at 30 September 2026 had neither been adopted nor made publicly available. Retraining programmes have not been launched.

Note: *The laws covered by the monitoring are the Law on Gas, the Law on the Deployment of Alternative Fuels Infrastructure, and the amendments to the Law on Planning and Construction, the Law on the Use of RES and the Law on Energy Efficiency and Rational Use of Energy. The secondary legislation comprises the five decrees under the Electricity Integration Package, the two decrees on the security of gas supply, the 18 rulebooks on ecodesign and energy labelling,*

the amendments to the Rulebook on the INECP, the Just Transition Action Plan, the regulations on governing its implementation, the Decree on the Programme for the Implementation of the Strategy, the framework for renewables acceleration areas, and the act establishing the Just Transition Coordination Body.

Statistics

	Total planned 11.4.2025 – 31.12.2026[55]	Due by 30.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	5	3 (60.0%)	1 (33.3%)	2 (40.0%)
Secondary legislation	32	28 (87.5%)	19 (67.9%)	4 (12.5%)

Conclusion

By 30 September 2026, Serbia had completed most of the legal alignment required under the closing benchmarks for Chapter 15. The Electricity Integration Package has been transposed, Transportgas Srbija has been certified and has joined the Regional Booking Platform, and the following have been adopted: new laws on gas and on emergency stocks of oil and petroleum products, decrees on the security of natural gas supply, the Just Energy Transition Plan, the Programme for the Implementation of the Energy Sector Development Strategy, and legislation introducing a tax on greenhouse gas emissions. The European Commission has upgraded its assessment of Serbia's progress from "limited" to "some progress", and Serbia leads the region in implementing the Energy Community acquis.

The gap between transposition and implementation, however, remains the key obstacle. In its opinion of 14 May 2026, the European Commission did not confirm the alignment required for market coupling, so coupling with EU markets is not expected before 2028. In practice, the gas market remains closed to new entrants, despite the establishment of a framework for transparent capacity allocation during 2026. Emergency oil stocks have reached approximately two thirds of the required level, while the investment cycle in the area of RES has slowed owing to the absence of a third auction round. Security of supply still depends on three-month annexes to the contract with Gazprom and on monthly OFAC licences for NIS, while the carbon price of EUR 4 per tonne, unchanged even after the August 2026 amendments, does not in itself secure an exemption from CBAM.

With the dissolution of the National Assembly on 9 September 2026, the deadlines in the Plan for adopting laws by the end of 2026, including the amendments to the Law on the Use of RES and the Law on Energy Efficiency and Rational Use of Energy, are in practice postponed until the newly elected Assembly is constituted. At the same time, deadlines have already been missed for adopting the law on alternative fuels infrastructure, adopting legislation on the energy performance of buildings and the TEN-E Decree, establishing the single point of contact and renewables acceleration areas, ensuring effective third-party access to the gas network and establishing a governance framework for the just transition.

[55] The statistics cover measures whose fulfilment requires the adoption of a law, secondary legislation or a planning act, including an action plan, a programme and an act establishing a coordination body, which are counted as secondary legislation for the purposes of the calculation. Operational and institutional measures (the level of emergency oil stocks, the certification of operators, capacity allocation, the establishment of reporting, the start of preparation of the new INECP and the retraining of employees), as well as the two Reform Agenda steps under measure 7.1.1 listed in the Plan, are not included in the statistics. The Law on the Exploration and Production of Hydrocarbons, which is mentioned in the Plan only in the part relating to the NPAA, is also not included. The 2025 and 2026 amendments to the Law on Planning and Construction are not counted as fulfilling the measure, as they did not transpose Directive 2010/31/EU. The term "due" covers obligations whose deadline expired by the end of the third quarter of 2026. The percentage of adopted acts is calculated in relation to the number of obligations due, in accordance with the methodology set out in the model example. The Rulebook on ecodesign requirements for light sources, adopted before the adoption of the Plan, is counted as adopted.

None of the three closing benchmarks for Chapter 15 had been met by the cut-off date. The new Government's priority should therefore be measures that enable genuine market opening and send a clear price and investment signal. Their implementation will determine whether formal legislative alignment translates into Serbia's genuine integration into the EU energy market.

WORKING GROUP FOR CHAPTER 16
TAXATION

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**1**
Partially fulfilled	**2**
Number of new recommendations	**1**

Objectives

Chapter 16 covers the obligation to align tax legislation with the EU acquis. This obligation relates primarily to indirect taxes (value added tax and excise duties) and, to a lesser extent, to direct taxes (corporate income tax and taxes on capital income). The aim is to prevent the adoption of national legislation that could distort the functioning of the EU internal market, to eliminate distortions in the cross-border business activities of EU companies and to prevent tax evasion.

State of Play

At the end of May 2021, the Law on Excise Duties was amended, which was a condition for opening Chapter 16 in the EU accession negotiations. However, more than five years later, although the negotiating position for this chapter has been submitted and the chapter is technically ready for opening, it has still not been opened. The administrative capacity of the Tax Administration and the level of development of the relevant IT systems remain low. Alignment of national tax legislation with the EU acquis began with the adoption of amendments to a set of tax laws on 31 August 2026. The Law on Corporate Income Tax, the Law on Personal Income Tax, the Law on Value Added Tax, the Law on Mandatory Social Insurance Contributions and the Law on Excise Duties were amended, while the Law on the Tax on Imports of Carbon-Intensive Products and the Law on the Greenhouse Gas Emissions Tax were supplemented. However, most of the accompanying secondary legislation has not yet been aligned with the EU acquis.

How to Unblock the Process? / Priority Steps to Unblock the Process

Chapter 16 requires accelerated implementation of the Tax Administration Transformation Programme. The priority and time-critical measures that would enable progress are:

1. Strengthening the administrative capacity of the Tax Administration: improving administrative capacity by increasing the number of staff, applying a staff retention policy and strengthening human and technical capacity;
2. Establishing and effectively operating an integrated information system to support the Tax Administration's new business model;
3. Adopting the secondary legislation accompanying the tax laws aligned with the EU acquis that were adopted on 31 August 2026, for which the deadline is the fourth quarter of 2026, in accordance with the Plan for the Fulfilment of the Most Important Obligations under the Accession Negotiations of the Republic of Serbia with the EU by the End of 2026.

Link to the Reform Agenda

Reform Agenda Measure	Status	Urgent for Chapter 16
6.2.1. Enhanced investment and development opportunities for entrepreneurs and private sector	Status: ongoing; deadline: 2027	This reform is one of the specific objectives of the Programme for Combating the Shadow Economy in the Republic of Serbia for the period 2023-2025. A lack of resources further complicates this undertaking. Given that 140 local self-government units (LSGUs) are involved, compiling a complete inventory of parafiscal charges is a very demanding task. Additional capacity and financial support will therefore be needed to resolve this issue.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Chapter 16 has not yet been formally opened, but the Plan sets out measures and deadlines for meeting the benchmarks envisaged for provisional closure. The table below follows the structure of the Plan.

Opening benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
Equalisation of the excise burden on spirit drinks through the calculation of excise duty on the basis of alcohol content	Amendment of the Law on Excise Duties	Ministry of Finance		Yes	Following the amendments to the Law on Excise Duties of May 2021, the European Commission assessed that the opening benchmarks had been met.

Planned measures under the Plan 2026

Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
Law on Personal Income Tax	Ministry of Finance	Q4 2026	Yes	
Law on Corporate Income Tax	Ministry of Finance	Q4 2026	Yes	
Rulebook on the Manner of Calculating and Paying Excise Duty, the Type, Content and Manner of Keeping Records, Submitting Data and Filing Tax Returns	Ministry of Finance	Q4 2026	Yes	
Rulebook on the Manner and Procedure for Calculating and Paying Excise Duty on Electricity for Final Consumption	Ministry of Finance	Q4 2026	Deadline not yet expired	
Rulebook on the List of Additives and Extenders Declared as Such for Addition to Motor Fuels	Ministry of Finance	Q4 2026	Deadline not yet expired	
Rulebook on the Detailed Conditions, Manner and Procedure for Exercising	Ministry of Finance	Q4 2026	Deadline not yet expired	

Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
the Right to a Refund of Excise Duty Paid on Petroleum Products, Biofuels and Bioliquids referred to in Article 9(1)(3), (5) and (7) of the Law on Excise Duties, Used for Transport Purposes and for Heating				
Rulebook on the Detailed Conditions, Manner and Procedure for Exercising the Right to a Refund of Excise Duty Paid on Petroleum Products and Bioliquids referred to in Article 9(1)(3), (4), (5), (6) and (7) of the Law on Excise Duties, Used as Energy Fuels in the Generation of Electricity and Heat or for Industrial Purposes	Ministry of Finance	Q4 2026	Deadline not yet expired	
Rulebook on the Detailed Conditions, Manner and Procedure for Exercising the Exemption from Excise Duty on Products Sold by the Producer or Importer to Diplomatic and Consular Missions and International Organisations, and on Petroleum Products, Biofuels and Bioliquids Sold on the Basis of an International Agreement	Ministry of Finance	Q4 2026	Deadline not yet expired	
Decree on the Manner and Procedure for Determining the Weighted Average Retail Selling Price of Cigarettes, Smoking Tobacco and Other Tobacco Products	Ministry of Finance	Q4 2026	Deadline not yet expired	
Decree on the Quantity of Losses (Evaporation, Spillage, Spoilage and Breakage) on which Excise Duty Is Not Paid	Ministry of Finance	Q4 2026	Deadline not yet expired	
Rulebook on the Content, Type of Data and Manner of Keeping the Register of Producers of Alcoholic Beverages and Coffee	Ministry of Finance	Q4 2026	Deadline not yet expired	
Rulebook on the Conditions and Procedure for Obtaining, Renewing and Revoking an Excise Licence, the Manner and Control of the Dispatch and Receipt of Products to and from an Excise Warehouse, and Record-Keeping in an Excise Warehouse	Ministry of Finance	Q4 2026	Deadline not yet expired	
Decree on the Implementation of the Law on Excise Duties in the Territory of the Autonomous Province of Kosovo and Metohija during the Validity of UN Security Council Resolution 1244	Ministry of Finance	Q4 2026	Deadline not yet expired	
Law on Value Added Tax	Ministry of Finance	Q4 2026		
Law on Excise Duties	Ministry of Finance	Q4 2026		

Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
Decree on the Quantity of Losses (Evaporation, Spillage, Spoilage and Breakage) on which Value Added Tax Is Not Paid	Ministry of Finance	Q4 2026	Deadline not yet expired	
Decree on the Criteria for Determining What Constitutes Predominant Supply of Goods Abroad within the Meaning of the Law on Value Added Tax	Ministry of Finance	Q4 2026	Yes	
Decree on the Implementation of the Law on Value Added Tax in the Territory of the Autonomous Province of Kosovo and Metohija during the Validity of UN Security Council Resolution 1244	Ministry of Finance	Q4 2026	Deadline not yet expired	
Decree on the Design of Excise Control Stamps, the Type of Data on the Stamp, the Manner and Procedure for Approving and Issuing Stamps, Keeping Records of Approved and Issued Stamps, and Marking Cigarettes, Alcoholic Beverages and Coffee	Ministry of Finance	Q4 2026	Deadline not yet expired	
Law on Tax Procedure and Tax Administration	Ministry of Finance	Q4 2026	Yes	
Decree on the Design of Excise Control Stamps, the Type of Data on the Stamp, the Manner and Procedure for Approving and Issuing Stamps, Keeping Records of Approved and Issued Stamps, and Marking Cigarettes, Alcoholic Beverages and Coffee	Ministry of Finance	Q4 2026	Deadline not yet expired	

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 1.10.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	5	0 (0%)	5 (100%)	5 (100%)
Secondary legislation	16	0 (0%)	2 (12.5%)	16 (100%)

Conclusion

Owing to a significant stalemate in the process of consultations and approval of the negotiating position by the Council, which has lasted for five years, Chapter 16 is not high on the political agenda. In addition, the reform of the Tax Administration requires a series of activities and a longer period of time to implement. The adoption in August 2026 of a set of tax laws aligned with EU tax rules represents concrete progress, but the accompanying secondary legislation remains to be adopted. Although the deadline for adopting this legislation (Q4 2026) has not yet expired, there is a high probability that it will be missed owing to the early parliamentary elections and the procedures related to the formation of a new Government.

WORKING GROUP FOR CHAPTER 17
ECONOMIC AND MONETARY POLICY

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**3**
Partially fulfilled	**0**
Number of new recommendations	**0**

Objectives

The objective of negotiating Chapter 17, which covers economic and monetary policy, is to support economic and institutional reforms aimed at preserving macroeconomic stability and improving the competitiveness of the Republic of Serbia. Progress in this area is an important step towards meeting the requirements for future membership of the Economic and Monetary Union and fulfilling the Maastricht criteria. The sustainability of public finances, the credibility of economic policy and a stable business environment are of particular importance as prerequisites for long-term economic development. At the same time, the alignment of economic policies and the strengthening of institutional capacity in line with European Union rules contribute to Serbia's stronger integration into the European economic governance framework.

State of Play

Chapter 17 was opened in 2018, and some progress has since been made towards meeting the benchmarks in this area. However, substantive reforms are needed to achieve further progress in the area of economic and monetary policy. During 2026, the competent institutions (the Government of the Republic of Serbia and the National Bank of Serbia) prepared draft amendments to key laws, including the Law on the Budget System and the Law on the National Bank of Serbia, and began consultations with the European Commission with a view to preparing bills to be submitted to the National Assembly for adoption. However, given that parliamentary elections were called for the fourth quarter of 2026, there is a significant risk that these legislative amendments will not be adopted within the deadlines set by the Government.

In addition to the challenges relating to the adoption of legislative amendments, substantive problems in meeting the benchmarks remain. Although the legal framework of the National Bank of Serbia is largely aligned with European standards, its de facto independence is limited by political influence. At the same time, centralised economic decision-making, insufficient transparency and shortcomings in public investment planning, as well as the circumvention of certain procedures during implementation, adversely affect the quality of public spending and the effectiveness of economic policy. Weaknesses in the legal and institutional environment further constrain domestic private investment, while the existing growth model relies heavily on public investment and inflows of foreign direct investment. All of the above points to the need to strengthen institutional capacity, improve transparency and create a more stable environment for sustainable and competitive economic growth.

How to Unblock the Process? / Priority Steps to Unblock the Process

Given that the steps envisaged in the previous period have not been sufficiently implemented and that substantive reforms have not taken place, the recommendations from the previous cycle remain relevant in this reporting period:

1. Proceed with the preparation of the Development Plan and the Investment Plan in accordance with the applicable legislative framework, with the proactive involvement of all relevant stakeholders;
2. Align the competences, capacity and programmes of the institutions supporting the development of the small and medium-sized enterprise (SME) sector with the practices of OECD member countries, with a particular focus on strengthening coordination and systematically evaluating the effects of programmes. This would significantly improve the position of the SME sector in the Republic of Serbia;
3. Significantly improve the transparency of public investment and establish a publicly accessible platform for monitoring it, taking into account the political context, the lack of transparency to date and frequent irregularities in the planning and implementation of public investment, particularly investments related to the EXPO 2027 project and/or bilateral agreements.

Link to the Reform Agenda

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 17
6.1.1. Management of public investment and of state-owned enterprises of the Republic of Serbia By the end of 2026, adopt the Policy Document and Action Plan for improving public investment management, and by the end of 2027, establish a legal framework introducing a single, comprehensive and transparent mechanism for the prioritisation of all public investment, in line with the findings of consultations with the European Commission.	Status: ongoing; deadline: December 2026 – December 2027.	Although this obligation is well identified in the Reform Agenda, the Working Group considers that its substantive implementation first requires a set of development objectives to be defined to guide the setting of investment priorities, together with criteria for assessing the contribution of investments to achieving those objectives. Defining future development and investment priorities is particularly important given that public debate and the available information on public investment currently relate largely to EXPO 2027. By the time this project is completed, the system should already be well advanced in preparing new priorities.
6.2.1. Improving investment and development opportunities for entrepreneurs and the private sector – State aid A final inventory of state aid schemes needs to be submitted, in line with the European Commission's comments of March 2024. By June 2025, an action plan with a clear timeline for aligning state aid schemes with the EU acquis, based on the final inventory and approved by the European Commission, was to be adopted. Preparation of the action plan is still ongoing. By December 2027, all remaining state aid schemes covered by the Stabilisation and Association Agreement (SAA) need to be aligned with the EU acquis.	Status: ongoing; deadline: December 2026 – December 2027.	Given that the action plan for aligning state aid schemes with the EU acquis is still being prepared and that alignment of all schemes is not expected before the end of 2027, and may not be completed even then, the Working Group considers it extremely important for the competitiveness of the Serbian economy to begin aligning at least some of the existing schemes with the EU acquis and standard EU practice now. Otherwise, Serbian SME exporters are at a serious competitive disadvantage compared with small and medium-sized enterprises operating on the EU market.
6.2.1. Improving investment and development opportunities for	Deadline: June 2025; contracts were not	The Law on Public Procurement will apply in full again only from June 2027, possibly later, while the publication of contracts concluded on the basis

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 17
entrepreneurs and the private sector – Public procurement From December 2024, all contracts concluded on the basis of intergovernmental agreements are to be published, and this practice is to continue for all future contracts. By June 2027, all laws and secondary legislation allowing derogations from the Law on Public Procurement are to be repealed.	published within the planned deadline	of intergovernmental agreements is uneven. To achieve the ultimate objective of this measure, namely establishing a competitive domestic market that promotes the quality and competitiveness of the economy, the Working Group considers it important for the Government, at least temporarily, to achieve similar effects in terms of transparency and competition by establishing a platform on which it would present all procurement in detail and explain its decisions on carrying it out.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Chapter 17 was opened in 2018, but it is also part of Cluster 3, the full opening of which under the new methodology has been pending for almost five years. Although some progress has been made towards meeting the closing benchmarks for the chapter, several further substantive steps need to be taken and additional conditions fulfilled for the relevant benchmarks to be met. The following table provides an overview of key information on the planned measures, their deadlines and status.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
1. Serbia aligns its legislative framework with the EU acquis to ensure the full independence of the central bank, the prohibition of monetary financing of the public sector, the prohibition of privileged access of the public sector to financial institutions, and the full integration of the national central bank into the European System of Central Banks	Law Amending the Law on the National Bank of Serbia	National Bank of Serbia	Q4 2026	Yes	The relevant legislative amendments were adopted on 6 March 2025, before the adoption of this Plan.
	Law on Public Property	National Bank of Serbia	Q4 2026	Deadline has not expired	
	Law Amending the Law on the National Bank of Serbia	National Bank of Serbia	Q4 2026	Deadline has not expired	This measure covers further amendments to the Law on the National Bank of Serbia to achieve further alignment with the operating principles of central banks in the EU.
2. Serbia aligns its national legislative framework to meet the requirements for national budgetary frameworks laid down in Council Directive 2011/85/EU	Law on the Budget System	Ministry of Finance	Q4 2026	Deadline has not expired	

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
3. Serbia meets the criteria regarding the existence of a functioning market economy	No specific measures are listed for meeting this benchmark. The implementation of the obligations under the Reform Agenda of the Republic of Serbia and the Economic Reform Programme for the period 2025–2027 is expected to contribute to meeting the conditions set.	All institutions responsible for implementing economic and monetary policy in the Republic of Serbia	No specific legislative measures, i.e. alignment with specific EU acquis, are envisaged for this benchmark, so no timeline for such alignment has been set.	Deadline has not expired	The measure is not sufficiently clearly defined, either in terms of the scope of activities or the competent institutions.

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	4	0	1 (25%)	3 (75%)
Secondary legislation	0	0	0	0

Conclusion

Further progress under Chapter 17 requires formal legislative alignment to be translated into substantive changes in the conduct of economic policy and the management of public resources. It is particularly important to strengthen the independence of the National Bank of Serbia, improve institutional capacity for planning and implementing public investment, and increase the transparency and inclusiveness of economic decision-making.

The draft amendments to key laws are a step in this direction, but their significance will depend primarily on the adoption and consistent implementation of the proposed solutions. At the same time, creating a more stable institutional environment and more favourable conditions for domestic private investment is crucial for the transition to a more sustainable growth model based on higher productivity and competitiveness. Such an approach can contribute to long-term macroeconomic stability and create a firmer basis for Serbia's further alignment with EU economic criteria and standards.

WORKING GROUP FOR CHAPTER 19
SOCIAL POLICY AND EMPLOYMENT

Status of the 2025 Recommendations

Fulfilled	**1**
Unfulfilled	**2**
Partially fulfilled	**0**
Number of new recommendations	**1 (partially new)**

Objectives

Chapter 19 enables the implementation of the EU acquis in the areas of labour law, health and safety at work, social dialogue, employment policy, social inclusion and social protection, anti-discrimination in employment and social policy, and equality between women and men in employment and social policy, as well as preparing the Republic of Serbia for the European Social Fund.

State of Play

Negotiating Chapter 19 is part of Cluster 3 – Competitiveness and Inclusive Growth. The chapter has not yet been opened, although the opening benchmark was met with the adoption of the Action Plan. The Government of the Republic of Serbia adopted its negotiating position in May 2021.

Labour law: The reform continues to be delayed. In spring 2026, the Ministry of Labour launched consultations and organised focus groups with the social partners and certain civil society organisations on aligning the Labour Law with EU directives, but by the end of September no working group had been set up to prepare a draft and no draft law had been published. A new Law on Strikes has not been adopted, and the Law on Traineeships, following a public consultation at the end of 2025, has not yet been adopted. Nor has legislation been adopted on European Works Councils and on the involvement of employees in the European Company and the European Cooperative Society. The fragmentation of labour legislation and its incomplete alignment with the EU acquis therefore remain among the key problems in implementing the Action Plan for Chapter 19 and in applying labour legislation.

Social dialogue: Institutional mechanisms are in place, and the Social and Economic Council continues to operate. However, the impact of social dialogue on policymaking and legislation is limited, while collective bargaining is poorly developed, particularly in the private sector. A 2025 ILO survey shows that around 13% of the private companies surveyed are covered by a collective agreement. Systemic reforms of the Law on the Social and Economic Council and the Law on Strikes have not been completed, and local social dialogue has not seen any significant progress.

Health and safety at work: Following the adoption of the Law on Health and Safety at Work in 2023, legislative alignment has continued through secondary legislation. The main challenges concern the implementation of legislation, the prevention of serious and fatal workplace injuries, and the capacity of the labour inspectorate, particularly in construction and industry. During 2026, the Labour Inspectorate is being strengthened in terms of staffing, with ILO project support. However, the improved capacity of the Inspectorate still needs to be demonstrated in practice, and the legal framework needs to be further improved through the Labour Law.

Employment policy: Implementation of the Employment Strategy for the period 2021-2026 and the Action Plan for the period 2024-2026 continued, with a focus on hard-to-employ groups. The most significant progress was made through piloting the Youth Guarantee and preparing for its nationwide roll-out from 2027. This fulfilled one of the Convention's 2025 recommendations. Funding for employment policy measures has increased in nominal terms, but coverage by publicly funded active labour market policy measures remains limited relative to the needs of the long-term unemployed and other vulnerable groups. A new Employment Strategy for the period 2027-2032, with an accompanying action plan, is being prepared, and a working group has been set up to draft it. Structural labour market problems, including high youth unemployment, long-term unemployment and inactivity, still require active employment measures to be strengthened and better targeted. During 2025, more than 64,000 foreign nationals resided in Serbia on the basis of some form of employment.

European Social Fund: Concrete progress is represented by the Financing Agreement for the Multiannual Operational Programme for Employment, Skills and Social Inclusion for the period 2024–2027, concluded with the EU in August 2025. The programme contributes to building capacity for programming, managing, monitoring and controlling measures similar to those financed by the European Social Fund. However, the capacity of the competent authorities and intermediate bodies, as well as capacity at local level, needs to be further strengthened.

Social inclusion and social protection: Systemic reform continues to be delayed. The draft Social Protection Strategy for the period 2025-2030, with its action plan, has not been adopted, and no progress has been recorded in the work of the working group since December 2025. In September 2026, the first meeting was held of the working group drafting a law amending the Law on Social Protection. Deinstitutionalisation measures and the development of community-based services have continued, but the availability and quality of services are uneven, while the coverage and adequacy of cash social assistance remain insufficient.

Anti-discrimination in employment and social policy: A legislative and institutional framework is in place, but unequal access to the labour market and social protection continues to affect Roma women and men, women from multiply disadvantaged groups, persons with disabilities, LGBT+ persons and older workers. Particular challenges include multiple and intersectional discrimination, as well as insufficiently targeted employment and social support measures.

How to Unblock the Process? / Priority Steps to Unblock the Process

The following recommendations are repeated and partially reworded versions of recommendations already set out in the previous period. The priorities in Chapter 19 are:

1. Speed up the reform of labour legislation and ensure full alignment with the EU acquis. Formalise the consultations that have begun, proceed with the transparent and inclusive drafting of a new Labour Law with the participation of the social partners and civil society organisations, and adopt a new Law on Strikes (*the NCEU recommendation on reforming the Labour Law has been repeated since 2021, and the recommendation to adopt a new Law on Strikes since 2019*);

2. Complete the systemic reform of social protection. Adopt the Social Protection Strategy and speed up the drafting and adoption of amendments to the Law on Social Protection, while improving the coverage and adequacy of cash benefits and ensuring more even availability of community-based services (*the NCEU recommendation on the Strategy has been repeated since 2018, and the recommendation on reforming the Law since 2019*);

3. Strengthen active employment policy and ensure the implementation of the Youth Guarantee at national level. Ensure sufficient and sustainable funding for active labour market policy measures, better target these measures at the long-term unemployed and other vulnerable groups, and carry out the planned nationwide roll-out of the Youth Guarantee, while monitoring the quality of offers and the outcomes achieved (*partially new recommendation*).

Link to the Reform Agenda

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 19
8.1.1. Improving labour market conditions	Law on Traineeships: a public consultation has been held, but the law has not been adopted. Youth Guarantee: piloting is ongoing; the Implementation Plan for the period 2027-2029 is being prepared.	Adopt the Law on Traineeships in line with EU standards; adopt the Youth Guarantee Implementation Plan for the period 2027–2029; secure funding and monitor the quality of offers and the coverage of active labour market policy (ALMP) measures.
8.1.2. Training and skills development programmes in critical sectors	Status: ongoing; deadline: by June 2027	Monitor programme outcomes and their relevance to labour market needs, with the participation of the social partners and civil society.
8.2.2. Reducing skills mismatches in the labour market and facilitating the school-to-work transition	Status: ongoing; certain deadlines are June 2026 and December 2027	Monitor the transition from education to employment, adult education and the match between qualifications and labour market needs; align the monitoring system with the EU.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
Serbia submits to the Commission an action plan for the gradual transposition of the acquis (where necessary) and for building up the necessary capacity for the implementation and enforcement of the acquis in all areas covered by the chapter on social policy and employment. The plan should include: (a) a timetable; (b) identification of the human resources assigned to each task; (c) identification of the institutions involved, their competences and role in the accession negotiations; and (d) identification of accompanying support activities in the pre-	Law Amending the Law on Health and Safety at Work – alignment with Framework Directive 89/391/EEC	Ministry of Labour, Employment, Veteran and Social Affairs	Q4 2026	Deadline has not expired	The amendments had not been adopted by the end of September 2026.
	Decree Amending the Decree on Preventive Measures for Safe and Healthy Work when Exposed to Asbestos – alignment with Directive 2009/148/EC	Ministry of Labour, Employment, Veteran and Social Affairs	Q4 2026	Deadline has not expired	Publicly available sources do not confirm that the planned amendment had been completed by the end of September 2026.
	Rulebook Amending the Rulebook on Preventive Measures for Safe and Healthy Work when Exposed to	Ministry of Labour, Employment, Veteran and Social Affairs	Q4 2025	Deadline expired	The status of the planned amendments in relation to the measure in the Plan needs to be confirmed.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
accession context (strengthening of administrative capacity).	Chemical Agents – alignment with Directive 98/24/EC				
	Labour Law	Ministry of Labour, Employment, Veteran and Social Affairs	Q4 2026	Ongoing / deadline has not expired	Consultations with the social partners began in 2026; by the end of September, no formal working group had been set up and no draft law had been published.
	Law on the Establishment of European Works Councils	Ministry of Labour, Employment, Veteran and Social Affairs	No later than two years before EU accession	Deadline has not expired	The law has not been adopted.
	Law on the Involvement of Employees in the European Company and the European Cooperative Society	Ministry of Labour, Employment, Veteran and Social Affairs	Q4 2026	Deadline has not expired	The law has not been adopted.
	Law on Traineeships	Ministry of Labour, Employment, Veteran and Social Affairs	Q4 2026 (Plan); December 2027 (Reform Agenda)[56]	Deadline has not expired / ongoing	A public consultation was held at the end of 2025, but the law had not been adopted by the end of September 2026.
	Youth Guarantee Implementation Plan for the period 2027–2029	Ministry of Labour, Employment, Veteran and Social Affairs	Q4 2026	Deadline has not expired / in preparation	The measure is linked to reform 8.1.1 of the Reform Agenda and the planned nationwide roll-out of the Youth Guarantee from 2027.
	Law Amending the Law on Financial Support to Families with Children	Ministry for Family Welfare and Demography / competent ministry	Q4 2026, or after the adoption of the Labour Law	Deadline has not expired	By the end of September 2026, the law had not been adopted in the part relevant to this obligation.
	Amendments to the Law on Social Protection	Ministry of Labour, Employment, Veteran and Social Affairs	Q4 2026	Deadline has not expired / ongoing	The first meeting of the Working Group for drafting the amendments was held in September 2026.
Administrative / institutional capacity	Required number of staff by year	Ministry of Labour,	**2025:** +2 in active labour	Insufficient data	By September 2026, there were

[56] The deadline for adopting the Law on Traineeships in the Reform Agenda is December 2027; see: https://www.mei.gov.rs/upload/documents/nacionalna_dokumenta/reformska_agenda_rs_2024_2027.pdf, p. 92.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
		Employment, Veteran and Social Affairs	market policy (ALMP), +2 in labour, +2 in social dialogue, +45 in the Labour Inspectorate and +4 in EU/IPA affairs. **2026:** +2 in ALMP, +2 in social dialogue, +45 in the Labour Inspectorate and +4 in EU/IPA affairs.		insufficient publicly available data to confirm that all planned posts had been filled. Recruitment procedures have been conducted in the Labour Inspectorate, but the final number of new staff needs to be confirmed.[57]
Strengthening NES capacity	Certification of employment counsellors for persons with disabilities (PwD)	National Employment Service	Q4 2025	88% certified	According to the NES Annual Report for 2025, 531 of a total of 602 counsellors have been certified.
Strengthening NES capacity	Training of staff working on employment mediation, further education and training, implementation of employment programmes and vocational rehabilitation of persons with disabilities (PwD)	National Employment Service	Q4 2025	Partially / figure not reported separately	Training is provided as part of NES activities, but the available report does not give an aggregate figure for this indicator.[58]

Conclusion

Progress in Chapter 19 remains uneven. Steps forward are visible in the implementation of the Youth Guarantee, in the area of health and safety at work and in preparations for the European Social Fund, while key systemic reforms of labour legislation, social dialogue and social protection continue to be delayed. Without timely fulfilment of the obligations under the Action Plan and the Plan by the end of 2026, alignment with the EU acquis will remain partial and administrative capacity insufficient for the full implementation of rights and policies after EU accession.

[57] See: https://www.minrzs.gov.rs/srb-lat/konkursi/javni-konkurs-za-popunjavanje-izvrsilackih-radnih-mesta---inspektorat-za-rad.
[58] National Employment Service, Annual Report for 2025, Human Resources; see: https://www.nsz.gov.rs/filemanager/Files/Dokumenta/Izve%C5%A1taj%20i%20program%20rada%20NSZ/Izvestaj%20o%20radu%20NSZ%202025.pdf, pp. 94-100.

WORKING GROUP FOR CHAPTER 20
ENTERPRISE AND INDUSTRIAL POLICY

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**0**
Partially fulfilled	**1**
Cannot be reliably assessed	**2**
Number of new recommendations	**3**

Note: *Of the three previous recommendations, one has been assessed as partially fulfilled. For the remaining two, there is insufficient evidence that all the elements proposed in the original text of the recommendations have been achieved. The number of new recommendations is shown separately.*

The recommendations of the NCEU Working Group for Chapter 20 from the 2025 Book of Recommendations remain relevant. The action plans have been partially implemented, but harmonised data on activities and performance indicators are lacking. The consultations held during the preparation of the industrial action plan confirm cooperation with stakeholders, but do not confirm the establishment of the joint institutional platform proposed in the previous recommendation. Support for the digitalisation of small and medium-sized enterprises (SMEs) has indeed been granted, but no evidence was found that all the previously proposed instruments have been applied, including tax incentives and public-private partnerships in the manufacturing industry and the agri-food sector. It is therefore not possible to reliably assess the fulfilment of the first and third recommendations in their original scope.[59]

Objectives

Chapter 20 focuses on improving the competitiveness of industry and developing entrepreneurship, so that domestic enterprises are able to operate and grow on the European Union market. Of particular importance for Serbia are increasing productivity and value added, applying innovation and modern technologies, and using energy and raw materials more efficiently. Achieving these objectives requires a predictable business environment and accessible financial and expert support for small and medium-sized enterprises (SMEs), together with stronger links between the business sector, science and the institutions implementing development policies.

State of Play

Chapter 20 was opened on 27 February 2017. In its 2025 Report on Serbia, the European Commission assessed that the country is moderately prepared in the area of enterprise and industrial policy and has made limited progress. The Commission's recommendations include improving consultation with the business community, implementing the reform of the governance of state-owned enterprises, adopting a new industrial policy action plan and increasing financial and technical support for small and medium-sized enterprises.[60]

[59] NCEU, *Book of Recommendations 2025*, contribution of the Working Group for Chapter 20, pp. 46-47. Ministry of Economy, *Industrial Policy Action Plan 2026-2027*, published on 1 July 2026; overview of performance and consultations, pp. 2–4.
[60] European Commission, *Serbia 2025 Report*, 4 November 2025, sections on Chapter 20, pp. 15 and 85-86.

During 2026, the planning framework for implementing the Industrial Policy Strategy of the Republic of Serbia from 2021 to 2030 continued to be developed. The Action Plan for the period 2026–2027 was adopted, thereby fulfilling the European Commission's recommendation to adopt a new plan. According to the summary overview in the new plan, 67 of the 71 activities, or 94.37%, were implemented during the previous period, and implementation began on 22 of the 23 measures. The Annual Report for 2025, however, shows 72 individually marked activities by area. Owing to the difference in scope, these figures should be reconciled before a final assessment is made of the degree of implementation of the previous action plan.[61]

At the same time, the results of industrial policy show significant differences between individual areas. The Ministry of Economy's Annual Report for 2025 on the implementation of the Industrial Policy Action Plan for 2024-2025, prepared in May 2026, reports that the target values were reached for all three measures relating to the technological structure of exports. In the area of digitalisation, the indicator target value was reached for one of the seven measures, while no data are available for two measures. In the area of investment, the target values were reached for two of the five measures, one was not reached, and no comparable data for 2025 are available for two. In the areas of innovation and the circular economy, none of the measures is shown as having reached its target value, and data for assessment are missing for some measures.[62]

Support to enterprises also shows limitations in implementation. In 2025, RSD 107.5 million of the planned RSD 350 million, or 30.71%, was spent on digitalisation activities. In interpreting this ratio, it should be borne in mind that the digital transformation support programme was created in December 2025 for implementation during 2026. The RSD 15 million earmarked for the joint circular economy support programme was not disbursed, as the joint programme of the Ministry of Economy and the Chamber of Commerce and Industry of Serbia was not drawn up; the Chamber of Commerce and Industry of Serbia carried out some of the activities using its own and donor funds. Reporting on results is further hampered by the uneven scope of the data: value added indicators for the manufacturing industry are also presented through data for industry as a whole. This limits a consistent assessment of the indicators relating to the manufacturing industry.[63]

In the coming period, the implementation of industrial policy needs to be linked to the results it delivers for enterprises: higher productivity, technological upgrading of production and greater participation in domestic and international value chains. The European Commission points to the need for investment incentives to contribute more to value added creation and the integration of SMEs into supply chains, with monitoring of the results achieved by domestic suppliers.[64] Particular attention should be paid to the reasons for the insufficient use of available funds and to the needs of enterprises that require expert support to prepare for and apply new technologies. Findings on targets not achieved should form the basis for adjusting support programmes and the allocation of funds.

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[61] Ministry of Economy, *Industrial Policy Action Plan 2026-2027*, published on 1 July 2026; overview of performance and consultations, pp. 2-4. Compare with: Ministry of Economy, *Annual Report for 2025 on the Implementation of the Industrial Policy Action Plan for 2024-2025*, pp. 8-14 and tables of activities by area; the scope of the individually marked activities differs from the summary overview in the new Action plan.

[62] Ministry of Economy, *Annual Report for 2025 on the Implementation of the Industrial Policy Action Plan for 2024-2025*, May 2026, pp. 8-14 and sections on digitalisation and the circular economy.

[63] Ministry of Economy, *Annual Report for 2025 on the Implementation of the Industrial Policy Action Plan for 2024-2025*, May 2026; sections on digitalisation, the circular economy and value-added indicators (source cited in the previous footnote).

[64] European Commission, *Serbia 2025 Report*, section on Chapter 20, pp. 85-86. The report is available at: https://enlargement.ec.europa.eu/document/download/6e68ce26-b95b-48e1-921a-c60c12da8f00_en?filename=serbia-report-2025.pdf.

SME development remains an important prerequisite for the wider effects of industrial policy. The Strategy for the Development of Small and Medium-Sized Enterprises for the period 2023-2027 provides the framework for this support, but the preparation of the accompanying Action Plan for 2025-2027 continued into 2026. Public consultations were held from 18 March to 1 April 2026, and the Government's Work Plan envisaged adoption in June. By 30 September 2026, no confirmation of the adoption of this action plan was found in the public sources consulted. This pace makes it difficult to monitor the planned measures and the institutions' responsibility for implementing them in a timely manner.[65]

Improving the business environment also requires the consistent application of the governance rules for companies owned by the Republic of Serbia. The Rulebook on the Content and Manner of Keeping and Maintaining Single Data Records and the Information Platform was adopted on 15 May 2025, and the Decree on the Content, Preparation, Deadlines and Manner of Submitting Plans and Periodic Reports of Capital Companies Owned by the Republic of Serbia on 3 July 2025. The November 2025 dates on the Ministry of Economy's website refer to the publication of the texts, not the adoption of these regulations. Assessing progress requires documenting the application of the rules on appointments, reporting and public access to data on the companies' operations.[66]

Addressing late payment is important for the liquidity of enterprises, particularly SMEs. In December 2025, amendments to the Law on Deadlines for Settling Monetary Obligations in Commercial Transactions were adopted, and during 2026 rulebooks were adopted on the Central Invoice Register and on supervision of the implementation of the Law. The amendments focus primarily on the recording of obligations and on supervision. Full alignment with Directive 2011/7/EU, envisaged in the national Plan for the end of 2025, remains an open issue. The statement of compliance accompanying the draft amendments states that they do not achieve alignment with EU legislation, while the European Commission, in its 2025 Report on Serbia, points to remaining differences in the rules on payments and creditor protection.[67]

Priority Steps to Unblock the Process

Further progress in Chapter 20 requires the consistent implementation of industrial policy and the targeting of support at the development needs of domestic enterprises. The first three recommendations continue the priorities from the previous Book of Recommendations, while the new recommendations concern consultation with the business community, the governance of state-owned enterprises and payment deadlines.

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[65] Ministry of Economy, *Report on the public consultations on the draft SME Action Plan 2025-2027*, published on 28 April 2026. Government of the Republic of Serbia, *Work Plan for 2026*, p. 117, Ministry of Economy, item 14: planned adoption of the SME Action Plan in June 2026.

[66] Ministry of Economy, Rulebook on the Content and Manner of Keeping and Maintaining Single Data Records and the Information Platform, adopted on 15 May 2025, *Official Gazette of the RS*, No 44/2025; Decree on the Content, Preparation, Deadlines and Manner of Submitting Plans and Periodic Reports of Capital Companies Owned by the Republic of Serbia, adopted on 3 July 2025, *Official Gazette of the RS*, No 59/2025. The dates of 24 and 26 November 2025 refer to the publication of the texts on the Ministry's website.

[67] National Assembly, Law Amending the Law on Deadlines for Settling Monetary Obligations in Commercial Transactions, adopted on 3 December 2025, *Official Gazette of the RS*, No 109/2025. Draft Law Amending the Law on Payment Deadlines of 2025, explanatory memorandum, p. 3, and statement of compliance, pp. 9-10. Ministry of Finance, Rulebook on the Central Invoice Register, *Official Gazette of the RS*, No 45/2026; published on 21 May 2026. Ministry of Finance, Rulebook on the Manner and Procedure for Supervising the Implementation of the Law on Deadlines for Settling Monetary Obligations in Commercial Transactions, *Official Gazette of the RS*, No 54/2026; published on 22 June 2026.

Measure	Expected result and deadline[68]	Competent institution	Comment
1. Strengthen the coordination of industrial policy, financing and innovation	By the end of 2026, publish a joint overview of support programmes and establish regular coordination of their objectives, budgets, indicators and responsibilities for implementation.	Ministry of Economy, Ministry of Finance and Ministry of Science, Technological Development and Innovation	Regular review of results should make it possible to eliminate overlaps between programmes and link research capacity with the needs of the business sector. Value added and the involvement of domestic suppliers should be monitored when assessing investment incentives.
2. Ensure continuity in implementing the action plans for industrial policy and SME development	By the end of 2026, publish a reconciled overview of the implementation of the Industrial Policy Action Plan for 2024–2025, with the status of each remaining activity and a decision on whether to continue, amend or discontinue it. If the SME Action Plan for 2025–2027 has not been adopted, ensure its adoption and set out responsibilities and resources for its implementation. By June 2027, publish a report for 2026 that shows separately the activities implemented, target values, results achieved and funds spent.	Ministry of Economy	For results not achieved, particularly in the areas of innovation and the circular economy, the causes and measures to address them should be identified.
3. Increase the accessibility and effectiveness of support for the digital and green transformation of SMEs; link financing with expert support for preparing and applying new technological solutions	By June 2027, publish, for the 2026 support programmes, the funds planned, contracted and disbursed, the number of beneficiaries and the results of the solutions applied, broken down by enterprise size, sector and region. On the basis of this analysis, propose adjustments to the support programmes.	Ministry of Economy, Development Agency of Serbia and Innovation Fund	Particular attention should be paid to the manufacturing industry and the agri-food sector, while considering tax incentives and partnership models in line with the needs and results of enterprises.
4. Improve the participation of the business community in the preparation of legislation and support programmes; involve representatives of SMEs, business associations and experts at an early stage of document preparation, with sufficient time to submit proposals	By June 2027, ensure consultation on 100% of legislation meeting the criteria set out in the Reform Agenda. Publish the number and share of procedures covered, as well as the reasons for each case in which no consultation was held.	Competent ministries, coordinated by the bodies responsible for the public policy system and the work of the Government	Consultation plans and reasoned responses to the comments received should be published regularly.
5. Ensure the application of the governance rules for state-owned companies	By the end of 2026, publish an overview of the remaining obligations under the implementing framework for the governance of companies owned by the Republic of Serbia. By June 2027, publish data on the application of the rules on appointments, internal audit in	Ministry of Economy	

[68] The deadlines indicated are proposed by the NCEU Working Group for Chapter 20.

Measure	Expected result and deadline[68]	Competent institution	Comment
	the companies to which this obligation applies, the submission of periodic reports and public access to the prescribed data, with the number and share of companies covered.		
6. Complete the alignment of the rules on payment deadlines and improve creditor protection	By the end of 2026, publish an overview of the compliance of legislation with Directive 2011/7/EU and propose the amendments needed to eliminate the remaining differences. By June 2027, publish a report on the application of the new rulebooks, the results of supervision, and data on public sector payment deadlines and late payments to businesses.	Ministry of Finance and the competent supervisory authorities; the Government and the National Assembly for the necessary legislative amendments	This recommendation does not change the deadline in the Government's Plan, which has already expired.

Link to the Reform Agenda

The Reform Agenda of the Republic of Serbia for the period 2024–2027 can contribute to achieving the objectives of Chapter 20 by improving the governance of state-owned enterprises, creating more predictable business conditions and making digital public services more accessible. For SMEs, it is particularly important that the reforms reduce administrative costs and allow more equal participation in the preparation of legislation. The Plan for negotiating obligations does not establish a direct link between the benchmarks for Chapter 20 and individual Reform Agenda steps. The table below highlights the reforms that are significant for the business environment.[69]

Reform Agenda Measure	Deadline for the selected steps	Relevance for Chapter 20
6.1.1. Management of public investment and of state-owned enterprises of the Republic of Serbia	Appointment requirements in the companies covered by the law, internal audit in the entities concerned, change of the legal form of republic-level public enterprises and publication of the prescribed data: December 2026; annual targets and periodic assessment: December 2027	Professionalisation of management, accountability for business results and application of equal rules.
6.2.1. Investment and development opportunities for entrepreneurs and the private sector	Consultation on 100% of legislation meeting the criteria set out in the Reform Agenda: June 2027; possibility of paying all public revenues electronically: December 2027.	Greater participation of the business community in the preparation of legislation and simpler fulfilment of administrative obligations.
7.2.2. Digitalisation of public services and administrative procedures for businesses and citizens	eProstor: December 2026; at least 30 new digital life events, 20 for businesses and 10 for citizens: December 2027.	Services that enterprises can use entirely electronically, with lower costs and shorter procedures.

Note: *The table shows selected reform steps, target values and deadlines. The available data on their implementation do not in themselves confirm that the closing benchmarks for Chapter 20 have been met.*

[69] *Reform Agenda of the Republic of Serbia 2024-2027*, reforms 6.1.1, 6.2.1 and 7.2.2.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

The overview covers the one closing benchmark for Chapter 20 from Form 1 and a legislative obligation from Form 2, which is not a separate benchmark. The deadline for the benchmark, Q4 2026, is set by the national Plan; the EU Common Position does not set this date as a deadline for closing the chapter.[70]

Overview of the implementation of the Plan

Benchmark	Planned measures	Competent institution	Deadline and deadline source	Status as at 30.9.2026[71]	Comment
1. The Republic of Serbia develops and starts implementing a comprehensive industrial strategy, supported by a system of evaluation indicators and benchmarks proposed on the basis of industry-relevant EU policies	Implementation of the Industrial Policy Action Plan for 2024-2025	Ministry of Economy and the bodies responsible for the measures	Plan period: 2024-2025; national deadline for the benchmark: Q4 2026	According to the new action plan, 67 of the 71 activities have been implemented; full completion of the previous plan has not been confirmed.	The new action plan also reports that implementation has begun on 22 of the 23 measures. The Annual Report for 2025 shows a different scope of individually marked activities, which requires reconciliation.
	Preparation of the new action plan and consultations; adoption of the Action Plan 2026-2027	Ministry of Economy; Government	National deadline for the benchmark: Q4 2026	The Action Plan for 2026-2027 has been adopted; its implementation is being monitored.	The public consultation was held from 23 March to 17 April 2026. The new action plan was published on 1 July 2026. The adoption of the document does not in itself confirm that the benchmark has been met.
	Annual reporting to the EC on the implementation of the strategy	Ministry of Economy	Ongoing obligation; national deadline for the benchmark: Q4 2026	The report for 2025 has been published; its submission to the EC has not been confirmed.	The report for 2025 has been made public. The date and manner of its submission to the European Commission have not been confirmed in the sources reviewed.[72]
	Continued implementation of the strategy and demonstration that the	Ministry of Economy and the bodies responsible for the measures	National deadline for the benchmark: Q4 2026	Fulfilment of the benchmark has not been confirmed; the national deadline had not	The available sources contain no confirmation from the EU that the benchmark has been met in full.

[70] Government of the Republic of Serbia, *Plan for the Fulfilment of the Most Important Obligations under the Accession Negotiations of the Republic of Serbia with the European Union by the End of 2026*, Chapter 20, pp. 254-258; Ministry of Economy, *Industrial Policy Action Plan for 2026–2027*, pp. 2-4; Ministry of Economy, *Annual Report for 2025 on the Implementation of the Industrial Policy Action Plan for 2024-2025*, pp. 8-14.

[71] The status shown is as at 30 September 2026, without a qualitative assessment of the legislation.

[72] Ministry of Economy, *Annual Report for 2025 on the Implementation of the Industrial Policy Action Plan for 2024-2025*, May 2026, pp. 8-14 and sections on digitalisation and the circular economy.

Benchmark	Planned measures	Competent institution	Deadline and deadline source	Status as at 30.9.2026[71]	Comment
	benchmark has been met			expired as at the cut-off date.	
Obligation under Form 2 (not a separate benchmark): full alignment of the legislation on late payment with Directive 2011/7/EU	Full alignment of the legislation on late payment with Directive 2011/7/EU	Ministry of Finance; Government and National Assembly	Q4 2025	Full alignment has not been confirmed.	Amendments to the law and two rulebooks (*Official Gazette of the RS*, Nos 45/2026 and 54/2026) have been adopted.

Statistics

For the Plan implementation period from 11 April 2025 to 31 December 2026, the situation as at 30 September 2026 is shown in the following table.

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	1	1	1 (amendments to the law adopted; full alignment not confirmed)[73]	0
Secondary legislation[74]	2	2 (100%)	2 (100%)	0

In total, three pieces of legislation have been adopted: one law amending a law and two rulebooks. This total does not represent a percentage of fulfilment of the Plan, as full alignment of the legislation with the Directive has not been confirmed.

The following results are recorded separately from the legislative statistics:

Indicator	Number / Percentage
New public policy documents covered by this overview	1: Industrial Policy Action Plan for 2026-2027
Activities reported as implemented in the summary overview of the new action plan for the previous period	67 of 71 (94.37%)
Arithmetic remainder of activities in the same summary overview	4 of 71 (5.63%)
Closing benchmarks for Chapter 20	1
Benchmarks whose national planned deadline expired by 30 September 2026	0 of 1 (0%)

[73] The Law Amending the Law on Deadlines for Settling Monetary Obligations in Commercial Transactions *(Official Gazette of the RS*, No 109/2025) has been adopted. Its adoption, however, does not confirm fulfilment of the obligation to achieve full alignment with Directive 2011/7/EU.

[74] Secondary legislation provided for in the 2025 amendments to the Law, which is not individually listed in the original Plan. The overview has been supplemented with the Rulebook on the Central Invoice Register (*Official Gazette of the RS*, No 45/2026) and the Rulebook on the Manner and Procedure for Supervising the Implementation of the Law (No 54/2026). Both rulebooks have been adopted, and the figure of 100% refers only to their adoption. The 180-day deadline for their adoption, laid down in Article 5 of the amendments to the Law, had expired by the cut-off date.

Indicator	Number / Percentage
Benchmarks with a national planned deadline after 30 September 2026	1 of 1 (100%): Q4 2026

Note: *The ratios 67/71 and 4/71 are taken from the summary overview of the new action plan. The Annual Report for 2025 shows a different scope of individually marked activities, which needs to be reconciled. The percentages shown are not the percentage of fulfilment of the closing benchmark for Chapter 20. The percentages of 0% and 100% in the last two rows refer solely to the distribution of national planned deadlines relative to the cut-off date.*[75]

Conclusion

Progress has been made in the planning framework under Chapter 20 with the adoption of the Industrial Policy Action Plan for 2026-2027. The results of the previous period show uneven achievement of industrial policy objectives. Despite progress in the technological structure of exports, target values remain unmet and data are missing in the areas of digitalisation, innovation and the circular economy. The low execution of certain budget allocations calls for an analysis of the pace at which programmes are adopted and implemented, administrative procedures, the conditions for support and the needs of enterprises. On the basis of that analysis, programmes should be adjusted and their results monitored.

In the coming period, the priority should be to implement measures that raise the productivity and technological capacity of the domestic economy, with clear institutional responsibility and regular monitoring of results. Better coordination of development programmes, continuity of SME support and a predictable business environment are essential for reform activities to contribute to the competitiveness of enterprises and their readiness for the EU single market. Assessing whether the closing benchmark has been met requires evidence of the implementation of the industrial strategy and a corresponding assessment by the EU.

[75] Ministry of Economy, *Industrial Policy Action Plan for 2026-2027*, published on 1 July 2026; overview of performance and consultations, pp. 2-4.

WORKING GROUP FOR CHAPTER 21
TRANS-EUROPEAN NETWORKS

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**1**
Partially fulfilled	**2**
Number of new recommendations	**1**

None of the three priority recommendations from 2025 has been fully fulfilled, so all three are retained, and one new recommendation is added.

Objectives

The objective of Chapter 21 – Trans-European Networks is to connect national transport, energy and telecommunications networks with European networks, while ensuring their interoperability and access to infrastructure. For Serbia, this means aligning with the EU acquis and developing infrastructure that enables sustainable and efficient transport of passengers and goods, better cross-border connectivity, more secure and diversified energy supply, and integration into the European market. The development of these networks should contribute to economic growth, employment and the achievement of climate objectives.

State of Play

Chapter 21 – Trans-European Networks was opened on 14 December 2021, as part of Cluster 4. In its 2025 Report, the European Commission assessed that Serbia has a moderate to good level of preparation and has made some progress. The recommendations have been partially implemented, and the priorities remain improving transport and energy connections, transposing the revised TEN-E Regulation, and preparing and implementing infrastructure projects in line with EU standards.

By 15 September 2026, progress had been made in preparing the modernisation of rail Corridor X. Tenders were published for design and works, and for supervision, on the Paraćin–Trupale–Međurovo section. Technical assistance to the Belgrade–Niš project implementation unit also continued. However, it has not been confirmed that the documentation has been completed for all sections covered by the previous year's recommendation. For the Merošina–Pločnik section of the Niš–Merdare motorway, a procedure was launched in June 2026 to decide on the need to update the environmental impact assessment study.

In the area of energy networks, no evidence was found that a decree transposing the revised TEN-E Regulation had been adopted by the cut-off date. Institutional progress was made with the approval of the Statute of the Republic Commission for Energy Networks, published in the *Official Gazette of the RS*, No 80/26. However, this step does not in itself confirm that the recommendation on strengthening the capacity of this institution has been fully fulfilled.

Previous year's priority steps therefore remain relevant: completing the project documentation, strengthening project management capacity and aligning national and European financing, and transposing the revised TEN-E Regulation. The confirmed activities represent individual steps

forward, but by 15 September 2026 it had not been demonstrated that the recommendations had been fully fulfilled.

How to Unblock the Process? / Priority Steps to Unblock the Process

The three priority recommendations from 2025 remain relevant and are repeated, taking into account the individual steps forward that have been made. For 2026, a recommendation is added on public monitoring of the implementation of infrastructure projects:

1. **Complete the full technical and tender documentation** for the remaining sections of the Niš–Merdare motorway and the railway lots on Corridor X, including feasibility studies and environmental and social impact assessments, while carrying out the necessary public participation procedures;
2. **Strengthen capacity for project management and the use of EU funds**, and align the timing of national and European financing so that delays in securing national funds do not hold up project implementation;
3. **Complete the transposition of the revised TEN-E Regulation into national legislation and strengthen the capacity of the Republic Commission for Energy Networks** by providing adequate staffing and operational resources;
4. **Establish regular public reporting on the implementation of priority transport and energy network projects**, covering data on deadlines, funds contracted and spent, the status of permits, the impact assessments carried out and the reasons for delays. Provide the Working Group of the National Convention on the European Union (NCEU) and the interested public with access to these data so that progress in project implementation can be monitored.

Link to the Reform Agenda

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 21
7.1.1. Step 5: Participation of the transmission system operator in regional coordination centres and fulfilment of the conditions for joining EU balancing platforms	Deadline: June 2026	Complete the remaining activities to improve regional coordination and meet the conditions for joining EU balancing platforms, so that cross-border electricity networks can be used more efficiently.
7.2.5. Step 2: Alignment with Regulation (EU) 2020/1056 on electronic freight transport information (eFTI)	Deadline: June 2026	Complete legal alignment and establish the conditions for interoperable electronic exchange of freight information, relevant to the functioning of the trans-European transport network (TEN-T).

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Chapter 21 was formally opened back in 2021, and the Plan sets out measures and deadlines for both benchmarks envisaged for closing the chapter. The table below follows the structure of the Plan.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
1. Serbia adopts an updated Transport Strategy in line with the guidelines for the development of the	Obtaining the World Bank's approval to launch the procedure for engaging the Institute of the Faculty of Transport and Traffic	Ministry of Construction, Transport and Infrastructure	Q1 2026	Yes	A contract award notice to the Faculty of Transport and Traffic Engineering was published on 30 March

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
trans-European transport network set out in Regulation (EU) No 1315/2013	Engineering of the University of Belgrade to prepare the final Transport Strategy document, and concluding the contract				2026, stating the value of the signed contract as EUR 884,787. The World Bank's approval is inferred indirectly from the procedure carried out and the contract concluded.
	Updating the existing Transport Strategy and preparing the final document in line with the guidelines for the development of the trans-European transport network set out in Regulation (EU) No 1315/2013 in the first half of 2025	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	No evidence was found that the final version of the Transport Strategy had been prepared by the cut-off date. The engagement of the contractor has been confirmed, but the completion of the document has not.
	Launching the procedure for adopting the Transport Strategy	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	
	Adoption of the updated Transport Strategy	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	
2. Serbia demonstrates the institutional and administrative capacity necessary to assume the responsibilities referred to in Regulation (EU) 2021/1153	Establishment of an Inter-Ministerial Working Group tasked with analysing Regulation (EU) 2021/1153	Ministry of Construction, Transport and Infrastructure	Q1 2026	Yes	
	Preparation of an act regulating the organisation and the financing and implementation procedures to be applied to individual CEF projects. Among other things, the act will improve inter-institutional coordination, starting with a clear division of responsibilities between institutions, and remove administrative obstacles to project preparation, implementation and financing.	Ministry of Construction, Transport and Infrastructure	Q1 2026	No	The Government's quarterly report announces the preparation of a new act. By 15 September 2026, no such act had been found, nor any official confirmation that this step had been completed.

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026[76] (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	0	0 (0%)	0	0 (0%)

[76] The cut-off date used by the NCEU Working Group for Chapter 21, as in the example in the methodological guidelines.

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026[76] (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Secondary legislation	1	1 (100%)	0 (0%)	0 (0%)

Conclusion

Although individual steps forward have been made in Chapter 21, none of the three priority recommendations of the NCEU Working Group from 2025 has been fully fulfilled. The engagement of the Faculty of Transport and Traffic Engineering to prepare the Transport Strategy and the establishment of the Inter-Ministerial Working Group on the Connecting Europe Facility (CEF) represent concrete progress. However, by 15 September 2026 it had not been confirmed that the Transport Strategy had been prepared and adopted, or that the act regulating the organisation, financing and implementation of CEF projects had been drawn up, even though the deadlines in the Plan expired in the first quarter of 2026. The competent ministries need to speed up the fulfilment of these obligations, complete the preparation of project documentation for priority infrastructure projects, strengthen capacity for their implementation and ensure the transposition of the revised TEN-E Regulation. Regular public reporting on deadlines, financing and results would allow more transparent monitoring of progress and a clearer determination of responsibility for delays.

WORKING GROUP FOR CHAPTER 22
REGIONAL POLICY AND COORDINATION OF STRUCTURAL INSTRUMENTS

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**2**
Partially fulfilled	**1**
Number of new recommendations	**1**

Objectives

Chapter 22 prepares Serbia to implement EU cohesion policy and to use the structural and cohesion funds after accession. This requires a functioning legal, institutional, administrative, programming, financial and control system capable of planning, managing, monitoring and evaluating a large multiannual investment cycle.

The essence, however, lies not only in absorbing funds. Cohesion policy should contribute to reducing regional disparities and strengthening economic, social and territorial cohesion. Future programmes must therefore be linked to development planning, public investment, the budget, smart specialisation, regional and local development, and the achievement of measurable territorial results.

State of Play

Chapter 22 has not yet been opened. Serbia adopted the Action Plan, which constitutes the opening benchmark for the chapter, and submitted it to the European Commission in 2019, and the Commission assessed the benchmark as met. However, the procedure in the Council of the EU has not been completed. In its 2025 Report, the European Commission assessed that Serbia is **moderately prepared** in this area, with limited progress, mainly as regards administrative capacity and programming.

Of the three priority recommendations set out in the 2025 Book of Recommendations, two remain unfulfilled, while one was partially fulfilled during 2026:

- **The recommendation concerning the Development Plan of Serbia and the regional development framework is assessed as not fulfilled**. By the cut-off date, Serbia had not adopted the Development Plan of the Republic of Serbia or a corresponding new national or regional development framework. The European Commission continues to point to the need for a national plan that would enable regional disparities to be reduced systematically;
- **The recommendation concerning the completion of the procedural steps for opening Chapter 22 is assessed as not fulfilled**. Chapter 22 has not yet been opened. The Action Plan for meeting the opening benchmark was adopted back in 2019, and the Commission had earlier assessed the benchmark as met. However, the Opening Benchmark Assessment Report is still pending before the Council of the EU;
- **The recommendation concerning a staff retention policy and the strengthening of administrative capacity is assessed as partially fulfilled**. A Roadmap and training

programmes are in place, and the COHPOL 2 project has been implemented since January 2026. However, the European Commission continues to warn of insufficient capacity in key institutions and highlights the adoption of a staff retention policy as a priority.

The most significant development in 2026 was the adoption of the **Law on the Establishment and Functioning of the Cohesion Policy Management System** on 23 April 2026 (*Official Gazette of the RS*, No 35/2026). However, the Law only lays the foundations of the system. The Government's Plan envisaged its adoption in Q3 2025, and for Q4 2025 it envisaged the adoption of the decree for the first cohesion policy goal, "Investment for jobs and growth", the decree or decrees for the second cohesion policy goal, "European territorial cooperation (Interreg)", and the decision on responsible persons and bodies. As at the cut-off date for the Book of Recommendations, there was no public confirmation that these acts had been adopted. Although the Law provides for a six-month deadline from its entry into force for the adoption of secondary legislation, the original deadlines in the Government's Plan have already been missed.

For the National Convention, the most important question is not only when the decrees will be adopted, but also what kind of system they will establish. Regarding the draft decree for the first cohesion policy goal, the NCEU Working Group for Chapter 22 assessed that the draft is predominantly general and administrative in nature and does not sufficiently elaborate the issues of responsibility, coordination, control, prioritisation, partnership, performance monitoring and transparency. In particular, it warned that the Partnership Agreement and future programmes must not become a parallel system, separate from development planning, public investment and regional policy. The NCEU identified the absence of the Development Plan and a regional development framework as a **systemic risk to good-quality programming and the measurement of development effects**. The Ministry of European Integration accepted some of the comments, but left a significant number of operational issues to be regulated subsequently through methodologies, common rules, inter-institutional agreements and manuals. Although this approach provides flexibility, the NCEU maintains its position that **key competences, rights, responsibilities, controls and criteria must not be left to internal acts of unclear legal nature**. The same applies to administrative capacity: the NCEU requested that the Roadmap cover staffing needs, staff profiles, the staff retention policy, the local and regional levels, deadlines, the budget and indicators, while the MEI replied that its content would be determined subsequently by a methodology.

Regarding the draft decree for the second cohesion policy goal, "European territorial cooperation (Interreg)", the NCEU Working Group for Chapter 22 insisted on clear lines of responsibility and the functional separation of management, accounting, control and audit. It also pointed to the need for a clear hierarchy between EU law, joint programme rules and national rules, an interoperable electronic system, a reliable statistical basis and continuous and comprehensive partnership. Such partnership should include the central level of government, local self-government units (LSGUs), regional development agencies, the business sector, universities and research institutions, civil society, the social partners and other relevant territorial actors. Their participation should not be limited to consultation, but should also cover programming, monitoring, evaluation and programme amendments. In its final assessment, the NCEU Working Group for Chapter 22 stressed that, before adoption, a full legal, institutional and legal-technical review should be carried out, including an analysis of compliance with the new EU cohesion policy framework for the period 2028-2034, in line with the new EU Multiannual Financial Framework (MFF 2028-2034). This is now all the more important, as the Commission's proposal for the new MFF 2028-2034 provides for national and regional partnership plans and significant changes in the structure of fund programming, while negotiations on the final rules are still ongoing.

The second systemic problem remains the **lack of an overarching development framework**. Without the Development Plan and a coherent regional policy, it is difficult to determine objectively where investment can achieve the greatest development effects and to measure the reduction of regional disparities. Regional policy remains institutionally fragmented, and the potential of regional development agencies and local development offices is underused. At the same time, the European Commission points to the need for financial and fiscal decentralisation and stronger partnership between all levels of government and non-state actors. Territorial strategies and activities such as EU INTEGRA provide important preparation and an opportunity for practical learning, but they cannot replace a national regional development system.

It is also important to draw a precise distinction between issues relating to the NSTJ and NUTS. Serbia has statistical regions at NSTJ 2 level (Nomenclature of Statistical Territorial Units), which follow the logic of the NUTS 2 classification. The formal NUTS classification applies to EU Member States. The problem, therefore, is not the absence of statistical regionalisation, but the fact that it is not accompanied by sufficiently strong development, institutional and administrative capacity at regional level. The NCEU has also pointed to this problem in previous editions of the Book of Recommendations.

Administrative capacity remains a critical issue. The European Commission considers that Serbia is able to manage existing EU funds, but that insufficient capacity in certain key institutions poses a risk to the functioning of the system. The Law itself and its explanatory memorandum point to the scale of future needs: around 1,200 staff will be required as early as the year of accession, and between 1,450 and 1,600 by the second year of membership. Training and project support, such as the COHPOL 2 project, are therefore necessary, but cannot replace a permanent policy of recruiting, retaining and developing staff, including staff at regional and local level. In particular, capacity needs to be strengthened for the indirect management of Instrument for Pre-accession Assistance (IPA) programmes, timely contracting and the transition to *ex post* controls.

Programming of the remaining IPA III funds has been completed, two operational programmes have been launched, the public investment system has been improved, and a functioning monitoring system and information system have been established. However, the NCEU considers that the quality of the system should be measured by its development effects, the public availability of data and genuine partnership, and not only by the existence of procedures or the volume of funds spent. This requires a reliable statistical baseline, indicators linked to national and regional development objectives, and the use of monitoring and evaluation results to adjust priorities, programmes and subsequent programming cycles. The recommendations concerning the establishment of a publicly accessible overview of planned projects (project pipeline), the publication of data on previous cross-border cooperation (CBC) projects, transparent criteria for prioritisation and the availability of evaluations therefore remain relevant.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. **Adopt and operationalise the secondary legislation under the Law on Cohesion Policy**. The decrees for both cohesion policy goals and the act on institutional responsibilities should be adopted only after the key NCEU comments have been addressed, concerning unclear lines of responsibility, insufficiently developed strategic coordination, weak partnership and insufficient transparency, as well as insufficiently elaborated mechanisms for control, risk and irregularity management and the protection of the EU's financial interests, electronic systems, the preparation and management of the project pipeline, and administrative capacity. The legislation must remain adaptable to the new EU framework for the period 2028-2034 (*new priority recommendation for 2026*).

2. **Adopt the Development Plan of Serbia and establish a coherent national and regional development framework**. Development planning, regional policy, the smart specialisation strategy (S3), public investment, the budget and future cohesion policy programmes need to be linked, with measurable territorial objectives, appropriate baselines and result indicators defined, and the capacity of local self-government units (LSGUs) and regional development agencies strengthened (*NCEU recommendation from 2025 – not fulfilled; repeated and made more specific*).
3. **Complete the procedural steps for opening Chapter 22 and maintain full readiness to prepare the negotiating position**. The fact that the European Commission has assessed the benchmark as met should not halt preparations for the future closing benchmarks or for establishing a functioning cohesion policy system (*NCEU recommendation from 2025 – not fulfilled; reworded to reflect the current status*).
4. **Adopt and implement a comprehensive policy for developing and retaining administrative capacity**. Clear data need to be provided on the required number and profiles of staff, the recruitment timeline, training, staff retention measures, capacity at regional and local level, the budget and performance indicators (*NCEU recommendation from 2025 – partially fulfilled; repeated*).

Link to the Reform Agenda

Although the Reform Agenda does not set out a reform step directly linked to Chapter 22, there are several horizontal and functional links, shown in the following table.

Reform Agenda measure (relevant to Chapter 22)	Status / Deadline	Urgent for Chapter 22
6.1.1. Improvement of public investment management and sustainable and efficient management of business entities owned by the Republic of Serbia	Status: ongoing; deadline: 2026-2027	Link the single and transparent prioritisation of public investment with development planning, territorial needs and future cohesion policy programmes.
6.2.1. Enhanced investment and development opportunities for entrepreneurs and private sector	Status: ongoing; deadline: 2027	Involve local self-government units (LSGUs), regional actors and the business sector in identifying development needs and investment priorities.
6.2.2. Further Development of the science and innovation ecosystem for a knowledge-based economy	Status: ongoing; period 2025-2027	Link the smart specialisation strategy (S3) with regional development and future cohesion policy programming, particularly at NSTJ 2 level.
7.2.2. Further digitalisation of public services and administrative procedures for businesses and citizens	Status: ongoing; period 2024-2027	Develop an interoperable fund management system and ensure public access to data on programmes, projects, beneficiaries and results.
Chapter 14 – Monitoring, Reporting, Evaluation	Established and being implemented	Ensure monitoring in line with EU standards, public evaluations and genuine participation of partners.
Chapter 15 – Control and Audit	Legislative framework established; implementation ongoing	Ensure a clear control and audit trail, functional separation of responsibilities and protection of the EU's financial interests.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

In line with the methodology of the NCEU Book of Recommendations for 2026, this section **does not assess the quality of legislation or the process of its preparation**, but solely the status of the

activities envisaged in the Plan, based on Government reports and publicly available sources. **A qualitative assessment is provided in the preceding sections of this contribution.**

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
Preparation of an Action Plan for meeting the requirements of EU cohesion policy	Presentation of a detailed Action Plan to the European Commission	Ministry of European Integration (MEI) / Government	Q2 2026	Yes	The Action Plan was adopted and submitted in 2019. The European Commission has assessed the benchmark as met, while the OBAR is still pending before the Council.
	Law on the Establishment and Functioning of the Cohesion Policy Management System	MEI / Government / National Assembly of the Republic of Serbia (NARS)	Q3 2025	Yes	The Law was adopted on 23 April 2026, i.e. after the deadline set in the Government's Plan.
	Decree "Investment for jobs and growth"	Government / MEI	Q4 2025	No*	The draft was subject to consultation in 2026, but by the cut-off date there was no public confirmation that the decree had been adopted.
	Decree(s) – Interreg	Government / MEI	Q4 2025	No*	The draft was subject to consultation in 2026, but by the cut-off date there was no public confirmation that the decree had been adopted.
	Decision on responsible persons and bodies	Government / MEI	Q4 2025	No*	No publicly available confirmation was found that the decision had been adopted.
	Comprehensive staff retention policy and addressing staff shortages	MEI / Ministry of Finance / relevant institutions	Ongoing	No*	A Roadmap, training and the COHPOL 2 project are in place, but it has not been confirmed that a comprehensive staff retention policy has been established.
	Further development of the national Development Plan	Competent institutions	Ongoing	No*	The Development Plan had not been adopted by the cut-off date.
	Systematic development and implementation of multiannual operational programmes	MEI / programme bodies	Ongoing	Yes	Two operational programmes have been launched.
	Monitoring and evaluation system	MEI / programme bodies	By accession	Yes	The European Commission considers that a functioning system and IT support are in place. Sectoral monitoring committees still need to be established and further developed in line with the partnership principle.

** In these cases, the status "No" means that completion of the activity **has not been confirmed on the basis of the available Government reports and publicly available sources by the cut-off date.***

Note: *The Government's Plan explicitly provides for the adoption of the Law in Q3 2025, and of both decrees and the decision in Q4 2025.*

Statistics

The aggregate statistics on legislative measures include only the acts listed in the Plan for Chapter 22 as stand-alone legislative measures with their own status or deadline.

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	1	1 (100%)	1 (100%)	0 (0%)
Secondary legislation	2	2 (100%)	0 (0%)	0 (0%)

Note*: The decision appointing responsible persons and bodies is monitored as a separate obligation in the monitoring table, but is not included in the aggregate statistics on legislative measures. For the second goal, the Plan uses the term "decrees", whereas current MEI information and the consultation documents indicate one decree for each of the two cohesion policy goals. Two pieces of secondary legislation have therefore been recorded in the statistics.*

Conclusion

During 2026, legislative progress was made in Chapter 22 through the adoption of the Law on Cohesion Policy, the launch of the COHPOL 2 project, the preparation of decrees for both cohesion policy goals, and progress in programming and monitoring. However, the system is not yet fully functional. The key test will be the quality of the secondary legislation: the decrees must clearly regulate responsibilities, the hierarchy of legal acts, strategic coordination, partnership, transparency, information systems, the pipeline of projects ready for financing, regional and local capacity, and the retention of qualified staff. These issues should be regulated by the legislation itself and by publicly available rules, rather than left exclusively to internal procedures. At the same time, the framework must remain flexible enough to adapt to future changes in EU cohesion policy for the period 2028–2034.

The second problem is the **absence of an overarching development framework**. Serbia has not yet adopted a National Development Plan, regional policy is fragmented, and there is a risk that future funds will be programmed according to available projects and sectoral priorities rather than on the basis of a clear territorial development logic. Although Serbia has statistical regions corresponding to NUTS 2 level, it does not yet have a sufficiently strong regional institutional and development layer. Regional development agencies, local self-government units (LSGUs), the statistical basis and territorial instruments therefore need to be strengthened.

The future system also requires considerably stronger administrative capacity. Training and technical assistance are not sufficient without a permanent policy of recruiting and retaining qualified staff, and a clear plan of staffing needs by institution and level of government. At the same time, the system is being built at a time when EU cohesion policy itself is changing for the period 2028-2034. Serbia should therefore avoid both postponing reform until the new EU acquis rules are adopted and relying excessively on the rules for the period 2021-2027, which may quickly become outdated.

The measure of success for Chapter 22 is not the number of pieces of legislation adopted, but Serbia's ability to build a development-oriented, place-based, transparent and administratively sustainable system that turns cohesion policy funds into a measurable reduction of regional disparities and long-term convergence.

WORKING GROUP FOR CHAPTER 23
JUDICIARY AND FUNDAMENTAL RIGHTS

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**6**
Partially fulfilled	**2**
Number of new recommendations	**1 new, 1 replaced, 3 adapted**

Note: *As one of the two priority recommendations in the judiciary sub-area from 2025 has been partially fulfilled, it is replaced by a new priority recommendation for 2026, and a third recommendation is added. One recommendation in the Fight against corruption section has been adapted because it has been partially fulfilled. Two recommendations in the Fundamental rights section have been adapted, while retaining the same meaning as the previous recommendations, which have not been fulfilled.*

Objectives

The objective of Chapter 23 is to establish an independent, efficient and accountable judiciary, to fight corruption resolutely, and to ensure full respect for fundamental rights and the rights of EU citizens. Reforms in this area should ensure the removal of political and other influence on the judiciary, the strengthening of institutional capacity, and guarantees of the freedom and equality of all citizens. Progress in this chapter is the foundation of the entire EU accession process and of strengthening the rule of law in Serbia.

JUDICIARY

State of Play

The independence of the judiciary and the autonomy of the public prosecution service continue to be exposed to political and other undue influence, while the existing protection mechanisms do not provide an effective institutional response. Independent monitoring recorded at least 54 cases of undue influence in 2025 and as many as 21 cases by August 2026, dominated by media campaigns and the repeated targeting of judicial office holders by the President of the Republic and members of parliament. During 2026, the question of preserving the positive mechanisms of the constitutional reform was further raised following the adoption of the so-called “Mrdić Laws”, whose manner of adoption and certain provisions gave rise to serious concerns regarding the independence of the judiciary, the autonomy of the public prosecution service and the position of the judicial councils, as also pointed out by the Venice Commission. At the same time, the first elections to the High Judicial Council (HJC) and the High Prosecutorial Council (HPC) under the new constitutional and legal framework were completed. Although the process was marked by a significant level of transparency, it was accompanied by disputes, interventions by the Constitutional Court and the repetition of part of the elections. The adoption of the Law on the Judicial Academy continued the trend of legislative interventions that raise the question of preserving the level of judicial independence achieved and the constitutional role of the HJC and HPC in the selection of judicial office holders, by giving the Judicial Academy exclusive competence over entry into judicial office. The amendments to the Criminal Code (CC) and the Criminal Procedure Code (CPC) are still in the process of being agreed with the European Commission. At the same time, results in the prosecution of war crimes remain limited. The War

Crimes Prosecutor's Office has been operating for more than two years without an elected Chief Public Prosecutor, the number of new indictments remains low, and there is no visible progress in prosecuting high-ranking perpetrators or cases of conflict-related sexual violence. Regional cooperation is limited, while the National Strategy for the Prosecution of War Crimes and the Revised Prosecutorial Strategy expire at the end of 2026, with no information available on the preparation of a new strategic framework.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. **Ensure the effective functioning and application of the mechanisms for protection against undue influence on the judiciary**
   The effective functioning of the mechanisms for protection against undue influence established within the High Judicial Council (HJC) and the High Prosecutorial Council (HPC) must be ensured. These mechanisms should be further strengthened through the adoption, amendment and consistent application of the relevant general legal acts adopted by the Government of the Republic of Serbia, the National Assembly, the Regulatory Authority for Electronic Media (REM) and other competent institutions (*NCEU recommendation from 2021, repeated several times, including in the 2025 report*).

2. **Ensure that the legislation governing the status of the judiciary improves, or at least preserves, the level of judicial independence and prosecutorial autonomy achieved, and is in line with the Constitution and European standards**
   All the consequences of the so-called "Mrdić Laws" should be reversed without delay, and amendments should be considered to the provisions adopted in the Law on the Judicial Academy, so that they neither diminish the constitutional competences of the HJC and HPC nor create new opportunities for undue influence on the selection and promotion of judicial office holders. Further legislative amendments must be made through a transparent and inclusive process, with the genuine participation of the judicial councils and the professional community.

3. **Ensure the institutional and strategic conditions for the effective prosecution of war crimes and improve regional judicial cooperation**
   The election of the Chief Public Prosecutor for War Crimes must be completed, cooperation and the exchange of evidence with the judicial institutions of the countries of the region must be improved, including mechanisms for cooperation with Kosovo* judicial institutions, and a new National Strategy for the Prosecution of War Crimes and a new Prosecutorial Strategy for the Investigation and Prosecution of War Crimes must be prepared in a timely manner. The new strategic framework should contain clear and measurable objectives, including progress in prosecuting high-ranking perpetrators and cases of conflict-related sexual violence, with transparent consultation and regular public reporting on results.

Link to the Reform Agenda

Reform Agenda Measure (relevant to Chapter 23)	Status / Deadline	Urgent for Chapter 23
9.6.1. Reform of justice system – Increase the number of appointed judges and public prosecutors by 10%	Deadline: December 2025 Status: unfulfilled	Decisive political and institutional will is needed to apply the existing legal framework consistently and to ensure an environment in which the judicial councils operate at full capacity, without fear and without external, above all political, influence.

Conclusion

During 2026, the challenges in preserving the independence of the judiciary and the autonomy of the public prosecution service deepened further. The adoption of the "Mrdić Laws" and the new Law on the Judicial Academy reopened questions about the level of judicial independence achieved, the constitutional role of the HJC and HPC, and the manner in which legislative reforms are carried out. At the same time, continued political and media pressure on judges and public prosecutors, together with the insufficiently effective response of the existing protection mechanisms, shows that formal institutional guarantees have not yet translated into effective protection against undue influence. In the coming period, the priority must be to remove the contested legislative provisions, apply the constitutional guarantees consistently, and ensure that the new compositions of the HJC and HPC act proactively to protect judicial independence and prosecutorial autonomy. At the same time, the limited results in the prosecution of war crimes, the failure to elect a Chief Public Prosecutor for War Crimes and the expiry of the existing strategic documents call for urgent strengthening of institutional capacity and regional cooperation, and the establishment of a new strategic framework with clear and measurable objectives.

FIGHT AGAINST CORRUPTION

State of Play

Despite the strategic framework in place, the fight against corruption is still not delivering sufficient results, particularly in high-level corruption cases. The Action Plan for the Implementation of the National Anti-Corruption Strategy for the period 2026–2028 was adopted in June 2026, but most of the proposals made by civil society organisations were not included, and certain key problems are not adequately addressed by the planned measures. At the same time, the GRECO and ODIHR recommendations remain only partially implemented. The amendments to the Law on the Prevention of Corruption and the Law on Lobbying brought certain improvements, but did not respond to some of GRECO's key recommendations, including those concerning the immunity of members of the Government for corruption-related offences, the competence of the Prosecutor's Office for Organised Crime and the political appointment of the most senior police officials. There is also no visible progress in the proactive work of the Agency for the Prevention of Corruption, while the legislative amendments made respond only partially to the ODIHR recommendations, without addressing the issue of a clear separation between the State and political parties. Of particular concern are the limited results in prosecuting high-level corruption and the pressure and obstacles faced by the competent public prosecutor's offices in conducting certain investigations. At the same time, the transparency of institutions and the quality of public participation in law-making remain insufficient. Consultations and public debates are often reduced to formal compliance with procedural requirements, with short deadlines, insufficient involvement of stakeholders and a lack of proper consideration of their proposals. Amendments to the Government's Rules of Procedure have further opened up the possibility of bypassing public consultations, while bills submitted by members of parliament can bypass the procedures that apply to Government bills. Following the withdrawal of the previous bill in 2025, the process of amending the Law on Free Access to Information of Public Importance has not yet resolved long-standing problems in exercising the right of access to information, including the enforcement of the Commissioner's decisions, oversight of the highest state authorities and control over the classification of information.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. **Supplement the National Anti-Corruption Strategy and Action Plan so that they address key challenges, including the limited number of high-level corruption cases investigated and the non-transparent contracting of the highest-value public works**
   Particular priority should be given to implementing the outstanding GRECO recommendations from the Fifth Evaluation Round and the ODIHR recommendations for improving electoral conditions, especially in the areas of preventing the misuse of public resources and ensuring a clear separation between the State and political parties. Although the amendments to the Law on the Prevention of Corruption and the Law on Lobbying brought certain improvements, reforms need to continue in order to address the recommendations that remain unfulfilled. The National Assembly should actively participate in monitoring the implementation of the National Strategy and regularly consider reports on its implementation (*adapted recommendation, as it has been partially fulfilled*).

2. **Increase the number of prosecutors specialised in corruption, and provide them with the necessary resources and the legislative amendments that enable the effective prosecution of high-level corruption cases**
   In addition to strengthening capacity, the legislative framework needs to be improved and conditions ensured for public prosecutor's offices to act autonomously and effectively in complex corruption cases. The public prosecution service should respond to substantiated allegations of high-level corruption, and decisions not to prosecute in such cases should be reasoned and made public. A clear distinction should also be drawn between corruption cases and cases of economic and other forms of crime, so that the results of the fight against corruption can be reliably monitored and assessed. It is particularly important to ensure that the police and other state authorities provide the prosecution service with the necessary support and that political or other influence does not obstruct the launch and conduct of investigations.

3. **The Government of the Republic of Serbia should relaunch the process of amending the Law on Free Access to Information of Public Importance and the Law on Data Secrecy through an inclusive and transparent process involving civil society, while strengthening the supervisory role of the Commissioner for Information of Public Importance and Personal Data Protection and control over the classification of information**
   The new reform process should address long-standing problems in exercising the right of access to information, including the non-enforcement of the Commissioner's decisions, insufficient proactive transparency and limited oversight of the conduct of the highest state authorities. In particular, effective oversight of the classification of information needs to be established, and classification must be prevented from being used to restrict access to information without justification. Amendments to these laws must be prepared through genuine, not merely formal, consultations, with sufficient time for participation and for consideration of the proposals of civil society, the media and the professional community.

Link to the Reform Agenda

Reform Agenda Measure (relevant to Chapter 23)	Status / Deadline	Necessary for Chapter 23
4.5.1. Improved fight against and prevention of corruption – Improve the rack record of effective and efficient investigations, prosecutions, final judgements, seizure, and final confiscations in corruption, including high-level corruption cases	Deadline: June 2026 Status: unfulfilled	Continued efforts are needed to strengthen the independence and capacity of the judicial authorities and the public prosecution service, improve transparency and ensure a legal framework that can respond effectively to the complexity and specific nature of high-level corruption cases.

Conclusion

The fight against corruption in Serbia is still not delivering results commensurate with the scale and seriousness of the problem, particularly as regards high-level corruption. Although the Action Plan for the period 2026-2028 and amendments to certain relevant laws were adopted during the previous period, a significant proportion of the GRECO and ODIHR recommendations remain unfulfilled, while the strategic framework does not sufficiently address key challenges, including the limited number of high-level corruption cases investigated and the lack of transparency in the highest-value public contracts. At the same time, the limited results in prosecuting high-level corruption and the insufficiently proactive conduct of the competent institutions show that formal legislative and strategic changes have not yet produced adequate results in practice. In the coming period, the priority must be to implement and supplement the existing strategic framework, strengthen the capacity and autonomy of the prosecution services in dealing with high-level corruption cases, and ensure greater transparency of institutions. It is particularly important to reopen the reform of the legislation on free access to information and data secrecy and to ensure effective oversight of its implementation. Progress in this area should be measured not only by the number of strategies, action plans and legislative amendments adopted, but by their actual effects: effective investigation and prosecution of corruption, accountability of public officials, more transparent management of public resources and more effective public scrutiny of institutions.

FUNDAMENTAL RIGHTS

State of Play

Despite constitutional guarantees and international obligations, the state of fundamental rights in Serbia has deteriorated further, particularly in the areas of freedom of assembly and expression and the protection of human rights defenders. Protests continued to be accompanied by detentions, the use of force and the initiation of criminal and misdemeanour proceedings, while the use of serious charges related to attacks on the constitutional order and other criminal offences in proceedings against protest participants and other publicly engaged citizens is of particular concern, as it may have a chilling effect on the exercise of guaranteed freedoms. At the same time, activists, civil society organisations and journalists are exposed to smear campaigns, threats, physical attacks, SLAPP proceedings and intrusions into their digital privacy, with an insufficiently effective institutional response. In 2025, 317 attacks on journalists and the same number on human rights defenders were recorded, and in the first eight months of 2026 a further 197 attacks on journalists and 231 attacks on activists. The attacks include legal and physical attacks, as well as threats to life and physical safety. At the same time, there is no effective response to serious intrusions into the privacy and digital security of activists, students and journalists, including documented cases of the use of spyware and other forms of digital surveillance. Problems in protecting fundamental rights are also present in other areas: the institutional response to gender-based violence remains insufficient, while environmental activists continue to face pressure and attacks. Despite the cases reported, the prosecution service, the Commissioner and the Protector of Citizens have not provided an effective response, nor has any of these cases been prosecuted or responsibility established so far. In the area of health care, in cases of serious and fatal outcomes, the patient, the applicant or the family of the deceased do not have a clearly guaranteed procedural position in the extraordinary external review of professional work, nor an appropriate mechanism for challenging the review's findings, which may hinder the full establishment of the facts and effective protection of the procedural aspect of the right to life.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. **Protect the right to peaceful assembly in line with international standards, without discrimination against participants on the basis of the formal status of the assembly, political expression or age**
   The police must protect the safety of all participants, and force must be used only when necessary and proportionate. The prosecution service and the courts must not become instruments of political persecution: proceedings against participants must be grounded in fact and law. In particular, criminal and misdemeanour proceedings, including the use of serious criminal charges, must be prevented from being used in a way that unjustifiably restricts freedom of assembly or has a chilling effect on citizens taking part in protests. The right of children and minors to peaceful assembly must be protected, with appropriate additional safeguards. The right to work must not be jeopardised by the expression of opinions through participation in protests, which means that pressure, threats and retaliation by employers or institutions must be prohibited.

2. **Ensure and strengthen the protection of journalists, activists and human rights defenders**
   Effective investigations must be conducted into attacks, threats and intimidation against human rights defenders, activists and journalists, as well as independent investigations into the use of spyware and other forms of unlawful surveillance. Unfounded proceedings against civil society organisations and human rights defenders should be discontinued, and the misuse of criminal, misdemeanour and other proceedings to intimidate them and restrict their legitimate activities should be prevented. In particular, cooperation between the prosecution service and the police in cases of attacks on and threats to journalists should be improved, police compliance with prosecutors' instructions and consistent application of the existing agreements on urgent action should be ensured, and police officers should be held accountable for violence against journalists. The protection of journalists, activists and civil society organisations against SLAPP proceedings should be improved in line with the relevant EU standards and Council of Europe recommendations (*adapted recommendation: same meaning, but a more logical form in view of the current situation*).

3. **Ensure that the implementation of the legislative reforms envisaged in the Reform Agenda and the Action Plan for Chapter 23 improves the protection of fundamental rights and does not lower the level of protection already achieved**
   Public consultations and debates must not be reduced to formal compliance with procedural requirements; genuine and timely participation of the professional community and civil society must be ensured, with the proposals submitted being considered and reasoned responses given on their acceptance or rejection. Meeting deadlines and formally carrying out the activities envisaged in the Reform Agenda and the Action Plan cannot be an end in itself; legislative reforms must be aimed at achieving measurable and sustainable changes in the protection of fundamental rights. This applies in particular to the amendments to the CC and the CPC, as one of the instruments for achieving the relevant Reform Agenda steps (*adapted recommendation: same meaning, but a more logical form in view of the current situation*).

Link to the Reform Agenda

Reform Agenda Measure (relevant to Chapter 23)	Status / Deadline	Urgent for Chapter 23
9.2.1. Enhance fundamental rights protection of vulnerable individuals and persons belonging to national minorities – Step 1	Deadline: December 2025 Status: unfulfilled	As indicated in the Reform Agenda, it is necessary to prepare and adopt regulations envisaged "following the adoption of action plans on gender-based violence, deinstitutionalisation, and the exercise of national minority rights". Special focus must be placed on transparent and inclusive consultations, where the

Reform Agenda Measure (relevant to Chapter 23)	Status / Deadline	Urgent for Chapter 23
		priority is not merely meeting deadlines, but ensuring conditions for meaningful public debate and the creation of societal consensus (also applicable to amendments to criminal legislation).

Conclusion

The state of fundamental rights in Serbia is marked by a growing gap between the existing constitutional and legal guarantees and their application in practice. Continued pressure on protest participants, journalists, activists and human rights defenders, together with the lack of effective investigations into attacks and allegations of unlawful surveillance, further undermines trust in the institutions responsible for protecting fundamental rights. Of particular concern is the use of criminal, misdemeanour and other institutional mechanisms in a way that may have a chilling effect on freedom of assembly and expression and on action in the public interest. In the coming period, progress cannot be measured solely by the adoption of legislation and the formal fulfilment of steps under the Reform Agenda and the Action Plan for Chapter 23. It must be ensured that legislative reforms are based on genuine participation of the professional community and civil society, and that their results improve, rather than diminish, the level of protection of fundamental rights already achieved. At the same time, the effective prosecution of attacks and threats, protection against unfounded proceedings and unlawful surveillance, and consistent respect for freedom of peaceful assembly are key indicators of real, rather than merely formal, progress in this area.

WORKING GROUP FOR CHAPTER 24
JUSTICE, FREEDOM AND SECURITY

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**3**
Partially fulfilled	**0**
Number of new recommendations	**0**

Objectives

Chapter 24 aims to ensure the security, rights and freedoms of the citizens of Serbia and the EU, and to promote international cooperation in addressing common challenges. It covers ten areas: migration; asylum; external border control and Schengen; visa policy; judicial cooperation in civil and criminal matters; police cooperation and the fight against organised crime; cooperation in the fight against terrorism; cooperation in the field of drugs; customs cooperation and the protection of the euro against counterfeiting.

State of Play

The Action Plan for Chapter 24 covers 42 interim benchmarks and more than 300 activities, of which only about half have been implemented. In addition, certain measures are also covered by the Reform Agenda. In its 2025 Report on Serbia, the European Commission assessed that Serbia has some to moderate level of preparation in this chapter (score 2.5 out of 5), while the assessment of annual progress was downgraded from some progress to limited progress (score 2 out of 5). The scores for the fight against organised crime sub-area are chronically lower (2 out of 5).[77]

The selective, inappropriate and unlawful conduct of the police during citizens' and student protests and local elections across Serbia points to a lack of operational autonomy.[78] Statements by the most senior officials, dismissals of senior officers and controversial appointments to senior police positions point to strong political control over the police. The involvement of police officers, including the former head of the Belgrade police, in the murder in Senjak in May 2026 has again highlighted the issue of links between the police and organised crime. In the context of increased repression against critics of the regime, police cooperation with informal private security structures is of additional concern; professional journalists have identified members of criminal and hooligan groups among their members. The relationship between the police and the prosecution service has not improved in practice, and obstruction is noticeable in politically sensitive cases. The security services continue to participate in criminal investigations.

The new draft Law on Internal Affairs has not been finalised. The version subject to public consultation in April 2026 ignores or deepens the problems outlined above, further centralises the

[77] European Commission, *Serbia 2025 Report*, 4 November 2025. Available at: https://enlargement.ec.europa.eu/serbia-report-2025_en.
[78] Jelena Pejić Nikić (ed), "PrEUgovor Alarm: Izveštaj o napretku Srbije u Klasteru 1" [*PrEUgovor Alarm: Report on Serbia's Progress in Cluster 1*], prEUgovor Coalition, Belgrade, May 2026, pp. 96–101. Available at: https://preugovor.org/Alarm-izvestaji/1950/Izvestaj-koalicije-prEUgovor-o-napretku-Srbije-u.shtml.

work of the Ministry of the Interior (MoI) and weakens internal and external oversight of the police.[79] The drafting process to date has prevented meaningful participation by the interested public, even though the minimum legal requirements for holding consultations were met.[80]

The Law on Preventing and Combating Trafficking in Human Beings and Protecting Victims was adopted in April 2026, but no results are yet visible in terms of faster detection of cases, more effective prosecution and better protection of victims. Proactive investigations remain rare, and trafficking in human beings is often reclassified as less serious criminal offences. The victim identification system remains passive and largely dependent on civil society organisations and project funding.

In the area of asylum and migration, there have been no significant changes in the functioning of the reception system, and only a small number of persons in mixed migration flows enter the asylum procedure. Access to health care, particularly specialist treatment and medicines, remains one of the most common problems, especially for persons living at private addresses. At the same time, smuggling networks remain active, with recorded cases of kidnapping, extortion and other forms of violence. The liberalisation of the labour market and the growing number of foreign workers further highlight the need to strengthen the protection of labour rights and prevent exploitation. A positive development is the introduction, from October 2026, of biometric identity cards for persons granted international protection. Following the start of application of the EU Pact on Migration and Asylum in June 2026, Serbia needs to continue aligning its legislative and strategic framework in the areas of asylum, migration and border management.

Priority Steps to Unblock the Process

Although none of the formally envisaged measures should be neglected, we again highlight three key problems whose resolution is a prerequisite for the meaningful implementation of the other reform activities in this chapter, given the current context:

1. **Politicisation and criminalisation of the police.** Representatives of the executive should stop exerting political pressure on the operational work of the police, both through informal channels and publicly. The Ministry of the Interior should publish its act on the organisation and systematisation of posts and refrain from frequently amending it in order to pursue a staffing policy based on party loyalty. The new law should lay down stricter conditions and greater transparency in recruitment, particularly for assignment to managerial posts. The practice of concealing the identity of police officers, including through the excessive and unjustified wearing of balaclavas, must be ended. The police must prevent and sanction the use of force by unauthorised persons;

2. **Lack of accountability for violations of the law within the police.** The competent authorities and bodies (the Internal Control Sector of the Ministry of the Interior, the Protector of Citizens and the prosecution services) should investigate effectively and without delay all allegations of police torture, excessive use of force, biased conduct, the use of prohibited means of coercion against protest participants, unauthorised disclosure of confidential information and other irregularities and unlawful acts in the work of the police. The facts and the individual

[79] NCEU, "Zbirni komentar radnih grupa NKEU za poglavlja 23 i 24 na Nacrt zakona o unutrašnjim poslovima" [*Consolidated Comments of the NCEU Working Groups for Chapters 23 and 24 on the Draft Law on Internal Affairs*], April 2026. Available at: https://eukonvent.org/wp-content/uploads/2026/04/Zbirni-komentar-radnih-grupa-NKEU-za-poglavlja-23-i-24_april-2026.pdf.

[80] NCEU, "Ograničavanje učešća javnosti u procesima donošenja propisa ugrožava proces evropskih integracija Srbije" [*Restricting Public Participation in Law-Making Jeopardises Serbia's European Integration Process*], 8 April 2026. Available at: https://eukonvent.org/ogranicavanje-ucesca-javnosti-u-procesima-donosenja-propisa-ugrozava-proces-evropskih-integracija-srbije/.

responsibility of police officers and other responsible persons in the police and the Ministry of the Interior must be established;

3. **Obstruction of prosecutorial investigations owing to insufficient cooperation between the prosecution service and the police.** Police officers participating in criminal investigations should be under the direct control of, and accountable for their work to, the competent public prosecutor, and the prosecutor's assessment of their performance should be a key criterion in decisions on their promotion.

Link to the Reform Agenda

Of the nine measures in total, four have been fulfilled (4.3.1, 4.3.2, 4.4.1 and 4.4.3), three of them in this reporting period. Two measures have been started but not completed (4.3.3 and 4.3.6). For one measure, the degree of fulfilment cannot be assessed owing to a lack of data (4.3.4), while for two measures the deadline has not yet expired (4.3.5 and 4.4.2), so their fulfilment cannot yet be definitively assessed.

Reform Agenda measure	Deadline	Status[81]
4.3.1. Adopt a new Law on Combating and Preventing Human Trafficking, Law on Weapons and Ammunition, and amend the Criminal Code in the area of weapons trafficking	June 2025	**Fulfilled with significant delay.** The Law on Preventing and Combating Trafficking in Human Beings and Protecting Victims was adopted on 23 April 2026.[82] The Government adopted the bill on 14 April 2026, almost ten months after the end of the public consultation. Although civil society organisations took part in the working group, the process was marked by limited opportunities to influence the final provisions, insufficient transparency in decisions on the comments received, and an urgent parliamentary procedure.[83] The adopted law is largely aligned with the EU acquis and improves the protection of victims, but its application begins only on 1 January 2027. The new Law on Weapons and Ammunition was adopted on 10 July 2026.[84] Until March 2026, the public had not been informed about the preparation of the new law or the composition of the working group. The public consultation lasted from 27 March to 20 April 2026, and public participation was limited to written submissions. The Law is largely aligned with Directive (EU) 2021/555, but its application begins only in April 2027. Amendments to the Criminal Code relating to the manufacture, carrying and smuggling of weapons were also adopted on 10 July 2026 under the urgent procedure.[85] They introduced new criminal offences, thereby largely aligning the legislation with the UN Firearms Protocol. The NCEU had previously criticised the non-transparent drafting of a more extensive draft amendment to the Criminal Code and the short duration of the public consultation in September 2025.[86]
4.3.2. Adopt a new strategic document and accompanying the Action Plan for the period 2025-	June 2025	**Fulfilled with significant delay.** The Programme for the Control of Small Arms and Light Weapons, Ammunition and Explosives in the Republic of Serbia for the period 2025-2030, with the accompanying Action Plan for 2025-2027, was adopted on 26 December 2025.[87] The drafting process formally included consultations and

[81] Cut-off date: 30 September 2026.
[82] *Official Gazette of the RS*, No 35/2026.
[83] Jelena Pejić Nikić (ed), "PrEUgovor Alarm: Izveštaj o napretku Srbije u Klasteru 1" [*PrEUgovor Alarm: Report on Serbia's Progress in Cluster 1*], op. cit, pp. 115-117.
[84] *Official Gazette of the RS*, No 63/2026.
[85] Law Amending the Criminal Code, *Official Gazette of the RS*, No 63/2026.
[86] NCEU, "Saopštenje Nacionalnog konventa o Evropskoj uniji povodom tekuće 'javne rasprave' o izmenama krivičnog zakonodavstva" [*Statement of the National Convention on the European Union on the ongoing "public consultation" on amendments to criminal legislation*], 23 September 2025. Available at: https://eukonvent.org/saopstenje-nacionalnog-konventa-o-evropskoj-uniji-povodom-tekuce-javne-rasprave-o-izmenama-krivicnog-zakonodavstva/.
[87] *Official Gazette of the RS*, No 119/2025.

Reform Agenda measure	Deadline	Status[81]
2030 for the control of Arms and Light Weapons (SALW)		a public consultation, but remained barely visible and of limited inclusiveness. The documents are largely aligned with the revised Regional Roadmap for SALW Control in the Western Balkans for the period 2025–2030.
4.3.3. Adoption of an operational plan for financial investigations	December 2025	**Not fulfilled.** The draft Operational Plan for Conducting Financial Investigations and Confiscating Crime-Related Assets for the period 2026–2028 was prepared and subject to public consultation from 22 October to 10 November 2025,[88] but has not yet been adopted by the Government. Neither the revised version of the document nor the report on the public consultation has been published. A further problem is the unclear legal status of this document within Serbia's planning system.
4.3.4. Continuously implement the SALW Action Plan and the National Programme on Combating Human Trafficking in the Republic of Serbia for 2024-2029 with five specific objectives	June 2026	Cannot be assessed owing to a lack of data.
4.3.5. Continuously implement the SALW Action Plan and the National Programme on Combating Human Trafficking in the Republic of Serbia for 2024-2029 with five specific objectives (same measure, different deadline)	June 2027	The deadline has not yet expired; a final assessment of fulfilment is not possible.
4.3.6. Adopt the Law on Internal Affairs with enhanced provisions on the operational independence of the police and on the prevention of torture	June 2025	**Not fulfilled.** The draft Law on Internal Affairs has been prepared and a public consultation was held in April 2026.[89] However, the outgoing Government neither finalised the bill nor submitted it to the National Assembly. In addition to the delays and the restriction of opportunities for meaningful public participation, the available draft only partially meets the requirements of the Reform Agenda regarding the operational independence of the police and the prevention of torture, and contains other contentious provisions (see the text above for more details).
4.4.1. Adopt new strategic document and accompanying action plan that covers counter terrorism and all forms of radicalization and violent extremism, including the issue of foreign fighters	June 2025	**Fulfilled with significant delay.** On 30 June 2026, the Government adopted the Programme for Countering Terrorism and All Forms of Radicalisation and Violent Extremism for the period 2026-2030, with the accompanying Action Plan for 2026-2027.[90] The Programme covers action regardless of political, religious or ethno-nationalist justification, including concrete steps to prevent the recruitment of Serbian citizens and their participation as foreign fighters, and to prosecute foreign fighters returning to Serbia. The documents underwent public consultations and a public consultation in the first half of 2025, but this process went almost unnoticed.[91] The Programme and the Action Plan have been improved in substance compared with the draft and are better aligned with the Reform Agenda and the European counter-terrorism framework. However, the monitoring system is based on the implementation of activities rather than an assessment of their actual impact.

[88] Documents available on the eConsultations portal: https://ekonsultacije.gov.rs/topicOfDiscussionPage/553/1, last accessed on 30 September 2026.
[89] Documents available on the eConsultations portal: https://ekonsultacije.gov.rs/topicOfDiscussionPage/427/3, last accessed on 30 September 2026.
[90] *Official Gazette of the RS*, No 58/2026.
[91] Documents available on the eConsultations portal: https://ekonsultacije.gov.rs/topicOfDiscussionPage/457/3, last accessed on 30 September 2026.

Reform Agenda measure	Deadline	Status[81]
4.4.2. Adopt documents with specific objectives in the area of countering terrorism and violent extremism	December 2026	The deadline has not yet expired; a final assessment of fulfilment is not possible.
4.4.3. Alignment with EU visa regime with at least three countries whose nationals need visa to enter the EU	December 2024	**Fulfilled.** Visas were introduced within the deadline for four countries: Oman, Mongolia, Qatar and Kuwait.[92]

Conclusion

The implementation of obligations under Chapter 24 remains slow and selective. Political control of the police and its links with criminal groups, the lack of accountability within the police and insufficient cooperation between the police and the prosecution service seriously undermine the rule of law and the credibility of reforms. During the reporting period, efforts were made to fulfil certain Reform Agenda measures, but delays and lack of transparency in their implementation, as well as the authorities' refusal to abandon repressive practices, call their purpose into question. Without resolving the key problems highlighted by the mass citizens' protests, further progress in this chapter remains uncertain.

[92] See the infographic: prEUgovor, "Usklađivanje Srbije sa viznom politikom Evropske unije" [*Serbia's Alignment with the European Union's Visa Policy*], 4 March 2025. Available at: https://www.preugovor.org/Infografici/1907/Uskladjivanje-Srbije-sa-viznom-politikom-Evropske.shtml.

WORKING GROUP FOR CHAPTER 27
ENVIRONMENT

Status of the 2025 Recommendations

Fulfilled	**1**
Unfulfilled	**4**
Partially fulfilled	**0**
Number of new recommendations	**0**

As only one of the five priority recommendations from 2025 has been fulfilled, the remaining four are repeated.

Objectives

The objectives of Chapter 27 are alignment with the EU acquis and its effective implementation in order to reduce pollution, preserve natural resources and biodiversity, protect public health and improve quality of life. The chapter also covers climate change mitigation and adaptation to its effects, as well as strengthening institutions, securing financing and ensuring public participation in environmental decision-making. Chapter 27 is one of the most demanding and costly chapters and covers ten sub-areas: horizontal legislation, water quality, air quality, waste management, nature protection, industrial pollution control and risk management, chemicals, noise, civil protection and climate change.

In the 2024 Reform Agenda of the Republic of Serbia, issues relevant to Chapter 27 are covered primarily in the "Green and digital transition" area, through the transformation of the energy sector, decarbonisation, the increased use of renewable energy sources and improved energy efficiency. Of particular importance is reform 7.1.6, which concerns the monitoring, reporting, verification and accreditation of greenhouse gas emissions (MRVA), as a prerequisite for future inclusion in the EU Emissions Trading System. Links with environmental protection also exist through the consideration of the climate and environmental impacts of capital projects, sustainable transport and agriculture.

Serbia has still not adopted a Development Plan, and the long delay in its adoption leaves the selection of priority environmental infrastructure projects without an overarching development framework. This makes it more difficult to set priorities transparently and to link investment to the needs of the population, sustainable development goals and the obligations under Chapter 27.

State of Play

Chapter 27 was opened on 14 December 2021, and in 2025 the Government adopted the Action Plan for meeting the closing benchmarks. The key issue remains the implementation of the planned activities within the envisaged deadlines, with adequate financing, institutional strengthening and publicly available reports on the results achieved. The Plan for the Fulfilment of the Most Important Obligations under the Accession Negotiations of the Republic of Serbia with the European Union by the End of 2026 sets out activities for the eight closing benchmarks. Chapter 27 requires multi-year investment, but the Government's Plan does not provide a consolidated and updated estimate of the costs of meeting all the benchmarks. The financial tables, which have not been filled in for most benchmarks, make it difficult to verify whether the envisaged deadlines are backed by sufficient funds and reliable sources of financing.

The adoption of new laws and secondary legislation represents progress, but questions remain regarding their implementation, effective public participation and access to justice. Fulfilment of the benchmarks cannot be reduced to the number of pieces of legislation adopted.

The Plan for the Fulfilment of the Most Important Obligations under the Accession Negotiations provides for numerous obligations by the end of 2026, but for waste infrastructure it leaves deadlines to be set after the revision of the directive-specific implementation plans. The financial tables for most benchmarks have not been filled in, which makes it difficult to assess the feasibility of the planned activities. Capacity-building does not consistently keep pace with the needs of the chapter either: the NPAA implementation report for the first quarter of 2026 records individual recruitments, while the measure to strengthen inspection is marked as unfulfilled, with one inspector having retired.

According to the Ministry of Environmental Protection's report for the period from June 2023 to June 2026, progress has been made through the establishment of a system for monitoring, reporting, verification and accreditation of emissions and the adoption, in December 2025, of laws on the taxation of emissions and of imports of carbon-intensive products. The initial carbon price was set at EUR 4 per tonne of CO_2 equivalent. However, the report itself points to shortcomings in financing, capacity and the availability of result indicators. The establishment of the system is therefore not yet proof of full implementation of the climate obligations under this chapter.

How to Unblock the Process? / Priority Steps to Unblock the Process

As the recommendation to involve the public in monitoring the implementation of the Multiannual Operational Programme for Environment and Energy has been fulfilled, the remaining four recommendations from 2025 are repeated:

1. Stop the repression of environmental and other activists. A society in which violence against citizens and activists is present cannot ensure systemic care for either human health or the environment;[93]
2. Carry out a review of the questionable permits and decisions on nature protection conditions issued by the Institute for Nature Conservation of Serbia for various projects (such as "Jadar", small hydropower plants and others), in view of allegations that these are falsified decisions whose content is not supported by the staff who worked on the proposals for these acts, and establish the responsibility of the persons involved in drafting or signing such acts;
3. Ensure transparent decision-making on environmental financing at local, provincial and national level, with citizen participation in decision-making (particularly young people); ensure that revenues from environmental fees are spent for their intended purpose;
4. Ensure the consistent application of the "polluter pays" and "user pays" principles and introduce stricter penalties for criminal offences in this area.

Link to the Reform Agenda

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 27
7.1.6. Implementation of the system for monitoring, reporting, verification and accreditation of greenhouse gas emissions (MRVA)	Deadline: December 2025; implementation needs to continue	Ensure full coverage of operators by approved monitoring plans and effective monitoring, reporting and verification of emissions, as a basis for alignment with the EU Emissions Trading System.

[93] In a report from May 2026, Amnesty International documents continued police violence, arbitrary arrests and pressure on protesters and civil society.

Reform Agenda Measure	Status / Deadline	Urgent for Chapter 27
7.1.7. Implementation of the Energy Efficiency Directive, The Energy Performance of Building Directive, Ecodesign and energy labelling legislation – part relating to the Air Quality Programme	Ongoing; deadline: December 2026	Implement the programme for replacing household heating appliances in line with the Air Protection Programme, in order to reduce pollutant emissions.
9.2.1. Enhance fundamental rights protection of vulnerable individuals and persons belonging to national minorities – part relating to crimes against the environment	Deadline: December 2025	Complete the remaining alignment of the provisions on environmental crime with EU law (amendments to the Criminal Code).

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Chapter 27 was formally opened on 14 December 2021, and the Plan sets out measures and deadlines for the eight benchmarks envisaged for closing the chapter. The table below follows the structure of the Plan.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
1. The Republic of Serbia completes alignment with the horizontal directives and continues implementing the legislation on impact assessment (the Environmental Impact Assessment and Strategic Environmental Assessment Directives), including public participation, transboundary consultations and access to justice in environmental matters; the Republic of Serbia demonstrates that it will be fully ready, by the date of accession, to ensure the **effective implementation and enforcement of the horizontal directives**.	Adoption (amendment) of secondary legislation under the Law on Environmental Impact Assessment	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	The Decree on Lists of Projects and two rulebooks have been adopted. The remaining three rulebooks are planned for Q4 2026.
	Adoption of secondary legislation under the Law on Strategic Environmental Assessment	Ministry of Environmental Protection	Q1 2026	Yes	Two rulebooks have been adopted.
	Adoption of the Strategy for the Implementation of the Aarhus Convention	Ministry of Environmental Protection	Q4 2025	No	
	Adoption of the Law Amending the Criminal Code	Ministry of Justice	Q4 2025	No	The July 2026 amendments to the Criminal Code did not align the environmental criminal offences and the prescribed penalties with the requirements of Articles 3 and 5 of Directive (EU) 2024/1203 on the protection of the environment through criminal law.
	Preparation and adoption of three acts relating to the Law on the National Spatial Data Infrastructure, the most	Ministry of Environmental Protection	2026	Deadline has not expired	

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	important being the amendments to the Law on the National Geospatial Data Infrastructure				
	Direct and indirect measures for implementing the INSPIRE Directive	Ministry of Environmental Protection	2025	Yes	
	Measures to improve the coordination of institutions for implementing the INSPIRE Directive in the Republic of Serbia	Ministry of Environmental Protection	2026	Deadline has not expired	The Law Amending the Law on the NGDI must be adopted first.
	Adoption of the Law on Environmental Liability	Ministry of Environmental Protection	Q2 2026	No	
	Adoption of the Environmental Protection Strategy: Green Agenda for Serbia	Ministry of Environmental Protection	Q2 2025	Yes	*Official Gazette of the RS*, No 71 of 31 July 2026.
2. As regards **air quality**, the Republic of Serbia achieves full alignment with the revised Directive on the reduction of national emissions of certain atmospheric pollutants (NEC Directive (EU) 2016/2284). The Republic of Serbia presents an analysis of cost-effective emission control strategies for 2020 and 2030, to serve as the basis for a final agreement between the European Union and the Republic of Serbia on its emission reduction commitments under the NEC Directive. The Republic of Serbia reports annually on its emissions, in	Adoption of the Law Amending the Law on Air Protection	Ministry of Environmental Protection	Q2 2025	Yes	*Official Gazette of the RS*, No 51/25 of 17 June 2025.
	Adoption of a new legislative act on national emission reduction commitments (based on the NEC DSIP proposal)	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Amendments to the Decree on the Methodology for Preparing Inventories of Emissions and Projections of Air Pollutants	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Amendments to the Decree on Emission Limit Values for Air Pollutants from Stationary Sources, except Combustion Plants	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of the Decree Amending the Decree on Monitoring Conditions and Air Quality Requirements	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of a new Decree on the Air Quality Control Programme in the National Network	Ministry of Environmental Protection	2025	Yes	*Official Gazette of the RS*, No 14/2026-3 of 13 February 2026.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
accordance with this Directive and the Convention on Long-Range Transboundary Air Pollution, and develops a national air pollution control programme. In addition, the Republic of Serbia improves its preparedness for implementing the acquis in this area by regularly taking measures to reduce national air pollution, particularly in zones where EU air quality limit values are exceeded, and by developing or updating air quality plans, as required by Directive 2008/50/EC on ambient air quality and cleaner air for Europe (Air Quality Directive).	Develop emission projections for NEC pollutants together with projections for greenhouse gases, and align the scenarios for both conventions	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Preparation and adoption of the National Air Pollution Control Programme	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Preparation of the Rulebook on Technical and Other Requirements for Marine Fuels	Ministry of Environmental Protection	No deadline required	Yes	*Official Gazette of the RS*, No 83/24 of 18 October 2024.
	Adoption of the DSIP for VOC Petrol	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of a new Decree on the Handling of Fluorinated Greenhouse Gases and on the Conditions for Issuing Import and Export Licences for These Gases	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Preparation of a new Decree on the Certification of Persons Performing Certain Activities Relating to Ozone-Depleting Substances and Fluorinated Greenhouse Gases	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Preparation of the Rulebook on Reporting and Record-Keeping on Ozone-Depleting Substances and Fluorinated Greenhouse Gases	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
3. The Republic of Serbia allocates adequate financing for infrastructure investment in line with the relevant EU legislation, **including the waste hierarchy**. The Republic of Serbia establishes waste prevention programmes and prepares a waste management plan	mplementation of the National Waste Management Programme and development of the planned waste management infrastructure	Ministry of Environmental Protection	Q4 2026; deadline for building infrastructure: after the revision of the DSIP	Deadline has not expired	
	Adoption of the Waste Prevention Plan	Ministry of Environmental Protection	Q1 2025	Yes	*Official Gazette of the RS*, No 17/25 of 28 February 2025.
	Adoption of amendments to the Rulebook on the List of Waste Prevention Measures	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
(WMP), national and regional, which includes information on all waste streams and the solutions for managing them, including the type and capacity of waste management infrastructure, separate collection schemes and economic instruments.	Preparation of a report on the implementation of the measures under the Waste Prevention Plan, with an Action Plan	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Preparation and adoption of regional and local waste management plans	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of amendments to the Law on Packaging and Packaging Waste	Ministry of Environmental Protection	Q4 2025	No	
	Amendment/adaptation of the legal framework for EPR organisations in line with the revised EU waste directives (regulating extended producer responsibility)	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of a new Rulebook on Report Forms on the Management of Packaging and Packaging Waste and a Rulebook on the Form of the Daily Record and Annual Report on Waste	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Develop new modules in the NRPS (National Register of Pollution Sources) information system in line with the new rulebooks	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Creation and maintenance of the National Register of Producers/Importers and development of the corresponding database	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of amendments to the Law on Waste Management	Ministry of Environmental Protection	Q4 2025	No	Partially; the Law on Waste Management (*Official Gazette of the RS*, No 109/25) does not include an obligation to create and maintain the National Register of Producers/Importers and develop the corresponding database.
	Establishment of the EPR framework	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	Adopt the Law on Agricultural Land	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Closure and remediation of existing non-sanitary landfills and dumpsites	Ministry of Environmental Protection	The revision of the DSIP and the determination of a transitional period are a prerequisite. The deadline for the revision is the end of 2025.	No	A draft DSIP has been prepared.
	Decree on the Lists of Waste for Transboundary Movement and on the Content and Form of the Documents Accompanying the Transboundary Movement of Waste, with Instructions for Completing Them	Ministry of Environmental Protection	Q4 2025	Yes	*Official Gazette of the RS*, No 19/26 of 27 February 2026.
	Rulebook on Medical Waste Management	Ministry of Environmental Protection	Q4 2025	Yes	*Official Gazette of the RS*, No 30/26 of 27 March 2026.
4. The Republic of Serbia makes significant progress in aligning with the acquis in the **water sector** and develops river basin management plans for each river basin district lying entirely within its territory, including the parts of international river basin districts falling within its territory, and ensures that the legal basis and mechanisms for the international coordination of these plans are in place.	Adoption of the Law on Waters	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of the Decree on Limit Values for Priority Substances and Priority Hazardous Substances Polluting Surface Waters and Deadlines for Achieving Them	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of the Rulebook on Technical Specifications for Chemical Analysis and Analyses Necessary for Water Monitoring	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of the Law on Drinking Water	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of the Rulebook on Drinking Water	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of the Rulebook on Bathing Water Quality	Ministry of Environmental Protection	The Law on Waters must be adopted first	Deadline has not expired	

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
5. In the area of **nature protection**, the Republic of Serbia submits to the Commission a list of proposed Natura 2000 sites that sufficiently covers habitat types and species in accordance with the requirements of the Birds Directive and the Habitats Directive, and demonstrates the capacity to manage the Natura 2000 network. The Republic of Serbia submits a National Action Plan on preventing the illegal killing of birds (IKB) and starts implementing a system for enforcing the relevant EU legislation, including the prevention of criminal offences involving the illegal killing of birds.	Establishment of the final list of the potential Natura 2000 network, including additional field surveys as necessary	Ministry of Environmental Protection	2026	Deadline has not expired	
	Amendments to the Rulebook on the Designation and Protection of Strictly Protected and Protected Species of Plants, Animals and Fungi	Ministry of Environmental Protection	2026	Deadline has not expired	
	Amendments to the Rulebook on the Criteria for Selecting Habitat Types, Sensitive, Endangered, Rare and Previously Protected Habitat Types and Measures for Their Conservation	Ministry of Environmental Protection	2026	Deadline has not expired	
	Adoption of the National Action Plan for the Implementation of the Rome Strategic Plan, which will fully cover the requirements of the National Action Plan on preventing the illegal killing of birds (IKB)	Ministry of Environmental Protection	2026	Deadline has not expired	
	Adoption of the Law on Nature Protection	Ministry of Environmental Protection	2026	Deadline has not expired	
	Adoption of amendments to the Rulebook on the Transboundary Movement and Trade of Protected Species	Ministry of Environmental Protection	2026	Deadline has not expired	
	Law on Placing Timber and Timber Products on the Market	Ministry of Environmental Protection	Q3 2025	Yes	*Official Gazette of the RS*, No 96 of 7 November 2025.
6. The Republic of Serbia continues aligning with the acquis in the sectors of **chemicals, noise and civil protection**, and demonstrates that it will be fully ready, by the date of accession, to ensure the implementation	Adoption of a new Law on IPPC	Ministry of Environmental Protection	Q3 2026	Yes	*Official Gazette of the RS*, No 63 of 10 July 2026.
	Adoption of five pieces of secondary legislation under the new IPPC Law	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Updating and revision of the DSIP for the IED (Industrial Emissions Directive)	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
and enforcement of EU requirements.[94]					
*** Adopted key laws and secondary legislation:** - Law on the Control of Major-Accident Hazards Involving Dangerous Substances; - Rulebook on the Content and Methodology for Preparing the Internal Major-Accident Protection Plan; - Rulebook on the Form and Manner of Keeping the Register of Establishments; - Rulebook on the Criteria for Notification of a Major Accident; - Rulebook on the List of Dangerous Substances and the Criteria for Classifying Establishments as Lower-Tier and Upper-Tier Establishments; - Rulebook on the Content, Form and Manner of Submitting the Notification on the Establishment, the Operator, the Description of the Establishment and its Surroundings, and the Inventory of	Adopt a specific implementation plan for the Chemicals Regulation (REACH)	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adopt a specific implementation plan for the Biocidal Products Regulation (BPR)	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	There is a problem with the deadline.
	Adoption of amendments to the Law on Waste Management	Ministry of Environmental Protection	Q4 2025	No	Partially; the Law was adopted in 2025, but is being amended again in 2026.[95]
	Adoption of three pieces of secondary legislation under the relevant Law on Environmental Noise Protection	Ministry of Environmental Protection	Q3 2026	No	
	Adoption of a new Law on Animal Welfare	Ministry of Environmental Protection	Q3 2026	No	A public consultation has been held.[96]
	Adoption of a new Rulebook on the Conditions for Entry in the Register for Animal Experiments and the Content and Manner of Keeping that Register, the Training Programme on the Welfare of Experimental Animals, the Application Form for Approval to Conduct Animal Experiments, etc.	Ministry of Environmental Protection	After the adoption of the new Law on Animal Welfare	No	
	Law on Chemicals	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Law on the Implementation of the BPR	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Protection and Rescue Plan of the Republic of Serbia	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	

[94] Industrial pollution is also covered, although, interestingly, it is not mentioned in the description of the benchmark.
[95] Owing to public pressure over the import of certain types of non-hazardous waste for incineration and use as fuel in industry. The new amendments seek more precise and restrictive control mechanisms. The Law provided for extensive decentralisation, transferring competence for issuing permits for non-hazardous waste to local self-governments. The new amendments must set additional transitional periods, as municipalities lack the staff and inspection capacity for this work. In the meantime, the European Union has further tightened its legislative framework (Directive (EU) 2025/1892), introducing mandatory extended producer responsibility for textiles and footwear, as well as even stricter food waste reduction targets.
[96] During the public consultation, animal protection associations and lawyers voiced strong criticism and called for the text to be withdrawn entirely and a new working group to be set up, so the further process could take several months.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
Dangerous Substances Present at the Establishment; - Rulebook on the Elements and Requirements of the Safety Management System; - Rulebook on the Content and Methodology for Preparing the Safety Report; - Lists of active substances in biocidal products.	Law in the area of protection and rescue	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Laws on the implementation of the REACH, CLP, PIC, POPs and Mercury Regulations – five laws	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Amendments to the Law on Fire Protection	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Law on Explosive Materials	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Amendments to the Law on Flammable and Combustible Liquids and Flammable Gases	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Rulebook on the Criteria for Determining Endocrine-Disrupting Properties	Ministry of Environmental Protection	Q4 2025	Yes	The requirement was transposed by the Rulebook Amending the Rulebook on the Classification, Packaging, Labelling and Advertising of Chemicals and Certain Products in accordance with the UN Globally Harmonised System (*Official Gazette of the RS*, No 91/25).
7. As regards **climate change**, the Republic of Serbia continues aligning with the acquis, in particular by adopting legislation on the functioning of the EU Emissions Trading System (EU ETS), in line with EU ETS Directive 2003/87/EC and its subsequent amendments. The Republic of Serbia continues aligning with the relevant secondary legislation on monitoring and reporting, accreditation and	Finalisation of the ETS Implementation Plan (DSIP)	Ministry of Environmental Protection	Q4 2025	No	It is in its final stage.
	Issuing GHG emission permits to operators of stationary installations (as the first step in ensuring the full MRVA cycle)	Ministry of Environmental Protection	Q4 2026	Yes	
	Establish a full national system for GR	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adopt amendments to the Law on Climate Change	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of the Decree Amending the Decree on the Handling of Ozone-Depleting Substances and on the Conditions for Issuing Import and Export Licences for These Substances	Ministry of Environmental Protection	Q4 2025	No	

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
verification, the Union Registry, free allocation and the auctioning of allowances. The Republic of Serbia ensures that an appropriate framework is established for the full implementation of the EU ETS as regards the monitoring, reporting and verification of greenhouse gases.	Updating and preparation of NDC version 3	Ministry of Environmental Protection	Q4 2025	No	On 4 September 2025, a Conclusion was adopted accepting the third Nationally Determined Contribution of the Republic of Serbia for the period up to 2035.
	Adoption of the Rulebook on the Method for Determining the CO_2 Emission Performance of New M1 and N1 Vehicles	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	Adoption of the Rulebook on the Method for Determining the CO_2 Emission Performance of New M2, M3, N2 and N3 Vehicles	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
8. In line with the Action Plan for Administrative Capacity Development, Serbia significantly improves the capacity of administrative bodies at all levels, including capacity for priority-setting, strategic planning and programming, information sharing and monitoring, performance measurement, and enforcement and compliance. Serbia further improves the coordination of work and demonstrates that all the appropriate administrative structures and appropriate training will be in place well before accession to allow the implementation and enforcement of the acquis in all sectors of this chapter.	Revise the APACD, improving its operational relevance	Ministry of Environmental Protection	Q4 2026	Deadline has not expired	
	New recruitment at central, regional and local level, included in the implementation of Chapter 27	Ministry of Environmental Protection	Ongoing	Deadline has not expired	
	Training for all staff involved in the implementation of Chapter 27	Ministry of Environmental Protection	Ongoing	Deadline has not expired	

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	25	8 (32%)	5 (20%)	17 (68%)
Secondary legislation	At least 99[97]	54 (54.5%)	16 (16.2%)	43 (43.4%)

Conclusion

Despite the adoption of new legislation and formal alignment with the EU acquis, progress in Chapter 27 continues to be limited by inconsistent implementation of legislation, weak institutional and inspection capacity, and delays in meeting obligations. Without a clear cost estimate and secured sources of financing, the deadlines for meeting the benchmarks remain doubtful. The number of pieces of legislation adopted cannot be a sufficient indicator of progress as long as there is no evidence of their implementation and of results in environmental protection.

Involving the public in monitoring one funding programme is a positive step, but it does not remove the reasons for citizens' distrust of the institutions. Violence and pressure on activists, the lack of a transparent review of the disputed permits and decisions on nature protection conditions, and insufficient accountability for pollution and environmental damage require a clear response from the competent authorities. Priorities for environmental investment must be set on the basis of sector-specific plans, giving precedence to the projects that contribute most to reducing pollution, conserving nature, protecting public health and serving the public interest. Progress towards closing Chapter 27 requires institutions that apply the law consistently and responsibly, enable citizens to influence decisions, and ensure more effective and stricter penalties for polluters and perpetrators of environmental crime.

[97] The figure refers to the planned items of secondary legislation; the final number of separate acts is not fully specified in the Plan.

WORKING GROUP FOR CHAPTER 28
CONSUMER AND HEALTH PROTECTION

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**4**
Partially fulfilled	**2**
Number of new recommendations	**2**

None of the six recommendations from the NCEU Book of Recommendations for 2025 has been fully implemented. Two recommendations have been partially implemented and revised, while one recommendation (concerning the COVID-19 report) has been deleted. The other recommendations have been revised or replaced by new recommendations, reflecting developments in the area of consumer and health protection. Two new recommendations have been added to the Book of Recommendations for 2026, while the remaining recommendations from the previous period have been revised and adapted to the new circumstances.

Objectives

The objective of negotiating Chapter 28 – Consumer and Health Protection is to ensure a high level of consumer and public health protection in line with European Union standards, through the alignment of legislation and supervisory mechanisms and the strengthening of the capacity of the competent institutions to enforce legislation. This covers the protection of consumer rights, the safety of products and services, adequate consumer information and market transparency, as well as the prevention and control of risks to public health, with the aim of strengthening consumer trust and ensuring functional integration with the EU single market.

State of Play

Serbia is **moderately prepared** in negotiating Chapter 28. Limited progress has been made in the area of consumer protection, while in the area of public health further alignment with the EU acquis, strengthening of administrative capacity and improved enforcement of legislation are needed.

In the area of **consumer protection**, the new Law on Consumer Protection (*Official Gazette of the RS*, No 35/2026) was adopted in April 2026 and has applied since August 2026. The Law further aligns the national legal framework with the EU acquis, including the rules on digital content and digital services, online marketplaces, price transparency and consumer protection in the digital environment, as well as protection against fake consumer reviews and paid advertising. Additional measures to protect minors have also been introduced, including a ban on selling electronic cigarettes and devices for heating tobacco and herbal products to minors. Amendments to the Law on Trade further regulate the rules on price indication and price reductions, including the obligation to indicate the lowest price of a product in the previous 30 days.

The system of **out-of-court resolution of consumer disputes** has been further developed and comprises 71 registered bodies. In 2024, 3,993 cases were resolved, while 1,869 cases were resolved in the period covered by the most recent report. The financial sustainability of these bodies remains a challenge. In the area of financial consumer protection, a new Law on the Protection of Financial Service Consumers (*Official Gazette of the RS*, No 19/2025) was adopted, partially transposing

Directive (EU) 2023/2225 on credit agreements for consumers. During 2025, the National Bank of Serbia resolved 813 complaints concerning banks.

In the area of **product safety**, further alignment with the EU acquis and stronger market surveillance capacity are needed, particularly in the context of e-commerce and digital platforms. Despite improvements in the legislative framework, enforcement, ensuring effective redress and protecting the collective interests of consumers remain challenges.

In the area of **public health**, Serbia has made some progress in strategic planning, digitalisation and participation in EU programmes. In December 2025, it became a full participant in the EU4Health programme. The sustainability of the Health Insurance Fund still needs to be ensured, the national plan for the development of human resources in health implemented, and eHealth improved, including the alignment of health records with EU data protection rules.

Further alignment is needed in the areas of **cross-border healthcare, serious cross-border threats to health, tobacco, blood, tissues, cells and organs, medicinal products for human and veterinary use, medical devices and health technology assessment**. Antimicrobial resistance poses a particular challenge, as does the need for stricter control over the prescription of antimicrobials. Capacity for surveillance of and response to cross-border health threats needs to be further strengthened.

In the area of **mental health**, community-based services remain insufficiently developed and accessible, and the Mental Health Protection Programme for the period 2019-2026 has not been fully implemented. Limited progress has also been made in the areas of cancer prevention, the promotion of healthy nutrition and physical activity, the prevention and reduction of drug-related harm, and the reduction of health inequalities.

How to Unblock the Process? / Priority Steps to Unblock the Process

Chapter 28 requires continued alignment with the EU acquis, but also a significant improvement in the enforcement of legislation, institutional coordination and the availability of effective protection and redress mechanisms. In this respect, the priority steps are:

1. Continue improving the institutional framework by considering the role of a **consumer ombudsman**, strengthening coordination between the competent institutions and consumer organisations, and considering the possibility of extending the role of the Commission for Protection of Competition in the area of consumer protection and introducing more effective administrative measures for serious infringements of consumer rights (*NCEU recommendation from 2021*);
2. Ensure more stable and transparent sources of funding for consumer organisations, including considering the introduction of a **dedicated budget fund (a "consumer dinar")** for activities in the public interest, such as product testing, consumer information and education, legal support and the protection of the collective interests of consumers (*NCEU recommendation from 2023*);
3. Ensure the effective application of the mechanisms for **protecting the collective interests** of consumers introduced by the new Law on Consumer Protection, and continue aligning the national legal framework with Directive (EU) 2020/1828 on representative actions. At the same time, improve the accessibility and effectiveness of out-of-court and judicial redress, particularly in cases of mass and repeated infringements of consumer rights (*NCEU recommendation from 2022 – revised*);

4. Continue **aligning product safety legislation** with the EU acquis and strengthen the capacity of the market surveillance authorities, particularly as regards e-commerce and products placed on the market through online platforms. Particular attention should be paid to the coordination of market surveillance and the effective exchange of data on unsafe products (*new recommendation for 2026*);

5. Ensure the **sustainability of the health insurance system** and implement the national plan for the development of human resources in health, while further improving eHealth and the interoperability of health data. Align the relevant legal framework with EU data protection rules and enable the appropriate use of de-identified health data in research and policymaking (*new recommendation for 2026, building on the NCEU recommendation from 2017*);

6. Speed up the implementation of **mental health programmes**, with a particular focus on developing community-based services, and strengthen preventive health care, including programmes for the prevention of non-communicable diseases and cancer, the promotion of healthy nutrition and the encouragement of physical activity. At the same time, improve tobacco control measures and measures to combat antimicrobial resistance, as well as capacity for the prevention of and response to serious cross-border threats to health (*NCEU recommendation from 2023, expanded with new priorities for 2026*);

7. Improve the **mechanisms for quality control of professional work and the protection of patients' rights** in cases of serious and fatal outcomes (new recommendation for 2026).

Link to the Reform Agenda

Chapter 28 is not directly covered by the Reform Agenda, but certain measures have an indirect impact on consumer protection, particularly through improvements to the business and regulatory environment, the digitalisation of public services, and horizontal mechanisms for monitoring, reporting, control and audit.

Reform Agenda Measure (indirect Impact on Chapter 28)	Status / Deadline	Urgent for Chapter 28 (indirect Impact on Chapter 28)
6.2.1. Enhancement of investment and development opportunities for entrepreneurs and the private sector	Status: ongoing; deadline: 2027	1. Ensure full application of the new Law on Consumer Protection and align the secondary legislation with its provisions and the relevant EU acquis. Pay particular attention to consumer protection in the digital environment, online trade, digital content and digital services, and the liability of online marketplaces. 2. Ensure the effective application of collective consumer protection mechanisms and improve the accessibility and efficiency of out-of-court resolution of consumer disputes. 3. Continue strengthening the capacity of the competent institutions and consumer organisations to implement the new rules and effectively protect consumer rights.
7.2.2. Further Digitalisation of Public Services and Administrative Procedures for Businesses and Citizens	Status: ongoing; period 2024-2027	Continue improving digital systems in the area of consumer protection and market surveillance, including NEPRO (National Register of Consumer Complaints) and e-Inspector, ensure their functionality, up-to-dateness and data exchange, and continue aligning them with the relevant EU systems and practice.
Chapter 14 – Monitoring, Reporting, Evaluation	Monitoring mechanism established; implementation ongoing	Ensure regular monitoring and reporting, as well as public access to information on the implementation of reform measures relevant to Chapter 28, with civil society involved in the monitoring and evaluation process.

Reform Agenda Measure (indirect Impact on Chapter 28)	Status / Deadline	Urgent for Chapter 28 (indirect Impact on Chapter 28)
Chapter 15 – Control and Audit	Control and audit system established; implementation ongoing	Continue strengthening the capacity of the competent institutions to control the implementation of reform measures and ensure effective mechanisms for controlling and preventing irregularities, including monitoring the use of funds earmarked for reforms relevant to Chapter 28.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
1. Serbia amends the Law on General Product Safety and the Law on Consumer Protection in order to further align its consumer protection legislation, in particular with the EU acquis on package travel, consumer credit, and the better enforcement and modernisation of EU consumer protection rules. Serbia demonstrates that an adequate administrative structure and the necessary enforcement capacity will be in place by the date of accession.	Law on General Product Safety	Ministry of Internal and Foreign Trade	Q4 2026	Deadline has not expired	
	Law on Consumer Protection	Ministry of Internal and Foreign Trade	Q3 2025 under the NPAA; Q2 2025 under the new deadlines	Yes	*Official Gazette of the RS*, No 35/2026
	Amendments to the Law on Tourism	Ministry of Tourism and Youth	Q2 2025	No	
2. Serbia demonstrates full alignment with EU legislation and international obligations in the area of tobacco control, and their full implementation.	Law on Tobacco	Ministry of Health	Q4 2027	Deadline has not expired	Fully aligned, applicable from 1 January 2027. The Ministry of Health is responsible for adopting the secondary legislation laying down the library of pictorial warnings to be used on tobacco products.
	Law Amending the Law on the Protection of the Population from Exposure to Tobacco Smoke	Ministry of Health	Q4 2026	Deadline has not expired	
3. Serbia demonstrates alignment with the EU acquis in other areas of public health, in particular patients' rights in cross-border healthcare, substances of human origin, medicinal products for human use, veterinary medicinal products, cosmetic products and medical devices. Serbia demonstrates that the appropriate	Law on Medicinal Products	Ministry of Health	Q4 2026	Deadline has not expired	
	Law Amending the Law on Medical Devices	Ministry of Health	Q4 2026	Deadline has not expired	
	Law on Health Insurance	Ministry of Health	Q4 2026	Deadline has not expired	

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
institutional, technical and administrative capacity for their implementation will be in place by the time of accession, and meets the reporting and coordination obligations for managing serious cross-border threats to health.	Law Amending the Law on Health Documentation and Records in Health Care	Ministry of Health	Q4 2026	Deadline has not expired	

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	8	2 (25%)	1 (12.5%)	6 (75%)
Secondary legislation	0	0	0	0

Conclusion

Serbia has made some progress in Chapter 28, particularly in improving the legislative framework for consumer protection and strengthening certain elements of the health system. However, a significant proportion of the obligations has still not been fully met, particularly as regards further alignment with the EU acquis, effective enforcement of legislation, product safety surveillance, the strengthening of institutional capacity, and the development of preventive and mental health services, among others.

Of particular note is that the **negotiating position for Chapter 28, agreed with the European Commission, was adopted by the Government and considered by the National Assembly back in March 2022**, but has still not been approved by the EU Member States, nor has the chapter been opened. Nevertheless, Serbia should continue fulfilling the remaining obligations and improving its readiness to open Chapter 28.

A further challenge is the implementation of the **Plan for meeting obligations by the end of 2026**, which provides for the adoption of a total of **eight laws relevant to Chapter 28**. One law has been adopted so far, while the others are at various stages of preparation, including drafting and public consultation, but have not yet been finalised and adopted. Although the end-2026 deadline has not yet expired, legislative activities need to be speeded up so that the planned obligations can be met on time.

At the same time, progress in Chapter 28 cannot be measured solely by the number of laws adopted. Their consistent application, more effective supervision and enforcement, sustainable capacity of the competent institutions and consumer organisations, and continued reforms in the area of public health must be ensured. The coming period should therefore be used to complete the remaining legislative obligations, improve the application of legislation and strengthen Serbia’s readiness to open Chapter 28.

WORKING GROUP FOR CHAPTER 29
CUSTOMS UNION

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**0**
Partially fulfilled	**3**
Number of new recommendations	**3**

Objectives

Chapter 29 covers the legislation on the customs union, which falls within the exclusive competence of the European Union. This means that, upon accession to the EU, the candidate country fully takes over the Union's legislation and regulations and applies them in their original form. In this area, the transfer of sovereignty from the Member State to the EU is complete.

State of Play

The customs legislation of the Republic of Serbia is largely aligned with the EU acquis. The European Commission's last two annual reports on Serbia, for 2024 and 2025, gave mostly positive assessments of the degree of alignment of Serbian legislation in this area, although the overall assessments were somewhat more reserved. The general assessment remains that Serbia has "a good level of preparation" in the area of the customs union. However, as regards the progress made during 2025, it was noted that "limited progress" had been made, particularly as regards the adoption of amendments to existing legislation, including secondary legislation, aimed at further alignment with the EU acquis, and the partial operationalisation of the new IT risk management system (RMS).

Following the expiry of the implementation period of the Action Plan for the Integrated Border Management Strategy of the Republic of Serbia for the period 2022–2024, a new Action Plan for the period 2025–2027 was drawn up. This Action Plan was adopted and published in the *Official Gazette of the RS*, No 119/2025.

During 2024 and 2025, Serbia started developing and implementing the Integrated Tariff Management System (ITMS), together with a data warehouse solution and automated decision-making systems for imports and exports. The Work Plan for the Development and Use of the Electronic Systems of the Customs Administration of the Ministry of Finance for the period 2025-2029 (IT Strategy) was adopted by the Government on 26 December 2025 and published in the *Official Gazette of the RS*, No 119/25.

The Ministry of Finance prepared the Business Plan for Improving the Organisation and Operation of the Customs Administration for the period 2025-2029, together with an Action Plan for its implementation. The Business Plan for Improving the Organisation and Functioning of the Customs Administration of the Ministry of Finance for the period 2025-2029 (Business Strategy) was adopted by the Government on 24 October 2025 and published in the Official Gazette of the Republic of Serbia, No 94/25.

How to Unblock the Process? / Priority Steps to Unblock the Process

In its 2025 Report on Serbia, the European Commission stressed that insufficient progress had been made on the previous year's (2024) recommendations, which therefore remain valid. In this context, Serbia should in particular:

1. Further improve the customs clearance system by integrating risk management (*NCEU recommendation from 2025*);
2. Continue developing the national customs IT system to enable its integration with European Union systems (*NCEU recommendation from 2025*);
3. Continue aligning customs legislation, procedures and administrative capacity with the EU acquis, particularly in areas such as:
   - risk management in customs procedures (Risk Management System);
   - customs classification and valuation of goods;
   - the Authorised Economic Operator (AEO) programme;
   - customs cooperation and data exchange with EU authorities;
   - fraud prevention and protection of the EU's financial interests (anti-fraud measures).

The development of the Integrated Tariff Management System (ITMS) and digital tools provides key support for implementing these reforms. During 2024 and 2025, Serbia launched the development and implementation of the ITMS, together with a data warehouse solution and automated decision-making systems for imports and exports. These systems are key to interoperability with the information systems of EU customs authorities (TARIC, EBTI, REX, NCTS).

Link to the Reform Agenda

This area is not directly included in the Reform Agenda, and therefore there are no measures specifically addressing it.

Reform Agenda Measure (indirect impact on Chapter 29)	Status / Deadline	Urgent for Chapter 29 (indirect impact on Chapter 29)
7.2.1. Development of secure and sustainable digital infrastructure, including the development of broadband access and 5G networks in rural areas	Deadline: December 2025	Alignment of the Republic of Serbia with the Gigabit Infrastructure Act through the adoption of the Law on Broadband Communications Infrastructure by the National Assembly.
7.2.2.(1) Alignment of digital identity and trust services with the EU Digital Identity Regulation and the eIDAS Regulation	Deadline: December 2025	Inclusion of the Republic of Serbia in the EU list of trusted third countries for the validation of electronic signatures as advanced in the EU, as a first step towards the mutual recognition of qualified trust services.
7.2.4.(1) Improvement of the legal framework for information security (introduction of the requirements of the NIS2 Directive and strengthening of the relevant institutions)	Deadline: December 2025	Adoption of a Law on Information Security fully aligned with the NIS2 Directive; establishment of the Information Security Office.
7.2.4.(2) Establishment of a legal framework for artificial intelligence	Deadline: December 2025	Adoption of a Law on Artificial Intelligence based on a risk-based approach, with the necessary implementation structures in place.
7.2.5. Introduction of an intelligent transport system and an electronic freight transport system	Deadline: December 2026	Ratification of the Convention on the Contract for the International Carriage of Goods by Road (eCMR), which is necessary for the application of eFTI.
9.3.1. Fight against organised and serious crime – adopt a new Law on	Period: 2024-2027. Status: The Law on Preventing and	Ensure the effective implementation of the new Law from 1 January 2027, together with the Programme and Action Plan for

Reform Agenda Measure (indirect impact on Chapter 29)	Status / Deadline	Urgent for Chapter 29 (indirect impact on Chapter 29)
Combating and Preventing Trafficking in Human Beings	Combating Trafficking in Human Beings and Protecting Victims was adopted on 23 April 2026 (*Official Gazette of the RS*, No 35/2026).	Combating Trafficking in Human Beings, so as to establish a comprehensive system in this area involving all the competent authorities.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

The Plan sets out measures and deadlines for all three benchmarks in Chapter 29 envisaged for provisional closure. The tables below follow the structure of the Plan.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
1. Serbia continues aligning its legislation with the EU acquis where necessary; alignment is needed in particular in the areas of customs facilitation, customs risk management and security aspects of customs, cultural goods and drug precursors.	**Law on the Customs Tariff**. The NPAA deadline for adoption is Q4 2025. No public consultation is required, as the law implements international agreements. The adoption of the Law on the Customs Tariff is planned after the Republic of Serbia's accession to the World Trade Organization (WTO), in order to align customs rates with the concessions agreed with WTO members and to reduce ten-digit tariff codes to eight-digit tariff codes.	Ministry of Finance, Customs System and Policy Department	Q4 2026	Yes	The Law was adopted in April 2026.
	Law Amending the Law on Free Zones. The amendments are being made to align state aid schemes, so no public consultation will be required. The NPAA deadline for adoption is Q4 2025. Full alignment of legislation in the area of free zones is envisaged by the date of the Republic of Serbia's accession to the European Union.	Ministry of Finance	Q4 2026	Yes	The Law Amending the Law on Free Zones has been adopted (*Official Gazette of the RS*, No 80/26).
	Decree Amending the Decree on Customs Reliefs. The NPAA deadline is Q4 2025 (alignment of the provisions on the value of low-value consignments, in the context of "actual value").			Yes	Decree Amending the Decree on Customs Reliefs (*Official Gazette of the RS*, No 103/25).

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	Law Amending the Customs Law (further alignment of customs legislation in the area of customs facilitation)		Q4 2026	Deadline has not expired	1. Law Amending the Customs Law – submitted to the EC for its opinion. 2. Decree on the Harmonisation of the Customs Tariff Nomenclature for 2026 (*Official Gazette of the RS*, Nos 10/25 and 45/26) – implemented. 3. Decree on the Harmonisation of the Customs Tariff Nomenclature for 2027 – in procedure.
2. Customs rules are applied consistently and efficiently, in particular as regards the processing of customs declarations, the determination of the origin of goods, the application of simplified procedures, the protection of intellectual property rights, and control selectivity and risk analysis, including automated pre-arrival and pre-departure risk analysis, for all modes of transport.	Business processes need to be automated and the technical capacity of the Customs Administration strengthened through the introduction of automated import and export systems and a customs decisions management system. The project "Implementation of Automated Import and Export Systems and the Customs Decisions Management System" is ongoing; the systems are expected to go live in May 2026 and to be fully operational by the end of 2026. A Customs Laboratory needs to be built and adequately equipped. Under the NPAA, the deadline for these planned measures is Q4 2027. An Integrated Tariff Management System needs to be introduced and a warehouse for storing customs data established. By the date of accession to the European Union, the Integrated Tariff Management System and its subsystems will be established through interconnectivity and interoperability projects. A simplified procedure for postal consignments needs	Ministry of Finance, Customs System and Policy Department	Q4 2026	Ongoing / deadline has not expired	Decree Amending the Decree on Customs Reliefs – after the adoption of the Law Amending the Customs Law.

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	to be established and applied. An application enabling the simplification of procedures in postal traffic is being developed. The Decree Amending the Decree on Customs Procedures and Customs Formalities was adopted at the Government session of 5 December 2024, with the aim of applying a simplified procedure for postal consignments. The Ministry of Finance – Customs Administration is continuously carrying out activities, with the support of various projects, to develop and modernise the customs information system, with the aim of digitalising customs procedures and connecting them with the relevant EU IT systems. The development of the system is set out in the Business Plan for Improving the Organisation and Operation of the Customs Administration of the Ministry of Finance for the period 2020-2024 and the Work Plan for the Development and Use of the Electronic Systems of the Customs Administration of the Ministry of Finance for the period 2020-2024. New strategic documents for the coming period are being prepared. In addition to random checks and checks carried out on the basis of decisions by customs officers in the field, controls are also based on intelligence and risk assessment in the transit procedure and in other customs procedures. Law Amending the Law on Substances Used in the Illicit Manufacture of Narcotic Drugs and Psychotropic Substances. A public consultation is required. The NPAA deadline is Q3 2027.				

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
3. Serbia presents to the European Commission comprehensive and coherent strategies for customs business and information technology, and makes sufficient progress in developing all the necessary IT systems to ensure their interconnectivity and interoperability.	During 2025, the Government of the Republic of Serbia adopted conclusions approving the most important strategic documents of the Customs Administration (the third cycle), namely: 1. Conclusion adopting the Business Plan for Improving the Organisation and Operation of the Customs Administration of the Ministry of Finance for the period 2025-2029 (Business Strategy 2025-2029) – Conclusion 05 No 021-11342/2025 of 24 October 2025 (*Official Gazette of the RS*, No 94/25 of 30 October 2025); 2. Conclusion adopting the Work Plan for the Development and Use of the Electronic Systems of the Customs Administration of the Ministry of Finance for the period 2025-2029 (IT Strategy 2025-2029) – Conclusion 05 No 021-14523/2025 of 26 December 2025 (*Official Gazette of the RS*, No 119/25 of 29 December 2025). The 2025 reports for both strategies were accepted by Government conclusions in April 2026.			Yes	The obligations relating to this benchmark can be considered to have been satisfactorily met at this stage.

Conclusion

Although Serbia's customs system under Chapter 29 is largely aligned with that of the European Union, it needs further improvement through the development of the customs IT system and the integration of risk management into customs procedures. During 2026, Serbia made technical progress in digitalising and modernising its customs system. The Work Plan for the Development and Use of the Electronic Systems of the Customs Administration of the Ministry of Finance for the period 2025-2029 (IT Strategy) was adopted. The Business Plan for Improving the Organisation and Functioning of the Customs Administration of the Ministry of Finance for the period 2025-2029 (Business Strategy) was also adopted. However, progress under Chapter 29 remains limited, mainly owing to political factors and the overall pace of the EU accession process.

The Reform Agenda measures relating to strengthening digital infrastructure, information security and legislation on artificial intelligence, as well as other activities under the digital transition (Part 2 of the Reform Agenda), will have an indirect impact on the functionality and operability of the customs system and are therefore also of strategic importance for Chapter 29.

WORKING GROUP FOR CHAPTER 30
EXTERNAL RELATIONS

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**2**
Partially fulfilled	**1**
Number of new recommendations	**1**

Objectives

Chapter 30 – External Relations concerns the adoption of legislation and standards relating to the EU Common Commercial Policy, i.e. their alignment with the EU acquis, international trade (including membership of the World Trade Organization and compliance with the rights and obligations deriving from membership), EU trade agreements with third countries, and the establishment of a system for the development cooperation and humanitarian aid that the Member States and the EU provide to developing and least developed countries.

State of Play

A key part of Chapter 30, concerning Serbia's membership of the World Trade Organization (WTO), has been essentially blocked for years owing to the contentious Law on Genetically Modified Organisms (GMOs), which introduced an absolute ban on trade in genetically modified organisms and products. This has blocked the multilateral track of Serbia's WTO accession negotiations, while Serbia also has open bilateral negotiations with the Russian Federation, Brazil, the United States of America and Ukraine. Administrative capacity in the competent ministry remains modest, with a noticeable outflow of experts. Although a draft Law on International Development Cooperation and Humanitarian Aid Abroad has existed since 2018, it has still not been adopted.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. Adoption of a new Law on Genetically Modified Organisms (GMOs) that would lift the existing absolute ban on trade in products containing GMOs. This would remove the obstacle to closing the multilateral track of Serbia's WTO accession negotiations.
2. Adoption of the Law on International Development Cooperation and Humanitarian Aid Abroad, and the start of work on an institutional mechanism (*NCEU recommendation from 2015, repeated in 2025 and 2026; the Q2 2025 deadline set in the Plan for adopting this law has not been met*).
3. Further strengthening of contacts in the bilateral WTO negotiations with the four members with which Serbia has open negotiations (*NCEU recommendation from 2025*).
4. Further strengthening of contacts in the bilateral WTO negotiations, primarily with Ukraine, with a view to concluding a free trade agreement as soon as possible, which would also conclude the negotiations on trade in goods and services with that country (*new recommendation for 2026*).

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
1. Serbia accedes to the WTO and makes progress in aligning with EU positions within the WTO.	Adoption of a new Law on GMOs, following a public consultation on the draft Law	Ministry of Agriculture	Q4 2026	Deadline has not expired	
	Complete the negotiations on goods and services with Ukraine and the Russian Federation	Ministry of Internal and Foreign Trade	Q4 2026	Deadline has not expired	
	Complete the negotiations on goods and services with the USA and Brazil	Ministry of Internal and Foreign Trade	Q4 2026	Deadline has not expired	
	Revision of the existing Legislative Action Plan for the WTO accession process	Ministry of Internal and Foreign Trade	Q4 2026	Deadline has not expired	
2. Serbia presents to the Commission an Action Plan for the remaining preparations as regards legislative alignment, the alignment of international agreements with the EU acquis and the improvement of administrative and control capacity, in order to ensure full implementation and enforcement of the EU acquis in this chapter from the date of accession	Revision of the existing Action Plan, which should contain detailed deadlines for meeting the obligations under the benchmark	Ministry of Internal and Foreign Trade	Q4 2026	Deadline has not expired	
	Adoption of the Law on the Export and Import of Dual-Use Items to align with Regulation (EU) 2021/821	Ministry of Internal and Foreign Trade	Q4 2026	Fulfilled in March 2025	The obligation was fulfilled before the adoption of the Plan 2026 in April 2025 and is therefore not included in the statistics on the implementation of the Plan.
	Adoption of the Law on International Development Cooperation and Humanitarian Aid Abroad	Ministry of Foreign Affairs	Q4 2026	Deadline has not expired	
	Strengthening of administrative capacity	Ministry of Internal and Foreign Trade	Q4 2026	Deadline has not expired	
	Repeal of the legislation introducing certain restrictive trade measures	Ministry of Internal and Foreign Trade	Q4 2026	Deadline has not expired	
	Planning activities for each individual agreement relating to economic or trade cooperation, so that they are aligned with EU legislation by the date of accession	Ministry of Internal and Foreign Trade	Q4 2026	Deadline has not expired	

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	2	0 (0%)	0	2 (100%)
Secondary legislation	0	0 (0%)	0 (0%)	0 (0%)

Conclusion

The stalemate in Chapter 30, which in practice dates back to the period before the chapter was even opened, is primarily caused by the absolute ban on trade in genetically modified products introduced by the 2009 Law on Genetically Modified Organisms (GMOs). Amending the law and lifting the absolute ban would open up the possibility of closing the multilateral track of Serbia's WTO accession negotiations and would reduce the obstacles to concluding the bilateral negotiations, primarily with the United States of America and Brazil. The announced conclusion of a free trade agreement with Ukraine also suggests the possibility of concluding the bilateral WTO negotiations with that country. As regards the bilateral negotiations with the Russian Federation, given that Serbia has a ratified agreement with the Eurasian Economic Union, the Russian Federation's request for bilateral tariff negotiations within the WTO is probably political rather than economic in nature.

Progress in meeting the requirements of Benchmark 2 has also been limited. Despite preparations carried out back in 2021, the Law on International Development Cooperation and Humanitarian Aid Abroad has not entered the adoption procedure. The Action Plan for the remaining preparations as regards legislative alignment, the alignment of international agreements with the EU acquis and the improvement of administrative and control capacity, in order to ensure full implementation and enforcement of the EU acquis in this chapter from the date of accession, has not been revised, and there are therefore still no detailed deadlines for meeting the obligations under Benchmark 2. The situation is similar with restrictive trade measures, which continue to be introduced or lifted periodically whenever the Government considers it necessary. The most likely reason for the lack of progress is that the chapter is de facto blocked, and significant progress can hardly be expected without steps relating to Benchmark 1, i.e. without progress in the WTO accession process.

WORKING GROUP FOR CHAPTER 31
FOREIGN, SECURITY AND DEFENCE POLICY

Status of the 2025 Recommendations

Fulfilled	**1**
Unfulfilled	**2**
Partially fulfilled	**0**
Number of new recommendations	**0**

Objectives

Chapter 31 is often classified as a political chapter, as it does not contain a substantial body of EU acquis and consists mainly of Council foreign policy decisions and political declarations, activities and agreements. It is also one of the chapters that rely to a significant extent on the EU's political criterion for the admission of new Member States.

The chapter concerns the adaptation of the national institutions responsible for the country's foreign, security and defence policy so that they can function and act proactively within the EU system. It also requires the progressive alignment of the Republic of Serbia's foreign policy action with the EU's foreign policy approach, which includes aligning with EU foreign policy declarations and applying the restrictive measures against third countries that follow from those declarations.

State of Play

The chapter is essentially blocked, as Serbia has not yet received the screening report, although the screening took place back in 2014. The issues covered by the chapter, particularly since the outbreak of the second phase of the war in Ukraine, have become key to assessing Serbia's alignment with the EU's foreign policy approach and values.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. Serbia should adopt a plan for progressive alignment with foreign policy declarations and measures in the coming period, as well as a plan for coordination with the EU in key international fora, in order to create the conditions for opening Cluster 6 within a reasonable timeframe. Once the plan has been adopted, results in its implementation need to be demonstrated, i.e. clear signals need to be sent that the plan will be implemented consistently.
2. Although Serbia has adopted the Law on the Participation of Civilians in Peacekeeping Missions outside the Republic of Serbia, the relevant secondary legislation is lacking. It needs to be adopted as soon as possible in order to create the conditions for Serbia's participation in EU and UN civilian missions as well.
3. Serbia should continue contributing to the Common Security and Defence Policy through participation in military missions and operations (*ongoing recommendation*).

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
Not defined	Gradual increase in the rate of alignment with EU declarations in the area of the Common Foreign and Security Policy, up to full alignment by EU accession	Ministry of Foreign Affairs	Q4 2026	Deadline has not expired	Regardless of fluctuations in the alignment rate, Serbia is not making the necessary efforts to align with key EU declarations, above all those concerning the war in Ukraine and the Russian Federation.
	Gradual alignment with EU policy and measures in the area of restrictive measures against third countries, up to full alignment	Ministry of Foreign Affairs	Q4 2026	Deadline has not expired	Serbia has aligned only with less significant restrictive measures against the Russian Federation; it has not aligned with any of the packages of restrictive measures introduced in response to the war in Ukraine since 2022.

Statistica

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	0	0 (0%)	0	0 (0%)
Secondary legislation	0	0 (0%)	0 (0%)	0 (0%)

Conclusion

Without full, or at least progressive, alignment with the EU Common Foreign and Security Policy in the coming period, Serbia potentially risks further deepening mistrust and, consequently, weakening support within the Union for its membership ambitions, which are often highlighted as one of its most important political objectives.

The alignment practice to date does not indicate a sufficiently pronounced tendency towards progressive alignment, as the key topics of declarations and restrictive measures, above all those relating to the Russian Federation and the war in Ukraine since 2022, have not been the subject of alignment.

WORKING GROUP FOR CHAPTER 32
FINANCIAL CONTROL

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**3**
Partially fulfilled	**0**
Number of new recommendations	**0**

Objectives

The objective of Chapter 32 is transparent and accountable management of public finances in Serbia, with effective and efficient public institutions and a system of internal and external control for detecting and correcting irregularities, fraud and corruption, in line with international standards and rules. It is also necessary to establish international cooperation and implement measures to prevent money laundering and protect the euro against counterfeiting. For the provisional closure of Chapter 32 – Financial Control, Serbia needs to meet three benchmarks, relating to the alignment of the legal framework in the area of public internal financial control (PIFC), the effective implementation of the relevant legislation while ensuring adequate administrative capacity at all levels of the public sector, and the alignment of the centralised budget inspection function with PIFC requirements. Fulfilment of these benchmarks is assessed on the basis of progress in establishing and operating the PIFC system, including financial management and control, internal audit, managerial accountability and the functioning of the budget inspection.

State of Play

The legal and institutional framework for achieving the objectives has largely been established, but the acts and rules adopted are still not sufficiently applied in practice. Weaknesses persist in performance management, in the lines of accountability between independent bodies and their parent institutions, and in the practical application of the system for managing and reporting irregularities. In the area of financial management and control (FMC), the basic system has formally been established by most users of public funds, but its consistent implementation remains a challenge, particularly as regards risk management, the documentation of business processes and the application of the established procedures in day-to-day work. Internal audit is aligned with international standards in legislative terms and shows an increase in the number of functionally established units, but insufficient staffing continues to limit its scope significantly. At central level, a functional internal audit has been established in 19 of the 25 ministries, while nine ministries have no permanently employed internal auditor, and only six ministries employ the prescribed minimum of three internal auditors.[98] At the same time, the number of functionally established internal audit functions at central level increased by 19% compared with the previous year, which indicates a positive trend, but also that capacity is not yet sufficient for a fully effective function in all central budget institutions. In 2025, internal auditors made 5,894 recommendations, of which 49% were implemented, which points to an additional challenge in following up and implementing recommendations. The budget inspection continues to contribute to strengthening budgetary discipline, with a decrease in the average number

[98] *Annual Report on Internal Audit for 2025*. Available at: https://www.mfin.gov.rs//upload/media/saQSz8_6a980d8cc4840.docx.

of illegalities and irregularities identified per inspection, from 2.4 in 2023 to 1.9 in 2024 and 1.58 in 2025.[99] However, the finding that most of the irregularities identified still relate to material and financial operations and public procurement points to the need to further strengthen preventive and control mechanisms and to address the weaknesses identified more consistently.

The Public Financial Management Reform Programme for the period 2026–2030, with an Action Plan for the period 2026–2028, has been prepared, providing a strategic framework for the continuation of the reform. However, a coordinated monitoring and reporting system needs to be established, based on the principles of managerial accountability, which also plays an instrumental role in establishing an effective system of public internal financial control (PIFC). As regards external audit, the State Audit Institution maintains its independence and is improving the quality of its findings and the impact of its audit work through better follow-up of the implementation of its recommendations. SAI reports are considered at sessions of the National Assembly's Finance Committee, but users of public funds still do not sufficiently implement the recommendations, which limits their effect on improving the management of public funds. In the area of the protection of the EU's financial interests, Serbia maintains good cooperation with the European Commission, but AFCOS staffing capacity remains a constraint on the effectiveness of the system. During 2025, AFCOS received 15 reports of suspected irregularities, of which administrative checks were launched in four cases and irregularities were established in three. These data show that the mechanism for reporting and checking irregularities is functional, but assessing its full effectiveness requires monitoring the further handling of the irregularities identified, as well as the capacity for their timely supervision and resolution. The key challenge remains the transition from the formal establishment of the system to its consistent and effective application in practice, in particular through strengthening staffing capacity, implementing internal and external audit recommendations, managing risks and irregularities more effectively, and strengthening managerial accountability.

In its 2025 Report on Serbia,[100] the European Commission assessed that Serbia is moderately prepared in the area of financial control, with limited progress made during the reporting period, in particular through the adoption of the Managerial Accountability Plan. The legal, strategic and institutional framework for public internal financial control (PIFC) has largely been established, but challenges remain in its full and effective implementation. In particular, the PIFC legal framework needs to be fully aligned with the general legal framework, the effectiveness of the internal audit function improved, capacity for applying internal control standards and risk management strengthened, and the Managerial Accountability Plan effectively implemented. The budget inspection function has been centralised, but it needs to be further strengthened and the appropriate role and scope of work of the national inspection clearly defined.

In the area of the protection of the EU's financial interests, amendments to the Criminal Code are planned to ensure full alignment with Directive (EU) 2017/1371 (the PIF Directive). The proposed amendments would cover the provisions on obtaining and using credit and other benefits without grounds, fraud in the conduct of business activities, tax evasion and abuse in connection with public procurement, with the aim of improving the protection of the EU's financial interests through criminal law. The amendments in this part have not yet been adopted, and according to information from the Ministry of Justice of July 2026, the European Commission's opinion is still awaited on the remaining proposed amendments to the Criminal Code.

[99] *Annual Report on the Work of the Budget Inspection for 2025*. Available at: https://www.mfin.gov.rs//upload/media/iSJXH1_69d4ca563d3ec.pdf.
[100] European Commission, *Serbia 2025 Report*. Available at: https://enlargement.ec.europa.eu/serbia-report-2025_en.

Priority Measures

1. **Ensure that internal audit is fully functional in all central budget institutions**. Systematised posts need to be filled and at least the prescribed minimum number of internal auditors ensured, particularly in the ministries, where nine of the 25 ministries still have no permanently employed internal auditor. At the same time, the staffing capacity and quality of internal audit need to be improved, including systematic monitoring of the implementation of recommendations through follow-up audits.

2. **Move from the formal establishment of the PIFC system to its consistent application and to stronger managerial accountability**. The priority should be the practical application of risk management, the documentation of key business processes, the management of irregularities and the monitoring of measures to remedy them, with clearly defined responsibilities of managers. Particular attention should be paid to implementing the Managerial Accountability Plan and establishing an effective system for monitoring performance and accountability between institutions. This would be a key step from formal compliance towards a functional system of internal financial control, which is the essence of several repeated recommendations of the European Commission.

3. **Strengthen the mechanisms for detecting, controlling and remedying irregularities, and ensure that the findings of control and audit institutions lead to concrete corrective measures**. The system for reporting and handling irregularities needs to be improved, the capacity of AFCOS and the Budget Inspection strengthened, and the recommendations of the SAI, internal audit and other control bodies implemented more consistently. It is particularly important to monitor not only the number of irregularities identified, but also the extent to which they are remedied and whether they recur, so that control mechanisms have a preventive, and not only a corrective, effect.

Link to the Reform Agenda

Reform Agenda Measure (relevant to Chapter 32)	Status / Deadline	Urgent for Chapter 32
6.1.1. Improvement of public investment management and sustainable and efficient management of business entities owned by the Republic of Serbia	Deadline: December 2026Status: Unfulfilled	Establish an independent internal audit function, in line with the Law on the Budget System, in 100% of the state-owned enterprises required to set up an audit committee under the Law on the Governance of Business Entities Owned by the Republic of Serbia.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
1. Serbia amends its legal framework to ensure the coherence of PIFC legislation. Serbia implements the PIFC legislation and underlying policies, and ensures sufficient administrative capacity at central and local level, in social security funds and in public enterprises. Serbia ensures that the centralised budget inspection function is aligned with PIFC requirements.	The Government plans to improve the effective application of PIFC and managerial accountability by strengthening the management of risks and irregularities, implementing the Managerial Accountability Roadmap, aligning internal audit with the new international standards and strengthening its capacity, while improving coordination and continuously monitoring the European Commission's recommendations.	Ministry of Finance	Q2 2026	Partially fulfilled	The regulatory and institutional framework for PIFC has largely been established and internal audit is being continuously improved, but there is still a significant gap between the formal framework and its effective application. Particular challenges remain as regards managerial accountability, the management of risks and irregularities, and ensuring a sufficient number of internal auditors with adequate capacity. The implementation of the Managerial Accountability Roadmap is also delayed, so it is not yet possible to assess its full effect. More attention should therefore be paid to the practical application of the system and to measurable results, rather than only to further improving the formal framework.
2. The State Audit Institution operates in line with the standards of the International Organization of Supreme Audit Institutions (INTOSAI), including financial, functional and institutional independence, carries out financial and performance audits, and has sufficient administrative capacity.	The Government plans to preserve the financial, organisational and functional independence of the SAI, further strengthen its administrative and professional capacity through recruitment and training, continue improving the quality and methodology of audits in line with INTOSAI standards, and ensure the comprehensive conduct of different types of audit and systematic monitoring of the	Ministry of Finance, State Audit Institution	Q3 2026	Mostly fulfilled	The measures have mostly been fulfilled, but there are limitations in the SAI's capacity and in monitoring the effects of its work. The legal framework and the financial, organisational and functional independence of the SAI have been preserved, audit procedures are aligned with international standards, and the quality of audit work and the monitoring of recommendations are

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	implementation of the recommendations made.				being continuously improved. However, the SAI still has not filled all its systematised posts, while data from its audits point to significant weaknesses in internal control systems. A particular problem is monitoring the follow-up to the reports that the SAI submits to the competent authorities: the available data do not provide a systematic overview of whether the prosecution services and courts have acted on these reports, within what timeframe and with what outcome. The effect of the SAI's work on establishing accountability for irregularities therefore cannot be fully assessed solely on the basis of the number of reports submitted; transparent monitoring of how they are followed up should be ensured.
3. Serbia ensures effective and efficient coordination of activities to combat irregularities and fraud, and cooperation with the Commission, in order to guarantee the fulfilment of future obligations arising from Article 325(3) of the Treaty on the Functioning of the European Union and the application of the provisions of Regulation (EU, Euratom) No 883/2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF) and Regulation (Euratom, EC) No 2185/96 concerning on-	The Government plans to further strengthen the system for protecting the EU's financial interests by improving the capacity and coordination of AFCOS, further developing cooperation with OLAF and the European Commission, improving the system for reporting and administratively checking irregularities, strengthening the capacity of the police and the prosecution service to deal with cases of fraud involving EU funds, and aligning the criminal law framework with EU law through amendments to	Ministry of Finance, Ministry of Justice	Q4 2025	Partially fulfilled	The measures have been partially fulfilled, with progress in the institutional framework and cooperation with OLAF, but key shortcomings remain in AFCOS capacity, alignment of the criminal law framework and results in investigations and court proceedings. AFCOS has clearly defined competences and continues to cooperate with OLAF and the European Commission, including by reporting irregularities through the Irregularity Management System,

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
the-spot checks and inspections carried out by the Commission, in particular the obligation to assist Commission inspectors. Serbia ensures that its national legislation provides for an obligation to preserve evidence. Serbia ensures a comprehensive legal basis and sufficient operational capacity for its national anti-fraud coordination service. Serbia demonstrates a track record of cooperation with the Commission on reported irregularities and investigations relating to EU funds.	the Criminal Code. These amendments are to clarify and extend certain criminal offences relevant to the protection of the EU's financial interests, including fraud, tax evasion and abuse in public procurement, and to explicitly cover them when committed to the detriment of the EU's financial interests.				but its administrative capacity and the practical coordination of the competent institutions need to be further strengthened. It is particularly important to demonstrate concrete results of cooperation with OLAF, i.e. that the irregularities reported and the investigations lead to effective action by national authorities and to final outcomes. The European Commission continues to point to the need to improve capacity and results in the area of the protection of the EU's financial interests. As regards the legislative framework, although the Criminal Code was amended in July 2026, those amendments did not include changes relevant to the protection of the EU's financial interests. The Ministry of Justice had previously announced amendments to align the national framework with Directive (EU) 2017/1371, including the extension of certain criminal offences to cases affecting the EU's financial interests, as well as amendments to the provisions on abuse in public procurement. The biggest problem, however, remains demonstrating results in practice. Meeting the benchmark requires more than the existence of AFCOS, an irregularity reporting system and cooperation with OLAF; it must be shown that the national

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
					police, prosecution services and courts act effectively in cases involving the misuse of EU funds and that proceedings end in final decisions. In the coming period, the entire chain of action, from the reporting of irregularities through investigation and indictment to the final court decision, should therefore be monitored more transparently, so that the actual effect of the system for protecting the EU's financial interests can be assessed.
4. Serbia ratifies and implements the 1929 International Convention for the Suppression of Counterfeiting Currency (Geneva Convention), aligns its legislation with the EU acquis on the authentication of euro coins and the handling of euro coins unfit for circulation, and on the authentication of euro banknotes. Serbia ensures sufficient administrative capacity in the technical analysis centre.	Serbia has met the requirements in the area of preventing currency counterfeiting by acceding to the Geneva Convention, establishing the National Central Office within the Ministry of the Interior and the national counterfeit analysis centres within the NBS, aligning its legal framework with EU rules on the authentication of the euro, and strengthening administrative capacity and cooperation with the European Commission and the European Central Bank in exchanging information and detecting counterfeit money.	Ministry of Finance, State Audit Institution, Ministry of Justice, National Bank of Serbia		Yes	The benchmark can be considered met.

Statistics

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	1	1	0	0
Secondary legislation	0	0	0	0

Conclusion

Although the system for public financial management (PFM) in Serbia has been largely established, it still requires further improvement. The adoption of planning documents and regulations, as well as the assessment of their implementation, must be conducted with greater public participation. The absence of public involvement in the planning of key public expenditures and the central government budget, combined with numerous irregularities in the management of public funds, highlights the need for more effective mechanisms for safeguarding public resources and maximising transparency. Programme budgeting should continue to be developed in order to enable effective performance management and improve transparency of the budgeting process. Full comparability of information on planned and implemented programmes must be ensured, and programme results should be thoroughly reviewed. Despite the formal establishment of numerous internal audit units, their operational capacity remains insufficient. As of 31 December 2024, nine ministries still lacked a single internal auditor, even though this requirement has existed for over a decade. Internal audit recommendations should be implemented promptly, while the quality assurance system for internal audit should be further strengthened, and transparency towards the public increased. The public still has limited access to information on the status of misdemeanour and criminal charges, as well as on the actions taken by competent authorities (e.g., the Public Prosecutor's Office) in response to the State Audit Institution (SAI) reports. The SAI should publish on its website the criteria used to prepare its annual audit plan and enhance cooperation with civil society and citizens to promote channels for reporting irregularities. The Parliamentary Committee on Finance should monitor the implementation of SAI recommendations quarterly, for example, by organising public hearings on the most significant strategic issues raised in SAI reports. The National Assembly should also review all analyses and reports submitted by the Fiscal Council.

WORKING GROUP FOR CHAPTER 33
FINANCIAL AND BUDGETARY PROVISIONS

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**1**
Partially fulfilled	**2**
Number of new recommendations	**1**

Objectives

Chapter 33 governs a Member State's contribution to financing the EU budget through the own resources system. By accession, Serbia must establish an administrative, statistical, accounting, information and control system for the correct calculation, forecasting, collection and control of own resources, their payment and reporting on them. The system currently comprises the contribution based on gross national income (GNI), traditional own resources (customs duties), the own resource based on value added tax (VAT) and the own resource based on non-recycled plastic packaging waste.

The chapter is highly horizontal and depends directly on progress in Chapters 16 – Taxation, 18 – Statistics, 29 – Customs Union and 32 – Financial Control, with relevant links to Chapters 27 – Environment and Climate Change and 22 – Regional Policy and Coordination of Structural Instruments.

State of Play

Chapter 33 was opened in 2018 with one benchmark for provisional closure: "Serbia strengthens its administrative capacity and establishes a coordination structure and an Action Plan with procedures for the functioning of the traditional own resources (TOR) system from the date of accession". Provisional closure also depends on reaching agreement with the EU on Serbia's request for the application of temporary corrective measures in relation to payments into the EU budget. In its 2025 Report on Sebia, the European Commission (EC) assessed that Serbia has some level of preparation, but that the organisational and procedural links between institutions remain insufficiently developed. It also assessed that **no progress** was made during the 2025 reporting period.

Of the three priority recommendations set out in the 2025 Book of Recommendations, two were partially implemented during 2026, while one remains unfulfilled:

- **The recommendation on adopting and implementing the Action Plan is assessed as partially fulfilled**. The Ministry of Finance prepared the Draft Action Plan for Chapter 33, discussed it with the European Commission and held a public consultation from 12 June to 2 July 2026. However, by the cut-off date there was no public confirmation that the Government had adopted the document, which is still listed as a draft on the Ministry's website;
- **The recommendation on the information and accounting system remains unfulfilled**. Serbia has established AFCOS and uses the IMS to record irregularities relating to EU funds, but for traditional own resources it does not yet have the OWNRES system or a corresponding national electronic database. In addition, separate A and B accounts have not been established;

- **The recommendation on administrative capacity and coordination is assessed as partially fulfilled**. The Ministry of Finance has a Group for the Coordination and Management of EU Own Resources, a Working Group for Chapter 33 has been set up, and certain institutional competences have been clarified. However, staffing, procedural, statistical and information capacity has not yet been fully established.

Preparation of the Action Plan was the most significant development in 2026. A Working Group for Chapter 33 was set up, inter-institutional cooperation was intensified, the Draft Action Plan was submitted to the European Commission, and the comments of the Directorate-General for Budget (DG BUDG) were considered before the public consultation was held. However, the NCEU assessed that the Draft is not yet sufficiently operational: deadlines are often imprecise, indicators are not sufficiently measurable, and there is no sufficiently clear public matrix for monitoring implementation. Institutional responsibilities and electronic monitoring have not been sufficiently elaborated, while the links with other chapters and the Reform Agenda are weak. By the date of preparation of this report, the adoption of the final document had not been publicly confirmed, so it is not possible to establish whether these comments have been addressed.

The legislative framework has not yet been completed. The Government's Plan provides for the adoption of the Law on the Budget System by the fourth quarter of 2026. In April 2026, a public consultation was held on the draft of a new law, which for the first time explicitly regulated Serbia's future contribution to the EU budget and the legal basis for the own resources system. On 31 August 2026, the National Assembly adopted amendments to the existing law (*Official Gazette of the RS*, No 80/2026), but they do not contain the provisions set out in the April draft. This measure therefore cannot yet be considered fulfilled in the context of Chapter 33, and the deadline set in the Government's Plan has not expired. The Government's report for the first quarter of 2026 also states that the new law is to provide the legal basis for adopting a decree and a rulebook on EU own resources, which were being drafted at the time. By the cut-off date, their adoption had not been publicly confirmed.

As regards traditional own resources, the main problem is no longer the basic customs legislation, but the functionality of the system. Serbia still does not have separate A and B accounts. The NCEU assessed that the Draft Action Plan does not sufficiently elaborate their technical and institutional architecture or their links with the customs, tax and accounting systems. In its report for the first quarter of 2026, the Customs Administration also considers that the deadlines set in the Draft Action Plan for traditional own resources are not realistically achievable, as the development of the accounting module for the A and B accounts depends on the AIS (Automated Import System), AES (Automated Export System) and CDS (Customs Decisions System), for whose implementation an extension of the deadline until November 2027 has been requested. Given the risk of delays, functional specifications, procedures, responsibilities, testing and training should be prepared in parallel with the development of the core IT infrastructure.

The same applies to the OWNRES system. Serbia has established AFCOS and uses the IMS to report irregularities in the use of EU funds, but for traditional own resources it does not yet have the OWNRES system or a similar national electronic database. The NCEU therefore calls for the responsible institutions, deadlines, data validation and control procedures, simulations, training and links with Chapter 32 to be defined in advance.

There are more concrete developments regarding VAT and GNI. The European Commission considers that there are sufficient data sources for calculating the weighted average VAT rate, while the Statistical Office of the Republic of Serbia (SORS) continues to compile supply and use tables (SUT). However, a need for five additional staff has been identified for this work, and it has not been

publicly confirmed that all the planned posts have been filled. As regards GNI, a publicly available time series of data from 1995 has been completed, but the GNI Inventory and the methodological documentation need to be finalised and reconciled with each other.

As regards non-recycled plastic packaging waste, the legislation is monitored under Chapter 27, but for the purposes of Chapter 33 a methodology needs to be developed, data ensured and adequate capacity established for calculating and controlling this own resource. At the same time, Serbia must follow the reform of the own resources system under the new EU Multiannual Financial Framework (MFF 2028-2034). The European Commission has proposed new own resources linked to the Emissions Trading System (ETS), the Carbon Border Adjustment Mechanism (CBAM), non-collected e-waste, excise duties on tobacco products and the CORE system. Although these proposals have not yet been adopted, the system that Serbia is now developing must be flexible enough to apply the EU acquis in force at the time of accession.

Administrative capacity remains the central challenge. A dedicated group has been established within the Ministry of Finance and its competences have been defined, but it has not been publicly confirmed that all the planned posts have been filled. Additional capacity is also needed in the Customs Administration, the Tax Administration, the SORS and the institutions responsible for environmental protection. An approved twinning project worth EUR 1 million is to support the building of the system. The Government's report for the fourth quarter of 2025 stated that an application had been approved for a twinning project to be financed from unallocated Instrument for Pre-accession Assistance (IPA) funds, with implementation expected to start in the first half of 2026. However, by the cut-off date it had not been publicly confirmed that implementation of the project had begun.

Transparency must be an integral part of the reform. The public consultation on the Action Plan is a positive step, but the final document, information on its status and the results of its implementation should be published regularly through a public matrix containing deadlines, indicators, responsible institutions and sources of verification. Without this, it is not possible to distinguish reliably between administrative activities and a genuine increase in the system's level of preparedness.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. **Adopt and operationalise the Action Plan for Chapter 33 as a measurable and publicly verifiable instrument**. The final version should specify deadlines and interim deadlines, institutional responsibilities, indicators and sources of verification, costs, staffing needs, simulations, testing and training, and should introduce a public matrix for monitoring implementation. In particular, the A and B accounts, the OWNRES system, data flows for VAT and GNI, and the own resource based on non-recycled plastic packaging waste (plastic-based own resource) should be operationalised. A mechanism should also be established for continuously monitoring changes in the EU own resources system and for adapting the national legal framework, methodologies, data sources, information systems and institutional responsibilities in good time, including changes that may result from the new EU Multiannual Financial Framework for the period 2028-2034 (*NCEU recommendation from 2025 – partially fulfilled; repeated and made more specific*).

2. **Establish a functional accounting and information system for traditional own resources**. The A and B accounts and the OWNRES system, or a compatible national solution, should be linked to the customs, tax, accounting and control systems. The development of the AIS/AES/CDS systems should not delay the preparation of procedures and specifications, the assignment of responsibilities, testing and training. For each data flow, data ownership, the method of validation and reconciliation, responsibility for corrections, the audit trail, data retention rules and access

rights should be clearly defined, particularly for data exchange between the Customs Administration, the Tax Administration, the SORS and the Ministry of Finance. The functionality of the system should be tested through end-to-end simulations covering the collection of source data, calculation, validation, reconciliation, recording in the A and B accounts, reporting, corrections, and control or audit (*NCEU recommendation from 2025 – not fulfilled; repeated*).

3. **Strengthen administrative capacity and inter-institutional coordination and make them sustainable**. Staffing gaps need to be filled in the Ministry of Finance (MoF), the Customs Administration, the Tax Administration, the SORS and other relevant institutions; permanent procedures for data exchange and control need to be established; regular simulations and training need to be organised; and Chapter 33 needs to be linked with Chapters 16, 18, 22, 27, 29 and 32. Simulations and training should cover all institutions involved in the own resources system and should be used to test the practical functionality of the system, identify remaining weaknesses, clarify responsibilities and improve procedures before EU accession (*NCEU recommendation from 2025 – partially fulfilled; repeated*).

4. **Prepare and regularly update a public analysis of the financial effects of Serbia's EU membership**. The analysis should cover expected payments into the EU budget, access to funds, the costs of implementing the EU acquis, fiscal risks and future changes to the own resources system, with scenarios for different possible years of accession. The analysis should become a permanent mechanism for projecting Serbia's future obligations towards the EU budget, regularly updated in line with changes to the multiannual financial framework and the own resources system, and linked to medium-term fiscal planning. It should show in particular the relationship between Serbia's expected gross contribution to the EU budget, expected inflows from EU programmes and funds, the costs of implementing the EU acquis and of establishing a system for managing EU funds, and other relevant fiscal effects. The different accession scenarios should also include the financial and institutional consequences of any transitional or corrective arrangements relating to Serbia's contribution to the EU budget (*the recommendation renews the NCEU's call for a study of the financial costs and benefits of membership*).

Link to the Reform Agenda

Reform Agenda Measure (relevant to Chapter 33)	Status / Deadline	Urgent for Chapter 33
6.1.1. Improvement of public investment management and sustainable and efficient management of business entities owned by the Republic of Serbia	Status: ongoing; deadline: 2026–2027	Complete a single and transparent system for prioritising public investment and include future obligations towards the EU budget in medium-term fiscal projections.
6.2.1. Public procurement and intergovernmental agreements	Partially implemented; derogations to be repealed by June 2027	Ensure full transparency of contracts and fiscal obligations for reliable budget monitoring and the assessment of fiscal risks.
7.2.2. Further digitalisation of public services and administrative procedures for businesses and citizens	Status: ongoing; some steps delayed; period 2024-2027	Develop interoperable IT systems and the electronic data exchange needed for the A and B accounts and electronic reporting on own resources.
Statistical capacity – horizontal link	Status: ongoing	Ensure reliable and methodologically verifiable data for calculating the GNI- and VAT-based own resources, and stable data exchange between the SORS, the Ministry of Finance, the Tax Administration and the Customs Administration.

Reform Agenda Measure (relevant to Chapter 33)	Status / Deadline	Urgent for Chapter 33
Chapter 14 – Monitoring, Reporting, Evaluation	Established and being implemented	Ensure regular, public and verifiable reporting and link the relevant results to monitoring the implementation of obligations under Chapter 33.
Chapter 15 – Control and Audit	Legislative framework established; implementation ongoing	Strengthen the control trail, the reporting of irregularities and internal control, as well as the link with the future control system for EU own resources.

Monitoring of the Plan for Fulfilling the Most Important Obligations from the Accession Negotiations of the Republic of Serbia to the European Union by the End of 2026

In line with the methodology of the NCEU Book of Recommendations for 2026, this section **does not assess the quality of legislation or the process of its preparation**, but solely the status of the activities envisaged in the Plan, based on Government reports and publicly available sources. **A qualitative assessment is provided in the preceding sections of this contribution.**

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
Serbia strengthens its administrative capacity, establishes a coordination structure and adopts an Action Plan for the own resources system.	Adoption of the Action Plan for Chapter 33	Ministry of Finance / Government of the Republic of Serbia	Q4 2026	No (deadline not yet expired)	The draft has been prepared, discussed with the EC, and public consultations have been held. By 27 September 2026, its adoption by the Government had not been publicly confirmed.
	Law on the Budget System – provisions relevant to EU own resources	Ministry of Finance	Q4 2026	No (deadline has not expired)	The new draft Law of April 2026 contains provisions on the contribution to the EU budget. In August, only amendments to the existing Law were adopted, without those provisions.
	Customs Law	Ministry of Finance – Customs Administration	Before the adoption of the Plan / marked as fulfilled in the Plan	Yes	The Plan marks this legislative measure as fulfilled.
	Decree on Customs Procedures and Customs Formalities	Ministry of Finance – Customs Administration	Before the adoption of the Plan / marked as fulfilled in the Plan	Yes	The Plan marks this measure as fulfilled.
	Regular compilation of SUT and the calculations needed for the weighted average VAT rate	Statistical Office of the Republic of Serbia (SORS), in cooperation with the Ministry of Finance and the Tax Administration	Ongoing until accession	Yes	The report for the first quarter confirms that regular compilation is continuing, and the SORS publishes the SUT and related materials. The status “Yes” refers to the continuous implementation of this

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
					activity, not to the completion of the entire system of VAT-based EU own resources.
	Calculation of GNI for the period 1995-2024 / completion of the series from 1995	SORS / NBS	2026	Yes	The SORS publishes the GNI data series for the period 1995-2024.
	Improving the exhaustiveness of GDP and GNI estimates, including estimates of illegal activities	SORS	By the end of 2026	Yes	The report for the first quarter states that official GDP and GNI estimates already include adjustments for the non-observed economy, including estimates of illegal activities.
	Updating the GNI Inventory	SORS	During 2026	No*	The report for the first quarter states that the activity is ongoing. By the cut-off date, no final updated version of the document had been publicly identified.
	Updating the methodological document on GDP and GNI calculation	SORS	During 2026	No*	The report for the first quarter envisages publication of the document after its reconciliation with the GNI Inventory. By the cut-off date, it had not been publicly confirmed that the document had been finalised.
	Providing additional SORS staff for SUT, the weighted VAT rate and VAT reporting	SORS	End of Q2 2026	No*	The report for the first quarter specifies a need for five new staff. No public confirmation was found that all the planned posts had been filled.
	Staff strengthening of the Group for the Coordination and Management of EU Own Resources	Ministry of Finance	Ongoing / until the system is established	No*	The Plan lists three systematised posts, two of which were filled, with a need for at least three or more. The existence of the Group has been confirmed, but full staffing has not been publicly confirmed.
	Establishment of the accounting module for traditional own resources (TOR)	Ministry of Finance – Customs Administration	Linked to AIS/AES/CDS / until the system is established	No*	The system is not operational. The report for the first quarter links the development of the module to the completion of the

Benchmark	Planned measures	Competent institution	Planned deadline	Fulfilled yes/no	Comment
	and the A and B accounts				AIS/AES/CDS systems, for which an extension of the deadline until November 2027 has been requested.
	Strengthening the administrative capacity of the Customs Administration in the area of post-clearance control	Customs Administration	Linked to the automation of AIS/AES	No*	The Plan envisages the redeployment of staff following automation. Completion of the measure had not been publicly confirmed by the cut-off date.
	Alignment of the Law on VAT	Ministry of Finance	Monitored under Chapter 16	—	The activity is monitored under Chapter 16 and is not counted as a separate legislative measure due under Chapter 33.
	Alignment of the Law on Packaging and Packaging Waste	Ministry of Environmental Protection	Monitored under Chapter 27	—	The activity is monitored under Chapter 27 and is not counted as a separate legislative measure due under Chapter 33.

** In these cases, the status "No" means that completion of the activity has **not been confirmed on the basis of the available Government reports and publicly available sources by the cut-off date.***

***Note**: The Decree and the Rulebook on EU own resources are not shown as separate rows in the monitoring table, as the original Government Plan does not list them as stand-alone, numbered measures with specific deadlines. The report for the first quarter lists them as documents being drafted, so their status is covered in the narrative part of this contribution.*

Statistics

The aggregate statistics on legislative measures cover only the acts listed in the Plan for Chapter 33 as stand-alone legislative measures with their own status or deadline, in order to avoid double-counting legislation monitored under Chapters 16 and 27.

	Total planned 11.4.2025 – 31.12.2026	Due by 15.9.2026 (% of total)	Adopted (total and %)	Due by 31.12.2026 (% of total)
Laws	1	0 (0%)	0 (0%)	1 (100%)
Secondary legislation	0	0 (0%)	0 (0%)	0 (0%)

***Note:** The Customs Law and the Decree on Customs Procedures and Customs Formalities are marked in the Plan as measures already fulfilled, so they are not included in the statistics for the period from 11 April 2025 to 31 December 2026. The Decree and the Rulebook on EU own resources are listed in the report for the first quarter of 2026 as documents being drafted, but have no specific deadlines in the Plan, so they are not included in these statistics.*

Conclusion

During 2026, after a stalemate lasting several years, Chapter 33 entered a somewhat more active phase: the Draft Action Plan for Chapter 33 was prepared and public consultations were held, inter-institutional coordination was intensified, the issue of the legal regulation of Serbia's future contribution to the EU budget was raised, and concrete progress was recorded in the statistical basis.

However, more visible progress in the process does not yet mean that a functioning EU own resources system has been established.

The key test will be implementation. The Action Plan must contain precise deadlines, clearly defined responsibilities, measurable indicators and a publicly verifiable monitoring mechanism. The legal framework must be supplemented by operational secondary legislation and procedures, while institutions must have a sufficient number of trained staff and ensure that they are retained. The establishment of the A and B accounts and electronic reporting through the OWNRES system in particular remain open issues. This capacity should be developed in parallel with the modernisation of customs information systems, rather than waiting for it to be completed. The same applies to statistics: the completed GNI data series and the supply and use tables (SUT) provide an important basis, but full readiness requires verifiable methodologies, stable data flows and sufficient capacity for regular calculation and control.

Chapter 33 cannot be prepared in isolation. The functionality of the system depends on the tax, statistical, customs and control systems, on the availability of environmental data, and on the State's ability to plan future fiscal obligations. Lasting coordination of activities under Chapters 16, 18, 22, 27, 29 and 32, alongside Chapter 33, is necessary, as is timely preparation for the changes that may result from the future EU Multiannual Financial Framework and own resources system for the period 2028–2034.

Finally, the debate should not be reduced to the question of how much Serbia will "pay the EU". Future payments should be considered together with the opportunity to use EU funds, the costs of alignment, fiscal risks and the overall benefits of membership. The NCEU recommendation to regularly update the analysis of the financial effects of membership therefore remains relevant.

The measure of success for Chapter 33 will not be the number of documents adopted, but Serbia's ability to ensure, from the first day of membership, a functioning, reliable, transparent and verifiable EU own resources system.

WORKING GROUP FOR CHAPTER 35
OTHER ISSUES – NORMALISATION OF RELATIONS BETWEEN SERBIA AND KOSOVO*

Objectives

Chapter 35 covers issues that cannot be classified under any other negotiating chapter, as well as issues that arise after the provisional closure of individual chapters, in order to avoid having to reopen them. This chapter therefore has no predefined EU acquis.

In Serbia's case, Chapter 35 currently concerns the normalisation of relations between Serbia and Kosovo and links the EU-facilitated Belgrade–Pristina Dialogue with Serbia's accession negotiations. In essence, this item is a mechanism for monitoring the implementation of the obligations and agreements reached within the Dialogue. At the same time, the EU negotiating framework provides that a lack of progress and of continued engagement by Serbia in fulfilling its obligations under Chapter 35 may lead to a halt in negotiations in other chapters.

State of Play

The 2023 Agreement on the Path to Normalisation and its Implementation Annex (the Ohrid Annex) have been included in the interim benchmarks for Chapter 35. The normalisation of relations and the rule of law determine the pace of Serbia's EU accession negotiations. According to the EU, the Agreement is therefore binding on both parties, although it has not been formally signed, and each party is assessed on the implementation of its own obligations.

In its 2025 Report on Serbia, the European Commission stresses that Serbia should begin recognising Kosovo's documents, symbols and institutions, while Kosovo should, in parallel, establish the Association/Community of Serb-majority municipalities in line with the EU draft statute. The European Commission also notes the stalemate regarding the Association/Community, but considers that Serbia, by lobbying against Kosovo's international membership, is in breach of the 2023 Agreement. The Commission also warns that unilateral, uncoordinated actions by the Government of Kosovo, including the closure of institutions financed by Serbia, make it more difficult for citizens to access services. The status of these institutions should be resolved through the Dialogue, in line with Kosovo legislation.

Limited progress has been made with the facilitation of the EU Special Representative for the Belgrade–Pristina Dialogue, Peter Sørensen. The first session of the Joint Commission on Missing Persons was held in January 2026, which is one of the few positive developments in the previous period.

In an effort to resolve citizens' problems with the application of the Law on Foreigners and the Law on Vehicles, Sørensen and Kurti held a press conference on 14 March 2026, after which the EU referred to their arrangements as the "Agreement on Civil Registration and the Law on Foreigners". This "agreement" covers initial twelve-month residence permits for employees of institutions and establishments of the Republic of Serbia and for students of the University of Pristina temporarily seated in Kosovska Mitrovica, as well as the use of identity cards issued by Serbia to residents of Kosovo until 15 March for identification in administrative procedures to regulate Kosovo citizenship or residence permits in Kosovo. The aim is to ensure that the application of the laws does not lead to the interruption of health and education services in Serb communities in Kosovo. During the press conference, Kurti announced the integration of health and education institutions into the Kosovo legal framework, while Sørensen stressed the need for consultations with the Serb community and respect

for earlier agreements. These arrangements were subsequently partially implemented. Independent reports indicate that only a small number of Kosovo Serbs have managed to regularise their legal status, while cases of closure of health and education institutions by the Kosovo authorities have also been recorded.

The European Commission considers the withdrawal of Serbs from Kosovo institutions in November 2022 to be a breach of Serbia's obligations and states that neither party is fully implementing the agreements on the judiciary. In February 2026, the European Commission assessed that Serbia, by arresting and prosecuting a Kosovo Albanian for alleged war crimes in Kosovo, was in breach of the 2015 Agreement on Justice, an interpretation that was not explained in more detail subsequently. Sørensen's efforts in August to return Serb judges and prosecutors collapsed after the competent Kosovo authorities verified their resignations. The European Commission assessed this move by the Kosovo authorities as not being in line with Kosovo law and as a factor hindering the return and representation of Serbs in the Kosovo judicial authorities.

The EU welcomed the handover of power in four municipalities in the north following local elections won by Srpska Lista candidates. Serbia has been asked for years to bring the perpetrators of the Banjska attack to justice, while Kosovo is asked to ensure coordination and the protection of property rights. In this regard, in August the EU called for a halt to the demolition of buildings at Gazivode until final court decisions were reached. This did not happen, as the Kosovo authorities, without any administrative or judicial procedure, demolished 33 houses and holiday homes, the Jezero Hotel, a public beach built with European Union funds and the village hall in the village of Rezala. The public enterprise Ibar-Lepenac, with the assistance of the Kosovo police, also took over the premises of the summer camp in the village of Rezala, one of the most important tourist facilities in the north of Kosovo.

How to Unblock the Process? / Priority Steps to Unblock the Process

With a view to unblocking the Dialogue process, the Working Group of the National Convention on the European Union for Chapter 35 proposes the following set of recommendations:

1. Create the conditions for the full implementation of the obligations under the agreements reached within the Dialogue on the normalisation of relations, including the establishment of the Association/Community of Serb-majority municipalities, resolving the issues relating to the application of the Law on Foreigners and the Law on Vehicles, the return of prosecutors, judges, police officers and municipal officials to the institutions, and resolving the issue of private property;

2. Prepare crisis response plans and measures to preserve peace and stability, protect the population and prevent disruptions in access to basic services. Particular attention should be paid to creating the conditions for the survival of the Serb community and the preservation of multi-ethnicity in Kosovo;

3. Place citizens' immediate needs at the centre of the Dialogue. When setting priorities, reaching agreements and monitoring their implementation, the starting point should be their concrete effects on citizens' everyday lives;

4. Make the Dialogue process predictable and the implementation of commitments measurable, through clearly defined steps, deadlines and responsibilities. Review the interim benchmarks and prepare an action plan for Chapter 35, with indicators for monitoring progress;

5. Improve judicial cooperation between Serbia and Kosovo in war crimes cases and other criminal cases, through regular communication between the competent authorities, the processing of requests for mutual legal assistance and the exchange of evidence;
6. Refrain from verbal provocations and hate speech in public communication about the Dialogue, as well as from glorifying convicted war criminals, denying war crimes and disputing facts established by the courts. Encourage public communication that contributes to building trust and to conducting the Dialogue constructively;
7. Ensure conditions for the safe operation of civil society organisations, informal groups and artistic collectives bringing together members of the Serb, Albanian and other communities, especially young people. Prevent threats and intimidation against these actors in Serbia and in Kosovo, and support their work on building inter-ethnic trust;
8. Involve a wider range of political and social actors in consultations on the Dialogue, particularly representatives of the communities directly affected by the agreements. Encourage different formats of discussion that contribute to understanding the agreements reached, the normalisation of relations and reconciliation;
9. Encourage the Office for Kosovo and Metohija to continue publishing regular reports on progress in the Dialogue, with a clear overview of the obligations implemented and outstanding, obstacles to implementation and next steps;
10. Improve school curricula by including content on transitional justice, the culture of remembrance and inter-ethnic reconciliation, so that young people better understand the importance of normalising relations and develop the capacity to build trust between communities.

Link to the Reform Agenda

Although the normalisation Dialogue is not formally covered by the Reform Agenda, Serbia and Kosovo are expected to engage constructively in the process of normalising relations, achieving measurable progress and tangible results. The aim is the full implementation of all obligations arising from the Agreement on the Path to Normalisation and its Implementation Annex, as well as the consistent implementation of all agreements previously reached within the Dialogue.

Conclusion

Serbia's European integration process is directly linked to achieving concrete results in the process of normalising relations with Pristina. It is therefore necessary to find effective ways to overcome the existing stalemates in the Dialogue, implement the commitments undertaken and resolve the accumulated problems that the Serb community in Kosovo faces every day.

MULTISECTORAL WORKING GROUP FOR FREEDOM OF EXPRESSION AND MEDIA

CHAPTER 5 – PUBLIC PROCUREMENT

Objectives

To ensure the transparency and efficiency of the public procurement system, prevent abuse and corruption, and ensure that public funds are used in line with the principle of the public interest, including in the area of public information. In the media sector, the objective is also to prevent distortions of market competition, media pluralism and the editorial independence of the media caused by the non-transparent allocation of public money.

State of Play

The 2025 amendments to the Law on Public Information and Media (*Official Gazette of the RS*, No 51/2025) added paragraph 8 to Article 47. It provides that all public procurement of media services carried out by public authorities is to be awarded on the basis of transparent, objective, proportionate and non-discriminatory criteria, published in advance on the public authority's website, and through open, proportionate and non-discriminatory procedures. The amendment was introduced as a formality, in response to a request from the European Commission, without substantively meeting its recommendations. The Law was adopted under the urgent procedure, and the Government proposed it without first holding a public consultation, on the grounds that it fulfilled obligations in the European integration process. The new provision reproduces Article 25(1) of the European Media Freedom Act (EMFA) almost verbatim. However, the elements that make that standard applicable have been omitted: the obligation of public authorities to publish annually information on their expenditure on media services and advertising, including information on the media to which funds were allocated and the amounts allocated, and supervision of the allocation by an independent body. In addition, the article does not define the types of media services that may be procured, the conditions and types of procedures, control mechanisms, or the relationship between this provision and the Law on Public Procurement. It is also unclear whether the provision applies to public enterprises and companies owned or controlled by the State, which are significant advertisers. Opportunities to circumvent the rules also remain: procurement through marketing agencies, which conceals the final recipients of the funds, procurement below the statutory thresholds, and the use of exemptions provided for in the Law on Public Procurement. All this opens the door to abuse, favouritism towards certain media and the financing of covert promotion of public officials with public funds. The legislator has thus failed to fulfil its obligation to regulate this area clearly and precisely in line with EU standards.

Priority Measure

1. Amend the Law on Public Information and Media so as to set out in detail the services that may be procured through public procurement and the conditions under which such procurement may be carried out. Align the application of this Law with the Law on Public Procurement in order to ensure the proper conduct of the entire procedure and establish an appropriate control mechanism.
2. In line with Article 25 of the European Media Freedom Act, lay down an obligation for all public authorities, public enterprises and companies owned or controlled by the State to publish annually information on all procurement of media services and advertising, including the name of the media outlet or service provider, the subject of the procurement and the amount, as well as information on the final recipients of the funds where the procurement is carried out through intermediaries.

The information should be published in a single place and in an open, machine-readable format. Supervision of the allocation of these funds should be entrusted to an independent body, with an obligation to report publicly on a regular basis.

3. Prohibit by law the procurement of media services that constitute covert promotion of public officials and political actors. Respect for professional and ethical standards should be laid down as a mandatory criterion for the allocation of funds, and measurable indicators of the achievement of advertising objectives should be set for each procurement.

Link to the Reform Agenda

The 2025 amendments to the media laws are part of the steps envisaged in the Reform Agenda of the Republic of Serbia. The draft amendments to the Law on Electronic Media and the Law on Public Information and Media were submitted to the European Commission for comments in December 2024. In the area of public procurement, the Reform Agenda provides for greater transparency of projects contracted on the basis of intergovernmental agreements, but does not contain measures concerning the transparency of public procurement of media services and advertising in the public sector. Formal fulfilment of Reform Agenda steps must not be equated with substantive alignment with EU standards.

Conclusion

The 2025 amendment to the Law on Public Information and Media has remained a declaratory provision. No clear rules, no obligation to publish data and no independent oversight of public spending on media services have been established. As no legislative action has been taken in this area, the legal framework needs to be supplemented in line with the above recommendations. Only in this way can public procurement be prevented from becoming a channel for the non-transparent financing of and favouritism towards certain media.

CHAPTER 8 – COMPETITION POLICY

Objectives

To monitor the concentration of media ownership and the state of competition in the media sector, as well as the control and/or financing of the media through the state aid system.

State of Play

The state aid system in the media sector remains non-transparent, without clear criteria or effective control. The Commission for Protection of Competition and the Commission for State Aid Control lack sufficient capacity and an adequate degree of independence, while funds are allocated in a way that favours certain media close to the authorities. The conditions and criteria for the compatibility of state aid in the area of public information are regulated by a separate decree (*Official Gazette of the RS*, No 9/22), but it applies only to project co-financing. Other forms of financing the media from public sources remain outside control: public procurement of media services, public sector advertising, debt write-offs and rescheduling, and investments by state-owned enterprises in the media. Nor does project co-financing ensure the protection of the public interest. The 2023 Law on Public Information and Media provides that, from 1 January 2025, a Register of Media Content Producers is to be kept in order to ensure the transparency of data on funds allocated as state aid and *de minimis* aid. However, this register does not cover media service providers and therefore does not give a complete picture of public money flows to the media. The 2025 amendments to the same Law introduced a prohibition of any action that restricts, prevents or distorts competition in the area of public information. They also

introduced specific rules for media whose publishers are companies established by companies engaged in electronic communications activities. However, these provisions are not accompanied by supervisory mechanisms or sanctions. Nor is there any obligation, when assessing concentrations on the media market, to assess their impact on media pluralism and editorial independence, as provided for in Article 22 of the European Media Freedom Act.

Priority Measures

1. Lay down specific rules for granting state aid in the media sector, including the obligations of recipients, reporting arrangements and control over the granting of state aid (*recommendation not fulfilled since 2017/2018*).
2. Introduce sanctions for abuse and breaches of state aid rules (*recommendation not fulfilled since 2017/2018*).
3. Strengthen the capacity and independence of the Commission for Protection of *Competition and the Commission for State Aid Control (recommendation* not fulfilled since 2017/2018).

Link to the Reform Agenda

Under the "Private sector development" sub-area, the Reform Agenda of the Republic of Serbia provides for all remaining state aid schemes to be aligned with the EU acquis by the end of 2027, in accordance with the requirements of the Stabilisation and Association Agreement. This measure should also cover state aid in the area of public information. The Reform Agenda does not, however, contain specific measures for the transparency of public funding of the media or for the protection of media pluralism in merger control procedures.

Conclusion

There have been no substantive changes in the area covered by this chapter, and none of the previous recommendations has been fulfilled. The 2025 amendments to the Law on Public Information and Media prohibit, in principle, the distortion of competition in the area of public information, but do not introduce mechanisms for enforcing that prohibition. All previous recommendations remain valid; they concern amendments to the legislation on granting state aid, the obligations of recipients, sanctions for breaches of the rules, and the competences and independence of the Commission for State Aid Control and the Commission for Protection of Competition.

CHAPTER 10 – DIGITAL TRANSFORMATION AND MEDIA

Objectives

To align the legal and institutional framework in the area of the media with European Union standards, ensure the independence of regulatory bodies, improve the quality of public service media and promote digital pluralism.

State of Play

Political influence over public service media and the Regulatory Authority for Electronic Media (REM) remains dominant, while independent media operate in increasingly difficult conditions. The process of electing the REM Council was completed only after the National Assembly adopted an authentic interpretation of Article 18(4) of the Law on Electronic Media. According to that interpretation, the declarations of intent of four Council members (Dubravka Valić Nedeljković, Iva Prodanov Krajišnik, Mileva Malešić and Rodoljub Šabić) are not considered resignations, since they

had not previously taken up their duties as members of the REM Council. They subsequently decided to take part in the work of the Council. The lawfulness of the election of the ninth Council member, from among the national councils of national minorities, also remains an open question. Media pluralism is under increasing pressure owing to the concentration of ownership, the growing influence of the State through Telekom Srbija, the consolidation of politically aligned media and the uneven allocation of public funds. Telekom Srbija, a majority state-owned company, combines media ownership, infrastructure and content distribution. After acquiring an 80% stake in Mondo INC at the end of 2025, it controls a total of 35 media outlets, according to available data. According to RATEL data for the first quarter of 2026, Telekom controls 62.3% of subscribers to media content distribution services, while SBB/Yettel has a share of around 34.4%. Together, these two operators thus account for around 96.7% of the market.

The consolidation of local media also accelerated during 2026. By June 2026, Best Media Team, owned by Alo Media System (90%) and by Insajder Tim, the publisher of the daily Informer (10%), had taken over ten local media outlets and registered at least three new local portals. By July 2026, the newly established Zaple Media Group had registered 12 new portals and taken over at least two existing ones, forming a network of at least 14 media outlets. In 2026 alone, these two structures are behind at least 27 media outlets that have been taken over or newly established. Neither the REM nor other competent authorities have assessed the impact of these changes on media pluralism.

The Media Strategy for the period 2020-2025 has expired, and its key measures were implemented selectively. The Ministry of Information and Telecommunications set up a working group to amend the Law on Public Information and Media and the Law on Electronic Media, with the stated aim of aligning them with the European Media Freedom Act (EMFA), as well as a working group to draft a new media strategy. The working groups also include newly established organisations close to the authorities. Given the experience with previous amendments to the media laws, which were carried out non-transparently, under the urgent procedure and without genuine participation of the professional community, this indicates the absence of any serious will to improve the media landscape. The key problem is not a lack of legislation, but its selective application and the absence of effective and independent institutions to oversee its implementation. Public service media are not independent in their work and do not fulfil their basic role towards citizens. They are exposed to constant political pressure and also lack financial independence. The biggest problem is their news programming, which is reduced to relaying information without critical scrutiny, with a complete absence of reporting on certain events of public interest.

In addition, by an arbitrary decision of Telekom, in the midst of the election campaign, free and unencrypted (free-to-air) viewing of several television channels via the terrestrial network, using an ordinary antenna, was made available throughout the territory of the Republic of Serbia. These channels include television stations without national broadcasting licences, including TV Informer and TV Kurir. Monitoring of TV Informer’s programming in particular confirms that the content it broadcasts is in stark contradiction with the criteria of objectivity, impartiality and accuracy, as well as with the obligation to present the other side’s views. In this way, the competences of the Regulatory Authority for Electronic Media were usurped, and these television stations were de facto enabled to broadcast with national coverage without undergoing the statutory procedure for obtaining the appropriate licence, and without paying the fee to the REM that is otherwise paid by television stations licensed to broadcast at national level.

What is particularly contentious is that the unlawful enabling of unencrypted reception of channels, including TV Informer and TV Kurir, took place at a politically highly sensitive moment, immediately before the parliamentary elections, which were to be held on 25 October 2026. By usurping the REM’s competences, Telekom contributed to the further deterioration of the already worrying state of media

pluralism, thereby also affecting freedom of expression, access to objective information and the fairness of the electoral process. Sixteen media and civil society organisations wrote to Telekom, the REM and RATEL, warning of numerous breaches of national legislation governing electronic media, as well as of the Constitution and international standards on freedom of expression, media pluralism and free elections. However, by the date of finalisation of this report, no reply had been received, nor had the unlawful broadcasting been stopped of the programmes of television stations that do not hold the appropriate licences for national broadcasting and whose programming adversely affects the fairness of the electoral process and the rights of its participants.

Priority Measures

1. Establish responsibility for the failures in the previous process of electing the REM Council and ensure the lawful and transparent election of the ninth Council member from among the national councils of national minorities. Ensure the lawful, independent and effective functioning of the Council, public debates on its work and effective oversight of broadcasters, including the protection of media pluralism in the context of ownership concentration, takeovers and the interconnection of media, as well as the transparency of media ownership (*combined recommendation, partially unfulfilled since 2016/2017*).

2. Do not carry out amendments to the media laws and the drafting of a new media strategy hastily and as a formality, on the grounds of alignment with the EMFA. These processes should be launched only once the conditions for a transparent procedure are in place, with genuine participation of the relevant journalists' and media associations and the professional community, and following a prior evaluation of the implementation of the Media Strategy for the period 2020–2025. Until then, the priority should be the consistent application of existing legislation (*new recommendation*).

3. Reduce political influence over public service media, ensure the consistent application of the law and strengthen their editorial and financial independence through an adequate and stable funding model. Improve the quality of programming, particularly news programming, so that public service media provide objective, timely and truthful information on all topics of public interest (*combined recommendation, not fulfilled since 2019*).

Link to the Reform Agenda

The amendments to the media laws adopted in 2025 are part of the steps envisaged in the Reform Agenda of the Republic of Serbia. The draft amendments to the Law on Electronic Media and the Law on Public Information and Media were submitted to the European Commission for comments in December 2024. Formal fulfilment of these steps has not led to substantive change: the REM Council is not functional, and the independence of public service media has not been ensured. Fulfilment of the Reform Agenda steps in the area of the media should be assessed on the basis of results in practice, not only on the basis of the legislation adopted.

Conclusion

The process of electing the members of the REM Council was marked by numerous procedural and substantive failures. The competent parliamentary committee supported nominators and candidates whose lawfulness and legitimacy were contested, without any substantive discussion of the applications themselves. Although the Council has been constituted, Serbia still does not have a functioning regulatory body that oversees broadcasters and performs its other statutory competences, while media pluralism is increasingly threatened by ownership concentration and the role of Telekom Srbija. By setting up working groups, the State creates the impression that it is working to improve

the media landscape, but the activities amount to formal fulfilment of obligations, without substantive change. The previous recommendations concerning the lawfulness and independence of the work of the REM and public service media remain valid.

CHAPTER 23 – JUDICIARY AND FUNDAMENTAL RIGHTS

Objectives

To ensure the protection of fundamental rights and freedoms, including freedom of expression, the safety of journalists and the public's right to information, in line with European Union standards and the European Convention on Human Rights.

State of Play

The safety of journalists deteriorated dramatically during the reporting period. In 2025, the Independent Journalists' Association of Serbia (NUNS) recorded 317 incidents: 113 physical attacks, 124 threats to the life or physical safety of journalists, 40 other threats against journalists, 32 threats against media outlets and 26 attacks on media outlets or organisations.

The trend continued in 2026. In the first eight months, 197 incidents were recorded, including 57 physical attacks and 68 threats to the life or physical safety of journalists. The most senior public officials openly target and discredit journalists and media, calling them terrorists, foreign mercenaries or traitors. Between January and September 2026, the Slavko Ćuruvija Foundation documented at least 1,193 verbal attacks on journalists and media by state officials, representatives of the authorities and officials of the ruling party. Such targeting is accompanied by coordinated media campaigns, which often escalate into serious threats. The police have become one of the biggest sources of threats to the safety of journalists. From March to December 2025, NUNS documented 77 cases in which the police used force against journalists, arbitrarily detained them or checked their identity, or passively watched as they were attacked. According to the records of the Supreme Public Prosecutor's Office, 143 cases involving journalists as injured parties were recorded in 2025, and in 50 cases the police did not act on the prosecutor's instructions. By the end of June 2026, 71 cases had been recorded, and the police had not acted on instructions in 30 cases. Impunity remains the key problem: of the 143 cases from 2025, only six ended in a conviction, and of the 71 cases from 2026, only one.

In addition, for more than a quarter of a century there has been complete impunity in Serbia for the murders of journalists. In the only case of the murder of a journalist that reached the courts, a final acquittal was handed down, which the Supreme Court found to have been rendered with substantial violations of procedural rules in favour of the defendants, but which cannot be changed owing to procedural constraints. The daughter of the murdered journalist lodged a constitutional appeal and an initiative for a review of the constitutionality of the provisions of the Criminal Procedure Code (CPC) that prevent the review of a final acquittal and deny the right to an effective remedy in cases where a second-instance court overturns a first-instance conviction and acquits the defendant. However, the Constitutional Court has not ruled on either the constitutional appeal or the initiative for a constitutionality review. Disciplinary complaints were also filed with the Disciplinary Prosecutor of the High Judicial Council against the judges who handed down the unlawful acquittal, but there has been no progress on them for more than eight months. Any further delay risks the statute of limitations expiring and disciplinary proceedings becoming impossible.

There is no systemic protection of journalistic sources. Over the past two years, journalists and their sources have been targeted with spyware, and the investigations into these cases are not progressing. Criminal and misdemeanour proceedings are increasingly being brought against journalists. During

2026, the prosecution service-initiated proceedings for alleged “causing panic and disorder” in connection with investigating the use of a “sound cannon” at the peaceful protest of students and citizens on 15 March 2025. This was followed by campaigns against journalists who reported on the use of the “sound cannon”, announcements of their arrest and the portrayal of journalists as an “organised media group”. Following a police search of the flat of journalist Aleksandar Radić, in connection with his public statements and his investigation into the use of a sonic weapon at the protest of 15 March, a police summons was also served on the editor-in-chief of the Beta news agency. A criminal complaint was filed against Radić, and the prosecution service published in a press release the initials of the journalists with whom he had communicated. This directly jeopardised the protection of sources and at the same time created a threat of criminal prosecution for anyone who dares to speak publicly about the use of a sonic weapon at a peaceful citizens’ protest. Lawsuits with the hallmarks of SLAPPs also continued. In April 2026 alone, two lawsuits were filed against journalists of the Radar portal and four lawsuits were filed by a former minister against local media.

An analysis of media disputes in the period from July 2024 to the end of December 2025 shows that high claims, exceeding RSD 1 million, are considerably more frequent in proceedings against media that report critically on the authorities than in proceedings against tabloids, which most often breach the Code of Ethics for Journalists. High claims may indicate SLAPP proceedings. The problems identified also include the frequent repetition of the same violations by the same media against the same claimants, most often opposition politicians. The court cases analysed clearly show that certain opposition politicians have for years been exposed to continuous negative campaigns in pro-government media. This problem is further compounded by the low damages awarded in such cases, which are clearly not commensurate with the frequency and seriousness of the violations and therefore have no deterrent effect.

Moreover, claims against pro-government media are mostly well founded: in 93% of the proceedings analysed against Informer, Kurir, Alo, Novosti, Srpski telegraf and Republika, the claims were upheld in part or in full, i.e. it was established that the claimants’ rights had been violated. At the same time, it is precisely the pro-government media that, according to both court proceedings and the Press Council’s monitoring, most often breach professional standards and abuse freedom of expression that receive the most funding from public sources. In this way, the State finances the continuous violation of citizens’ rights.

Project co-financing of media content in the public interest in 2026 was carried out in fundamental contradiction to the public interest. According to data from the Journalists’ Association of Serbia (UNS), RSD 1,933,356,000 (around EUR 16.47 million) was allocated for this purpose at all levels of government through 153 public calls. This is the highest amount since this model was introduced, and the funds were allocated in the most inappropriate manner. The publishers of the tabloids Alo and Informer and their subsidiaries received a total of more than RSD 154.5 million. According to the Press Council’s monitoring, it is precisely these media, together with Kurir, that most often breach the Code of Ethics for Journalists of Serbia: in the second half of 2025, Alo committed 2,004 breaches in 1,205 articles, and Informer 1,456 breaches in 837 articles. Problems in the implementation of the calls have persisted for years: delays in launching calls, the composition of the selection committees and disregard for conflicts of interest, the allocation of funds to media established shortly before the call, and the lack of evaluation of the projects implemented.

The legislative amendments made often depart from the recommendations of the Media Strategy for the period 2020-2025, which has expired. The accompanying action plans have not been adopted since 2022.

Priority Measures

1. Shed light as soon as possible on all cases of attacks on journalists and threats to their safety, and conclude proceedings against the perpetrators within a reasonable time. Improve cooperation between the prosecution service and the police and ensure that the police act on prosecutors' instructions, with consistent application of the agreements on urgent action that have been signed. Conduct proceedings against police officers who took part in attacks on journalists or in compromising their digital security, and ensure the transparency of those investigations. Ensure that the police respect the law, stop attacking journalists and allow them to work unhindered (*recommendation not fulfilled since 2017/2018*). The Constitutional Court must decide, without undue delay, on the proceedings brought in connection with the case of the murdered journalist Slavko Ćuruvija, taking into account the case law of the European Court of Human Rights, and disciplinary proceedings must be conducted without delay against the judges reasonably suspected of having committed several serious disciplinary offences in their handling of the Ćuruvija case, which have damaged the reputation of and trust in the judiciary.

2. Ensure effective protection of journalistic sources and put an end to the misuse of criminal and misdemeanour proceedings against journalists on account of their work. Investigate urgently and independently the cases of the use of spyware against journalists. Public officials should refrain from targeting journalists, and responsibility should be established in such cases. Once the conditions for a transparent and inclusive process are in place, improve protection against SLAPP proceedings in line with the EU Anti-SLAPP Directive and Council of Europe Recommendation CM/Rec(2024)2 (*new recommendation*).

3. Ensure the consistent application of the law in project co-financing procedures and amend the secondary legislation to prevent the abuses identified. Lay down an obligation to launch calls, objective criteria for allocating funds, mandatory consideration of the decisions of the Press Council and the REM Council, and evaluation of the projects implemented. Identify irregularities in the procedures carried out and establish responsibility for them (*recommendation not fulfilled; reworded*).

Link to the Reform Agenda

Partially covered by reform step 9.2.2.

Conclusion

Legislative activities concerning freedom of expression take place through problematic and non-transparent processes, with deadlines not being met and insufficiently proactive public information. Despite the Government's working bodies and the relaunched legislative amendments, the safety of journalists deteriorated dramatically during the reporting period. The number of attacks rose sharply with the start of protests across Serbia, and the competent institutions did not respond adequately; the police have become one of the main sources of threats to the safety of journalists. Impunity sends the message that threats and attacks on journalists are permitted, and further undermines journalists' already shaken trust in institutions. This is compounded by SLAPP lawsuits, criminal and misdemeanour proceedings, and the undermining of the protection of journalistic sources.

There has also been no progress in the area of the financial sustainability of the media. The absence of a legal obligation to launch calls, objective criteria for allocating funds, an obligation to take into account the decisions of the Press Council and the REM Council, and an obligation to evaluate projects has led to the highest amount since the introduction of project co-financing being allocated mainly to

media close to the authorities, which systematically breach the Code of Ethics for Journalists of Serbia. The previous recommendations have not been fulfilled and remain valid.

CHAPTER 28 – CONSUMER AND HEALTH PROTECTION

Objectives

The objective of monitoring this chapter is to analyse control over the media through the system of financing media content.

State of Play

The rules on advertising by state authorities, public enterprises and political parties are still not precisely defined. The 2025 amendments to the Law on Public Information and Media provide only in general terms that public procurement of media services by public authorities is to be carried out according to transparent, objective, proportionate and non-discriminatory criteria. No obligation has been introduced for public authorities and public enterprises to publish data on how much they have spent on advertising and which media they have paid, nor has independent oversight of these funds been established, as provided for in Article 25 of the European Media Freedom Act (EMFA). The allocation of funds through direct contracts, public procurement and state advertising remains non-transparent, and funds are largely channelled to media close to the authorities. State advertising thus becomes one of the most effective channels of undue pressure on the media. Political advertising is not regulated by specific legislation, and campaigning by public officials, i.e. the use of public office and public resources to promote the ruling parties, remains a widespread practice. On online platforms, the problem of non-transparent political advertising is particularly pronounced: citizens have no insight into who pays for the content, how much has been spent and at whom the advertisement is targeted. The State has neither technical nor regulatory mechanisms for overseeing the digital advertising market. This opens the door to disinformation and manipulation, especially in the run-up to elections. In the European Union, Regulation (EU) 2024/900 on the transparency and targeting of political advertising has applied since October 2025. The Regulation requires the mandatory labelling of political advertisements, the publication of data on the sponsor, the amount spent and the targeting, and the establishment of a public repository of political advertisements. Serbia has not taken any steps towards aligning with these standards.

Priority Measures

1. Ensure full transparency of data on advertising by state authorities, public enterprises and other public entities (*recommendation not fulfilled since 2017/2018*).
2. Introduce clear rules governing political advertising in order to prevent campaigning by public officials and potential abuse by ruling political parties (*recommendation not fulfilled since 2021*).
3. Improve legislation to ensure the transparency of political advertising and of political parties' spending on online platforms during election campaigns (*recommendation not fulfilled since 2021*).

Link to the Reform Agenda

The Reform Agenda of the Republic of Serbia does not contain any steps concerning the transparency of state advertising or the regulation of political advertising.

Conclusion

There have been no substantive changes in this area during the reporting period. There has been no legislative action to address the lack of a legal framework for political and state advertising. The only amendment, a general provision on public procurement of media services in the Law on Public Information and Media, has remained declaratory, with no obligation to publish data and no control mechanisms. Non-transparent state advertising continues to enable the financing of media close to the authorities, while unregulated political advertising, particularly on online platforms, leaves room for campaigning by public officials, disinformation and manipulation. None of the recommendations in this area has been fulfilled, and all remain valid.

CHAPTER 32 – FINANCIAL CONTROL

Objectives

To ensure that institutions managing public funds operate transparently and accountably and are subject to independent financial control. In the media sector, this means in particular that the Regulatory Authority for Electronic Media (REM) must establish a clear system of control and accountability towards the public.

State of Play

The State Audit Institution's (SAI) oversight of the spending of budget funds on financing political parties and of the conduct of calls for media co-financing remained unchanged during the reporting period. Audits do not systematically cover either the performance or the lawfulness of the allocation of funds to the media. Irregularities identified rarely have consequences, as sanctions are not clearly laid down.

The need for effective control is particularly pronounced in the area of project co-financing of the media. According to data from the Journalists' Association of Serbia (UNS), RSD 1,933,356,000 (around EUR 16.47 million) was allocated for this purpose in 2026 at all levels of government, through 153 public calls, the highest amount since this model was introduced. Two local self-governments did not even launch public calls. Most of the funds were allocated to media close to the authorities that systematically breach the Code of Ethics for Journalists of Serbia. The publishers of the tabloids Alo and Informer and their subsidiaries received a total of more than RSD 154.5 million. The calls have been dogged by the same problems for years: delays in launching them, the contentious composition of the selection committees and disregard for conflicts of interest, the allocation of funds to media established shortly before the call, and the absence of control over project implementation and evaluation.

In addition, the funds allocated to the media through direct contracts, public procurement and state advertising are not subject to a separate audit.

Nor are the REM's operations subject to effective control. The SAI has not carried out a performance audit of the REM, and the work of the audit firm that audits the REM's financial statements each year is not monitored. For a long period, the REM operated without a Council able to exercise its competences, and the newly constituted Council is still not operating at full capacity. This makes it even more difficult to establish accountability for the management of the funds of this body, which is financed from broadcasting fees.

Priority Measures

1. Clearly define and specify sanctions for irregularities identified during audits of operations (*recommendation not fulfilled since 2017/18*).
2. The State Audit Institution should carry out a performance audit of the REM covering at least the two previous years (*recommendation not fulfilled since 2017/18*).
3. Monitor the work of the audit firm that carries out the annual audit of the REM (*recommendation not fulfilled since 2017/18*).

Link to the Reform Agenda

The Reform Agenda of the Republic of Serbia does not contain any steps concerning the financial control of the REM or the audit of public funds allocated to the media.

Conclusion

The State Audit Institution's oversight of the spending of budget funds on financing political parties and of the conduct of calls for media co-financing remained unchanged during the reporting period. The REM's operations are still not subject to effective control. In a year in which the largest amount to date was allocated for project co-financing of the media, and the funds were allocated in the most inappropriate manner, the lack of audit and sanctions allows public money to be channelled to media close to the authorities without consequences. None of the recommendations in this area has been fulfilled, and all remain valid. Without clear rules and effective oversight, citizens remain exposed to manipulation and deception, which directly jeopardises their right to accurate and objective information.

MULTISECTORAL WORKING GROUP FOR THE ECONOMIC REFORM PROGRAMME (ERP)

Objectives

The Economic Reform Programme (ERP) is a strategic public policy document that EU candidate countries prepare and submit to the European Commission for the purpose of alignment with EU policies. However, in view of the changes to the ERP Guidance introduced by the European Commission and the changes in the process itself, the objectives of this document have also changed. The ERP is now based on a medium-term macroeconomic framework and relies on the Fiscal Strategy.

State of Play

In line with the European Commission's Guidance, since 2024 the ERP has been prepared in a more concise form, as the strategic reform priorities have been separated from this document and agreed within the Reform Agenda, prepared under the Growth Plan for the Western Balkans and adopted by the Government of the Republic of Serbia in early October 2024. Given the changes to the content and structure of the ERP, the question arises of its continued relevance for the implementation of strategic reforms in the European integration process, at least in the short term, while the Reform Agenda is in force.

As the ERP is prepared on a continuous basis, preparation of the document for the next three-year period began in mid-2026, with the aim of presenting the draft of the new edition to the public in November and December of the same year, in step with the adoption of the new Fiscal Strategy. The adopted ERP for the period 2027–2029 is then submitted to the European Commission in January for consideration in the "European Semester Light" process for the Western Balkans and Türkiye.

According to the European Commission's assessment of the ERP 2026, published in May 2026, of the nine areas monitored to assess the fulfilment of the policy guidance, one was assessed as fully implemented, five as substantially implemented and three as having limited implementation. The areas with weaker assessments concern banking, public sector wage policy reform and the improvement of public investment management.

How to Improve the Process

1. The structure of the ERP would be significantly improved if the chapter on fiscal risks were expanded to include information on existing plans or mitigation measures in the event that macroeconomic and fiscal risks materialise.

2. The ERP preparation process should be made more inclusive and transparent through greater involvement of civil society representatives (business associations, professional associations, academia and citizens' associations) in drafting the document, in addition to the existing public consultation mechanism.

Conclusion

Although the structure of the ERP has changed and strategic reforms have been moved to the Reform Agenda, the ERP, together with the Fiscal Strategy, remains the key medium-term macroeconomic public policy document.

MULTISECTORAL WORKING GROUP FOR POLITICAL CRITERIA[101]

RELATIONS BETWEEN SERBIA AND THE EUROPEAN UNION[102]

Objectives

Improving relations between Serbia and the EU depends on political trust and the unanimous support of the Member States, as every step in the negotiations (the opening of clusters and chapters) requires the consent of all 27 Member States, not just a positive technical assessment by the European Commission (EC). The key issues in relations between Serbia and the EU are the rule of law (Chapters 23 and 24: the judiciary, the media and the electoral framework), the normalisation of relations with Pristina, and alignment with EU foreign policy, including sanctions against Russia. Meeting these conditions directly affects the pace of the accession process. The European Commission considers that Serbia has technically met the conditions for opening Cluster 3 since 2021. In July 2026, it recommended opening the cluster in view of recent progress. However, eight EU Member States remain opposed, leaving the opening of Cluster 3 blocked. The Serbian authorities should seize the favourable geopolitical moment for enlargement and, through consistent implementation of the Reform Agenda, confirm their strategic commitment to EU accession, accelerate integration and make maximum use of the available funding.

State of Play

No new cluster has been opened since December 2021, and the opening of Cluster 3 continues to be postponed. Although in July 2026 the EC again assessed that Serbia had met the technical conditions for opening Cluster 3, concerns about the state of the rule of law and the functioning of democratic institutions remain pronounced. The EC's 2026 Rule of Law Report points, among other things, to increased political pressure on the judiciary and the prosecution service, serious concerns about political and economic influence over the media, the deterioration of the safety of journalists and growing pressure on civil society organisations. Anti-European rhetoric and biased reporting on the accession process make it even more difficult to restore trust. In this context, the political conditions for opening Cluster 3 have still not been met. The European Parliament takes a similar position: in its report on Serbia, it clearly pointed out that the accession process has effectively stalled owing to democratic backsliding, the weakening of the rule of law, the failure to implement key reforms and non-alignment with EU foreign policy. The European Parliament also stressed that Serbia needs free and fair elections in order to overcome the political crisis. In addition to the stalemate in the negotiations, funds under the Growth Plan have been de facto frozen since January 2026, when the EC approved the disbursement of part of the funds for the first and only time. Without a clear political priority to implement reform steps in a timely manner and, above all, without a credible commitment to European integration, there is a serious risk that most of the total funds available will remain undrawn, further widening the gap between the promises contained in the Reform Agenda and Serbia's actual reform results.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. In the run-up to the early parliamentary elections scheduled for 25 October 2026, consistently implement the relevant ODIHR recommendations, particularly as regards the voter register, the prevention of the misuse of public resources and pressure on voters, oversight of campaign

[101] Edited by: Srđan Majstorović, European Policy Centre
[102] Authors: Strahinja Subotić and Marko Todorović, European Policy Centre

financing, and ensuring a level playing field for all electoral contestants, including equal media coverage.

2. Create the conditions for restoring formal cooperation with the NCEU and establish a permanent, measurable and transparent mechanism for joint action by the State and civil society in the EU accession process.

3. Implement without delay the steps envisaged in the Reform Agenda, primarily in the area of "Fundamentals and Rule of Law", with a high level of transparency and the involvement of civil society at all stages of implementation, particularly bearing in mind that the deadline for the subsequent fulfilment of certain unfulfilled steps expires on 31 December 2026.

4. End the practice of using anti-European rhetoric and publicly blaming EU Member States for the domestic political crisis, the protests and interference in internal affairs, and ensure responsible, accurate and constructive communication about the EU and the accession process.

Role of the Reform Agenda

Reform Agenda Measure	Status / Deadline	Urgent for improving Serbia–EU relations
4.1.1. Prepare a Roadmap/Plan and address recommendations of OSCE/ODIHR and Council of Europe bodies on the electoral framework	In its first payment assessment, the EC assessed this step as not fulfilled; the period for subsequent fulfilment runs until 31 December 2026. The audit of the Unified Voter Register has been launched but not yet completed. The REM Council has eight of its nine members.	Before the early parliamentary elections of 25 October 2026, ensure the conditions for an effective and credible audit of the voter register and the effective functioning of the REM Council, with transparent oversight of media coverage during the election campaign.
4.2.2. Enhance freedom of expression, by amending the laws on electronic media and on public information and media to align with the EU acquis and European standards and by adopting the law on public service media and ensure implementation	The step, originally due by December 2024, was assessed as not fulfilled in the EC's first assessment, with a period for subsequent fulfilment until 31 December 2026. Following the adoption of the set of media laws in June 2025, the main challenge remains their effective implementation. In July 2026, the EC pointed to serious concerns about political and economic influence over the media, insufficient implementation of the rules on public funding and ownership transparency, and the deterioration of the safety of journalists.	Ensure full implementation of media legislation, particularly as regards independent regulatory oversight, the transparency and fairness of public funding of the media, the protection of editorial autonomy and the safety of journalists.

Conclusion

Improving Serbia–EU relations as a whole is a multi-layered process that requires commitment in all areas covered by the negotiations. At this point, however, it is crucial that Serbia ensure the effective functioning of democratic institutions, judicial independence and the rule of law, and make concrete progress in aligning with EU foreign policy measures, including restrictive measures. Decisive and measurable steps in these areas, including the credible conduct of the upcoming elections, consistent implementation of the Reform Agenda and responsible communication about the EU, are key to restoring trust and creating the political conditions for opening Cluster 3 and continuing the negotiation process. Otherwise, there is a risk of further stagnation or deterioration in overall relations, as well as the loss of the funds earmarked under the Growth Plan for the Western Balkans.

ELECTIONS AND FUNCTIONING OF PARLIAMENT[103]

Objectives

The political criteria for EU membership require stable institutions guaranteeing democracy, the rule of law, human rights and respect for and protection of minorities. Periodic elections are the fundamental institution of a democratic order, and the standards of democratic elections include universal suffrage, free and fair election campaigns and equal access to the media. A functioning parliament, as an independent legislative branch of government, is also a key prerequisite for the stability of democratic institutions.

State of Play

At the end of 2025, amendments to the Law on the Unified Voter Register were adopted, and between May and August 2026 six more laws relating to electoral conditions wer[104]e amended. These legislative amendments addressed some of the ODIHR recommendations, including those concerning the financing of political activities and the capacity of the electoral administration, but civil society observers assessed that only a small proportion of the recommendations had been fully implemented. In addition, the amendments were once again adopted shortly before elections, despite recommendations that electoral laws should be amended well in advance.

Despite these steps, numerous problems in the electoral process remain unresolved. Although a Commission for the Audit of the Voter Register was established, the audit was not completed before the elections were called. The work of the new composition of the Regulatory Authority for Electronic Media (REM) in the electoral context is significantly constrained by internal divisions within that body. During the pre-election period, election observers again recorded a significant media imbalance between electoral contestants, particularly on the public service broadcaster, as well as the continued blurring of the line between the State and the ruling party in the activities of public officials. No more effective mechanisms for protecting voters from pressure have been established. In the local elections held in November 2025 and March 2026, in addition to the long-standing problems of the electoral process mentioned above, violent incidents were also recorded, including attempts to intimidate election observers, to which the police did not respond adequately. Early parliamentary elections in Serbia were called on 9 September 2026 and will be held on 25 October 2026.

Sessions of the National Assembly in the second half of 2025 and the first half of 2026 took place in a somewhat calmer atmosphere than in the previous period. In 2025, Parliament sat somewhat more often than in 2024, but still considerably less often than in previous years. Parliament's oversight role vis-à-vis the Government remained limited, among other reasons because regular sessions at which members of parliament could put questions to members of the Government were not held. The session on the motion of no confidence in the Government, submitted by opposition members of parliament in February 2026, was unjustifiably postponed until July of the same year.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. State institutions should ensure a proactive response to all forms of inequality in the electoral process, including: (a) unequal representation of electoral contestants in the media; (b) the merging of state and party functions during the campaign and the potential misuse of public resources; (c)

[103] Author: Aleksandar Ivković, Centre for Contemporary Politics
[104] ODIHR reports on elections in Serbia, with recommendations for improving electoral conditions, are available at: https://odihr.osce.org/odihr/elections/serbia.

pressure on voters; (d) irregularities in the voter register; (e) irregularities on election day itself; and (f) violent incidents.

2. Once the new National Assembly has been constituted, it needs to overcome all the problems that marked the work of the previous Assembly, above all its general inactivity and the very limited oversight role of the legislature vis-à-vis the executive. In addition, the new Parliament should make more intensive use of mechanisms for public involvement, such as committees of inquiry, commissions and public hearings, which were used rarely in the previous period and without genuine political will to apply them in good faith.

Conclusion

Serbia is entering a new electoral cycle with formal implementation of some ODIHR recommendations, but without resolving the long-standing problems that have caused the greatest controversy during election campaigns for years. In the run-up to the upcoming elections, there is great uncertainty regarding possible violent incidents during the campaign and on election day itself, as well as the regularity of the determination of the election results. Unfortunately, the prospects of overcoming these problems in the short term appear to be very slim. This is a very worrying situation for a country that aspires to meet the political criteria for EU membership. The long-standing trend of the political marginalisation of Parliament continued during this reporting period, and it remains an open question whether it will be reversed in the coming period.

CIVIL SOCIETY[105]

Objectives

A strong civil society is one of the essential elements of any democratic society. The conditions for civil society activity must be enabling, in order to ensure active citizen participation in community life. Pressure that restricts or even stifles freedom of association directly prevents citizens from exercising their guaranteed human rights. A society in which organisations can participate, make proposals and act without fear of consequences or institutional obstacles is a society that nurtures a culture of dialogue, democracy and the rule of law. The transparency and inclusiveness of political processes are achieved precisely through the broad and equal participation of civil society organisations (CSOs).

State of Play

During 2026, the conditions for the activities of civil society organisations not only failed to improve, but the trend of shrinking space for their activities continued. Public space was flooded with messages from representatives of the ruling majority and media sympathetic to them claiming that civil society organisations are behind the protests in Serbia and are carrying out a "colour revolution" with the alleged aim of seizing power. At the highest level of government, talks were launched with representatives of GONGOs on ways of "regulating" the activities of organisations funded from abroad.[106] In addition, representatives of civil society organisations were subjected to physical attacks,

[105] Author: Alma Mustajbašić, Civic Initiatives

[106] On 4 August 2026, the Speaker of the National Assembly, Ana Brnabić, called an urgent meeting with Vukša Dragović, the leader of the organisation "Serbian Sovereignists", founded in June 2026. The meeting was called following Dragović's alleged "revelations" that the non-governmental sector in Serbia had received a total of EUR 1.3 billion from abroad over the previous five years. Pro-government media presented the meeting as "the State's direct showdown with foreign agents who have been undermining the country's stability for years". After the meeting, the Speaker of the National Assembly announced that all the amendments proposed by Dragović would be adopted. During 2026, Dragović actively campaigned

threats, arrests and campaigns directed against them. At a press conference in early September 2026, representatives of the Students in Blockade initiative announced that a forensic analysis carried out by domestic and international organisations had established that spyware had been installed on the phones of 14 students, activists and opposition politicians, including Pegasus, which, according to the text, can be obtained only by states, and NoviSpy, a domestically produced software. During 2026, the social media accounts of students, civil society organisations, activists and the media were subjected to coordinated bot attacks, as a result of which they were suspended on several occasions. This constitutes a form of targeted restriction of freedom of expression.

Institutional pressure was also present during 2026. At the very beginning of the election campaign for the early parliamentary elections, the Higher Public Prosecutor's Office in Belgrade issued a statement claiming that it had been established that no sound cannon had been used on 15 March 2025 and that further measures would be taken to sanction all those who had allegedly spread falsehoods about the use of this prohibited means of dispersing demonstrations. In the author's assessment, the statement and the analysis published herald further persecution of citizens, the media, students and civil society organisations. The lack of political will to improve the position of CSOs is also evidenced by the fact that Government representatives in the Council for Creating an Enabling Environment for the Development of Civil Society did not accept the demands of the CSO representatives in that body. In 2025, all civil society representatives in the Council decided to suspend their membership owing to the growing repression to which citizens and organisations are exposed. Despite several meetings held during 2026, their demands were not accepted.

After one of the meetings, the CSO representatives were also provided with the Ex-post Analysis of the Effects of the Implementation and Performance Evaluation of the Law on Associations, which was prepared without prior consultation with CSO representatives and contains a recommendation to adopt a new Law on Associations, based on reasoning whose soundness is questionable. Such a non-transparent procedure, together with the practice to date of adopting laws without participatory public consultations, and the systematic rejection of CSOs' proposals and suggestions, could lead to a deterioration of the legal framework for civil society activity.

How to unblock the process? / Priority steps to unblock the process

1. Stop the unacceptable campaign by representatives of the authorities against civil society organisations and activists.
2. End the practice of misusing institutions to stifle freedom of expression, assembly and association.
3. Strengthen the role of the Council for Creating an Enabling Environment for the Development of Civil Society by developing mechanisms for the consistent implementation of its decisions.
4. Involve representatives of credible civil society organisations at an early stage in any preparation of amendments to existing laws, or in drafting a new law governing the status, rights and obligations of civil society organisations in Serbia.

Conclusion

The conditions for civil society activity in Serbia have been continuously deteriorating for years owing to an active campaign against civil society organisations and activists led by the highest state officials. Persistent advocacy for introducing restrictions on organisations funded from abroad directly threatens freedom of association and poses a danger to the exercise of fundamental human rights in the future.

against civil society organisations on social media, thereby taking over the role played in 2025 by the Centre for Social Stability, an organisation closely linked to the highest state officials.

A strong and stable civil society is an essential component of any democratic society, and improving the conditions for its activities contributes to greater transparency and accountability of institutions.

DEMOCRATIC CIVIL CONTROL OF THE SECURITY SECTOR[107]

Objectives

The objective of democratic civilian control of the security sector is to ensure that the army, the police and the security services act lawfully and accountably. Parliamentary oversight is one of the key mechanisms of such control, as it enables the elected representatives of citizens to oversee the work of the executive, review the work of security sector institutions and hold their heads to account.[108] In the National Assembly, this role is performed primarily by the Committee on Defence and Internal Affairs and the Security Services Control Committee, also making use of other parliamentary mechanisms, including parliamentary questions.

State of Play

The Committee on Defence and Internal Affairs held 13 sessions during the reporting period, two of which were closed to the public, while the remaining 11 were public. Although the Committee regularly considered reports from security sector institutions, a number of events that attracted considerable public attention were not included as separate agenda items. The clearest example is the "Senjak" case, when opposition members of the Committee requested that the Ministry of the Interior (MoI) submit a special report on the murder of a person and the arrest of the then head of the Belgrade Police Directorate, Veselin Milić. This request was not included in the agenda of the 27th session, but the case nevertheless became one of the central topics of debate thanks to questions from opposition members. They also raised questions about the responsibility of Marko Kričak, head of the Criminal Police Directorate, the conduct of masked police officers and members of special units during protests, and allegations of police violence during the protests in Valjevo. MoI representatives did not give concrete answers to some of these questions.[109]

The level of transparency in the work of the Security Services Control Committee was considerably lower: of its nine sessions, five were expressly closed to the public, one was public, and the status of the remaining three cannot be reliably determined from the available National Assembly press releases. At the only public session during the reporting period, held on 31 March 2026, there was a heated debate on the work of the security services and of the Committee itself. An opposition member of the Committee argued that the body had failed to perform its basic function of civilian control and pointed to what he described as the politicisation of the services, as well as to violence during the local elections at the end of March 2026. In doing so, he referred to the appearance of masked persons and people with police badges in Bor, Bajina Bašta and other places. Representatives of the ruling majority rejected these allegations and accused the opposition of "politicising the session".[110] On the other

[107] Author: Miloš Jovanović, Belgrade Centre for Security Policy
[108] Filip Ejdus, "Skupštinski nadzor sektora bezbednosti" [*Parliamentary Oversight of the Security Sector*], Belgrade: Centre for Civil-Military Relations, 2009, pp. 2–5. Available at: https://bezbednost.org/wp-content/uploads/2020/06/ejdus_2009_skuptinski_nadzor_sektora_bezbednosti.pd .
[109] Ana Novaković, "Direktor policije ćuti, ministar 'preživeo strašni sud': Sednica Odbora bez konkretnih odgovora na slučaj 'Senjak'" [*Police Director silent, minister "survived the Last Judgement": Committee session without concrete answers on the "Senjak" case*], N1, 29 May 2026. Available at: https://n1info.rs/vesti/direktor-policije-cuti-ministar-preziveo-strasni-sud-sednica-odbora-bez-konkrenih-odgovora-na-slucaj-senjak/.
[110] Beta, "Parlamentarni odbor: Vlast i opozicija oprečno o službama bezbednosti" [*Parliamentary committee: Government and opposition at odds over security services*], Danas, 31 March 2026. Available at: https://www.danas.rs/vesti/politika/parlamentarni-odbor-vlast-i-opozicija-oprecno-o-sluzbama-bezbednosti/.

hand, parliamentary questions were used only to a limited extent as an instrument of security sector oversight. Although the Minister of Defence answered questions from members of parliament, questions relating to the defence sector mostly concerned specific policies and decisions, such as the reintroduction of compulsory military service, rather than the lawfulness of the institutions' work and the establishment of accountability.[111] Overall, these findings point to the limited reach of parliamentary oversight of the security sector in practice, despite the existence of formal mechanisms and the regular work of the competent committees.

How to Unblock the Process? / Priority Steps to Unblock the Process

1. The Committee on Defence and Internal Affairs and the Security Services Control Committee should continue to hold sessions regularly and make full use of their oversight powers. This means not only considering regular reports, but also requesting special reports and additional documentation, holding thematic sessions, overseeing the lawfulness of the use of special measures and actions, and establishing the facts about irregularities and unlawful acts identified. After conducting oversight, the committees should adopt concrete conclusions and recommendations and monitor their implementation.
2. Both committees should be chaired by members of the opposition, while committee members should hold security clearances for access to classified information and make active use of them in overseeing the work of security sector institutions and analysing their reports thoroughly. Sessions should be open to the public whenever there are no justified grounds for closing them, and after closed sessions the public should be given more substantive information on the issues considered and the conclusions adopted.
3. Members of parliament should make regular and systematic use of parliamentary questions to require members of the Government to explain the conduct of security sector institutions, particularly in relation to possible abuses and security incidents that cause public concern.

Conclusion

Parliamentary oversight of the security sector during the period under review remained largely formal and reactive. Such practice does not provide sufficiently strong protection against the political instrumentalisation of the security sector and may further undermine citizens' trust in institutions. More consistent and proactive use of existing oversight powers would strengthen the accountability of security sector institutions and their heads and increase the transparency of parliamentary oversight.

PUBLIC ADMINISTRATION REFORM[112]

Objectives

Public administration reform (PAR) is one of the key conditions for Serbia's accession to the European Union. Its main objectives include strengthening administrative capacity, delivering services more efficiently and improving public policy management. The reform also covers the modernisation of the civil service system, digitalisation, the improvement of public finances, and the strengthening of control over and transparency of the work of the public administration.

[111] National Assembly of the Republic of Serbia, "Poslanička pitanja u novembru" [*Parliamentary questions in November*], 27 November 2025. Available at: https://www.parlament.gov.rs/Poslani%C4%8Dka_pitanja_u_novembru.52236.941.html.
[112] Author: Miloš Đinđić, European Policy Centre

State of Play

According to the most recent European Commission (EC) report, Serbia is still assessed as moderately prepared in this area, with the finding that no progress has been made. The EC reiterates the recommendations set out in previous editions of the same report.[113] During the reporting period, the new Public Financial Management Reform Programme for the period 2026-2030 and the 2026 Action Plan for the implementation of the Public Procurement Programme were adopted. However, there is a noticeable discontinuity in the implementation of strategic activities, as the Action Plan for the implementation of the PAR Strategy and the Programme for Improving Public Policy Management and Regulatory Reform, which would have covered the period from 2026 to 2030, have not been adopted. As stated in the latest WeBER PAR Monitor, the State budget preparation process continues to lack transparency and inclusiveness.[114] In October 2025, the Ministry of Finance launched the Budget Portal with the aim of encouraging active citizen participation, inviting citizens to submit proposals for the 2026 and 2027 budgets.[115] However, the Ministry has so far published "initial" and "selected" proposals from citizens, but not comprehensive reports showing how these proposals were considered in the process of preparing and adopting the budget. The introduction of the "Green Budget" annex from 2025 is also a novelty, but the impact of this initiative is limited, as the annex is outside the text of the Budget Law and the list of green projects for 2025 and 2026 covers only a few bodies.[116] According to the same research, Government decision-making remains non-transparent, and the Government's planning documents and the reports on their implementation are still not published consistently.[117] For example, in November 2025 the most recent available Annual Work Plan of the Government related to 2023, while the next published plan was for 2026. It is important to note that the Government has adopted certain decisions that may have far-reaching consequences for the transparency and inclusiveness of the policy-making system. New provisions of the Government's Rules of Procedure from 2025 allow an exemption from holding public consultations where "open issues have been agreed" during consultations.[118] The latest amendments to the Decree on Regulatory Impact Assessment[119] and the Decree on the Methodology for Drafting Public Policy Documents,[120] from March 2026, also introduced a basis for exempting legislation and public policy documents adopted in the context of the EU accession process from the obligation to carry out an impact assessment or consultations. Finally, during the reporting period, the Government continued to dismiss senior civil servants without giving reasons for such decisions. This practice represents an additional form of control over and obstruction of the professional civil service, despite a legal framework that should ensure its professional autonomy.[121]

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[113] European Commission, *Serbia 2025 Report*. Available at: https://enlargement.ec.europa.eu/serbia-report-2025_en.
[114] WeBER, *National PAR Monitor Serbia: Public Financial Management*. Available at: https://shorturl.at/cVIdF.
[115] Budget Portal. Available at: https://budzet.mfin.gov.rs/sr-cir/.
[116] Law on the 2026 Budget. Available at: https://shorturl.at/F8qEQ.
[117] WeBER, *National PAR Monitor Serbia: Policy Development and Coordination*. Available at: https://www.par-monitor.org/policy-development-and-coordination/.
[118] Rules of Procedure of the Government, Article 41a. Available at: https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/poslovnik/2006/61/1/reg.
[119] Decree on Regulatory Impact Assessment. Available at: https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/20/4/reg.
[120] Decree on the Methodology for Drafting Public Policy Documents. Available at: https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/20/5/reg.
[121] The draft of the CEP's policy brief on the unlawful dismissal of senior civil servants, to be published after the publication of the NCEU Book of Recommendations for 2026.

Priority Steps for the Next Period

1. The Government should lay down clear legal obligations for the proactive publication of key information on the work of its sessions, including the agenda, minutes, and all acts and decisions adopted.
2. The General Secretariat of the Government should ensure the regular and timely publication of the Government's Annual Work Plan immediately after its adoption, in accordance with the law.
3. The legislative framework governing consultations and public debates is inconsistent and fragmented across several pieces of legislation, which do not cover all relevant aspects of the consultation process. The Government should prepare and adopt a coherent legislative framework, which would include the introduction of a minimum consultation period of 20 days, the establishment of mechanisms for timely notification of upcoming consultation processes, and the repeal of Article 41a of the Government's Rules of Procedure.
4. The latest amendments of 2026 to the Decree on Regulatory Impact Assessment and the Decree on the Methodology for Drafting Public Policy Documents should be repealed.
5. The Ministry of Finance should publish detailed reports on the consultation process during budget preparation and hold public debates on each draft budget law.
6. The Government should end the practice of excessive appointment of acting heads and the extension of their status beyond the periods laid down in the Law on Civil Servants. In addition, all dismissals of senior civil servants should be duly reasoned, in accordance with the law.

Conclusion

No significant progress was made in public administration reform (PAR) in Serbia during 2026. Activities during the reporting period indicate that certain decisions adopted run counter to the principles of good governance, in particular the principles of government accountability and transparency. To encourage progress, institutional accountability and inter-ministerial coordination need to be further strengthened, but decisions that reduce or undermine the transparency of the administration's work and the inclusiveness of the policy-making process also need to be repealed. The long-standing practice of undue political influence on top managers in the public administration must also be curbed.

MULTISECTORAL WORKING GROUP FOR SUSTAINABLE DEVELOPMENT

Introduction

In 2015, by adopting United Nations Resolution "Transforming our world: the 2030 Agenda for Sustainable Development", the Republic of Serbia committed itself to contributing to the achievement of the 17 Sustainable Development Goals (SDGs), which link economic development, social inclusion and environmental protection. Achieving these goals requires the alignment of national development priorities, public policies and budget allocations, together with effective mechanisms for monitoring results and the involvement of relevant social actors.

The most recent Report on Progress towards the Sustainable Development Goals in the Republic of Serbia for 2025, prepared by the Statistical Office of the Republic of Serbia, is the sixth consecutive annual monitoring of Serbia's progress in implementing the 2030 Agenda. The Report covers 162 available indicators, 13 more than in the previous reporting cycle. Progress is measured on the basis of data available in October 2025, mostly for the period 2019-2024, using the Eurostat methodology. The results show that, despite progress in certain areas, Serbia still faces stagnation and movement away from the goals for some of the indicators. It is particularly important to monitor the achievement of the goals relating to sustainable agriculture, waste management, and the reduction of material consumption and greenhouse gas emissions.[122]

Reform Agenda of the Republic of Serbia and Agenda 2030

The process of European integration and the implementation of the 2030 Agenda should be viewed as interlinked processes. The adoption of the Reform Agenda of the Republic of Serbia for the period 2024-2027, in October 2024, was an important step in defining reform priorities under the EU Growth Plan for the Western Balkans. However, reform measures and their indicators cannot fully replace a comprehensive national development framework that would link long-term development goals, sectoral policies and financial resources.

According to the available official documents, the need to adopt the Development Plan of the Republic of Serbia remains one of the key issues of strategic planning. Its absence makes it difficult to align sectoral strategies and reform obligations with the country's long-term development priorities. Further planning should therefore be based on a clear link between the 2030 Agenda, the EU accession process, the Reform Agenda and national budgetary priorities. According to the First Independent Monitoring Report[123] on the implementation of the Reform Agenda of the Republic of Serbia, of the 34 reform steps, six were assessed as achieved and 28 as not achieved.

European Integration Process and Agenda 2030

The mapping of the national planning framework against the Sustainable Development Goals, published by the Public Policy Secretariat, links national public policy documents with all 17 SDGs and the six negotiating clusters in the EU accession process. This approach makes it possible to examine shortcomings in strategic planning in the context of European integration as well. However, the existence of strategies and programmes does not in itself prove that the goals are being achieved,

[122] For more information, see: https://sdg.indikatori.rs/media/Izvestaj/sdg_godisnji_izvestaj_srbija_2025_lat.pdf.
[123] European Policy Centre (CEP), First Independent Monitoring Report on the Implementation of the Reform Agenda. Available at: https://cep.org.rs/en/publications/first-independent-monitoring-report-on-the-implementation-of-the-reform-agenda/.

so the implementation of measures and their results need to be monitored regularly on the basis of measurable indicators.

Cluster 1 – Fundamentals covers the rule of law, democratic institutions, public administration reform, public procurement, financial control and statistics. Its link with SDG 16, on peace, justice and strong institutions, implies the need for transparent decision-making, accountable institutions, accessible information and effective participation of citizens and civil society organisations.

Cluster 2 – Internal Market contributes to achieving SDG 3, on health and well-being, through consumer and public health protection policies. Links between health and environmental policy need to be improved, particularly in the areas of disease prevention, air, water and environmental quality, and access to health services. In this context, monitoring the impact of the environment on public health should be part of an integrated planning and reporting system.

Cluster 3 – Competitiveness and Inclusive Growth is linked to SDGs 1, 4, 5, 8, 9 and 10, which concern the reduction of poverty and inequality, education, gender equality, decent work and economic development. In this cluster, it remains important to ensure that economic growth is accompanied by a reduction in social disparities, an improvement in the quality of work and more equal access to development opportunities. In the area of transport and infrastructure, investment priorities need to be linked to the objectives of sustainable mobility, emission reduction and balanced regional development.

Cluster 4 – Green Agenda and Sustainable Connectivity covers energy, transport, environment and climate change, and trans-European networks. It is linked to SDGs 6, 7, 11, 12, 13 and 15, which concern water and sanitation, clean energy, sustainable cities, responsible consumption and production, climate change and the conservation of terrestrial ecosystems. The strategic framework in force includes the Low Carbon Development Strategy of the Republic of Serbia for the period 2023-2030, the Climate Change Adaptation Programme for the period 2023-2030, the Energy Sector Development Strategy up to 2040, the Integrated National Energy and Climate Plan up to 2030, and the Air Protection Programme for the period 2022-2030.

During 2025 and 2026, the regulatory and programming framework in this area was further developed. The Law on Waste Management (*Official Gazette of the RS*, No 109/25) was adopted, followed in July 2026 by a new Law on Integrated Pollution Prevention and Control (*Official Gazette of the RS*, No 63/26). These laws represent relevant changes in the legal framework for waste management and industrial pollution control.

In July 2026, the Government of the Republic of Serbia adopted the Environmental Protection Strategy of the Republic of Serbia up to 2033 – Green Agenda for Serbia, with an action plan, and in August 2026 the Government adopted the Nature Protection Programme of the Republic of Serbia for the period 2026-2031. The Programme focuses on biodiversity conservation, the protection and restoration of ecosystems, improved management of protected areas, and alignment with international obligations and nature protection objectives. Their implementation should be linked to SDG 15 and other goals concerning the conservation of natural resources and the resilience of local communities.

Cluster 5 – Resources, Agriculture and Cohesion covers agriculture, rural development, food safety, veterinary and phytosanitary policy, fisheries and regional policy. This cluster contributes to achieving SDG 2, on ending hunger, improving nutrition and sustainable agriculture. Unlike the situation described in the previous edition of the Book of Recommendations, the new Agriculture and Rural Development Strategy of the Republic of Serbia for the period 2026–2034 was adopted in August 2026. Its priorities include food security, the competitiveness of the agri-food sector and sustainable rural development.

This fulfils the recommendation concerning the adoption of a new overarching strategy in the area of agriculture. In the coming period, attention should focus on its implementation, its alignment with the Sustainable Development Goals and monitoring its effects on the position of agricultural holdings, rural communities and natural resources.

Cluster 6 – External Relations is linked to SDG 17, on partnerships for the goals. In February 2026, the United Nations Sustainable Development Cooperation Framework for the Republic of Serbia for the period 2026–2030 was signed. This document sets out the priorities for joint development cooperation and provides a framework for linking national development needs with support from the United Nations system.

Recommendations

1. Cluster – Fundamentals

Given that the Strategy for Combating Organised Crime has no time-limited period of validity, but also has no action plan for its implementation, the area of public security and the fight against organised crime needs to be further optimised.

2. Cluster – Internal Market

Improve the links between health and environmental policy, particularly in the areas of preventing pollution-related diseases, air and water quality, and protecting the health of vulnerable population groups. Integrated monitoring of indicators linking the state of the environment with public health needs to be developed.

3. Cluster – Competitiveness and Inclusive Growth

Improve the strategic framework for reducing poverty and social inequalities by adopting an overarching document, linking social policy, employment and regional development. In the area of transport, strategic documents need to be aligned with the objectives of sustainable mobility, emission reduction and balanced territorial development.

4. Cluster – Green Agenda and Sustainable Connectivity

The priority should be the coordinated implementation of the existing strategies, programmes and laws in the areas of environmental protection, climate change, energy, waste management and nature protection. At the same time, transparent monitoring of the implementation of the new framework legislation, the Environmental Protection Strategy of the Republic of Serbia up to 2033 – Green Agenda for Serbia, and the Nature Protection Programme for the period 2026-2031 must be ensured, with the involvement of civil society organisations and local communities.

5. Cluster – Resources, Agriculture and Cohesion

Following the adoption of the Agriculture and Rural Development Strategy for the period 2026–2034, the priority should be implementing the planned measures, adopting and implementing the accompanying action plans, and establishing a system for monitoring results. Particular attention should be paid to the sustainable use of land and water, the position of small agricultural holdings, rural development and the resilience of agriculture to climate change.

6. Cluster – External Relations

Ensure that the United Nations Sustainable Development Cooperation Framework for the Republic of Serbia for the period 2026-2030 is linked to national priorities and the goals of the 2030 Agenda. The coordination of international development cooperation, the transparency of the use of funds and the involvement of national civil society organisations in planning and monitoring development programmes need to be improved.

MULTISECTORAL WORKING GROUP FOR REGIONAL COOPERATION

Status of the 2025 Recommendations

Fulfilled	**0**
Unfulfilled	**0**
Partially fulfilled	**6**
Number of new recommendations	**1**

Objectives

The Multisectoral Working Group for Regional Cooperation monitors regional cooperation, primarily within the Berlin Process, as well as within other regional initiatives. The Berlin Process is a diplomatic initiative launched in 2014 with the aim of strengthening regional cooperation and accelerating the European integration of the Western Balkan countries.

State of Play

Montenegro holds the Chairmanship of the Berlin Process in 2026 under the slogan "Region in Motion. Owning the Change". During the year, 25 events were organised, 14 of them at ministerial level. The most politically significant meetings included the ministerial meeting on employment and social policy, held in Berlin on 11 May, at which all six Western Balkan partners adopted the "Work Plan on Employment and Social Policy"; the meeting of interior ministers, held on 16 September in Podgorica; the third ministerial meeting on the Green Agenda, held on 18 and 19 September in Žabljak; the meetings of ministers responsible for youth, held on 22 and 23 September in Podgorica; the meeting of ministers of economy and trade, held on 30 September in Cetinje; the meeting of foreign ministers, held on 1 October in Pržno/Budva; and the Roma Ministerial, held on 8 October in Podgorica. The Leaders' Summit was scheduled for 22 October 2026 in Miločer/Budva.

The Green Agenda meeting adopted the 2026 Ministerial Declaration and gave political endorsement to key regional documents: the Climate Change Adaptation Strategy for the Western Balkans (WB6), the Biodiversity Strategic Plan to 2030, the Forest Landscape Restoration Plan, a regional commitment to phase out the five most common single-use plastic products, and a regional framework for extended producer responsibility for plastic packaging. The focus of the Berlin Process is thus increasingly shifting from taking on new political commitments to implementing them and achieving measurable results.

The Civil Society & Think Tank Forum 2026 was held in Pristina from 5 to 7 October under the slogan "Proof, Not Promises". The Forum brought together more than 150 civil society organisations and think tanks from the six Western Balkan partners (WB6). The Forum adopted six sets of recommendations: (1) competitiveness and growth – better monitoring of the effects of the Common Regional Market and a roadmap for gradual integration into the EU single market; (2) digital transformation and artificial intelligence – the establishment of institutionally ready, human rights-based frameworks for digital governance; (3) security and resilience – the full inclusion of the WB6 in the European Democracy Shield initiative and the renewal of the mechanism for monitoring security commitments; (4) civic space and democratisation – binding protection of civic space in the EU accession process, protection of journalists and human rights defenders, strengthening electoral integrity and ensuring meaningful participation of civil society organisations; (5) green transition –

stronger accountability for implementing commitments, a just energy transition, better quality of green investment and the involvement of local communities; and (6) enlargement – gradual integration as a political instrument leading to full membership, with a stronger role for civil society and safeguard mechanisms after EU accession.

How to Unblock the Process? / Priority Steps to Unblock the Process

The Republic of Serbia participates actively in the Berlin Process. In the coming period, the following steps need to be taken:

1. Move from formal participation to measurable implementation of commitments: publicly monitor the implementation of the Common Regional Market, the removal of practical obstacles to trade and mobility, and Serbia's preparations for gradual integration into the EU single market (*repeated recommendation*);
2. Consistently implement the regional Work Plan on Employment and Social Policy, particularly in the areas of active labour market policy, labour rights, health and safety at work, labour inspection and social dialogue, while linking these activities with the reforms under Chapter 19 (*repeated recommendation*);
3. Speed up the implementation of the Green Agenda and of the regional documents adopted, by setting measurable indicators, planning a just transition, strengthening local capacity, ensuring transparent use of EU funds and ensuring full participation of civil society and local communities (*repeated recommendation*);
4. Link regional cooperation more closely with democratisation and the rule of law within the Berlin Process: protect civic space, journalists and human rights defenders, improve the integrity of electoral processes and prevent obligations towards the EU from being used as a justification for shortening public consultations (*repeated recommendation*);
5. Develop regional digital cooperation and the use of artificial intelligence in line with European standards on human rights, transparency and independent oversight, with Serbia's inclusion in the relevant European mechanisms for strengthening digital and democratic resilience (*repeated recommendation*);
6. Ensure the continuous involvement of civil society within the NCEU in preparing Serbia's positions for Berlin Process ministerial meetings and summits. The competent institutions should be required to respond publicly to recommendations, in line with the "respond or explain" principle, and to report on their implementation (*repeated recommendation*);
7. Restore a stronger regional framework for transitional justice, reconciliation and dealing with the past through regional initiatives. This includes resolving the issues of missing persons and war crimes, protecting the rights of victims and developing guarantees of non-recurrence, by strengthening the rule of law, democratic institutions, independent media, education and inter-ethnic trust (*new recommendation*).

Conclusion

In 2026, the Berlin Process is increasingly focused on demonstrable results and the implementation of commitments already undertaken. For Serbia, it is essential to link regional cooperation with concrete reform results in the areas of the single market, the green and digital transitions, labour and social rights, security, democracy and the rule of law, while ensuring the full and timely participation of civil society.

MULTISECTORAL WORKING GROUP FOR MONITORING THE IMPLEMENTATION OF THE REFORM AGENDA

IMPLEMENTATION OF THE REFORM AGENDA AND THE REFORM AND GROWTH FACILITY[124]

Status of the Recommendations from the First Independent Report of the MWG for RA

Fulfilled	**0**
Unfulfilled	**7**
Partially fulfilled	**5**
Number of new recommendations	**0**

The Multisectoral Working Group for Monitoring the Implementation of the Reform Agenda (MWG for RA) is contributing to the Book of Recommendations for the first time (there were no recommendations in 2025), so the status shown refers to the twelve recommendations it addressed to the Government in the First Independent Monitoring Report on the Implementation of the Reform Agenda.[125] The Report was submitted on 24 April 2026 to the members of the Monitoring Committee of the Reform and Growth Facility, including the Government, and was published in June 2026. By 31 July 2026, none of the recommendations had been fulfilled in full, five had been partially fulfilled and seven had not been fulfilled.[126] The three priority recommendations for 2026 consolidate the previous recommendations and update them in line with the findings of the Second Independent Monitoring Report.

Objectives

The Reform and Growth Facility makes the disbursement of the funds allocated to Serbia, totalling EUR 1.586 billion by the end of 2027, conditional on the fulfilment of the reform steps set out in the Reform Agenda of the Republic of Serbia for the period 2024-2027. The aim is for reforms to be implemented in line with the way they are formulated and described in the Reform Agenda, through transparent and inclusive processes, with publicly available evidence of their fulfilment. This would enable Serbia to make use of the funds allocated to it, and the reforms to deliver concrete results for citizens and businesses. The Union's support also depends on meeting the precondition, namely the existence of effective democratic mechanisms and the rule of law, and on the general conditions for payment, which include budget transparency and oversight.

[124] Author: Milena Mihajlović Denić, European Policy Centre (CEP), coordinator of the Cross-Sectoral Working Group for Monitoring the Implementation of the Reform Agenda of the Republic of Serbia.
[125] Multisectoral Working Group for Monitoring the Implementation of the Reform Agenda, *First Independent Monitoring Report on the Implementation of the Reform Agenda*, 2026. Available at: https://eukonvent.org/wp-content/uploads/2026/06/First-Independent-Monitoring-Report-on-the-Implementation-of-the-Reform-Agenda-1.pdf.
[126] Multisectoral Working Group for Monitoring the Implementation of the Reform Agenda, *Second Independent Monitoring Report on the Implementation of the Reform Agenda*, draft for comments, 7 October 2026, Table 11. All data in this contribution refer to the situation as at 31 July 2026, unless otherwise indicated.

State of Play

Of the 47 reform steps whose deadline expired by June 2026, the MWG for RA assesses that 15 have been achieved (nine of them from earlier cycles), while 32 have not been achieved. Of the ten steps due in June 2026, only one has been achieved. All five steps achieved in this cycle were fulfilled after the deadline, during the six weeks preceding the submission of the fourth payment request on 15 July 2026.

The quality of the process has not improved. Public consultations are short, are held during holidays or are organised simultaneously for several related laws, while revised drafts and the versions of documents submitted to the European Commission are not published. Working groups for reform steps are mostly set up without a public call. Several sources of verification listed in the Reform Agenda have not been published, while data on steps defined by results, such as the track record in organised crime and corruption cases and indicators in the area of education, are not publicly available or differ from one institution to another.

In the fourth payment request, the Government reported as fulfilled 21 steps that the European Commission had not approved, and the MWG for RA assesses that nine of them have not been achieved. In all these cases, the Government presents a formal act or an interim stage of implementation as the fulfilment of steps that the Reform Agenda defines more broadly and substantively. The ministries, for example, publish information on contracts concluded on the basis of intergovernmental agreements, rather than the contracts themselves.

The MWG for RA assesses that the precondition under Article 5(1)(a) of Regulation (EU) 2024/1449, namely the existence of effective democratic mechanisms, including the rule of law and respect for human rights, has not been met. Nor has the third general condition for payment, laid down in Article 12(3), concerning budget transparency and oversight, been met. A significant proportion of the largest capital projects continue to be implemented on the basis of special laws and intergovernmental agreements, outside the regular system of public investment planning, public procurement and reporting.

No new funds have been released to Serbia since January 2026. As at 31 July 2026, the European Commission had not assessed three payment requests covering 40 steps with a total value of EUR 625 million. Of the four steps that the European Commission found in January 2026 not to have been achieved, two, according to the MWG for RA, have still not been achieved: the first complex step in the area of elections and the step concerning the amendment of the media laws, with a total value of EUR 40.8 million. The grace period for these steps expires on 31 December 2026. The National Assembly was dissolved on 9 September 2026, and early parliamentary elections were held on 25 October 2026. Many of the steps not achieved, including both steps in the grace period, depend on laws and acts that cannot be adopted until the new National Assembly is constituted and a new Government is formed.

The Plan for the Fulfilment of the Most Important Obligations under the Accession Negotiations of the Republic of Serbia with the European Union by the End of 2026 links 27 of the total of 47 steps with benchmarks in eight negotiating chapters. However, the Government's report on the implementation of the Plan for the first quarter of 2026 contains information on the status of only 13 of these steps (Table 3).[127]

[127] Government of the Republic of Serbia, *Plan for the Fulfilment of the Most Important Obligations under the Accession Negotiations of the Republic of Serbia with the European Union by the End of 2026*, April 2025. Available at: https://www.ujn.gov.rs/wp-content/uploads/2025/08/Plan-za-ispunjavanje-najvaznijih-obaveza-iz-procesa-pregovora-o-

Priority recommendations / How to unblock the process?

The recommendations are addressed to the Government and the National Assembly:

1. **Give priority to the steps in the grace period and adopt and publish a roadmap for their fulfilment**. The most urgent task is to implement the two steps whose grace period expires on 31 December 2026: the first complex step in the area of elections (Reform 9.1.1) and the amendments to the media laws (Reform 9.2.2). Immediately after the National Assembly is constituted and the Government is formed, the working group should be re-established in line with the ODIHR recommendation, the audit of the Unified Voter Register completed, with full access to the relevant databases ensured for all members of the audit commission, and the REM Council completed by electing a member nominated by the national councils of national minorities, through a transparent and inclusive procedure. The media laws should be amended to address concerns regarding the independence of the REM, public funding and the protection of investigative journalism, with public consultations held. For each step in the grace period, as well as for the steps that will enter it once the Commission has assessed the payment requests currently pending, the roadmap should set out the remaining obligations, the competent institutions, the deadlines and the manner of consulting the public (*recommendation from the First Independent Report, repeated and updated*).

2. **Implement reforms in substance, in line with the way they are formulated and described in the Reform Agenda, rather than on the basis of formal acts that do not achieve the purpose of the steps envisaged**. The most important example is contracts concluded on the basis of intergovernmental agreements: they should be published, together with all amendments, in a systematic and comparable form, as required by Reform 6.2.1. Large investment projects should be brought back into the regular system of public investment planning, public procurement and reporting, the introduction of new exemptions should stop and the number of existing ones should be reduced, starting with the legal framework for EXPO 2027. This is also key to meeting the general condition concerning budget transparency and oversight. The same applies to other steps that the Government reports as fulfilled on the basis of a formal act, such as the certification of an operator that does not manage the entire gas transmission system, just transition governance without a dedicated funding mechanism, and the adoption of a Law on Information Security whose full alignment with the NIS2 Directive has not been confirmed (*recommendation from the First Independent Report, repeated and updated*).

3. **Ensure transparent, inclusive and evidence-based preparation of the acts implementing reform steps, and publish evidence of their fulfilment**. Restore the Government's Rules of Procedure to the text in force before the amendments of November 2025, retaining only the amendment required by the Reform Agenda, and abolish the exemptions from the obligation to carry out impact assessments and public consultations introduced by the March 2026 amendments to the Decree on Regulatory Impact Assessment and the Decree on the Methodology for Drafting Public Policy Documents. Holidays should not count towards the minimum 20-day period for public consultations, and consultations on related laws should not be held in parallel; if they are held simultaneously, the deadline for them should be extended accordingly. Revised drafts and reports on public consultations should be published on the eConsultations portal before acts are adopted, as should the versions of documents submitted to the European Commission. Early consultations on the starting points for laws and public

pristupanju-RS-u-EU-do-kraja-2026.-godine.pdf; *Report on the Implementation of the Plan for the First Quarter of 2026* (submitted to the National Assembly).

policy documents, which are still the exception, should become standard practice for all acts implementing the Reform Agenda. Working groups for reform steps should be set up through a public call and their composition published. At the latest with each payment request, the sources of verification listed in the Reform Agenda should be published, as should the request itself in full, including the amounts. For steps defined by results, the data and methodology on which the baseline and target values are based should be published (*recommendation from the First Independent Report, repeated and updated*).

Link to the Reform Agenda

Table 1 covers the 44 reform steps from the Reform Agenda whose deadlines expired by June 2026 and which the European Commission had not approved by 31 July 2026. The steps are listed according to the deadlines set in the Reform Agenda. **Table 2** shows the situation by policy area, while **Table 3 shows** the reform steps that the Plan 2026 links with benchmarks in negotiating chapters. The assessments of the MWG for RA refer to the situation as at 31 July 2026.

Table 1. Reform Agenda steps in the grace period, by deadlines set in the Reform Agenda

Reform Agenda deadline (grace period until)	Reform Agenda step	Government, fourth payment request	MWG for RA
December 2024 (31 December 2026)	6.2.1 Final inventory of state aid schemes	Fulfilled	Achieved
December 2024 (31 December 2026)	9.1.1 First complex step: working group in line with the ODIHR recommendation, thorough audit of the voter register and re-election of the REM Council	Not fulfilled	Not achieved
December 2024 (31 December 2026)	9.2.2 Amendments to the Law on Electronic Media and the Law on Public Information and Media, and a new Law on Public Service Media	Fulfilled	Not achieved
December 2024 (31 December 2026)	9.5.1 National Anti-Corruption Strategy and Action Plan	Fulfilled	Achieved
June 2025 (30 June 2026)*	6.2.1 Transparency of projects contracted on the basis of intergovernmental agreements	Fulfilled	Not achieved
June 2025 (30 June 2026)*	6.2.1 Action plan for aligning state aid schemes, approved by the Commission	Fulfilled	Achieved
June 2025 (30 June 2026)*	6.2.2 Increased number of funded researchers and innovative companies	Fulfilled	Achieved
June 2025 (30 June 2026)*	7.1.1 The entire gas transmission system managed by a single certified Serbian operator	Fulfilled	Not achieved
June 2025 (30 June 2026)*	7.1.1 Third-party access to gas infrastructure	Fulfilled	Not achieved
June 2025 (30 June 2026)*	7.1.1 Capacity allocation at Horgoš and at the border points of the interconnector with Bulgaria	Fulfilled	Not achieved
June 2025 (30 June 2026)*	9.3.1 Strategic framework for small arms and light weapons control 2025–2030	Fulfilled	Achieved
June 2025 (30 June 2026)*	9.3.1 Law on Internal Affairs: police autonomy and recommendations of the European Committee for the Prevention of Torture (CPT)	Not fulfilled	Not achieved
June 2025 (30 June 2026)*	9.3.1 Legislative framework on trafficking in human beings, arms smuggling in the Criminal Code, and the Law on Weapons and Ammunition	Fulfilled	Achieved

Reform Agenda deadline (grace period until)	Reform Agenda step	Government, fourth payment request	MWG for RA
June 2025 (30 June 2026)*	9.4.1 Strategic framework for countering terrorism and preventing violent extremism	Fulfilled	Achieved
December 2025 (31 December 2026)*	6.2.1 Amendment of the Government's Rules of Procedure: the decision on holding a public consultation is taken by the Government	Fulfilled	Not achieved
December 2025 (31 December 2026)*	6.2.2 Full alignment with the Regulation on the European Research Infrastructure Consortium (ERIC)	Fulfilled	Achieved
December 2025 (31 December 2026)*	6.3.1 At least 10 rural infrastructure projects financed from the national budget and contracted	Fulfilled	Achieved
December 2025 (31 December 2026)*	7.1.3 Just transition governance and the Just Transition Fund	Fulfilled	Not achieved
December 2025 (31 December 2026)*	7.1.5 Single point of contact for renewable energy permits in line with the RED II Directive	Fulfilled	Not achieved
December 2025 (31 December 2026)*	7.1.6 Approval of monitoring plans under the MRVA package	Fulfilled	Achieved
December 2025 (31 December 2026)*	7.1.7 Implementation of the Energy Performance of Buildings Directive	Not fulfilled	Not achieved
December 2025 (31 December 2026)*	7.2.1 Law on Broadband Communications Infrastructure (alignment with the Gigabit Infrastructure Act)	Not fulfilled	Not achieved
December 2025 (31 December 2026)*	7.2.2 Alignment with the eIDAS Regulation and EU legislation on digital identity	Not fulfilled	Not achieved
December 2025 (31 December 2026)*	7.2.2 List of third countries considered trustworthy by the EU for the validation of electronic signatures	Not fulfilled	Not achieved
December 2025 (31 December 2026)*	7.2.4 Law on Information Security fully aligned with the NIS2 Directive	Fulfilled	Not achieved
December 2025 (31 December 2026)*	7.2.4 Functioning Information Security Office	Fulfilled	Achieved
December 2025 (31 December 2026)*	7.2.4 List of entities under the NIS2 Directive, coordinated vulnerability disclosure framework and crisis management framework	Not fulfilled	Not achieved
December 2025 (31 December 2026)*	7.2.4 Law on Artificial Intelligence	Not fulfilled	Not achieved
December 2025 (31 December 2026)*	9.1.1 Second complex step: revision of key electoral legislation and the secretariat of the Republic Electoral Commission	Not fulfilled	Not achieved
December 2025 (31 December 2026)*	9.2.1 Legislation envisaged following the adoption of the action plans on gender-based violence, deinstitutionalisation and national minorities	Not fulfilled	Not achieved
December 2025 (31 December 2026)*	9.2.2 Full implementation of media legislation	Not fulfilled	Not achieved
December 2025 (31 December 2026)*	9.3.1 Operational plan for financial investigations	Not fulfilled	Not achieved
December 2025 (31 December 2026)*	9.5.1 Filling vacant judge and prosecutor posts in anti-corruption units	Not fulfilled	Not achieved
December 2025 (31 December 2026)*	9.6.1 Increase in the number of elected judges and public prosecutors by 10%	Not fulfilled	Not achieved

Reform Agenda deadline (grace period until)	Reform Agenda step	Government, fourth payment request	MWG for RA
June 2026 (30 June 2027)*	6.3.1 Law on Land Consolidation adopted	Not fulfilled	Not achieved
June 2026 (30 June 2027)*	7.1.1 Transmission system operator in regional coordination centres and on EU balancing platforms	Not fulfilled	Not achieved
June 2026 (30 June 2027)*	7.1.5 Legal and institutional framework for renewables acceleration areas and permitting (Directive (EU) 2023/2413)	Not fulfilled	Not achieved
June 2026 (30 June 2027)*	7.2.3 Establishment of digital corners in more than 50 municipalities	Not fulfilled	Not achieved
June 2026 (30 June 2027)*	7.2.5 Alignment with Regulation (EU) 2020/1056 on electronic freight transport information	Not fulfilled	Not achieved
June 2026 (30 June 2027)*	8.2.1 Enrolment of children aged six months to three years in preschool education	Fulfilled	Achieved
June 2026 (30 June 2027)*	8.2.1 Enrolment of children aged three to five and a half years in preschool education	Not fulfilled	Not achieved
June 2026 (30 June 2027)*	8.2.2 Transition rates to secondary education and secondary education completion rates	Not fulfilled	Not achieved
June 2026 (30 June 2027)*	9.3.1 Track record in cases of organised crime, arms smuggling and trafficking in human beings	Not fulfilled	Not achieved
June 2026 (30 June 2027)*	9.5.1 Track record in corruption cases, including high-level corruption	Not fulfilled	Not achieved

Summary (by deadline)

Reform Agenda deadline	Number of steps	Value of steps (EUR million)	Reported as fulfilled by the Government	Steps achieved according to the MWG for RA	Steps not achieved according to the MWG for RA but reported as fulfilled by the Government	Value of steps not achieved according to the MWG for RA (EUR million)
December 2024	4	51.0	3	2	1	40.8
June 2025	10	163.1	9	5	4	101.9
December 2025	20	265.0	8	4	4	217.4
June 2026	10	197.0	1	1	0	176.6
Total	**44**	**676.1**	**21**	**12**	**9**	**536.7**

***Notes**: The grace period for the steps due in December 2024 was set by Commission Implementing Decision C(2026) 18. * According to the Government's interpretation, the grace period runs from the deadline set in the Reform Agenda (for the steps due in June 2025, it expired on 30 June 2026). "Government, fourth payment request" refers to the fourth payment request, submitted on 15 July 2026, in which the Government again reports all the steps it had previously reported that the Commission has not approved. "Fulfilled" means that the Government reports the step as fulfilled, while "Not fulfilled" means that the Government states that the step has not been fulfilled. "MWG for RA" refers to the assessment of the MWG for RA as at 31 July 2026. The table does not include the three steps due in December 2024 that the Commission approved by Implementing Decision C(2026) 18. The value of the steps is the value assigned to them in the Reform Agenda, not the amount due for payment. Totals may differ owing to rounding.*

Table 2. Reform steps due by June 2026, by policy area

Policy area	Number of steps	Achieved (MWG for RA)	Reported as fulfilled by the Government	Of which not achieved according to the MWG for RA	Approved by the European Commission
Business environment and Development of the Private Sector	8	5	7	2	0
Green Transition – energy	10	2	6	5	1
Digital Transformation	10	2	2	1	1
Human Capital	3	1	1	0	0
Fundamentals	16	5	5	1	1
Total	**47**	**15**	**21**	**9**	**3**

Notes: *"Achieved" also includes nine steps from earlier cycles (six achieved according to the First Independent Report and three approved by the Commission by Implementing Decision C(2026) 18 of 12 January 2026), whose results have been sustained. "Reported as fulfilled by the Government" refers to the fourth payment request, submitted on 15 July 2026, excluding the three steps already approved by the Commission. "Of which not achieved according to the MWG for RA" refers to steps that the Government reports as fulfilled but that the MWG for RA assesses as not achieved. By 31 July 2026, the European Commission had not assessed any subsequent payment request.*

Table 3. Reform Agenda steps that the Plan 2026 links with benchmarks in negotiating chapters

Chapter (benchmark)	Reform Agenda step (deadline)	Report on the implementation of the Plan – first quarter of 2026	Government, fourth payment request	MWG for RA
5 (1, 3)[128]	6.2.1 Transparency of projects contracted on the basis of intergovernmental agreements (June 2025)	No information on the publication of contracts	Fulfilled	Not achieved
8 (3, 4, 6)	6.2.1 Final inventory of state aid schemes (December 2024)	The state aid inventory for the period 2017-2025 was adopted by Government conclusion on 10 July 2025, after the Commission accepted it as final; an updated inventory is planned by the end of May 2026.	Fulfilled	Achieved
8 (3, 4, 6)	6.2.1 Action plan for aligning state aid schemes, approved by the Commission (June 2025)	The proposal has been updated in line with the Commission's comments (the most recent comments were submitted on 30 April 2026); a new update is under way.	Fulfilled	Achieved
10 (1)	7.2.1 Secondary legislation on 5G network security (December 2024)	No information	–	Achieved (approved by

[128] Benchmark 1 for Chapter 5 also requires the alignment with the EU acquis of international agreements that exempt certain works from the application of public procurement rules. The Reform Agenda provides for the publication of contracts concluded on the basis of intergovernmental agreements (June 2025) and for the repeal of special laws and decrees introducing derogations from public procurement legislation (June 2027), but does not provide for the alignment of the agreements themselves.

Chapter (benchmark)	Reform Agenda step (deadline)	Report on the implementation of the Plan – first quarter of 2026	Government, fourth payment request	MWG for RA
				the Commission)
10 (1)	7.2.1 Law on Broadband Communications Infrastructure (December 2025)	The draft law on measures to reduce the cost of deploying very high capacity electronic communications networks is being agreed with the Commission.	Not fulfilled	Not achieved
10 (2)	9.2.2 Amendments to the media laws and a new Law on Public Service Media (December 2024)	With the adoption of the laws in June 2025, "the Ministry has fully fulfilled the binding reform step".	Fulfilled	Not achieved (nor according to the Commission's assessment); grace period
10 (2)	9.2.2 Full implementation of media legislation (December 2025)	The REM has started publishing on its website complaints and the decisions taken on them, with reasons.	Not fulfilled	Not achieved
10 (3)	7.2.2 Alignment with the eIDAS Regulation and EU legislation on digital identity (December 2025)	A public consultation was held from December 2025 to January 2026; the draft law was submitted to the Commission for its opinion on 31 March 2026.	Not fulfilled	Not achieved
10 (3)	7.2.2 EU list of trusted third countries for the validation of electronic signatures (December 2025)	No information	Not fulfilled	Not achieved
10 (3)	7.2.3 Establishment of digital corners in more than 50 municipalities (June 2026)	No information	Not fulfilled	Not achieved
10 (3)	7.2.4 Law on Information Security fully aligned with the NIS2 Directive (December 2025)	The Law was adopted on 22 October 2025; the Commission's final assessment of alignment is expected after the adoption of the decree on the criteria for identifying operators.	Fulfilled	Not achieved
10 (3)	7.2.4 List of entities under the NIS2 Directive, coordinated vulnerability disclosure framework and crisis management framework (December 2025)	The draft decree on the criteria for identifying operators was sent to the Commission on 6 March 2026; no information on the frameworks.	Not fulfilled	Not achieved
10 (4)	7.2.4 Functioning Information Security Office (December 2025)	The Information Security Department has been established in the job classification, and all planned posts have been filled.	Fulfilled	Achieved
11 (1, 2)	6.3.1 At least 10 rural infrastructure projects financed	No information	Fulfilled	Achieved

Chapter (benchmark)	Reform Agenda step (deadline)	Report on the implementation of the Plan – first quarter of 2026	Government, fourth payment request	MWG for RA
	from the national budget and contracted (December 2025)			
11 (1, 2)	6.3.1 Law on Land Consolidation adopted (June 2026)	No information	Not fulfilled	Not achieved
14 (1)	7.2.5 Alignment with Regulation (EU) 2020/1056 on electronic freight transport information (June 2026)	The draft law has been prepared; a public consultation was planned for the period from 8 to 27 May 2026; the draft was sent to the Commission on 10 June 2026.	Not fulfilled	Not achieved
15 (2)	7.1.1 Implementation of the Electricity Integration Package (December 2024)	No information	–	Achieved (approved by the Commission)
15 (2)	7.1.1 The entire gas transmission system managed by a single certified Serbian operator (June 2025)	On 31 March 2026, the Energy Agency confirmed that Transportgas Srbija meets the conditions for certification as an independent system operator.	Fulfilled	Not achieved
15 (2)	7.1.1 Third-party access to gas infrastructure (June 2025)	No information	Fulfilled	Not achieved
15 (2)	7.1.1 Capacity allocation at Horgoš and at the border points of the interconnector with Bulgaria (June 2025)	No information	Fulfilled	Not achieved
15 (2)	7.1.1 Transmission system operator in regional coordination centres and on EU balancing platforms (June 2026)	No information	Not fulfilled	Not achieved
15 (3)	7.1.3 Just transition governance and the Just Transition Fund (December 2025)	No information	Fulfilled	Not achieved
25 (1)	6.2.2 Increased number of funded researchers and innovative companies (June 2025)	No information	Fulfilled	Achieved
25 (1)	6.2.2 Full alignment with the Regulation on the European Research Infrastructure Consortium (ERIC) (December 2025)	“Fulfilled” – the law was adopted on 3 December 2025.	Fulfilled	Achieved
27 (1)	9.2.1 Legislation envisaged following the adoption of the action plans on gender-based violence, deinstitutionalisation and national minorities (December 2025)	The Plan provided for amendments to the Criminal Code in the fourth quarter of 2025; the Ministry of Justice has continued work on the amendments.	Not fulfilled	Not achieved

Chapter (benchmark)	Reform Agenda step (deadline)	Report on the implementation of the Plan – first quarter of 2026	Government, fourth payment request	MWG for RA
27 (2)	7.1.7 Implementation of the Energy Performance of Buildings Directive (December 2025)	No information	Not fulfilled	Not achieved
27 (7)	7.1.6 Approval of monitoring plans under the MRVA package (December 2025)	No information on monitoring plans; 97 greenhouse gas emission permits have been issued.	Fulfilled	Achieved

Summary

	Steps linked to benchmarks in the Plan	Report on the implementation of the Plan provides status information	Reported as fulfilled by the Government	Steps achieved according to the MWG for RA	Steps not achieved according to the MWG for RA but reported as fulfilled by the Government
Total	27	13	14	9	7

Notes: *The table covers the steps from the Second Independent Report (due by June 2026) for which the Report on the Implementation of the Plan for the first quarter of 2026 indicates a related reform step; the order follows the structure of the Plan. The Plan also links to benchmarks steps with later deadlines or steps outside the scope of the CSWG on the Reform Agenda's report, which are not shown here. The Plan does not link 20 steps from the CSWG on the Reform Agenda's report to any benchmark, 13 of them in the Fundamentals area, as Chapters 23 and 24 are not covered by the Plan. "Government, fourth payment request": the mark "–" refers to steps approved by the Commission by Implementing Decision C(2026) 18. "No information" means that the Report on the Implementation of the Plan contains no information on that step.*

Conclusion

The Reform Agenda is being implemented with delays, mostly through closed processes and with evidence that is often not publicly available. In some cases, the Government reports the formal adoption of acts as fulfilment of reform steps, even though the Reform Agenda provides for their substantive implementation. No new funds have been released since January 2026, and the grace period for two steps in the areas of elections and the media expires on 31 December 2026, at a time when the new Government will only just be taking office. The new National Assembly and Government can reverse this trend if they immediately give priority to the steps in the grace period, implement reforms in line with what the Reform Agenda provides, starting with the publication of contracts concluded on the basis of intergovernmental agreements, and make the drafting of acts and the evidence of their fulfilment publicly available. Otherwise, Serbia risks a reduction in the funds linked to the steps not achieved, while reforms remain at the level of formally adopted acts, without the changes that the Reform Agenda was meant to bring.

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