

# WHITE

Proposals for improvement of the business environment in Serbia

# BOOK

2024

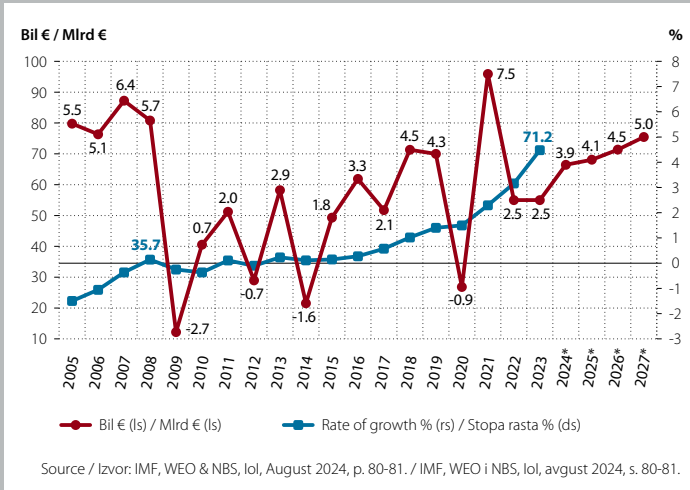
# Essentials



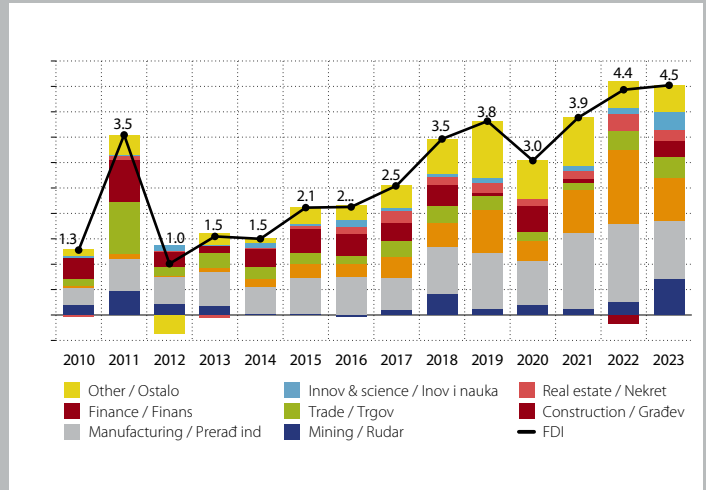
**Foreign Investors Council**

# MACRO DATA / MAKROEKONOMSKI PODACI

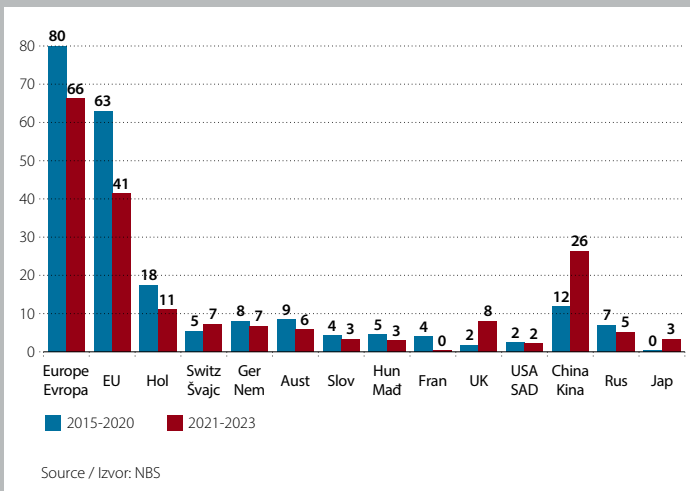
Serbian GDP level and rate of growth / Nivo i stope rasta GDP u Srbiji



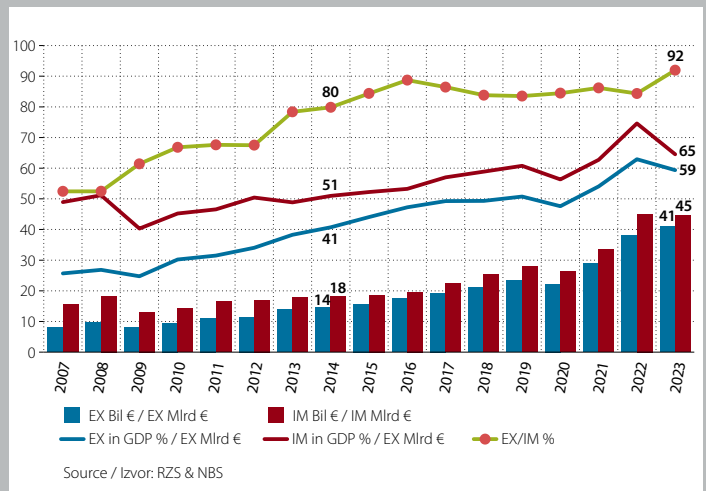
FDI inflow in Serbia (Bil €) / Priliv FDI u Srbiji (u mlrd €)



FDI inflow in Serbia by countries (%) / Priliv FDI u Srbiji po zemljama (%)



Export and import / Izvoz i uvoz



## DEAR READER,

It is our great privilege to present you this year's "The White Book Essentials" – an executive summary of the White Book edition for 2024. The White Book publication is a comprehensive overview of the business environment in Serbia, which covers a wide range of topics and provides a set of recommendations for each of them. The purpose of the "The White Book Essentials" is to shed light on the main conclusions of the publication and highlight the areas which we see as priorities for the future economic development of Serbia.

Browsing through this booklet you will be able to get acquainted with key macroeconomic data, learn what the White Book is, and familiarize yourself with the main findings of the edition for 2024. We will portray developments in the ten areas we consider priorities and provide the main recommendations on how to accelerate future progress in each of them. You will have the opportunity to inform on the Foreign Investors Council (FIC), our members, and representatives.

In order to fully embrace the era of digitalization, but also to be environment-friendly, we have opted again this year against printing the White Book publication. Instead, we invite you to scan the **QR Code below** and download this year's edition, which will also be available for free download on the FIC website ([www.fic.org.rs](http://www.fic.org.rs)).

We do hope that you will find the information and proposals presented in the "The White Book Essentials" and the White Book publication useful and that we will work together towards the joint goal of **making Serbia more competitive and economically stronger!**

**Aleksandar Ljubic**  
FIC Executive Director



By scanning the QR Code, you may  
download White Book 2024

## DRAGI ČITAOČE,

Velika nam je čast da Vam predstavimo ovogodišnju brošuru „Bela knjiga: rezime“ – rezime izdanja „Bele knjige“ za 2024. godinu. Publikacija „Bela knjiga“ daje sveobuhvatni prikaz poslovne klime u Srbiji, koji uključuje veliki broj tema i skup preporuka za svaku od njih. Svrha brošure „Bela knjiga: rezime“ je da se predstave glavni zaključci i ukaže na oblasti koje mi vidimo kao prioritete za budući ekonomski razvoj Srbije.

Prelistavajući ovu brošuru, bićete u prilici da se upoznate sa makroekonomskim pokazateljima, saznate šta je „Bela knjiga“ i koji su glavni nalazi izdanja za 2024. godinu. Predstavićemo dešavanja u deset oblasti koje smatramo prioritetima i dati glavne preporuke kako da se u svakoj od njih ubuduće ubrza napredak. Imaćete priliku da saznate više informacija o Savetu stranih investitora, našim članicama i predstavnicima.

S ciljem da uhvatimo korak sa erom digitalizacije, ali i da pokažemo odgovornost prema životnoj sredini, rešili smo ponovo ove godine da ne štampamo publikaciju „Bela knjiga“. Umesto toga, **pozivamo Vas da učitate „QR“ kod** koji se nalazi ispod i preuzmete ovogodišnje izdanje, koje je takođe dostupno za besplatno preuzimanje na internet stranici Saveta ([www.fic.org.rs](http://www.fic.org.rs)).

Nadamo se da će Vam informacije i predlozi koji su predstavljeni u brošuri „Bela knjiga: rezime“ i publikaciji „Bela knjiga“ biti korisni i da ćemo zajednički raditi na ostvarenju opšteg cilja **da Srbija postane konkurentnija i ekonomski snažnija!**

**Aleksandar Ljubić**  
izvršni direktor Saveta



Učitavanjem QR koda, možete  
preuzeti Belu knjigu 2024

# WHAT IS THE WHITE BOOK?

- An annual publication, first issued in 2003
- Gives an overview of the business climate and provides a set of recommendations on how to improve it
- Promotes EU economic integration and open market economy
- Written by FIC members, promoting their common interests
- A mechanism to create consensus among members
- A platform for dialogue with stakeholders
- Each topic has a score card which tracks the response to the recommendations given in the previous year
- Based on the score card results, each topic is given a grade, where 1 is the lowest score and 3 is the highest score
- The publication has an independent Editor-in-Chief, who also provides macroeconomic input and prepares the ranking data. The Editor for the 2024 edition is Prof. Nebojša Savić

## Structure of the White Book text

Score card tracking results in implementation of recommendations from White Book 2023.

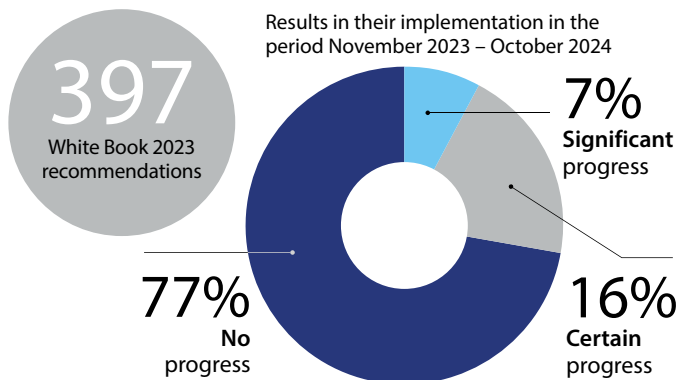


## White Book 2024 in numbers



## Recommendations

Each topic has a score card which tracks the response to the recommendations given in the previous year.



## Grades

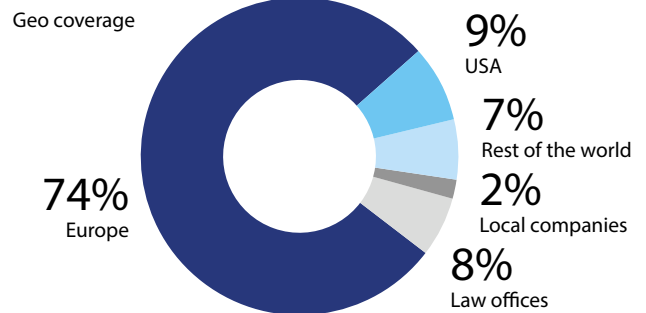
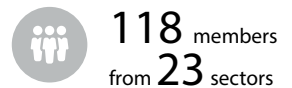
Based on the score card results, each topic is given the grade, where 1 is the lowest and 3 is the highest score.

# FIC – PARTNER FOR GROWTH

## Key characteristics and values of FIC

Independence	Regulatory expertise
Consistency	Best Practices
EU promotion	Cooperation

## Key figures



## ŠTA JE BELA KNJIGA?

- Godišnje izdanje, prvi put objavljeno 2003. godine;
- Daje prikaz poslovne klime i nudi skup preporuka za njeno unapređenje.
- Promoviše ekonomsku integraciju sa EU i otvorenu tržišnu privredu.
- Pišu je članice Saveta i promoviše njihove zajedničke interese.
- Mehanizam za stvaranje konsenzusa među članicama.
- Platforma za dijalog sa drugim akterima.
- Svaka tema je upotpunjena pregledom realizacije preporuka datih u prethodnoj godini.
- Na osnovu rezultata u realizaciji, svaka tema dobija ocenu u rasponu od 1 (najniža) do 3 (najviša).
- Publikacija se priprema uz angažman nezavisnog urednika, koji takođe daje makroekonomske podatke i priprema FIC indeks. Urednik za izdanje u 2024. godini je prof. Nebojša Savić.

### Struktura teksta iz Bele knjige

Pregled realizacije preporuka iz Bele knjige 2023.

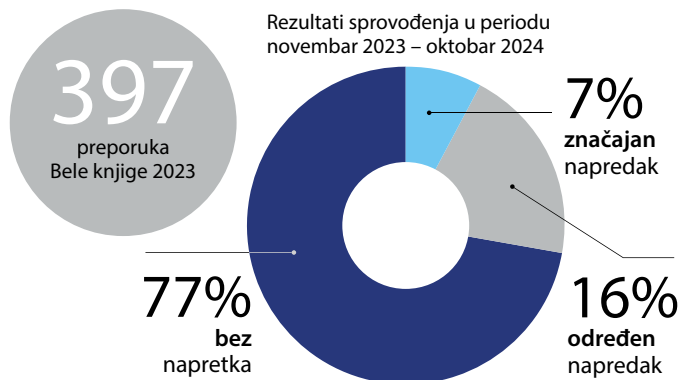


### Bela knjiga 2024. u brojevima



### Preporuke

U svakoj oblasti je dat „Pregled realizacije preporuka“ koji prati mere preduzete kao odgovor na preporuke date u prethodnoj godini.



### Ocene

Na osnovu rezultata u realizaciji, svaka tema dobija ocenu, pri čemu je 1 najniži skor, a 3 najviši skor.

## SAVET – PARTNER ZA RAST

### Ključne karakteristike i vrednosti Saveta

Nezavisnost	Regulatorna stručnost
Doslednost	Najbolje prakse
Promocija EU	Saradnja

### Ključne brojke



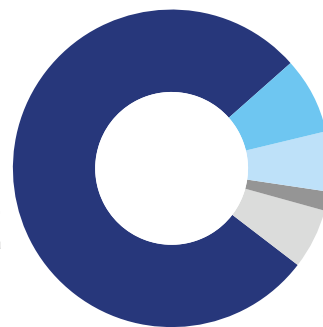
22 godina postojanja



118 članica iz 23 sektora

Geografska pokrivenost

74% Evropa



> €45 mlrd. investicija u Srbiji od strane članica Saveta



> 116,000 direktno zaposlenih u Srbiji od strane članica Saveta



9 odbora

# MAIN RECOMMENDATIONS

## Taxes

1.1

### Results in implementation of recommendations from the White Book 2023

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Taxes – total	1.10	2	3	56
Latest Developments – Parafiscals	1.00	0	0	6
Personal Income Tax	1.11	0	1	8
Value Added Tax	1.08	0	1	11
Corporate Income Tax	1.00	0	0	9
Tax Procedure	1.00	0	0	12
Property Tax	1.00	0	0	5
Customs	1.20	0	1	4
Fiscalization and E-Invoicing	1.63	2	1	5

### Positive developments

in the period Nov 2023 – Oct 2024

There were no significant improvements of the domestic tax legislation, except for the improvement of the E-Invoicing System (“SEF”) for sending, receiving, recording, processing and storing e-Invoices, in order to resolve identified problems and issues in practice.

With regard to international tax laws, Serbia concluded a Free Trade Agreement with China last year, which came into force in July this year.

### Main recommendations for the future

Organize timely public consultations around all new regulations and regular dialogue with the business community.

Resolving the most pressing tax issues like the changes to the property tax law, fair value of property for corporate income tax purposes, parafiscals, etc.

## Labour

1.09

### Results in implementation of recommendations from the White Book 2023

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Labour – total	1.09	1	2	39
Employment of Foreigners	1.67	1	0	2
Secondment Abroad	1.00	0	0	3
Staff Leasing	1.00	0	0	3
Vocational Rehabilitation and Employment of Persons with Disabilities	1.33	0	1	2
Labour Law	1.00	0	0	11
Human Capital	1.00	0	0	6
Safety and Health at Work	1.00	0	0	6
Dual Vocational Education	1.14	0	1	6

### Positive developments

in the period Nov 2023 – Oct 2024

Positive developments include implementation of simplified procedure for obtaining unified permits for residence and work of foreigners and adopting set of bylaws related to the Law on Safety and Health at Work.

### Main recommendations for the future

It is necessary to amend key labor-related laws, such as the Labor Law, and to adopt the remaining bylaws on the Law on Safety and Health at Work. The changes should facilitate the digitization of labor law documentation, introduce more flexible working conditions outside the employer’s premises, rationalize salary structure and compensation, and clarify certain grounds for employment termination.

## Porezi

1,1

### Rezultati u sprovođenju preporuka iz „Bele knjige 2023“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Porezi – ukupno	1,10	2	3	56
Najnovije tendencije – parafiskalni nameti	1,00	0	0	6
Porez na dohodak građana	1,11	0	1	8
Porez na dodatu vrednost	1,08	0	1	11
Porez na dobit pravnih lica	1,00	0	0	9
Poreski postupak	1,00	0	0	12
Porez na imovinu	1,00	0	0	5
Carine	1,20	0	1	4
Fiskalizacija i E-fakturisanje	1,63	2	1	5

### Poboljšanja

u periodu novembar 2023 – oktobar 2024.

Nije bilo bitnih izmena domaćih poreskih propisa, osim u vezi sa unapređenjem rada Sistema elektronskih faktura („SEF“) preko koga se vrši slanje, prijem, evidentiranje, obrada i čuvanje e-faktura, i otklanjanjem uočenih problema i poteškoća u praksi.

Što se tiče međunarodnih propisa, Srbija je prošle godine zaključila Sporazum o slobodnoj trgovini sa Kinom koji je u julu ove godine stupio na snagu.

### Glavne preporuke za budućnost

Organizovati pravovremene javne rasprave o svim novim propisima uz redovan dijalog sa poslovnom zajednicom.

Neophodno je pristupiti rešavanju najznačajnijih poreskih pitanja i kontinuiranih problema poput izmena poreza na imovinu, vrednovanja imovine po fer vrednosti za svrhe poreza na dobit i uvođenja parafiskala i dr.

## Radna snaga

1,09

### Rezultati u sprovođenju preporuka iz „Bele knjige 2023“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Rad – ukupno	1,09	1	2	39
Rad stranaca	1,67	1	0	2
Privremeni rad u inostranstvu	1,00	0	0	3
Iznajmljivanje radne snage	1,00	0	0	3
Zapošljavanje osoba sa invaliditetom	1,33	0	1	2
Zakon o radu	1,00	0	0	11
Ljudski kapital	1,00	0	0	6
Bezbednost i zdravlje na radu	1,00	0	0	6
Dualno obrazovanje	1,14	0	1	6

### Poboljšanja

u periodu novembar 2023 – oktobar 2024.

Značajna poboljšanja uključuju početak primene pojednostavljenog procesa dobijanja jedinstvene dozvole za boravak i rad, kao i usvajanje dela podzakonskih akata koji prate Zakon o bezbednosti i zdravlju na radu.

### Glavne preporuke za budućnost

Neophodno je izmeniti ključne zakone u oblasti rada, poput Zakona o radu, te doneti sva podzakonska akta koja se odnose na bezbednost i zdravlje na radu. Izmene bi trebalo da omoguće digitalizaciju u administriranju radnopravnih dokumenata, fleksibilnije uslove rada van prostorija poslodavca, racionalizaciju strukture i obračuna zarade, preciziranja u pogledu pojedinih osnova prestanka radnog odnosa.

## Digitalization and E-Commerce

2.29

### Results in implementation of recommendations from the White Book 2023

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Digitalization & E-Commerce	2.29	3	3	1

### Positive developments in the period Nov 2023 – Oct 2024

All businesses in Serbia have been assigned a unique eMailbox (eSanduče) linked to their business address registered with the Business Registers Agency (APR).

As part of the Open Balkan initiative, the "Open Balkan Identification Number" was made available on the eUprava portal - Serbian citizens with a digital identity on the portal can generate this identifier, which can be used for e-Government services in North Macedonia and Albania and vice versa.

Work has begun on the Strategy for the Development of Artificial Intelligence in the Republic of Serbia for the period 2024-2030, on amendments to the Law on Electronic Government and the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business.

In the financial services sector, the trend of further development of digital services and regulatory solutions that enable further modernization and digitization (open banking, reliable user authentication, digitization of bills of exchange) continued.

### Main recommendations for the future

Increase information security within public administration and state-owned enterprises to ensure the uninterrupted functioning of these entities and prevent the misuse of citizens' data.

Enact a new Law on Information Security and align it with the EU's NIS2 Directive.

Pass a Law on Artificial Intelligence that will regulate the application of this technology in a way that promotes innovation while respecting human rights and freedoms.

Reduce the costs of electronic archiving of business documents by amending the regulations in the direction of exempting the largest part of business documents as they are not of importance for culture, art, science and other categories of the Law on archival material and archival activities.

## Real Estate

1.23

### Results in implementation of recommendations from the White Book 2023

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Real Estate – total	1.23	0	6	20
Construction Land and Development	1.33	0	2	4
Restitution	1.33	0	1	2
Cadastral Procedure	1.23	0	3	10
Mortgages and Real Estate Financial Leasing	1.00	0	0	4

### Positive developments in the period Nov 2023 – Oct 2024

Amendments to the Law on Planning and Construction abolished the conversion of construction land with a fee for certain subjects, defined the concept of "green construction" and other elements of the green agenda, introduced the "E-space" system, which is expected to facilitate the process of issuing building permits and other necessary approvals.

The Republic Geodetic Authority has continued to work intensely on the digitalization of procedures. Additional improvements are noticeable - instructions and forms were published on the Cadastre website with the possibility of monitoring the status of the case, the use of the "estimated value of real estate" service was made possible, the work on improving the software continued, the creation of the infrastructure cadastre is planned...

### Main recommendations for the future

Issuance of construction permits within a consolidated procedure with the appropriate content that will enable property rights registration without additional time and cost for obtaining additional specific documentation, and their implementation ex officio.

It is necessary to continue intensive work in order to achieve uniformity of practice and clear application of the law for further acceleration of operations and predictability of cadastral procedures, as well as to find a systemic solution as soon as possible for resolving all backlogged first- degree and second-degree cases.

It is necessary to amend the Legalization Law, the Law on Mortgage and the Law on Financial Leasing.



## Digitalizacija i elektronsko poslovanje

2,29

### Rezultati u sprovođenju preporuka iz „Bele knjige 2023“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Digitalizacija i elektronsko poslovanje	2,29	3	3	1

### Poboljšanja

u periodu novembar 2023 – oktobar 2024.

Sva privredna društva u Srbiji dobila su jedinstveno eSanduče koje je povezano sa adresom privrednog društva registrovanom kod APR-a.

U okviru regionalne inicijative Otvoreni Balkan, na portalu eUprava omogućena je usluga „identifikacioni broj Otvorenog Balkana - državljani Srbije koji imaju digitalni identitet na portalu, mogu da generišu ovaj identifikator koji će koristiti za servise e-uprave u Severnoj Makedoniji i Albaniji i obrnuto.

Započet je rad na Strategiji razvoja veštačke inteligencije u Republici Srbiji za period 2024-2030. godine, na izmenama i dopunama Zakona o elektronskoj upravi, Zakona o elektronskom dokumentu, elektronskoj identifikaciji i uslugama od poverenja u elektronskom poslovanju.

U sektoru finansijskih usluga nastavljen je trend daljeg razvoja digitalnih servisa i regulatornih rešenja koji omogućavaju dalju modernizaciju i digitalizaciju (open banking, pouzdana autentifikacija korisnika, digitalizacija menice...).

### Glavne preporuke za budućnost

Povećanje informacione bezbednosti državne uprave i javnih preduzeća kako bi se omogućilo nesmetano funkcionisanje ovih subjekata i sprečavanje zloupotrebe podataka građana.

Donošenje novog Zakona o informacionoj bezbednosti i usklađivanje sa NIS2 Direktivom Evropske unije.

Donošenje Zakona o veštačkoj inteligenciji koji će regulisati primenu ove tehnologije tako da se omogući dalji razvoj inovacija uz poštovanje ljudskih prava i sloboda

Smanjiti troškove elektronskog arhiviranja dokumentacije privrednih društava kroz izmenu propisa u pravcu izuzimanja najvećeg dela poslovne dokumentacije jer ista nije od značaja za kulturu, umetnost, nauku i druge kategorije Zakona o arhivskoj građi i arhivskog delatnosti.

## Nekretnine i izgradnja

1,23

### Rezultati u sprovođenju preporuka iz „Bele knjige 2023“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Nekretnine i izgradnja – ukupno	1,23	0	6	20
Građevinsko zemljište i izgradnja	1,33	0	2	4
Restitucija	1,33	0	1	2
Katarstarski postupak	1,23	0	3	10
Hipoteke i finansijski lizing nekretnina	1,00	0	0	4

### Poboljšanja

u periodu novembar 2023 – oktobar 2024.

Izmenama i dopunama Zakona o planiranju i izgradnji, ukinuta je konverzija građevinskog zemljišta uz naknadu za određene subjekte, definisan je koncept “zelene gradnje” i drugi elementi zelene agende, uveden je sistem “E-prostor” od kog se očekuje da će olakšati procese izdavanja građevinskih dozvola i drugih neophodnih saglasnosti.

Republički geodetski zavod je nastavio da intenzivno radi na digitalizaciji procesa. Vidljiva su i dodatna poboljšanja - na sajtu RGZ objavljene su instrukcije, forme uz mogućnost praćenja statusa predmeta, omogućeno je korišćenje usluge “procenjene vrednosti nepokretnosti”, nastavljen je rad na unapređenju softvera, planirano je formiranje katastra infrastrukture...

### Glavne preporuke za budućnost

Izdavanje građevinskih dozvola u postupku objedinjene procedure u odgovarajućoj sadržini koja će omogućiti upis prava svojine bez dodatnog gubitka vremena i trošenja sredstava radi pribavljanja dodatne dokumentacije i njihovo sprovođenje po službenoj dužnosti.

Potrebno je nastaviti sa intenzivnim radom radi postizanja ujednačenosti prakse i jasne primene zakona radi dodatnog ubrzanja i predvidljivosti katastarskih procedura, kao i u što kraćem roku pronaći sistemsko rešenje kako bi se rešili svi zaostali prvostepeni i drugostepeni predmeti.

Potrebno je izmeniti Zakon o ozakonjenju, Zakon o hipoteci i Zakon o finansijskom lizingu.

## Illicit Trade and Inspection Control

1.29

### Results in implementation of recommendations from the White Book 2023

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Illicit Trade and Inspection Control	1.29	0	2	5

### Positive developments in the period Nov 2023 – Oct 2024

Government of Republic of Serbia adopted Programme for Suppressing Grey Economy in 2023-2025 and Action Plan for the Implementation of the Programme for Suppressing the Grey Economy in 2023-2024.

The system for electronic exchange of invoices (e-invoices), fully implemented since 1 January 2023, as well as previous introduction of the e-fiscalization, contributed to the fight against grey economy.

### Main recommendations for the future

Introduce the specialization of judges for misdemeanor offences in business.

Establishing a system of reporting on the measures and effects of Action Plans (flowcharts), while communicating the results of controls to stakeholders from the economy.

Improve the level of fiscal burden on businesses operating in the Republic of Serbia with further regulation of parafiscal charges by creating a registry of fees payable by businesses.

## Food and Agriculture

1.00

### Results in implementation of recommendations from the White Book 2023

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Food and Agriculture – total	1.00	0	0	15
Food Safety Law	1.00	0	0	7
Food and Food Contact Material Inspections	1.00	0	0	4
Quality and Labelling of Food Products	1.00	0	0	4

### Positive developments in the period Nov 2023 – Oct 2024

No improvements were noted in Food and Agriculture area.

### Main recommendations for the future

Ensure alignment of Food Safety Law and regulations with EU regulatory framework (178/2002/EC).

Implement transparent and thorough risk analysis system for all inspection services, supported by functional IT system and digital supervision.

Standardize inspection procedures with a uniform rulebook.

Adopt new Sanitary Supervision Law and regulations for inspection work, aligning aligned with the Law on Inspection Supervision and EU regulations, as well as a Law on Official Controls based on Regulation (EU) 2017/625.

Incorporate regenerative agricultural practices into national agricultural and rural development laws and strategic documents.

## Borba protiv nedozvoljene trgovine i inspeksijski nadzor

1,29

### Rezultati u sprovođenju preporuka iz „Bele knjige 2023“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Borba protiv nedozvoljene trgovine i inspeksijski nadzor	1,29	0	2	5

### Poboljšanja

u periodu novembar 2023 – oktobar 2024.

Vlada Republike Srbije je usvojila Program za suzbijanje sive ekonomije 2023-2025. godine i Akcioni plan za sprovođenje Programa za suzbijanje sive ekonomije 2023-2024. godine.

Sistem za elektronsku razmenu faktura (e-faktura), koji je u punoj primeni od 1. januara 2023. godine, kao i prethodno uvođenje e-fiskalizacije, doprineli su borbi protiv sive ekonomije.

### Glavne preporuke za budućnost

Uvesti specijalizaciju sudija za prekršaje u privredi.

Uspostaviti sistem izveštavanja o merama i efektima Planova aktivnosti (hodograma), a rezultate kontrola komunicirati sa zainteresovanim stranama iz privrede.

Unaprediti sistem fiskalnog opterećenja za preduzeća koja posluju u Republici Srbiji izradom registra važećih naknada, u cilju dalje kontrole parafiskalnih nameta.

## Hrana i poljoprivreda

1,00

### Rezultati u sprovođenju preporuka iz „Bele knjige 2023“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Hrana i poljoprivreda – ukupno	1,00	0	0	15
Zakon o bezbednosti hrane	1,00	0	0	7
Inspekcije za hranu i materijale u kontaktu sa hranom	1,00	0	0	4
Kvalitet i deklarisanje prehrambenih proizvoda	1,00	0	0	4

### Poboljšanja

u periodu novembar 2023 – oktobar 2024.

Nije zabeležen napredak u oblasti hrane i poljoprivrede.

### Glavne preporuke za budućnost

Obezbediti usklađenost Zakona o bezbednosti hrane i propisa sa regulatornim okvirom EU (178/2002/EC).

Implementirati transparentan i sveobuhvatan sistem analize rizika za sve inspeksijske službe, podržan funkcionalnim IT sistemom i digitalnim nadzorom.

Standardizovati procedure inspeksijskih službi donošenjem jedinstvenog pravilnika.

Usvojiti novi Zakon o sanitarnom nadzoru i propise za inspeksijski rad, usklađene sa Zakonom o inspeksijskom nadzoru i propisima EU, kao i Zakon o službenim kontrolama po ugledu na uredbu (EU) 2017/625.

Ugraditi regenerativne poljoprivredne prakse u nacionalne zakone o poljoprivredi i ruralnom razvoju i strateške dokumente.

## Environmental Regulations

1.55

### Results in implementation of recommendations from the White Book 2023

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Environmental Regulations	1.55	1	4	6

### Positive developments

in the period Nov 2023 – Oct 2024

Serbia has made several important steps forward in its environmental and climate agenda.

Notable achievements include the adoption of the Low Carbon Development Strategy for 2023-2030 and NECP as an essential step toward aligning Serbia with EU climate goals and improving its overall energy security and sustainability.

First Air Protection Programme for 2022-2030 was adopted, as well as a Programme for the Development of the Circular Economy, Amendments to the Law on Waste Management.

### Main recommendations for the future

Complete the transposition of the EIA and SEA Directives.

The draft Laws on EIA and SEA should be adopted promptly to ensure alignment with EU standards

Serbia must accelerate the implementation of its air quality plans and strengthen monitoring systems to reduce air pollution levels.

Improve waste management practices - efforts to increase waste sorting at the source should be expanded, and illegal dumpsites must be eradicated.

Improve enforcement and monitoring - strengthening the administrative capacity of both national and local institutions is crucial, particularly for inspectorates and the judiciary.

Invest in nature protection and biodiversity - institutional and human resource capacity in the area of nature protection must be strengthened, namely at the local level.

## Foreign Exchange Regulations

1.33

### Results in implementation of recommendations from the White Book 2023

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Foreign Exchange Regulations	1.33	1	1	7

### Positive developments

in the period Nov 2023 – Oct 2024

Positive trend introduced by the National Bank of Serbia (NBS) by publishing its responses on frequently asked forex questions on its website should be continued as it significantly contributes to legal certainty.

### Main recommendations for the future

Amend the Law to implement already published interpretations by the NBS with relaxation of positivistic manner of setting Law provisions.

In the context of the ongoing integration processes in the region, the regime within Open Balkan area should be gradually liberalised, at least at the same level as awarded in relations with the non-residents from the EU, especially as statistically the highest number of mother companies are seated in the Republic of Serbia which enables easier control important for macroeconomic monitoring.

Further relaxation of administrative requirements (e.g., delivering of documentation via e-mail instead in hard copy), and particularly switching to ex post reporting of cross-border financial loans.

Simplify the set-off rules for all types of current and capital transactions and allow, with prescribing adequate conditions, cash pooling between affiliated parties

## Zaštita životne sredine

1,55

### Rezultati u sprovođenju preporuka iz „Bele knjige 2023“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Zaštita životne sredine	1,55	1	4	6

### Poboljšanja

u periodu novembar 2023 – oktobar 2024.

Srbija je napravila nekoliko važnih koraka napred u svojoj ekološkoj i klimatskoj agendi.

Značajna dostignuća uključuju usvajanje Strategije niskougljeničnog razvoja do 2030. godine i Integrisanog nacionalnog energetskeg i klimatskog plana kao suštinski korak ka usklađivanju Srbije sa klimatskim ciljevima EU i poboljšanju njene ukupne energetske bezbednosti i održivosti

Usvojen prvi Program zaštite vazduha za 2022-2030, Program razvoja cirkularne ekonomije, Izmene i dopune Zakona o upravljanju otpadom

### Glavne preporuke za budućnost

Završiti transpoziciju EIA i SEA direktiva.

Nacrt zakona o proceni uticaja na životnu sredinu i procenu uticaja na životnu sredinu treba brzo usvojiti kako bi se obezbedila usklađenost sa standardima EU

Srbija mora da ubrza primenu svojih planova za kvalitet vazduha i ojača sisteme praćenja kako bi smanjila nivoe zagađenja vazduha

Poboljšati praksu upravljanja otpadom – pojačati napore da se poveća sortiranje otpada na izvoru, a ilegalne deponije moraju biti iskorenjene.

Unapređenje primene i nadzora – Jačanje administrativnih kapaciteta nacionalnih i lokalnih institucija je od ključnog značaja, posebno za inspektorate i pravosuđe

Ulagati u zaštitu prirode i biodiverzitet – potrebno je ojačati institucionalne i kadrovske kapacitete u oblasti zaštite prirode, i to na lokalnom nivou.

## Devizno poslovanje

1,33

### Rezultati u sprovođenju preporuka iz „Bele knjige 2023“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Devizno poslovanje	1,33	1	1	7

### Poboljšanja

u periodu novembar 2023 – oktobar 2024.

Positivan trend uveden je kada je NBS otpočela sa objavljivanjem na svojoj web-stranici odgovora na najčešće postavljena pitanja o primeni propisa o deviznom poslovanju (koji su ažurirani u prethodnom periodu) što značajno doprinosi pravnoj sigurnosti i potrebno ga je kontinuirano nastaviti u budućnosti.

### Glavne preporuke za budućnost

Izmene Zakona u smislu implementacije izdatih tumačenja NBS uz ublažavanje pozitivističkog načina definisanja odredbi Zakona.

U kontekstu trenutnih procesa regionalne integracije, režim za zemlje u regionu Otvorenog Balkana treba da bude postepeno liberalizovan, bar na nivou koji je dostupan nerezidentima iz zemalja članica EU, posebno imajući u vidu da je procentualno najveći broj majki kompanija u Republici Srbiji čime je olakšana kontrola važna za makroekonomsko praćenje.

Dalje ublažavanje administrativnih zahteva (npr. dostavljanje dokumentacije putem e-mail-a umesto u papiru), a posebno preći na naknadno izveštavanje o prekograničnim finansijskim kreditima.

Pojednostaviti pravila o prebijanju potraživanja za sve vrste tekućih i kapitalnih poslova i dozvoliti, uz propisivanje adekvatnih uslova, udruživanje novčanih sredstava odnosno salda na računima („cash-pooling“) između povezanih lica.

## Pharmaceuticals

1.70

### Results in implementation of recommendations from the White Book 2023

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Pharmaceuticals	1.70	3	8	9

### Positive developments

in the period Nov 2023 – Oct 2024

The trend of availability of innovative medicines is encouraging, but the introduction of innovative medicines to the Reimbursement List should not be a one-time investment. It is necessary to ensure that funds for therapies are provided continuously every year.

Off-label use of medications has been enabled, allowing the NHIF to cover the cost of using a single medication to treat diseases for which it is not registered. This has increased the number of therapeutic options for various diseases.

Continuation of activities on the digitalization of healthcare and the establishment of the Republic Integrated Health Information System (RIZIS).

ALIMS is actively continuing the digital transformation of regulatory processes in the field of medicines by introducing and launching RIMS (Regulatory Information Management System)

### Main recommendations for the future

The Government should provide steady funding for innovative medicines and generic medicines while expanding the indications through a special-purpose transfer of budget funds to NHIF.

NHIF should ensure the acquisition of the funds required from the central budget for introducing new medicines on the Reimbursement List.

The Ministry of Health should work continuously, together with the Ministry of Finance and the NHIF, on securing additional funds from the budget of the Republic of Serbia with the aim of including new therapies on the NHIF Reimbursement List.

## Tourism and Hospitality

1.00

### Results in implementation of recommendations from the White Book 2023

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Tourism and Hospitality	1.00	0	0	6

### Positive developments

in the period Nov 2023 – Oct 2024

During 2023, the development of a new strategic framework for the Serbian tourism sector was initiated, especially defining market positioning, vision, mission, growth goals, challenges/opportunities, etc. whose adoption is expected in the upcoming period.

### Main recommendations for the future

Adoption of new Tourism Development Strategy with a change in the management concept of tourist destinations.

Adoption of the new Strategic Tourism Marketing Plan with a clearly defined Action Plan (KPIs, responsible persons/institutions, implementation deadlines, etc.).

Introduction of a new methodology for assessing the foreign exchange inflow of the tourist economy through the application of the methodology of tourism satellite accounts;

Amendments to the Law on Simplified Working in Seasonal Affairs in certain activities in the direction of the circle extensions on the tourism sector and hospitality;

Amendments to the Law on Value Added Tax to expand activities that would be taxed at a special, reduced rate to increase tourism destination competitiveness of Serbia;

Amendments to the Law on Copyright regarding the method of determining the Copyright and related rights tariff in hospitality;

Suppression of the high level of the grey economy in the individual accommodation services segment which allows unfair competition for facilities that work legally.

## Farmaceutska industrija

1,70

### Rezultati u sprovođenju preporuka iz „Bele knjige 2023“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Farmaceutska industrija	1,70	3	8	9

### Poboljšanja

u periodu novembar 2023 – oktobar 2024.

Trend dostupnosti inovativnih lekova je ohrabrujući, ali uvođenje inovativnih lekova na Listu lekova ne bi trebalo da bude jednokratno ulaganje, već je neophodno da se sredstva za terapije obezbeđuju kontinuirano svake godine.

Omogućena je off label primena lekova čime je dozvoljeno da se o trošku RFZO jednim lekom leče i bolesti za koje on nije registrovan, što je povećalo broj terapijskih opcija za različite bolesti.

Nastavak aktivnosti na digitalizaciji u zdravstvu i uspostavljanju Republičkog integrisanog zdravstvenog informacijskog sistema (RIZIS).

ALIMS aktivno nastavlja sa digitalnom transformacijom regulatornih procesa u oblasti lekova uvođenjem i puštanjem u rad RIMS-a (Regulatory Information Management System).

### Glavne preporuke za budućnost

Obezbediti stabilno finansiranje inovativnih lekova kao i generičkih lekova uz proširenje indikacija namenskim transferom budžetskih sredstava prema RFZO i time nadomesti očigledan manjak istih u finansijskom planu RFZO-a.

RFZO treba da osigura dobijanje iz centralnog budžeta potrebnih sredstava za uvođenje novih lekova na Listu lekova.

Ministarstvo zdravlja treba da zajedno sa Ministarstvom finansija i RFZO kontinuirano radi na obezbeđivanju dodatnih finansijskih sredstava iz Budžeta Republike Srbije, u cilju stavljanja novih terapija na Listu lekova RFZO.

## Turizam i ugostiteljstvo

1,00

### Rezultati u sprovođenju preporuka iz „Bele knjige 2023“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Turizam i ugostiteljstvo	1,00	0	0	6

### Poboljšanja

u periodu novembar 2023 – oktobar 2024.

Tokom 2023. godine pokrenut je razvoj novog strateškog okvira za sektor turizma u Srbiji, posebno definisanje tržišnog pozicioniranja, vizije, misije, ciljeva rasta, izazova/mogućnosti itd., čije se usvajanje očekuje u narednom periodu.

### Glavne preporuke za budućnost

Donošenje nove Strategije razvoja turizma uz promenu koncepta upravljanja turističkim destinacijama.

Donošenje novog Strateškog marketing plana turizma sa jasno definisanim Akcionim planom (KPIs, odgovorne osobe/institucije, rokovi realizacije i dr.).

Uvođenje nove metodologije za procenu deviznog priliva sektora turizma kroz primenu metodologije satelitskih računa u turizmu;

Izmene i dopune Zakona o pojednostavljenom radu u sezonskim poslovima u pojedinim delatnostima u pravcu proširenja obuhvaćenih delatnosti na sektor turizma i ugostiteljstva;

Izmene Zakona o porezu na dodatu vrednost radi proširenja delatnosti koje bi se oporezovale po posebnoj, sniženoj stopi radi povećanja konkurentnosti Srbije kao turističke destinacije;

Izmene i dopune Zakona o autorskom i srodnim pravima u pogledu načina utvrđivanja visine tarife za autorska i srodna prava u sektoru ugostiteljstva;

Suzbijanje visoke stope sive ekonomije u turizmu i ugostiteljstvu sa akcentom na segment fizičkih lica pružalaca usluga smeštaja.

# FIC COMMITTEES

The Committees are the core bone of FIC and most credited for the White Book preparation. They are the platform where FIC members exchange ideas, share best practices, and jointly formulate proposals how to overcome existing regulatory obstacles. Currently, 9 committees operate within FIC:

## Anti-Illicit Trade & Food Committee

Aim of the Committee is to improve the regulatory framework related to the food and agriculture industries and intensify the fight against illicit trade through regulatory changes and better law enforcement.

## Financial Services Committee

This Committee is dedicated to improving the regulatory environment for financial services in Serbia to modernize the market and facilitate economic growth with focus on digitalization, capital market, prevention of money laundering, insurance and leasing.

## Human Resources Committee

Mission of the Committee is to work on proposals for removing obstacles faced by investors in HR area and labour regulations, to make suggestions on how to enhance the quality of the human resources in the country stretching its portfolio from managing to educational aspects of the HR policies.

## Infrastructure & Real Estate Committee

Committee's activities are aimed at improvement and modernization the framework for development of the infrastructure and real estate, energy, and transportation. This includes advocating for the implementation of the strategies, development and coming up with new proposals to modernize regulatory framework.

## Legal Committee

The Legal Committee focuses on the analysis of general legal framework in Serbia. Aim of this cross-sectoral Committee is to advocate for improvement of the overall legal framework by closely monitoring the work of Serbian authorities and generating proposals for its improvement.

## Pharma Industry Committee

Aim of this sectoral Committee is to promote the needed reforms of the health sector, health insurance model and advocate for the full harmonization of legislation with the EU and removing legislative obstacles.

## Taxation Committee

Taxation Committee, that gathers members from virtually all fields, contributes to upgrading tax system to align it with international practices and OECD guidelines and improve consistency in implementation and work of the Tax Administration.

## Telecommunications & Digital Economy Committee

Aim of this Committee is to advocate for the improvement of the investment climate in the sector of Telecommunications, for removing legislative and other barriers for further development of e-Commerce and digital services and to promote new business models.

## Tourism and Hospitality Committee

The main focus of the Tourism & Hospitality Committee is the need for improvement of the regulatory framework, as well as tourism governance, and advance a cross-cutting government approach, including innovative solutions and effective coordination of all objectives under a shared vision of improved destination competitiveness.



# ODBORI SAVETA STRANIH INVESTITORA

Odbori su okosnica rada Saveta i najzaslužniji za pripremu Bele knjige, platforme na kojoj članovi Saveta razmenjuju ideje, dele najbolje prakse i zajednički formulišu predloge kako da se prevaziđu postojeće regulatorne prepreke. Trenutno u okviru Saveta radi 9 odbora:

## Odbor za borbu protiv nedozvoljene trgovine i hranu

Cilj odbora je unapređenje regulatornog okvira koji se odnosi na prehrambenu industriju i poljoprivredu, kao i intenziviranje borbe protiv nedozvoljene trgovine kroz regulatorne promene i efikasnije sprovođenje zakona.

## Odbor za finansijske usluge

Odbor je posvećen unapređenju regulatornog okvira sektora finansijskih usluga u Srbiji kako bi se modernizovalo tržište i omogućio ekonomski rast sa fokusom na digitalizaciju, tržište kapitala, sprečavanje pranja novca, osiguranje i lizing.

## Odbor za ljudske resurse

Misija odbora je da radi na predlozima za otklanjanje prepreka sa kojima se suočavaju investitori u oblasti ljudskih resursa i radnopravnoj regulativi, daje sugestije za unapređenje kvaliteta ljudskih resursa u zemlji proširujući svoj portfolio od upravljanja do obrazovnih aspekata HR politika.

## Odbor za infrastrukturu i građevinarstvo

Aktivnosti odbora su usmerne ka unapređenju i modernizaciji okvira za razvoj infrastrukture i građevinarstva, energetike i saobraćaja. To uključuje zalaganje za implementaciju strategija, razvoj i kreiranje novih predloga sa ciljem modernizacije regulatornog okvira.

## Pravni odbor

Pravni odbor se fokusira na analizu opšteg pravnog okvira u Srbiji. Cilj ovog međusektorskog odbora je zalaganje za unapređenje sveukupnog pravnog okvira putem pažljivog monitoringa rada srpskih vlasti, kao i generisanje predloga za njegovo dalje unapređenje.

## Odbor za farmaceutsku industriju

Cilj ovog sektorskog odbora je promovisanje potrebnih reformi zdravstvenog sektora, modela zdravstvenog osiguranja i zalaganje za punu harmonizaciju zakonodavstva sa EU, kao i uklanjanje zakonodavnih prepreka.

## Poreski odbor


Poreski odbor, koji okuplja članove iz gotovo svih oblasti privrede, značajno doprinosi unapređenju poreskog sistema sa ciljem njegovog daljeg usklađivanja sa međunarodnom praksom i smernicama OECD-a, kao i poboljšanju doslednosti u primeni i radu Poreske uprave.

## Odbor za telekomunikacije i digitalnu ekonomiju

Cilj ovog odbora je da se zalaže za unapređenje investicione klime u sektoru telekomunikacija, za uklanjanje zakonskih i drugih barijera za dalji razvoj e-trgovine i digitalnih usluga, kao i za promociju novih poslovnih modela.

## Odbor za turizam i ugostiteljstvo

Ključni fokus odbora za turizam i ugostiteljstvo je na poboljšanju regulatornog okvira, ali i upravljanja turizmom i unapređenje međusektorskog vladinog pristupa, uključujući inovativna rešenja i efektivnu koordinaciju svih ciljeva radi ostvarivanja zajedničke vizije unapređene konkurentnosti destinacije.

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sladara soufflet  
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