



Funded by  
the European Union



SERBIA

# Reform Agenda Update - Reform Monitor

2<sup>ND</sup> SEMESTER, 2025



# Reform Agenda Update - Reform Monitor

**Serbia - 2<sup>ND</sup> SEMESTER, 2025**

Publisher:

**European Policy Centre - CEP**

Author:

**Marko Todorović, CEP**

Editor:

**Stefan Ristovski, European Policy Institute - EPI**

Design:

**Relativ**

Belgrade, March, 2026

This publication was funded by the European Union. Its contents are the sole responsibility of European Policy Centre - CEP and the Think for Europe Network, and do not necessarily reflect the views of the European Union.

# CONTENTS

INTRODUCTORY NOTE	04
KEY FINDINGS & RECOMMENDATIONS	05
RGF PROCESS MONITORING: LEGAL AND INSTITUTIONAL ARRANGEMENTS	08
REFORM AGENDA IMPLEMENTATION (SEMESTER 2, 2025) REFORMS IN FOCUS: REFORM MONITOR POLICY DOMAINS	12
RULE OF LAW AND FUNDAMENTAL RIGHTS	14
JUDICIAL REFORMS	14
ANTI-CORRUPTION	16
FIGHT AGAINST ORGANISED CRIME	19
DIGITAL TRANSITION	25
DIGITAL PUBLIC SERVICES	25
CYBER SECURITY	29
ENERGY AND GREEN TRANSITION	33
ENERGY EFFICIENCY	33
RENEWABLES	35
HUMAN CAPITAL	37
VOCATIONAL EDUCATION AND TRAINING	37
BUSINESS ENVIRONMENT AND PRIVATE SECTOR DEVELOPMENT	38
COMPETITION POLICY AND STATE AID	38
STATE- STATE- OWNED ENTERPRISES (SOES)	41

This publication is part of the “Reform Agenda Updates” series, national monitoring reports tracking the implementation of Reform Agendas under the Reform and Growth Facility for the Western Balkans, within the Reform Monitor project.

The “Reform Agenda Updates” assessment focuses on the implementation progress of country-specific obligations under the RGF. Monitoring is conducted through a set of procedural, reform implementation, and financial indicators. The core of the monitoring exercise tracks reform steps with defined deadlines, assessing their implementation status based on publicly available evidence and official documentation obtained from national authorities, and, where relevant, complemented by information from independent institutions and civil society sources. Cross-cutting attention is given to stakeholder participation and transparency.

The monitoring exercise covers selected reforms organised into so-called “policy domains,” created by coding the sub-areas of the harmonised policy areas in the Reform Agendas. The selected policy domains, which enable regional-level analyses, benchmarking, and comparability, are supported by the available human resources and the thematic expertise of the TEN network.

For methodological notes and the reform steps selection process, see the draft methodology note at the [link](#).

The Reform Agenda Update is structured as follows. The Key findings and recommendations provide a high-level summary. The Legal and Institutional Arrangements and Requests and Release of Funds sections monitor overall progress in the procedural and financial aspects of implementing the Reform Agenda. The last section, *Reforms in Focus: Reform Monitor policy domains*, provides independent monitoring findings on selected reforms. Here, each section provides a narrative snapshot of progress and obstacles in implementing Serbia’s Reform Agenda.

The cut-off date for data collection and assessment for this update is 31 December 2025. Further policy developments may shift the status of currently pending reforms and will be reflected in subsequent updates.

These monitoring updates are not a substitute for the European Commission’s formal assessment role.



The monitoring findings indicate partial progress in implementing reforms under Serbia's Reform Agenda. While some reform steps have advanced, many reforms remain incomplete or only partially implemented. For 7 of the 17 monitored reform steps, the grace period has already been triggered, increasing the risk that final deadlines may be missed and funds linked to those milestones could be lost.

By the end of December 2025, Serbia had not yet received any disbursements under the Reform and Growth Facility, other than pre-financing, despite having fulfilled key procedural requirements, including establishing the necessary legal and institutional arrangements and submitting payment requests on time. The extended period for the Commission's assessment suggests that the documentation submitted with the payment requests may not have been sufficiently robust, requiring the Commission to request additional information and clarifications before completing its first evaluation and adopting an implementing decision in January 2026.

Across policy domains, reform implementation frequently follows a pattern in which a significant portion of preparatory policy work is completed, but the final stages of adoption and/or operationalisation are delayed. In several cases, legislative and policy preparation cycles have largely been brought to a close at the national level, but adoption remains pending due to prolonged coordination with the European Commission. In other cases, delays stem from the absence of secondary legislation, incomplete institutional procedures, or limited administrative capacity for implementation. In addition, certain reform steps are structurally linked, with later ones depending on the completion of earlier ones. In such cases, delays in the initial reform step can trigger a chain effect, creating cumulative delays across the reform sequence. The overall pattern suggests that internal timelines within government institutions for completing specific reform steps are not consistently respected.

Transparency of reform implementation remains a cross-cutting challenge affecting the monitoring framework. Although a tripartite Monitoring Committee has been established, comprising representatives of government institutions, the European Commission, and civil society through the National Convention on the European Union (NCEU), access to key documentation necessary for monitoring implementation of reforms remains limited. The robustness of publicly available information varies significantly across reform steps, and there is no centralised public database that consolidates relevant documentation. Instead, available information, where it exists, is scattered across the websites of different institutions. In such a situation, the supporting documentation submitted to the European Commission as part of payment requests

would represent the most relevant source for the independent verification of the completion of certain reform steps. However, this documentation is not shared with the civil society representative on the Monitoring Committee, which further constrains independent monitoring.

Implementation gaps are more prevalent in certain policy areas, particularly in rule-of-law related reforms. Delays in adopting strategic frameworks and staffing shortages within specialised institutions continue to affect the effective implementation of anti-corruption and organised crime policies. At the same time, recent legislative developments affecting the judiciary, widely referred to in public debate as the “Mrdić laws”, have raised concerns among domestic judicial institutions, civil society organisations (CSOs), and European stakeholders regarding potential implications for judicial independence and prosecutorial autonomy. Given that respect for rule-of-law principles constitutes a fundamental precondition for the functioning of the Reform and Growth Facility, such developments may affect the broader governance environment necessary for credible reform implementation and sustained access to Reform and Growth Facility (RGF) funding.

In the next implementation period, priority should be placed on ensuring the finalisation of already initiated reform steps, strengthening coordination and sequencing of interdependent reform steps, and improving transparency and accessibility of documentation related to reform implementation. Of particular importance will be ensuring that Serbia continues to meet the democratic and rule-of-law preconditions required under the RGF, as failure to do so could affect the country’s ability to continue accessing available funds.

### Key Recommendations:

- **Ensure full alignment of recent judicial legislation with EU rule-of-law standards.** Serbian authorities should address concerns raised by domestic and international stakeholders regarding the recent amendments to judicial legislation. These legislative changes should be reviewed through an inclusive and transparent consultative process involving judicial institutions, professional associations, CSOs, and international partners. Given that respect for rule-of-law principles represents a core precondition for the functioning of the RGF, any legislative developments perceived as weakening judicial independence risk undermining the credibility of the broader reform framework and may affect the conditions for future RGF disbursements.

- **Ensure effective transparency of RGF monitoring and reporting documentation.** The Government should systematically publish documentation related to the implementation of the Reform Agenda, including the Annual RGF Implementation Report and key supporting materials submitted with payment requests. Where disclosure is restricted due to confidentiality considerations, a clear and well-founded justification should be provided.
- **Ensure transparency of RGF monitoring documentation and meaningful participation of civil society in the Monitoring Committee.** In line with the tripartite governance model of the Monitoring Committee, the Government should ensure timely and structured information-sharing with the civil society representative delegated by the National Convention on the European Union (NCEU), including access to all documentation submitted to the European Commission as part of payment requests as early as possible, and at the latest one month after their submission to the Commission, enabling civil society to effectively exercise its monitoring mandate.
- **Prioritise the completion of reform steps currently implemented within the grace period.** Serbian authorities should prioritise the timely completion of reform steps that are currently being implemented within the grace period, particularly those originally scheduled for June 2025, as the grace period for their verification is June 2026. At the same time, this prioritisation should not come at the expense of reforms scheduled for completion later in the implementation cycle. Authorities should ensure parallel progress across all remaining reform steps, including those with grace period deadlines at the end of the year, in order to avoid the accumulation of implementation delays that could affect the predictability of future RGF disbursements.
- **Strengthen implementation capacity in rule-of-law related reforms.** Authorities should prioritise the completion of outstanding measures to fill vacant positions in specialised anti-corruption and organised crime institutions, as well as the increase in the number of elected judges and prosecutors. Improving staffing levels will be essential for strengthening institutional capacity and demonstrating credible progress in this policy area.
- **Accelerate legislative adoption in domains where preparatory work has been completed.** In several domains, including digital public services and energy efficiency, substantial preparatory work has already been carried out, but reforms remain incomplete due to delays in parliamentary adoption or the finalisation of technical frameworks. Authorities should prioritise completing these legislative processes to enable formal compliance and facilitate verification within the RGF framework.

During the reporting period, Serbia maintained the main legal and institutional steps required to enable and sustain access to funding under the RGF. The adoption and entry into force of the relevant [EU and national legal acts](#), the ratification of the [Facility](#) and [Loan Agreements](#), and the formal establishment of the [coordination mechanism](#) have provided a stable procedural framework for implementation. Moreover, since the publication of the [previous Reform Monitor](#), Serbia has fulfilled remaining institutional requirements, including the adoption and publication of the [Communication and Visibility Plan](#) and the establishment of the [RGF Monitoring Committee](#), which held its inaugural meeting on 2 October 2024.

The institutional design and composition of the Committee are particularly relevant in this context. In this regard, in the context of previously strained relations between public authorities and CSOs, and with facilitation by the European Commission, a specific tripartite governance model has been [established](#). In addition to the co-chairs (the National Coordinator and the European Commission), the Rules of Procedure guarantee that one civil society representative delegated by the National Convention on the European Union (NCEU), the largest coalition of pro-European CSOs in Serbia, participates as a full member, with speaking and voting rights. Moreover, the NCEU, through its representative, has the right to issue a formal dissenting opinion in cases where decisions are adopted by the other two members without its support. Additionally, further NCEU delegates are invited to the Monitoring Committee meetings as participants with speaking rights. This tripartite arrangement has been [assessed](#) by civil society actors as a positive institutional mechanism for inclusive oversight, particularly in light of previous patterns of limited trust and the perceived ineffectiveness of earlier participatory models, in which civil society participation was often reduced to a symbolic rather than a substantive role.

However, continued transparency and active information-sharing with civil society remain important to ensure that the Monitoring Committee's CSO member can effectively fulfil their role as an independent observer while maintaining structured coordination and information exchange with the broader civil society network through the NCEU Intersectoral Working Group on Monitoring the Reform Agenda implementation.

LEGAL AND INSTITUTIONAL ARRANGEMENTS

Procedural Step	Status	Progress Details
Reform Agenda Submission to the EU	Achieved	Formally submitted on 9 July 2024.
Reform Agenda Implementing Decision	Achieved	Adopted on 23 October 2024.
Facility Agreement Ratification and Entry Into Force	Achieved	Entered into force on 4 December 2024.
Loan Agreement Ratification and Entry Into Force	Achieved	Entered into force on 19 March 2025.
National RA Coordinator Appointment	Achieved	The Minister of European Integration appointed as the National RA Coordinator.
Anti-Fraud Coordination Service	Achieved	The Anti-Fraud Coordination Service (AFCOS), established under IPA III, fulfils RGF-related obligations. <sup>1</sup>
RGF Monitoring Committee Establishment	Achieved	Established and convened for the first time on 2 October 2024.
RGF Monitoring Committee Functioning	Achieved	The Rules of Procedure set the framework for its functioning.
Civil Society Participation in the RGF Monitoring Committee	Achieved	A NCEU representative holds full membership status. Additional CSO representatives nominated by the NCEU participate as participants, with speaking rights.
Technical Infrastructure for Monitoring and Reporting	Achieved	Action Plan for the Implementation of the Reform Agenda adopted. <sup>2</sup>
Communication and visibility plan	Achieved	The Communication and Visibility Plan published on the MEI website with a delay.

1 The AFCOS is institutionalised as an internal unit under the direct authority of the Minister of Finance and is responsible for coordination with the European Commission in preventing, detecting, and reporting fraud and other irregularities involving EU funds.

2 According to the Ministry of European Integration, this document is used for monitoring and reporting purposes, but it is not published as it serves for internal use only.

During the reporting semester as well as earlier semesters, Serbia formally complied with the key procedural steps required under the Facility to ensure eligibility for disbursement. Both the pre-financing request and the first payment request were submitted on 14 March 2025. While the pre-financing request enabled the release of advance funds, the first payment request covered reform steps due in December 2024. Pre-financing funds were subsequently released on 20 June 2025. In addition, the second semi-annual payment request, submitted on 15 July 2025, covered reform steps with deadlines up to June 2025, alongside outstanding measures initially due by the end of December 2024. Both the first and second payment requests were accompanied by supporting documentation.<sup>3</sup>

Although submission-related obligations on the part of the national authorities were formally met within the semester, the Commission’s assessment of the Reform Agenda implementation had not been completed by the reporting cut-off date. The assessment was adopted on 12 January 2026 and related to the first payment request submitted in the first semester of 2025, covering reform steps with deadlines in December 2024, while the second payment request remains under assessment. Although the Facility foresees a 90-day deadline for the Commission’s assessment, which may be extended where additional information is required, the evaluation period in this case was extended beyond the reporting semester, thereby affecting the timing of performance-based disbursements.

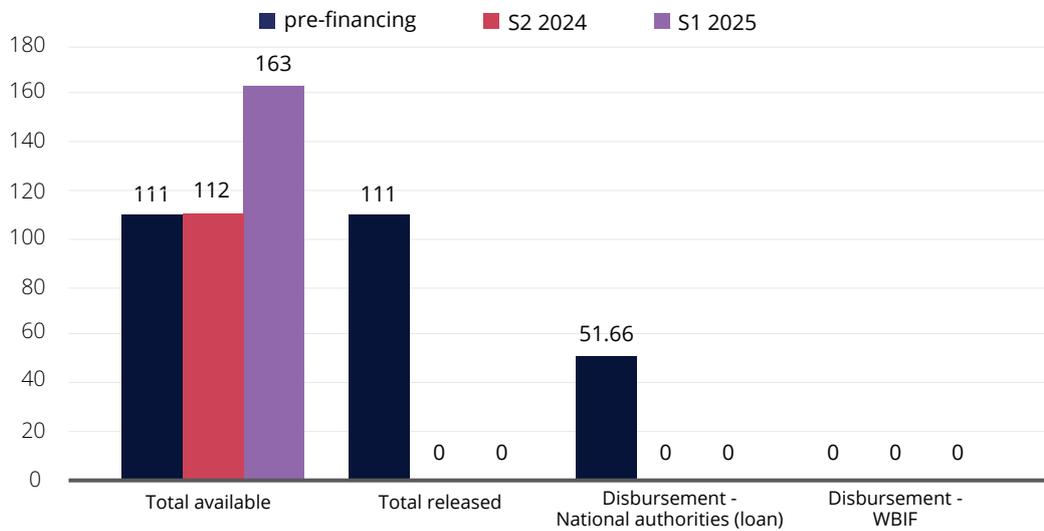
Procedural Step	Status	Progress Details
Pre-financing request	Achieved	Submitted on 14 March 2025.
Pre-financing release	Achieved	Released on 21 June 2025.
Semi-annual payment request submission	Achieved	Submitted on 15 July 2025.
Supporting documentation for reform completion (national semi-annual reporting)	Achieved	Submitted with the second payment request on 15 July 2025. The content not made public.
EC assessment on RA implementation	Partially achieved	The first payment request assessment adopted on 12 January 2026. The second payment request is still under review.
General Conditions met	Achieved	The Implementing Decision approving the first release of funds to Serbia confirms that the general conditions are maintained (although adopted after the applicable cut-off date).

3 The dates of submission of the payment requests are based on information shared with civil society representatives within the framework of the RGF Monitoring Committee information-sharing process. While the Government shared the document “ANNEX A: The Request for the Release of Funds”, which indicates the date of submission, the list of reform steps for which disbursement was requested, and the corresponding financial amounts in line with the Reform Agenda, the full supporting documentation submitted to the European Commission — as well as the 2024 RGF Implementation Report — have not been made publicly available nor shared with civil society representatives, including the civil society member of the Monitoring Committee. This absence of disclosure significantly constrains independent scrutiny of reform implementation and transparency regarding the basis for performance-based disbursements.

Pre-Conditions met	Achieved	The Implementing Decision approving the first release of funds to Serbia confirms that the pre-conditions are maintained (although adopted after the applicable cut-off date).
Annual RGF Implementation Report Prepared and Submitted	Achieved	The 2024 RGF Implementation Report was submitted on 14 March 2025. Not made public.

During the reporting semester, a total of EUR 386.2 million under the RGF envelope was available to Serbia, including pre-financing and performance-related allocations linked to reform steps due in S2 2024 and S1 2025. Of this amount, EUR 111.04 million was requested as pre-financing, EUR 67.93 million under the first payment request, and EUR 105.30 million under the second payment request. In practice, only the full pre-financing amount was released during the semester, while no performance-based payments were released by the cut-off date. Of the EUR 111.04 million in pre-financing, EUR 51.66 million has so far been disbursed to the state budget, whereas the remaining portion, allocated to projects under the Western Balkans Investment Framework (WBIF), has not yet been disbursed.

Serbia - Release of Funds, S2 2025 (Jul-Dec 2025)



Following the close of the reporting period, the Commission adopted its assessment in January 2026 and approved EUR 56.54 million under the first payment request (net loan component: EUR 40.32 million; net grant component: EUR 16.22 million). As this decision was adopted after the cut-off date, it is not reflected in the above graph. The remaining amount linked to reform steps due in S2 2024 (potentially EUR 112 million) was not approved at that stage. However, a grace period remains in place until the end of 2026, allowing Serbia to complete the relevant measures and potentially access the remaining funds.

In this update, the Reform Monitor tracked 17 reform steps across the selected policy domains, out of 37 scheduled for implementation by December 2025 as the cut-off date. The coverage includes reform steps with deadlines in the reporting semester (December 2025), as well as outstanding steps from earlier deadlines (December 2024 and June 2025) that remain relevant for implementation and RGF assessment.

The table below provides a summary overview by policy area and policy domain, indicating which reforms are covered. It indicates how many reform steps are monitored in each case as an entry point to the detailed policy-domain analysis and reform-step assessments presented in the following sections.

Policy area (harmonised)		
Reform (ID & Title)	Progress Details	In focus [due and monitored]
<b>Fundamentals and Rule of Law</b>		
Judicial reforms	Reform of justice system	1/2
Anti-corruption	Improved fight against and prevention of corruption	2 / 4
Fight against organised crime	Tackling of organised and serious crime	5/8
<b>Digital Transition</b>		
Digital public services	Further digitalisation of public services and administrative procedures for businesses and citizens: Digital identity and trust services compliant with the EU Digital Identity Regulation and eIDAS Regulation	2/3
	Further digitalisation of public services and administrative procedures for businesses and citizens: Improvement of availability of digital public services for businesses and citizens	0/1
	Further digitalisation of public services and administrative procedures for businesses and citizens: Digitalisation of documents and procedures for spatial and urban planning	0/1
	Strengthen adult education, training, and relevant up-skilling opportunities of Digital Skills and Literacy	0/1
Cyber resilience	Setting-up a comprehensive framework for cyber resilience and artificial intelligence	3/5
<b>Energy and Green Transition</b>		
Energy efficiency	Implementation of the Energy Efficiency Directive, The Energy Performance of Building Directive, Ecodesign and energy labelling legislation	1/3
Renewables	Ensure transparent and competitive procedures for the deployment of renewable energy	0/2
	Implementation of the Renewable Energy Directive (permitting, guarantees of origin, prosumers)	1/2
<b>Human Capital</b>		
Vocational education and training (VET)	Reduce the skills mismatch on the labour market and facilitate school-to-work transitions, including by stepping up further VET, including dual VET, strengthening adult education, training, and relevant up-skilling	0/4
<b>Business Environment and Private Sector Development</b>		
Competition policy /State aid	Enhanced investment and development opportunities for entrepreneurs and private sector	2/4
State- owned enterprises (SOEs)	Improvement of public investment management and sustainable and efficient management of business entities owned by the Republic of Serbia	0/6

The Reform Agenda emphasises the need for an independent, impartial, accountable, competent and efficient judiciary as a prerequisite for addressing structural challenges and advancing EU accession commitments. The Agenda links judicial reform to the implementation of the [Judiciary Development Strategy](#), the [Human Resources Strategy for the Judiciary \(2022–2026\)](#), and broader efforts to strengthen institutional capacity and improve the effectiveness of the justice system.

By the cut-off date, one reform step was due in this policy domain: an increase of 10% in the number of elected judges and public prosecutors, relative to the baseline established in the Reform Agenda (2,718 judges and 689 public prosecutors). This quantitative capacity-building measure is intended to strengthen the efficiency and effectiveness of the justice system by addressing staffing shortages and workload pressures. As reflected in the table, implementation has been only partially achieved. While the target increase for public prosecutors was met, the number of judges remained below the baseline and significantly below the 10% increase threshold.

This uneven progress reflects differing election dynamics within the judiciary and prosecution services. In the next semester, progress will depend on finalising ongoing appointment procedures and ensuring measurable expansion of judicial capacity in line with strategic reform objectives.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Reform of justice system			
Number of elected judges and public prosecutors increased by 10%	December 2025	Review not initiated. Funding not requested yet.	Prosecutor target met; number of judges below baseline; overall increase not achieved.

## REFORM OF JUSTICE SYSTEM

### **4.6.1.1 Number of elected judges and public prosecutors increased by 10% - Review not initiated. Funding not requested yet:**

This reform step requires a 10% increase in the number of elected judges and public prosecutors compared to the baseline defined in the Reform Agenda. The baseline stands at 2,718 judges and 689 public prosecutors, meaning that the target thresholds are 2,990 judges and 758 public prosecutors.

By the cut-off date, the target was partially achieved. With regard to judges, the required increase was not met. According to the [official list](#) published by the High Judicial Council, as of 26 February 2026, 2,658 judges were in office—fewer than the baseline number defined in the Reform Agenda. Although eight [public calls](#) for judicial appointments were announced during 2025, none had been finalised by the cut-off date.

In contrast, the target for public prosecutors was achieved. By the end of 2025, there were 698 public prosecutors and 64 chief public prosecutors (including the Supreme Public Prosecutor), amounting to a total of [762 officeholders](#), exceeding the 10% increase threshold of 758.

All relevant documentation, including the calls, candidates' lists, eligibility criteria, and evaluation sheets, is regularly posted and publicly available on the websites of the [High Judicial Council](#) and the [High Prosecutorial Council](#). Several rulebooks governing merit-based selection procedures are in force, including those regulating [judicial appointments](#), [criteria for evaluation of candidates for prosecutorial functions](#), and [professional qualification examinations for first-time candidates](#).

Overall, the reform step remains only partially fulfilled. This assessment is also reflected in Serbia's own position, as no disbursement was requested for this step in the payment request submitted on 15 February 2026.

The Reform Agenda addresses the fight against corruption primarily by establishing a new strategic framework and strengthening institutional capacities for prevention, investigation, and prosecution of corruption. The core reform is the adoption and implementation of the National Anti-Corruption Strategy (2025–2028) and its accompanying Action Plan, aimed at improving transparency, accountability and the effectiveness of public institutions across twelve corruption-risk sectors, including public procurement, public enterprises, construction, police, and political party financing. The strategy is also intended to address long-standing recommendations from the European Commission and GRECO and to help meet the interim benchmarks under Chapter 23.

By the cut-off date, two reform steps were due in this policy domain, including one originally scheduled for December 2024. The first step—adoption of the Anti-Corruption Strategy and an Action Plan covering the full 2025–2028 period—remained incomplete, as the action plan for the entire period had not yet been adopted. The second step, concerning the filling of all vacant judicial and prosecutorial positions in specialised anti-corruption and organised crime bodies, was also not completed.

Progress in the next reporting period will depend primarily on completing the strategic framework by adopting the remaining Action Plan, as well as on filling vacant judicial and prosecutorial positions in specialised anti-corruption and organised crime departments. Strengthening the staffing capacity of these institutions will be essential for improving the track record of corruption investigations and prosecutions.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Improved fight against and prevention of corruption			
Following consultations with the Commission, the strategy and action plan for 2025-2028 are adopted	December 2024	Not achieved. The grace period runs until 31 December 2026.	Strategy adopted; Action Plan pending.
All vacant positions for prosecutors and judges in anti-corruption departments and in special prosecutor's office for organised crime, and special department of the higher court and of the appellate court in Belgrade for organised crime are filled in accordance with the Annual Schedule of Judges (adopted by the HJC) and the Decision of the High Prosecution Council on the number of public prosecutors and trained	December 2025	Review not initiated. Funding not requested yet.	No publicly available information.

## IMPROVED FIGHT AGAINST AND PREVENTION OF CORRUPTION

### **4.5.1.1 Following consultations with the Commission, the strategy and action plan for 2025-2028 are adopted – Not achieved. The grace period runs until 31 December 2026:**

This reform step requires, following consultations with the European Commission, the adoption of an Anti-corruption Strategy and a corresponding Action Plan covering the entire 2025–2028 period. The step was initially due in December 2024 but was carried over, as the originally adopted documents did not meet the full scope requirement.

The Strategy was adopted on 25 July 2024, and the Action Plan covering the 2024–2025 period was adopted on 26 December 2024. Serbia subsequently requested disbursement for this step in the first payment request in March 2025. However, the Commission [assessed](#) the milestone negatively, as the adopted Action Plan did not cover the full duration of the Strategy. As a result, the step was considered, in binary terms, as not achieved.

According to the information shared by the Government at the trilateral meeting in early December 2025, the new Action Plan covering the 2026–2028 period has been finalised and was shared with the Commission on 12 November 2025, while its adoption is pending the Commission’s opinion. Until the revised Action Plan is formally adopted, the step remains only partially fulfilled.

The drafting process was procedurally transparent. Drafts of both the Strategy and the Action Plan were regularly published on the e-Consultation platform and the Ministry of Justice website during the [consultation](#) and [public debate](#) phases. The consultation process for the 2026–2028 action plan was partially comprehensive in terms of the actors involved. The available [consultation report](#) confirms that the Ministry of Justice organised a public call inviting interested stakeholders to submit proposals and comments on the draft Action Plan, and that a working group was established, including representatives of state administration bodies, independent institutions, courts and prosecution offices, as well as civil society organisations selected through this public call. However, the documentation does not provide detailed evidence of the scope and outcomes of these consultations, such as a clear overview of how stakeholder comments were incorporated into the revised draft, submitted for public debate. Moreover, the report on the public debate was not published (although it was obtained via a Freedom of Information request), which further limits the transparency of the process.

Content-wise, the monitoring, reporting, and accountability provisions are clearly structured and in line with the requirements of the Law on the Planning System, including defined timelines, responsible institutions, and performance indicators.

In the consultation report, the Ministry of Justice explicitly stated that [GRECO recommendations](#) from the 5th and 6th evaluation rounds were taken into account during drafting. However, according to expert assessments, while formal references to GRECO standards are present, certain structural corruption risks remain insufficiently addressed. Experts have noted that the draft does not adequately address issues such as the absence of binding obligations for prosecutors to act upon documented corruption cases, weaknesses in safeguards against abuse in public procurement and legislative processes, and corruption risks related to institutions outside the executive branch.

Overall, although formal progress has been made and procedural standards largely observed, the reform step cannot yet be considered fully achieved due to the pending adoption of a comprehensive Action Plan covering the entire 2026–2028 period and outstanding concerns regarding the substantive robustness of anti-corruption measures.

***4.5.1.4 All vacant positions for prosecutors and judges in anti-corruption departments and in special prosecutor's office for organised crime, and special department of the higher court and of the appellate court in Belgrade for organised crime are filled in accordance with the Annual Schedule of Judges (adopted by the HJC) and the Decision of the High Prosecution Council on the number of public prosecutors and trained - Review not initiated. - Funding not requested yet. The grace period runs until 31 December 2026:***

The reform step requires that all vacant positions for prosecutors and judges in anti-corruption departments and in the specialised institutions for organised crime be filled. However, the step could not be fully assessed due to limited data availability and transparency constraints. Information on the exact number of filled and vacant positions across the specialised departments of the prosecution and judiciary is not systematically published, and there is no centralised accessible dataset that would allow independent verification of staffing levels in accordance with the Annual Schedule of Judges adopted by the High Judicial Council and the decisions of the High Prosecutorial Council.

Nevertheless, it is noteworthy that Serbia did not request disbursement of funds for this reform step in the third payment request, confirming that the step is considered not achieved. In the coming period, it will be necessary to ensure the completion of recruitment procedures for vacant judicial and prosecutorial positions in specialised anti-corruption and organised crime departments, while also improving transparency by publishing consolidated and regularly updated staffing data for these institutions.

The *Fight against Organised Crime* policy domain addresses one of the key security challenges identified by Serbia in the Reform Agenda. Organised crime represents a serious threat to the country's security, economic stability and the safety of its citizens, due to its transnational nature, financial power and links to corruption, money laundering and other forms of serious crime. The Reform Agenda, therefore, aims to strengthen both the normative and strategic framework for tackling organised crime, including improvements to relevant legislation such as the Law on Internal Affairs, the Criminal Code, and the new Law on Suppression and Prevention of Trafficking in Human Beings. In addition, the reforms seek to reinforce policy coordination and the operational capacities of law-enforcement authorities, particularly in areas such as the illegal trafficking of firearms, human trafficking and financial investigations. These measures are expected to improve Serbia's track record in investigations, prosecutions and final convictions in organised crime cases, while enhancing cooperation among competent institutions and aligning Serbia's framework with EU standards under Chapter 24 of the EU accession negotiations.

By the cut-off date for this reporting semester, five reform steps in this policy domain were due, as reflected in the monitoring table below. While the strategic framework for Small Arms and Light Weapons (SALW) control was adopted in line with the revised Regional SALW Roadmap, other key reforms—such as the adoption of the counter-terrorism strategy and action plan, the operational plan on financial investigations, and elements of the new legislative framework addressing organised crime and trafficking—remained incomplete.

Overall, progress in this policy domain has been slow and uneven. Key legislative and strategic measures envisaged under the Reform Agenda are still under preparation and, in several cases, are not yet close to adoption. This poses a tangible risk that Serbia may fail to meet the required milestones within the prescribed timelines, potentially leading to the loss of available funding under the RGF. Delays in completing these reforms also prolong the structural challenges the measures are intended to address, including weaknesses in the strategic framework, institutional coordination, and the overall effectiveness of the fight against organised crime.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
<b>Tackling of organised and serious crime</b>			
Following consultations with the Commission, new strategic document and accompanying Action Plan *(2025-2030) for the control of Small arms and light weapons (SALW) in line with the provisions of the revised Regional SALW Roadmap for Western Balkans are adopted	June 2025	Under review	Both the Programme and Action Plan were adopted in December 2025.
New legislative framework is adopted, notably: a new Law on suppression and prevention of THB by Parliament; criminal code is amended in order to criminalise effectively the trafficking of weapons, in line with the provisions of the Convention on transnational organised crime and firearms protocol; adoption of a new Law on weapons and ammunition, in line with EU acquis	June 2025	Review not initiated. Funding not requested yet.	None of the three laws was adopted.
The Law on internal affairs addressing the issue of police autonomy from the Ministry of Interior during pre-investigation and investigation phases and recommendations from the Committee for Prevention of Torture is adopted;	June 2025	Review not initiated. Funding not requested yet.	Law not adopted; draft law not publicly available.
A new strategic document and accompanying action plan that covers counter terrorism and all forms of radicalization and violent extremism (irrespective of political, religious or ethno-nationalist so-called justification) are adopted in line with EU policies, including envisaging concrete steps to prevent recruitment and participation of Serbian citizens as foreign fighters and to prosecute returning foreign fighters returned to Serbia	June 2025	Review not initiated. Funding not requested yet.	Neither Programme nor Action Plan was adopted.
Adoption of operational plan on financial investigations	December 2025	Review not initiated. Funding not requested yet.	Operational Plan not adopted.

## TACKLING OF ORGANISED CRIME

### ***4.3.1.2 Following consultations with the Commission, new strategic document and accompanying Action Plan (2025-2030) for the control of Small arms and light weapons (SALW) in line with the provisions of the revised Regional SALW Roadmap for Western Balkans are adopted – Under review:***

This reform step requires, following consultations with the European Commission, the adoption of a new strategic document and accompanying Action Plan for the control of SALW, aligned with the revised [Regional SALW Roadmap](#) for the Western Balkans.

The [SALW Programme](#) and the accompanying [Action Plan](#) were adopted on 26 December 2025, during the grace period running until June 2026. However, the Action Plan does not formally cover the entire duration of the Programme, but only the 2025-2027 period. The alignment with the Regional SALW Roadmap and EU standards has been confirmed through an official opinion issued by the South Eastern and Eastern Europe Clearinghouse for the Control of Small Arms and Light Weapons (SEESAC). The opinion—obtained via a Freedom of Information request submitted to the Ministry of the Interior—was addressed to the Government of Serbia and confirms that both the Strategy and the Action Plan are fully aligned with the revised Regional SALW Roadmap and EU standards. SEESAC has been mandated by the European Commission to support the implementation of the Roadmap. However, it remains unclear whether the Government received the green light from the European Commission and/or SEESAC to adopt the Action Plan only for the first three years of the Programme's duration.

The drafting process was formally transparent but not largely inclusive. Draft and final versions of the documents were published on the Ministry of Interior's [website](#) and on the [e-Consultation platform](#). However, stakeholder involvement was limited in practice. The formal consultation period lasted only seven days, which was insufficient for meaningful stakeholder participation. No comments were submitted during either the consultation phase or the public debate, although all required procedural documentation was published.

Overall, despite limited stakeholder engagement in practice, the normative requirements of the reform step have been largely met, notwithstanding the remaining uncertainty regarding the shortened duration of the Action Plan.

**4.3.1.1 New legislative framework is adopted, notably: a new Law on suppression and prevention of THB by Parliament; criminal code is amended in order to criminalise effectively the trafficking of weapons, in line with the provisions of the Convention on transnational organised crime and firearms protocol; adoption of a new Law on weapons and ammunition, in line with EU acquis – Review not initiated. Funding not requested yet:**

This reform step required the adoption of a comprehensive legislative framework addressing organised crime, notably: (i) a new Law on suppression and prevention of trafficking in human beings (THB); (ii) amendments to the Criminal Code to effectively criminalise trafficking in weapons in line with the [UN Convention against Transnational Organised Crime and the Firearms Protocol](#); and (iii) a new Law on weapons and ammunition aligned with the EU acquis.

The step was not achieved by the cut-off date and is running in the grace period until June 2026. None of the three legislative acts had been adopted or entered into parliamentary procedure.

The [draft THB Law](#) and [draft amendments to the Criminal Code](#) were published on the e-Consultation platform, and reports from the conducted public debates were made available. However, civil society organisations raised concerns regarding the quality and inclusiveness of the consultation process, highlighting the short duration of the consultation period, as well as an unfavourable political climate. According to the statement from the Ministry of Justice, shared at the tripartite meeting in early December 2025, the Criminal Code amendments were being aligned with the latest comments from the European Commission, received on 15 October 2025.

The draft Law on weapons and ammunition had not yet been published, and public consultations had not commenced by the cut-off date. According to the information shared by the Ministry of the Interior at the same meeting, the working group was finalising the draft text, after which consultations were expected to begin.

Although available draft versions of the THB Law and Criminal Code amendments foresee entry into force eight days after publication in the Official Gazette, none of the laws had been formally adopted. Overall, while preparatory drafting work was underway and partial consultations were conducted, the legislative framework remained incomplete and the reform step unfulfilled.

***4.3.1.6 The Law on internal affairs addressing the issue of police autonomy from the Ministry of Interior during pre-investigation and investigation phases and recommendations from the Committee for Prevention of Torture is adopted – Review not initiated. Funding not requested yet:***

This reform step required the adoption of a new Law on Internal Affairs that addresses police autonomy from the Ministry of Interior during pre-investigation and investigation phases, as well as the incorporation of the [recommendations of the Committee for the Prevention of Torture \(CPT\)](#).

The step was not achieved by the cut-off date, and is in the grace period until June 2026. The law had not been adopted. Although a [consultation process](#) was conducted and formally concluded in January 2025, no subsequent draft was published. Moreover, the NCEU refused to participate in the consultation process, citing the lack of the Ministry's genuine commitment to raising standards and practices in relation to the prohibition of torture, accountability, and police independence.

According to information provided by the Ministry of the Interior, the draft law had been finalised and was awaiting internal approval, after which the consultation process was expected to be repeated.

In the absence of a publicly available final draft and formal adoption, it was not possible to assess whether and how the issues of police operational autonomy and CPT recommendations were substantively addressed.

**4.4.1.1 A new strategic document and accompanying action plan that covers counter terrorism and all forms of radicalization and violent extremism (irrespective of political, religious or ethno-nationalist so-called justification) are adopted in line with EU policies, including envisaging concrete steps to prevent recruitment and participation of Serbian citizens as foreign fighters and to prosecute returning foreign fighters returned to Serbia – Review not initiated. Funding not requested yet:**

This reform step requires, following consultations with the European Commission, the adoption of a new strategic document and accompanying Action Plan covering counter-terrorism and all forms of radicalisation and violent extremism, irrespective of political, religious or ethno-nationalist justification. The documents must align with EU counter-terrorism policies and envisage concrete measures to prevent recruitment and participation of Serbian citizens as foreign fighters, as well as to prosecute and reintegrate returning foreign fighters.

The step has not been achieved. By the cut-off date, the [programme](#) and the accompanying [Action Plan](#) had been drafted and were being finalised, but had not yet been formally adopted. According to the Ministry of the Interior, the documents are to be adopted jointly after addressing the Commission's final comments.

The drafting process was procedurally transparent. Draft versions were published on the Ministry of Interior's [website](#) and on the [e-Consultation platform](#). Public consultations lasted for almost three months, whereas the public debate lasted for 20 days, the statutory minimum. Consultation documentation and reports were regularly published. Comments received during the public debate were partially incorporated, with reasoned explanations provided for those not accepted.

However, alignment with EU counter-terrorism rules was still being finalised at the cut-off date, indicating that the post-public debate version was not yet fully aligned with EU standards. Importantly, Serbia did not request disbursement for this step in either the second payment request (July 2025) or the third payment request (January 2026).

#### **4.3.1.3 Adoption of operational plan on financial investigations – Review not initiated. Funding not requested yet:**

This reform step required the adoption of an operational plan to strengthen financial investigations in the fight against organised crime, including improved asset tracing, confiscation mechanisms and inter-institutional coordination in line with EU standards.

The [draft operational plan](#) was made available at the start of the public debate (22 October 2025), without the previously conducted consultations or CSO involvement in the Working Group. According to the information the Ministry of Justice shared at the tripartite meeting in early December 2025, the revised draft was submitted to the European Commission for opinion following the public debate and prior to formal adoption. However, the version transmitted to the Commission was not published, nor were reports from the consultation process made publicly available. As a result, it was not possible to ascertain how stakeholder comments were reflected in the revised draft, thereby limiting the overall transparency of the process.

The *Digital Public Services* domain focuses on aligning Serbia's legal and institutional framework for electronic identification, trust services, and digital identity with the EU acquis, notably the [eIDAS Regulation](#) and the [EU Digital Identity framework](#). These reforms are essential for enabling legally secure cross-border digital transactions, strengthening interoperability, and positioning Serbia within the EU Digital Single Market ecosystem.

In parallel, the Reform Agenda includes measures to improve the availability and usability of digital public services for businesses and citizens. This reform seeks to expand the scope, accessibility and integration of services available through the national e-Government portal, streamline administrative procedures, and strengthen the application of the once-only principle, thereby reducing administrative burden and increasing efficiency in public service delivery.

Furthermore, the digitalisation of documents and procedures in spatial and urban planning aims to modernise planning processes by standardising data formats, enhancing the use of Geographic Information System (GIS) tools, improving procedural transparency, and strengthening public participation mechanisms. By introducing interoperable digital tools and aligning spatial data management with EU standards, including the [INSPIRE Directive](#), this reform seeks to increase legal certainty, procedural visibility, and administrative efficiency in urban development and permitting processes.

By the cut-off date, two reform steps were due, both of which fall under the reform related to Digital Identity and trust services compliant with the EU Digital Identity Regulation and eIDAS Regulation. As reflected in the table, implementation remains incomplete. While substantive preparatory work was undertaken and draft legislation prepared, the key enabling legal act was not yet adopted, thereby preventing the formalisation of compliance and the initiation of EU-level procedural steps.

The main constraint in this domain is legislative sequencing. Continued delays in parliamentary adoption may slow progress toward mutual recognition of trust services and limit Serbia's integration into EU digital infrastructure frameworks. Advancing this domain next semester will depend primarily on completing the legislative process and ensuring timely entry into force of the amended legal framework.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor finding
Further digitalisation of public services and administrative procedures for businesses and citizens: Digital identity and trust services compliant with the EU Digital Identity Regulation and eIDAS Regulation			
Compliance with the EU digital identity Regulation and eIDAS Regulation is achieved through the adoption of the amendments of the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business (or a new law depending on % of amendments) by the National Parliament	December 2025	Review not initiated. Funding not requested yet.	Draft aligned with EU acquis; parliamentary adoption pending; not in force.
Serbia has joined the EU Third Countries trusted list for the validation of electronic signatures as advanced electronic in the EU as a first step towards pursuing mutual recognition of qualified trust services	December 2025	Review not initiated. Funding not requested yet.	Legal amendments pending; Trusted List accession process not initiated.

## FURTHER DIGITALISATION OF PUBLIC SERVICES AND ADMINISTRATIVE PROCEDURES FOR BUSINESSES AND CITIZENS: DIGITAL IDENTITY AND TRUST SERVICES COMPLIANT WITH THE EU DIGITAL IDENTITY REGULATION AND EIDAS REGULATION

### **2.2.2.4 Compliance with the EU digital identity Regulation and eIDAS Regulation is achieved through the adoption of the amendments of the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business (or a new law depending on % of amendments) by the National Parliament – Review not initiated. Funding not requested:**

This reform step requires Serbia to achieve compliance with the EU Digital Identity Regulation and the eIDAS Regulation by having the National Parliament adopt the new Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business (or adoption of a new law, depending on the scope of changes).

The step was not achieved by the deadline. The [draft law](#) has been prepared and made publicly available; however, it has not been adopted by the National Parliament and has therefore not entered into force. Consequently, formal legal alignment has not been secured.

According to expert assessments presented during a public [roundtable](#) organised on 22 January 2026 and confirmed in expert interviews conducted in February 2026 as part of this monitoring process, the draft fully reflects the structure and substantive requirements of both the eIDAS Regulation and the EU Digital Identity Regulation. The Ministry also issued a formal [Statement of Compliance with the EU acquis](#), including a detailed article-by-article correlation table certifying full alignment and complete transposition of the relevant EU legal provisions into the draft law. However, during an expert interview, several were raised, particularly regarding the translation and adaptation of key legal concepts from the two EU regulations, which are not always fully harmonised with existing domestic legislation. Such inconsistencies could create interpretative ambiguities and implementation challenges once the law enters into force.

In terms of openness and transparency of the legislative process, the draft law was [published](#) on the e-Consultation portal as late as at the start of the public debate (26 December 2025 – 19 January 2026), rather than during earlier stages of drafting. Stakeholder involvement in the early drafting phase was limited. Only one civil society organisation and one faculty participated in the working group, and no broader open consultation was conducted prior to the formal public debate.

**2.2.2.2 Serbia has joined the EU Third Countries trusted list for the validation of electronic signatures as advanced electronic in the EU as a first step towards pursuing mutual recognition of qualified trust services – Review not initiated. Funding not requested:**

This reform step requires Serbia to join the EU Trusted List for third countries, enabling the validation of Serbian electronic signatures as advanced electronic signatures within the EU, as a first step towards mutual recognition of qualified trust services.

According to information obtained through a Freedom of Information request submitted to the Ministry of Information and Telecommunications, the procedure for including Serbia in the EU Third Countries Advanced Electronic Signatures List of Trusted Lists (Tc AdES LoTL) was initiated on 4 April 2025. Following the submission of the request, several working meetings were held with representatives of the European Commission to clarify procedural steps and identify elements of the legal, institutional, and technical framework that require further alignment with the eIDAS Regulation.

In this context, the Ministry submitted the completed eIDAS Assessment Checklist to the European Commission on 15 December 2025, together with English translations of relevant legislation and by-laws, and held a follow-up working meeting with the Commission on 18 December 2025 to discuss initial observations regarding Serbia's trust services framework. According to the Ministry, further alignment of certain by-laws—particularly those related to qualified electronic certificates, qualified electronic signatures, the maintenance of the trusted list, and the application of relevant ETSI standards—will be required in the next phase of the process.

However, no official public documentation confirming the level of completion of this activity has been published to date.

The Reform Agenda frames cybersecurity reform as part of *Setting up a Comprehensive Framework for Cyber Resilience* reform, with the primary objective of aligning Serbia with the new EU cybersecurity acquis and introducing the requirements of the [NIS2 Directive](#). The reform aims to impose security requirements on entities in critical sectors, strengthen national authorities, protect critical infrastructure, and ensure resilience and continuity of essential services. Implementation is structured in sequential steps, including adoption of the Law on Information Security, the establishment of a fully operational supervisory office, and finalisation of the list of entities in scope, alongside operational Coordinated Vulnerability Disclosure (CVD) and crisis-management frameworks.

By the cut-off date, three steps were due. As reflected in the tables, legislative alignment has been achieved through the adoption of the Law on Information Security, consistent with the first implementation milestone foreseen in the Agenda. However, the subsequent operational steps, namely, the full operationalisation of the Office for Information Security and finalisation of the list of entities with accompanying frameworks, remain either partially institutionalised or pending. This reflects a partial implementation dynamic, where primary legislation has progressed faster than secondary legislation and operational enforcement mechanisms.

Given that the Reform Agenda itself identifies challenges related to resource sufficiency, enforcement capacity, and effective monitoring mechanisms, the current implementation trajectory suggests that the next semester will be decisive in closing the gap between formal legal alignment and practical enforcement capacity. Further progress will depend on demonstrating fully staffed supervisory structures, adoption of the necessary by-laws, and operational use of NIS2-aligned frameworks.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Setting-up a comprehensive framework for cyber resilience and artificial intelligence			
The Law on Information Security is adopted by Parliament and fully aligned with the NIS2 Directive	December 2025	Under review	Law adopted; aligned with the NIS2 directive; entered into force.
The Office for Information Security (within the Office for IT and e-Government) is operational (sufficiently staffed with at least 20 employees, equipped with supervisory powers, performing supervisory checks)	December 2025	Under review	Organisational framework established; staffing and supervisory capacity not independently verifiable.
List of entities in the scope of the national law corresponding to the NIS2 Directive is finalized and Frameworks introduced by NIS2 alignment (CVD framework, crisis management framework), are in place and use	December 2025	Review not initiated. Funding not requested yet.	By-law pending; entity list not finalised; frameworks not operational.

## SETTING-UP A COMPREHENSIVE FRAMEWORK FOR CYBER RESILIENCE AND ARTIFICIAL INTELLIGENCE

### ***2.2.4.1 The Law on Information Security is adopted by Parliament and fully aligned with the NIS2 Directive – Under review:***

This reform step requires adopting a new Law on Information Security aligned with the NIS2 Directive to establish a modernised national cybersecurity framework. The law aims to strengthen information and communication technology (ICT) security by expanding the scope of regulated entities, introducing specific obligations for operators of priority and important ICT systems, and setting out mandatory risk assessment and protective measures. It also enhances incident reporting requirements and supervisory powers to manage cybersecurity risks and ensure a timely response to significant incidents, in line with key elements of the NIS2 framework.

The National Parliament [adopted the Law on Information Security](#) on 22 October 2025, and it was subsequently published in the [Official Gazette](#). The law entered into force seven days after publication. In terms of formal legislative adoption, all milestones foreseen under this reform step have been met.

The correspondence table accompanying the [legislative proposal](#) indicated full legislative alignment with the NIS2 Directive. The Law transposes the Directive's core requirements, including the categorisation of entities, comprehensive risk management obligations, structured incident notification, supervisory mechanisms and sectoral scope. No gaps in transposition were identified. This assessment was echoed in an expert interview conducted in February 2026, which indicated that the adopted framework fully reflects the Directive's key governance and cybersecurity requirements.

The drafting process was accompanied by a structured public consultation. A formal public debate was conducted between 3 and 23 July 2024, and the draft law was published on the Ministry's website and on the [e-Consultation portal](#).

In addition to written consultations, two roundtables were organised during the earlier drafting phase: one in Belgrade (18 August 2023) and one in Kragujevac (21 August 2023), bringing together representatives of state authorities, regulatory bodies, the private sector, academic institutions and civil society organisations. The official [Report on the Conducted Public Debate](#) provides a detailed overview of received comments, including individual proposals as well as the Ministry's responses and justifications for acceptance or rejection. Several substantive amendments were incorporated into the final draft, including refinements of definitions, risk management provisions and technical terminology. Where comments were

not accepted, written reasoning was provided, often referencing alignment with NIS2 requirements or the scope of the law. Taken together, the documentation indicates that the consultation process was formally structured, publicly accessible and accompanied by documented feedback and reasoned replies.

While the formal legislative milestones have been completed and a full degree of alignment with NIS2 requirements is evident, continued monitoring will be necessary to assess the effectiveness of secondary legislation and implementation in practice.

**2.2.4.7 The Office for Information Security (within the Office for IT and e-Government) is operational (sufficiently staffed with at least 20 employees, equipped with supervisory powers, performing supervisory checks) – Under review:**

This reform step requires that the Office for Information Security, established within the Office for IT and e-Government, be fully operational by December 2025. Operationalisation entails: (i) staffing with at least 20 employees, (ii) supervisory powers in force, and (iii) the conduct of supervisory checks in practice.

A [Rulebook on Internal Organisation and Systematisation](#) adopted in December 2025 provides for the establishment of a dedicated Department for Information Security and foresees 20 positions within that department, each with clearly defined job descriptions and qualification requirements. This indicates that the formal organisational framework for meeting the staffing threshold has been put in place.

However, according to information from the Office for IT and e-Government dated December 2025, more than 10 staff members were performing relevant functions at that time, while coordination with the European Commission was reportedly ongoing regarding acceptable contractual arrangements. Following the cut-off date, Serbia requested disbursement for this step in a payment request submitted on 15 February 2026, signalling that the authorities consider the milestone fulfilled.

According to information obtained through a Freedom of Information request submitted to the Office for IT and e-Government, by the end of December 2025, staffing corresponding to 20 positions had been secured, partly through the reassignment of existing civil servants and partly through contractual engagements. A review of the official website of the [Human Resources Management Service](#) indicates that no public recruitment procedures for positions within this Department were announced during the previous semester, confirming that staffing was largely secured through internal reassignment and contractual arrangements rather than open recruitment.

In response to the Freedom of Information request, the Office also stated that it is already exercising supervisory competences under the Law on Information Security, although the annual supervisory plan for 2026 had not yet been adopted at the time of the response, with the statutory deadline set for the end of April 2026.

**2.2.4.2 List of entities in the scope of the national law corresponding to the NIS2 Directive is finalized and Frameworks introduced by NIS2 alignment (CVD framework, crisis management framework), are in place and use – Review not initiated. Funding not requested:**

This reform step requires the finalisation of the list of entities falling within the scope of the national cybersecurity law in line with the NIS2 Directive, as well as the establishment and operational use of the CVD and crisis-management frameworks.

The step was not achieved by the deadline. According to information provided by the Ministry in early December 2025, a by-law defining the methodology and criteria for identifying entities in scope was under preparation. However, no such by-law had been adopted by the cut-off date, and no official list of entities had been published. As a result, the CVD and crisis-management frameworks cannot be considered operational in practice, as their effective application presupposes a clearly defined scope of regulated entities. Furthermore, in the payment request submitted on 15 February 2026, Serbia did not request disbursement for this step, indicating that the authorities do not consider it completed.

According to information obtained through a Freedom of Information request submitted to the Ministry of Information and Telecommunications, a by-law defining the general and sectoral criteria for identifying operators of priority and important information and communication systems is currently undergoing adoption. In addition, a by-law regulating the content and procedures for vulnerability verification and the management of technical vulnerabilities in ICT products and services is currently under preparation.

The Ministry also indicated that several additional by-laws necessary for the implementation of the Law on Information Security are planned for the upcoming period, including regulations related to security measures for critical ICT systems, incident notification procedures and classification, proactive vulnerability scanning, certification of ICT systems, products and services, as well as the maintenance of registers of ICT system operators.

Overall, while the primary cybersecurity legislation has been aligned with NIS2, the secondary legislation and operational mechanisms necessary for implementation remain pending.

The *Energy Efficiency* policy domain targets faster reductions in energy consumption and greenhouse gas emissions through full implementation of the [Energy Performance of Buildings Directive \(EPBD\)](#), alongside measures under the [Energy Efficiency Directive \(EED\)](#) and the strengthening of ecodesign and energy labelling enforcement. The domain is framed as a core enabler of decarbonisation “at the lowest possible cost,” and is directly linked to Green Agenda objectives.

By the cut-off date, one reform step in this domain was due. As reflected in the table, implementation remains incomplete and contingent upon the finalisation of underlying regulatory and methodological elements necessary for legislative alignment. Given the central role of building performance standards and certification schemes in driving energy efficiency improvements, prolonged delays may slow the pace of alignment with the EU acquis and undermine the predictability of the regulatory framework. In the next semester, progress will depend on completing pending preparatory steps and translating technical groundwork into formally adopted and enforceable measures.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Implementation of the Energy Efficiency Directive, The Energy Performance of Building Directive, Ecodesign and energy labelling legislation			
The EPBD is implemented: recast of minimum energy performance standards for non-residential buildings and setting nearly zero energy building standards for new buildings, issuing of EPC in line with EPBD; independent control systems for EPC and inspection reports for heating and cooling systems	December 2025	Review not initiated. Funding not requested yet.	EPBD alignment pending; MEPS, nZEB and EPC framework not adopted.

## IMPLEMENTATION OF THE ENERGY EFFICIENCY DIRECTIVE, THE ENERGY PERFORMANCE OF BUILDINGS DIRECTIVE, ECODESIGN AND ENERGY LABELLING LEGISLATION

### ***2.1.7.1 The EPBD is implemented: recast of minimum energy performance standards for non-residential buildings and setting nearly zero energy building standards for new buildings, issuing of EPC in line with EPBD; independent control systems for EPC and inspection reports for heating and cooling systems – Review not initiated. Funding not requested yet:***

This reform step requires legislative alignment with the revised EPBD, including the recast of minimum energy performance standards (MEPS) for non-residential buildings, adoption of updated nearly zero-energy building (nZEB) standards, and revision of the Energy Performance Certificate (EPC) framework.

The step was not achieved by the deadline. During the technical monitoring meeting held in early December 2025, the Government presented a detailed update on the state of implementation, indicating that full implementation is contingent upon the development of a new methodology for EPC calculations, identified as a key prerequisite for alignment with the EPBD recast. At the same meeting, it was reported that consultations with technical faculties had been conducted and that the Terms of Reference for procuring the new methodology had been prepared. The Ministry further indicated its intention to launch parallel procurement procedures for both the methodology and the accompanying IT software in order to expedite the process. It was also stated that partial upgrades of the EPC database had been undertaken and that three implementing by-laws were under preparation (two pending completion and one finalised), but that these could not be adopted or published before the methodology is formally approved.

The existing regulations (including the [Rulebook on the Energy Efficiency of Buildings](#), and [Regulation on Minimum Energy Efficiency Requirements for New and Reconstructed Energy Facilities](#)) remain in force and publicly available, but are not aligned with the EPBD recast. While the EPC scheme is operational in practice, it is not compliant with updated EPBD requirements due to the absence of revised legislation and methodology. Overall, substantive alignment with the EPBD has not yet been achieved.

Within the Reform Agenda, renewable energy reforms are embedded in the subarea *Energy Sector Transformation* and focus on accelerating the uptake of renewable energy sources (RES), streamlining permitting procedures, strengthening institutional coordination, and aligning national legislation with the [EU Renewable Energy Directive \(RED II\)](#). These reforms are central to Serbia's decarbonisation trajectory, integration into the EU energy market, and broader commitments under the Green Agenda.

By the cut-off date, one reform step in this domain was due: the designation of a Single Contact Point in line with RED II. As reflected in the table, implementation has progressed through institutional and operational measures, though in a phased manner and with limited scope at this stage. While formal compliance was reported, the effectiveness and full alignment with EU functional requirements—particularly regarding comprehensive coverage and procedural streamlining—remain subject to continued monitoring.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Implementation of the Renewable Energy Directive (permitting, guarantees of origin, prosumers)			
Designation of a Single Contact Point in line with the RED II Directive	December 2025	Under review.	Single Contact Point established for strategic RES projects (pilot phase); phased expansion to follow.

## IMPLEMENTATION OF THE RENEWABLE ENERGY DIRECTIVE (PERMITTING, GUARANTEES OF ORIGIN, PROSUMERS):

### ***2.1.5.1 Designation of a Single Contact Point in line with the RED II Directive – Under review:***

This reform step requires the designation of a Single Contact Point (SCP) in line with Article 16 of the RED II, aimed at streamlining and coordinating administrative procedures for renewable energy projects. The SCP is intended to serve as a central interface for project developers, ensuring transparency of permitting processes, facilitating communication among competent authorities, and contributing to the reduction of procedural delays and administrative burdens in line with EU requirements.

According to information provided by the Ministry of Mining and Energy (MRE) in response to a December 2025 e-mail inquiry, this step was completed in October 2025 through the signing of a cooperation agreement between the MRE, the Ministry of Construction, Transport and Infrastructure (MCTI), and the Ministry of Environmental Protection.

A functional [Single Contact Point](#) has since been established within the MRE for large strategic renewable energy projects. The SCP is publicly accessible through a dedicated page on the Ministry's website which includes a designated email address. In this first phase, the SCP covers major strategic RES projects, including a 1 GW solar power plant identified as a pilot project. The SCP receives electronic inquiries, provides guidance, directs applicants to the CEOP digital permitting system managed by the MCTI, informs them about environmental consent procedures, and monitors statutory deadlines.

During a tripartite meeting held in early December 2025 between representatives of the Government, the European Commission, and civil society, the MRE maintained that RED II establishes functional requirements—such as digital access, transparency of procedures, and monitoring of statutory deadlines—but does not mandate immediate full coverage of all renewable energy projects. Serbia has therefore opted for phased implementation, initially focusing on strategic projects, with gradual expansion to other RES projects following future amendments to the [Law on the Use of Renewable Energy Sources](#).

This position was subsequently confirmed in an expert interview conducted in January 2026 with a specialist in energy transition, who assessed that the current SCP arrangement is broadly in line with RED II requirements. However, the expert emphasised that the phased implementation approach would benefit from clearer procedural structure and forward planning to ensure predictability and full functional alignment with the Directive.

On balance, while the institutional framework and operational structure for the SCP are in place, the current scope of application is limited to strategic projects only, and full coverage of all RES projects has not yet been achieved. The extent to which the existing arrangement fully satisfies all functional requirements of RED II, particularly regarding legal entrenchment and comprehensive procedural streamlining, will require continued monitoring in subsequent reporting periods.

Within the Reform Agenda, *Vocational Education and Training (VET)* reforms are situated under the Human Capital policy area and aim to reduce skills mismatches, strengthen school-to-work transitions, and align education outcomes with labour market needs. The Agenda places emphasis on modernising qualification standards, further developing dual and work-based learning models, and improving cooperation between education providers and employers, in line with EU best practices.

No specific reform steps in the VET domain were due during the reporting semester. The Reform Monitor will continue to track developments related to legislative amendments, implementation of dual VET measures, alignment with EU frameworks, and progress in addressing labour market needs, and will provide a detailed assessment once concrete reform steps become due in subsequent reporting periods.

Within the Reform Agenda, the *Competition Policy and State Aid* domain aims to strengthen market fairness, reduce distortions, and ensure transparency of state aid schemes in line with the EU acquis, thereby contributing to a level playing field and improved business environment. Alignment in this area is essential both for safeguarding fiscal discipline domestically and for advancing Serbia's integration into the EU Single Market.

By the cut-off date, two reform steps in this domain were due, including the finalisation of the state aid inventory (due in December 2024) and the adoption of a time-bound action plan for alignment with the EU acquis (due in June 2025). Implementation has been marked by delays and inconsistencies, particularly in the timing of submissions, requests for disbursement, and the lack of publicly verifiable evidence of completion. In the next semester, progress will depend on clarifying the status of the final state aid inventory, adopting and publishing the action plan within the grace period, and improving the overall transparency of these processes.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Enhanced investment and development opportunities for entrepreneurs and private sector			
Final inventory submitted in line with the European Commission's comments from March 2024	December 2024	Not achieved. Grace period is activated and runs until December 2026.	Inventory finalised and submitted. Compliance with the EC's comments not publicly verifiable.
A time-bound action plan for alignment of state aid schemes with the EU acquis, based on a final inventory, is adopted and approved by the European Commission	June 2025	Under review.	Implementation claimed by the Government. Documentation unavailable. Verification pending.

## ENHANCED INVESTMENT AND DEVELOPMENT OPPORTUNITIES FOR ENTREPRENEURS AND PRIVATE SECTOR

### ***1.2.1.1 Final inventory submitted in line with the European Commission's comments from March 2024 – Not achieved. Grace period is activated and runs until December 2026:***

This reform entails submitting the final inventory of state aid measures and fully addressing the European Commission's comments provided in March 2024. The inventory should document Serbia's state aid measures and the comprehensive alignment of practices with the EU acquis.

Based on the Commission's [assessment](#), Serbia considered this step partially fulfilled at the time of submitting the first payment request in early 2025, and no funds were requested for it. In the second payment request, submitted in July 2025, Serbia requested disbursement for this step, suggesting that the inventory had by then been finalised. The subsequent [Serbia 2025 Report](#) acknowledged that a final inventory had been submitted, yet no explicit confirmation has been issued regarding full compliance with all the Commission's comments.

Independent verification of this reform step was not possible. The Commission's comments were not publicly available, nor were draft or final versions of the state aid inventory disclosed. As a result, it was not feasible to assess the comprehensiveness of the inventory, its alignment with the Commission's recommendations, or the transparency and completeness of the listed state aid measures. In response to a November 2025 e-mail inquiry, the Commission for State Aid Control indicated that formal confirmation from the European Commission had not yet been received and therefore, the document could not be shared. A subsequent Freedom of Information request, submitted at the end of January 2026, did not receive a response within the statutory deadline.

Overall, according to the above-mentioned sources, formal progress appears to have been made, but the absence of publicly accessible documentation limits the possibility of independent assessment. The process largely unfolded as a bilateral exchange between the Serbian authorities and the European Commission, with limited transparency.

**1.2.1.5 A time-bound action plan for alignment of state aid schemes with the EU acquis, based on a final inventory, is adopted and approved by the European Commission - Under review:**

This reform step requires the adoption of a time-bound action plan setting out concrete deadlines for aligning Serbia's existing state aid schemes with the EU acquis, based on a comprehensive and finalised inventory of all existing state aid measures. The action plan must be formally adopted by the Government and subsequently approved by the European Commission.

According to the Commission's [Serbia 2025 Report](#), published in November 2025, the action plan to align state aid schemes with the EU acquis had not yet been adopted. Nevertheless, the Serbian Government considered this step completed as it requested disbursement for it in the second payment request submitted in July 2025.

This inconsistency could not be clarified. An email inquiry was sent to the Prime Minister's Office on 9 December 2025; however, no response was received. Subsequently, a Freedom of Information request was submitted in late January 2026 to the same institution, given that the Government is the collective body responsible for implementing this reform step under the Reform Agenda. The Prime Minister's Office informed that the request had been forwarded to the Ministry of Finance for further handling. No substantive response had been received by the time of drafting this report.

No draft versions were made publicly available, and it was not possible to assess whether and how the action plan was aligned with the European Commission's recommendations, whether inter-agency coordination took place during its drafting, or whether initial implementation steps had commenced.

Overall, the process lacks transparency, and, in the absence of publicly accessible documentation or confirmation of Commission approval, the reform step cannot be independently verified as having been achieved.

Reforms related to state-owned enterprises (SOEs) fall under the Reform Agenda's Policy Area *Business Environment and Private Sector Development*, with a focus on improving public investment management, strengthening oversight of SOEs, enhancing transparency, and reducing fiscal risks. These reforms aim to ensure more efficient and accountable management of state-owned entities, improve corporate governance standards, and contribute to a level playing field in the market economy in line with EU rules.

No specific reform steps in this policy domain were due during the reporting semester. The Reform Monitor will continue to track progress in implementing measures related to SOE governance, transparency obligations, fiscal risk monitoring, and alignment with EU competition principles, and will provide a detailed assessment in subsequent reporting periods once concrete milestones become due.

