

PAR Monitor Report Serbia

POLICY DEVELOPMENT AND COORDINATION

2024/2025



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ABOUT WEBER 3.0

Building upon the achievements of its predecessors, the WeBER (2015 – 2018) and WeBER 2.0 (2019 – 2023) projects, the **Western Balkan Enablers for Reforming Public Administrations – WeBER 3.0** project is the third consecutive EU-funded grant of the largest civil society-led initiative for monitoring public administration reform (PAR) in the Western Balkans. Its implementation period is February 2023 – July 2026. Guided by the SIGMA/OECD Principles, the first two phases of the initiative laid the foundation for WeBER 3.0's ambition **to further empower civil society organisations (CSOs) to contribute to more transparent, open, accountable, citizen-centric and thus more EU-compliant administrations in the WB region.**

WeBER 3.0 continues to promote the crucial role of CSOs in PAR, while also advocating for broader citizen engagement in this process and inclusive reform measures which are user-tailored and thus lead to tangible improvements. By grounding actions in robust monitoring data and insights, WeBER 3.0 will empower civil society to more effectively influence the design and implementation of PAR. To foster collaborative policymaking and bridge the gap between aspirations and actionable solutions, the project will facilitate sustainable policy dialogue between governments and CSOs through the WeBER Platform and its National PAR Working Groups. Finally, through small grants for local CSOs, WeBER 3.0 bolsters local-level PAR engagement, amplifying the voices of citizens – the final beneficiaries of the public administrations' work.

WeBER 3.0 products and further information about them are available on the project's website at www.par-monitor.org.

WeBER 3.0 is implemented by the Think for Europe Network (TEN), composed of six EU policy-oriented think tanks in the Western Balkans:



By partnering with the Centre for Public Administration Research (KDZ) from Vienna, WeBER 3.0 has ensured EU-level visibility.



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As in the case of the previous editions of the National PAR Monitor reports, published for 2017/2018, 2019/2020 and 2021/2022, special acknowledgements go to the members of the WeBER Platform and the National Working Group in Serbia, as well as the other stakeholders in Serbia that shared their experiences through interviews, thus immensely contributing to the quality of this report. They are not individually identified in this report to protect their anonymity.

The WeBER3.0 team would also like to thank its main partners and associates, who have supported the project in research and other activities. Most notably, these are the SIGMA/OECD (Support for Improvement in Governance and Management)¹, the ReSPA (Regional School of Public Administration), and the Ministry of Public Administration and Local Self-Government of Serbia, as a project associate.

¹ A joint initiative of the European Union and the OECD.

EXECUTIVE SUMMARY

This report assesses the transparency and inclusiveness of four aspects of policy development and coordination: 1) transparency and inclusiveness of government decision-making process, 2) transparency of government planning and reporting, 3) transparency and inclusiveness of policy making and legislation development process, and 4) transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny. The first aspect examines whether transparency in government decision-making is secured through strategic commitments, legal provisions, and systematic publication of information from government sessions. The second looks at whether the government's planning and reporting obligations are regulated, and whether related documents are published on time, performance-oriented, and accessible in open formats. The third assesses whether policy-making and legislative development are transparent, inclusive, and evidence-based — covering stakeholder participation, impact assessments, consultation reporting and oversight, and the influence of public input on final decisions. The fourth examines legal and practical mechanisms for advance notification, publication of monitoring and ex-post evaluation reports, and stakeholder involvement in parliamentary oversight. The findings cover the period from 2023 until 2025, as well as the end-of-2022 developments not covered in the previous cycle.

Serbia has formal strategic documents and a regulatory framework that recognise transparency as a principle in Government decision-making. However, these frameworks do not include concrete measures or obligations to ensure proactive and systematic transparency. While the Rules of Procedure of the Government require public communication through press releases and media channels, there is no legal requirement to publish agendas, minutes, or materials of the Government's sessions. During the monitoring period (1 November 2025 - 1 February 2026), the Government held 22 sessions, yet no agendas or minutes were published. Press releases were issued for 16 sessions, providing only partial information. A freedom of information request to obtain full session information, including agenda items and adopted decisions, was denied, preventing verification of the extent to which decisions were publicly disclosed. Overall, the transparency of Government decision-making remains limited. Key non-state actors in Serbia confirmed that the Government's decision-making process lacks transparency. Information is primarily obtained through media reports or selective disclosures, while access to session materials and minutes is heavily restricted. They further argue that certain politically sensitive decisions are even less transparent, and press releases often provide limited context.

The PAR strategic framework in Serbia foresees improvements to the Government's planning and reporting, including stronger alignment between the Action Plan for the Implementation of the Government Programme, the National Programme for the Adoption of the Acquis, and the Government Annual Work Plan, as well as measures to enhance monitoring and reporting. Transparency requirements, however, are only partially regulated. The Law on the Planning System prescribes publication of the Government Annual Work Plan and the Action Plan for the Implementation of the Government Programme and their implementation reports, while no equivalent legal obligation exists for the National Programme for the Adoption of the Acquis. In practice, publication of central planning documents and their implementation reports is inconsistent. At the time of the assessment (November 2025), the latest available Government Annual Work Plan was for 2023, while the Action Plan for the Implementation of the Government Programme for 2025-2027 and the recent National Programme for the Adoption of the Acquis documents were published on time. Publication of implementation reports also shows uneven practice, including limited availability of reports on implementation of the Action Plan for the Implementation of the Government Programme, and occasional gaps in quarterly reporting on implementation of the National Programme for the Adoption of the Acquis. Substantively, the current planning and reporting practices do not consistently enable performance measurement - only the Action Plan for the Implementation of the Government Programme includes performance indicators and reporting on achieved results. In addition, data from central planning documents or their reports are not available in open format on relevant websites. At the same time, they are also not assessed as citizen friendly and although isolated examples of more accessible reporting exist, such practices are not applied systematically. Key informants disagree that the Government's planning and reporting activities are transparent, timely or citizen friendly and emphasise that communication to the public in this regard tends to be selective and limited.

A broad legal framework that regulates consultations and impact assessments is in place. However, the system is characterised by fragmentation, inconsistency, and lack of alignment across multiple legal acts. Key consultation requirements (such as minimum duration, advance notification, and transparency of work of working groups) are either missing or insufficiently regulated. New provisions of the Government Rules of Procedure from 2025 allowing exemptions from public debates introduce additional discretionary power and could negatively influence the overall quality of consultations in practice. A central quality control mechanism is not established, as no single body is responsible for monitoring compliance with consultation requirements across the entire policy cycle. In practice, significant discrepancies exist between public policy documents and legislation. All five analysed public policy documents (adopted from November

2024 until November 2025) included ex-ante impact assessments and underwent consultations. In contrast, only 28% of all laws included impact assessments, although this increases to 67% when excluding laws that are not required to undergo such assessments (e.g. ratification laws). When impact assessments were conducted, they were rarely published alongside consultation materials, i.e., were published for only 23% of relevant laws. This prevents stakeholders from understanding the evidence base, i.e., the rationale behind the proposed changes or innovations introduced by the act, during consultations. Moreover, while impact assessment reports were generally adequate in structure, they consistently lacked references to external data sources. Similarly, consultations were conducted for only 21% of laws, rising to 50% when excluding exempt laws, indicating inconsistent application of participatory practices in legislative processes. Even when consultations are conducted, they often occur late in the process and are not consistently documented, since reports are either not published or often not comprehensive and do not provide all elements regarding addressing received inputs. Lack of transparency is also noted regarding working groups for policy and legislative development, as information on their work is not publicly available. The use of the eConsultations portal is widespread: 37 out of 41 consultation processes were announced on the portal. However, only 7 out of 41 processes identified the Portal as a channel for submitting comments, indicating that it serves mainly as a notification tool rather than a platform for full participations and documentation of the process. Finally, despite the relatively positive experiences reported by non-state actors involved in working groups for policy and legislative development, they point to certain shortcomings in documenting the workflow and warn that diverse composition does not guarantee actual influence on outcomes. Public perception is mainly negative, with only one-third of citizens (33%) believing they have opportunities to participate in policy making at the state level. This indicates a significant gap between formal participation mechanisms and their visibility or accessibility to the broader public. Although the system provides a formal basis for participatory and evidence-based policy making, its effectiveness is undermined by legal framework incoherence and a lack of quality control mechanisms.

The strategic framework for transparency and inclusiveness of policy monitoring and evaluation practices is partially in place. It addresses transparency of these processes, but it does not systematically promote inclusiveness. Specifically, the Programme for Improving Public Policy Management and Regulatory Reform (2021–2025) and its Action Plan, outline general objectives related to policy management and transparency, yet without specifying measures to involve external stakeholders in monitoring and evaluation. Regulatory provisions do not require advance notification to affected groups about upcoming legal changes, and parliamentary rules limit participation in public hearings to formally invited

individuals, as chairmen of committees exclusively invite committee members, deputies, and other persons whose presence is deemed relevant to the topic of a public hearing. In practice, engagement with stakeholders is inconsistent. For example, only the Ministry of Information and Telecommunication proactively consulted postal operators on amendments to the Law on Postal Services, while other ministries did not provide advance notifications for sampled draft laws. Publication of monitoring reports on implementing sector strategies is uneven and often not citizen-friendly, with many reports presented solely as data tables without narrative summaries or visual aids. Ex-post evaluations of policy implementation are largely absent, and those available rely exclusively on internal data without inputs from external sources or actors. Parliamentary public hearings are also non-transparent. During the 12 months preceding the monitoring period, 12 public hearings were held, but no attendance records were kept, making it impossible to determine the involvement of affected groups or non-state actors. While draft laws and explanatory notes are generally available online at the website of the National Assembly, the transparency of the legislative process is still limited, and incomplete consultation reporting limits opportunities for public scrutiny. Overall, current practices indicate that transparency and inclusiveness in policy monitoring and evaluation, and legislative processes are largely missing.

Recommendations from this monitoring cycle focus on transparency of government decision-making and planning, by calling for legal obligations for the proactive publication of materials from government sessions, with particular emphasis on government conclusions. Central planning documents and their implementation reports should be regularly published, and supplemented with mandatory citizen-friendly summaries. Furthermore, data from the central planning documents should be published in machine-readable open format on the Open Data Portal. Recommendations also focus on the consolidation of the consultation framework through further regulation of different aspects of the process, prerequisites for a wider use of the eConsultation Portal, and the establishment of a central coordination body. Recommendations are further devoted to the policy monitoring aspect and call for regular publication of monitoring reports on sectoral policy documents and their citizen-friendliness. Ex post evaluations of sectoral policy documents should become a standard practice, drawing on diverse and external data sources. Finally, parliamentary transparency should also be improved to allow independent stakeholders and affected groups to participate in public hearings through open mechanisms.

LIST OF ABBREVIATIONS AND ACRONYMS

APIGP	Action Plan for the Implementation of the Government Programme
CSO	Civil Society Organisation
FOI	Freedom of Information
GAWP	Government Annual Work Plan
GSG	General Secretariat of the Government
IA	Impact Assessment
LPA	Law on Public Administration
LPS	Law on Planning System
MEI	Ministry of European Integration
NPAA	National Programme for the Adoption of Acquis
PAR	Public Administration Reform
PPD	Public Policy Document
PPS	Public Policy Secretariat
ReSPA	Regional School of Public Administration
RIA	Regulatory Impact Assessment
RoP	Rules of Procedure
SIGMA	Support for Improvement in Governance and Management
WB	Western Balkan
WeBER 3.0	Western Balkan Enablers for Reforming Public Administrations
WG	Working Group

I. WeBER PAR Monitor: What we monitor and how?

I.1 WeBER's approach to monitoring PAR

The Public Administration Reform (PAR) Monitor methodology was developed in 2015-2016, as part of the first Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform (WeBER) project. Since the onset, WeBER has adopted a markedly evidence-based approach in its endeavour to increase the relevance, participation and capacity of civil society organisations (CSOs) in the Western Balkans to advocate for and influence the design and implementation of PAR. The PAR Monitor methodology is a cornerstone WeBER product, enabling civil society monitoring of PAR based on evidence and analysis.

In line with WeBER's focus on the region's EU accession process, once the SIGMA *Principles of Public Administration* were revised in 2023, the WeBER PAR Monitor methodology was also redesigned in 2024, building on the Principles,² and on SIGMA Methodology,³ and complementing the monitoring by SIGMA by providing additional observations focused on transparency, inclusiveness, openness or other aspects of state administrations' work depending on PAR area in question. This revision helps maintain the focus of WeBER's recommendations on EU-compliant reforms, thus guiding the governments in the region towards successful EU accession and future membership. The main changes in the revised PAR Monitor methodology are briefly listed below.⁴

² OECD (2023), *The Principles of Public Administration*, OECD Publishing, Paris, <https://doi.org/10.1787/7f5ec453-en>.

³ Available at: <https://www.sigmaweb.org/en/publications/documents/2024/assessment-methodology-of-the-principles-of-public-administration.html>.

⁴ For detailed information on the scope and process of methodology revision please visit <https://www.par-monitor.org/par-monitor-methodology/>.

Table 1: Main changes in the PAR Monitor methodology

STRUCTURE

In order to align with the new SIGMA methodological approach, the following structural changes are introduced:

- Introduction of single indicator per PAR area, divided into sub-indicators, further consisting of several sub-indicator elements (i.e. specific criteria assessed), in order to streamline the approach and emphasise the focus on transparency, inclusiveness and openness in each PAR area.
- Introduction of types of sub-indicator elements, ensuring that all following aspects of reform are covered:
 - 1) Strategy and Policy,
 - 2) Legislation,
 - 3) Institutional Setup,
 - 4) Practice in Implementation, and
 - 5) Outcomes and Impact.
- Introduction of a 100-point scale, for a more nuanced assessment of progress in each PAR area.

DATA SOURCES

- Introduction of interviews with “key informants”, i.e. key non-state actors engaged and familiar with the processes. These interviews serve as a data source for the “Outcomes and Impact” elements instead of the formerly implemented survey of civil society organisations.
- More systematic use of public perception survey results as a data source for “Outcomes and Impact” elements and expanding the scope of the survey to complement the assessment in five PAR areas – all except “Strategy for PAR”.
- Removal of the survey of civil servants as a data source due to persistent issues with ensuring adequate response rates across the region’s administrations.

PAR MONITOR REPORTING

- Six national PAR Monitor reports, one per PAR area (36 in total for the entire PAR Monitor), in order to facilitate timely publication and advocacy for the monitoring results rather than publishing the results of 18 months of research at the end of the process.
- Six regional Western Balkan overview reports, one per PAR area (6 in total).

I.2 Why and how WeBER monitors the “Policy Development and Coordination” area

Meaningful citizen participation in the policy-making processes represents a cornerstone of good governance, by ensuring that decisions reflect the actual societal needs, are developed through dialogue with all stakeholders and affected groups and are subject to public scrutiny. Policies shaped through an open and transparent approach are more legitimate, better informed and evidence-based, and more likely to be effectively implemented. Planning plays a crucial enabling role in this process. When governments adopt, publish, and report on planning documents, they provide predictability, allow stakeholders to engage in a timely manner, and create a basis for assessing whether decisions align with stated strategic objectives. WeBER’s monitoring, thus, focuses on the transparency and inclusiveness of key elements of the policy cycle: from government planning and decision-making, through policy development, to policy implementation and evaluation, and, finally, parliamentary scrutiny. By assessing these interconnected stages, the monitoring examines how key principles of good governance transpose into the everyday practice of public administration, and provides insights into how Western Balkan governments communicate their decisions with the public, and to what extent the voice of the public is heard when key decisions are being made.

Monitoring in **the Policy Development and Coordination area** is based on all six SIGMA Principles in this area:

Principle 2: Public policies are coherent and effectively co-ordinated by the centre of government; decisions are prepared and communicated in a clear and transparent manner.

Principle 3: The government plans and monitors public policies in an effective and inclusive manner, in line with the government fiscal space.

Principle 4: Public policies are developed based on evidence and analysis, following clear and consistent rules for law making; laws and regulations are easily accessible.

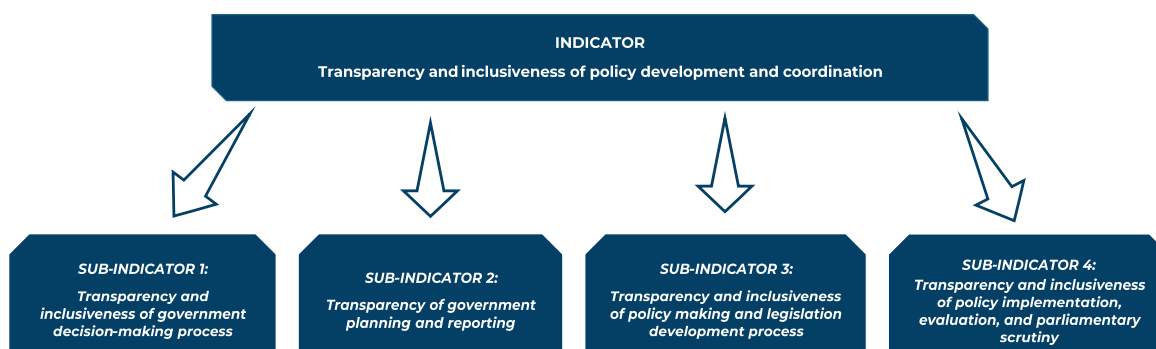
Principle 5: All key external and internal stakeholders and the general public are actively consulted during policy development.

Principle 6: Public policies are effectively implemented and evaluated, enhancing policy outcomes and reducing regulatory costs and burdens.

Principle 7: The parliament effectively scrutinises the government policymaking and ensures overall policy and legislative coherence.

These Principles are assessed from the perspective of the availability, accessibility and timeliness of all relevant information on the government planning, reporting and decision-making, while also examining the inclusiveness of policy and legislative development. The focus on transparency and inclusiveness also

seeks to determine if policies are regularly monitored, evaluated and subject to parliamentary scrutiny.



The monitoring period for the Policy Development and Coordination covers developments since the last PAR Monitor cycle, which lasted from January until November 2022. Thus, this report focuses primarily on the period from 2023 until 2025, as well as the end-of-2022 developments not covered in the previous cycle. Although this report provides a comparison of findings with previous PAR Monitor editions, country scores are incomparable to the previous monitoring due to methodological changes.

The **first sub-indicator** focuses on the existence of strategic and legal framework provisions that provide for transparent government decision-making, while also examining if key documents are available in practice: agendas for government sessions, meeting minutes, decisions and press releases. For the assessment of outcomes and impact, researchers conduct three key informant interviews with non-state actors who possess significant expertise in the area.

Table 2: Indicator elements under sub-indicator 1

Indicator element: number and title	Type
E 1.1 There is a strategic document in force that envisages improvement of transparency of government decision-making process	Strategy and policy
E 1.2 Regulations stipulate transparency of government decision-making process	Legislation
E 1.3 Government regularly publishes agenda items, minutes, and press releases from its sessions online	Practice in implementation
E 1.4 Government regularly publishes decisions from its sessions online	Practice in implementation
E 1.5 Key non-state actors consider the Government's decision-making process as transparent	Outcomes and impact

The **second sub-indicator** assesses the timeliness, availability and regularity of publishing of government planning documents and reports on their implementation, while also examining whether performance-based indicators and citizen-friendly elements are present. Monitoring of strategy and policy, legislation, and practice elements is performed by analysing strategic documents, legal acts and official data publicly available on the websites of relevant institutions. Assessment of outcomes and impact is based on the findings obtained from three key informant interviews, as in the previous sub-indicator.

Table 3: Indicator elements under sub-indicator 2

Indicator element: number and title	Type
E 2.1 There is a strategic document in force that envisages improvement of government planning and reporting practice	Strategy and policy
E 2.2 Regulations stipulate public availability of government planning documents and reports on their implementation	Legislation
E 2.3 Regulations stipulate public availability of government's European integration plans and reports on their implementation	Legislation
E 2.4 Government regularly and timely publishes its annual work plans	Practice in implementation
E 2.5 Government publishes its programme in a timely manner	Practice in implementation
E 2.6 Government's programmes and work plans contain performance indicators for monitoring achievement of results	Practice in implementation
E 2.7 Government regularly and timely publishes reports on the implementation of its work plans	Practice in implementation
E 2.8 Government regularly and timely publishes reports on the implementation of its programme	Practice in implementation
E 2.9 Government regularly and timely publishes its European integration plans	Practice in implementation
E 2.10 Government regularly and timely publishes reports on implementation of its European integration plans	Practice in implementation
E 2.11 Government's reports on implementing its programmes and work plans include assessments of achievement of key results and performance indicators	Practice in implementation
E 2.12 Government plans and reports are citizen friendly	Practice in implementation
E 2.13 Data contained in the government's reports on implementing work plans are available in open format	Practice in implementation
E 2.14 Key non-state actors consider the Government's planning and reporting activities as transparent, timely and citizen friendly	Outcomes and impact

The **third sub-indicator** seeks to examine if policy and legislation development are transparent, inclusive, and evidence-based, both in the strategic and legal framework and its implementation in practice. This includes meaningful stakeholder participation from the earliest phases, regular and comprehensive reporting on consultations, implementation of and reporting on impact assessments, oversight of consultation requirements, and the impact of public input on final decisions.

Monitoring of strategy and policy, legislation, institutional set-up, and practice aspects is performed by combining various data sources to maximise the reliability of results. It includes qualitative analysis of strategic documents, legal acts and official data that is publicly available or obtained from responsible institutions using FOI requests. The analysis of practice type elements under this sub-indicator is conducted on a sample of public policy documents and legal acts adopted in the period of 12 months preceding the monitoring window. Certain elements are based on a sub-sample of two adopted public policy documents and three adopted laws assessed as having significant impact on society or specific affected groups. For the outcomes and impact assessment, researchers conduct three key informant interviews with non-state actors, members of working groups for the development of sample public policy documents and laws, and use the findings of the WeBER public perception survey.

Table 4: Indicator elements under the sub-indicator 3

Indicator element: number and title	Type
E 3.1 There is a strategic document in force that envisages improvement in transparency and inclusiveness of policy making and legislation development process	Strategy and policy
E 3.2 Regulations envisage transparency and inclusiveness of policy making and legislative development process	Legislation
E 3.3 Regulations stipulate minimum consultation requirements	Legislation
E 3.4 Regulations envisage online and free of charge access to consolidated versions of all policy documents and legislation	Legislation
E 3.5 Regulations stipulate mandatory ex ante assessment of impacts - including on gender equality - during policy making, and publication of IA reports	Legislation
E 3.6 There is a designated government institution for checking compliance with consultations requirements	Institutional set-up
E 3.7 Ex ante impact assessments – including on gender equality - are consistently applied during the development of policy documents	Practice in implementation

E 3.8 Ex ante impact assessments – including on gender equality - are consistently applied during the development of primary legislation	Practice in implementation
E 3.9 Reports on implemented ex ante impact assessments during the development of primary legislation are regularly published online, together with the draft documents	Practice in implementation
E 3.10 Published reports on implemented ex ante impact assessments during the development of primary legislation contain key information	Practice in implementation
E 3.11 Non-state actors participate in the Government-led working groups for policy and legislative development	Practice in implementation
E 3.12 Procedures and decisions of working groups are transparent	Practice in implementation
E 3.13 Public consultations on policy documents and primary legislation are regularly held	Practice in implementation
E 3.14 Public consultations are conducted in an early phase of policy development	Practice in implementation
E 3.15 Reports on public consultations on policy documents are publicly available	Practice in implementation
E 3.16 Reports on public consultations on primary legislation are publicly available	Practice in implementation
E 3.17 Public consultation reports contain all elements of the implemented consultation process	Practice in implementation
E 3.18 Online, central consultation portal for the implementation of consultations is regularly used	Practice in implementation
E 3.19 Designated government institution regularly checks compliance with public consultation requirements	Practice in implementation
E 3.20 Lead ministries proactively inform on public consultations	Practice in implementation
E 3.21 Consolidated versions of primary and secondary legislation are easily accessible online, and available free of charge	Practice in implementation
E 3.22 Public consultation results have impact on final policy and legislative proposals	Outcomes and impact
E 3.23 Key non-state actors consider the work of the Government-led working groups as transparent and inclusive	Outcomes and impact
E 3.24 Citizens' perception of their opportunity to participate in the development of laws and strategies	Outcomes and impact

The **fourth sub-indicator** focuses on the transparency of policy implementation through availability of monitoring reports and ex-post evaluations, advance notifications to affected groups on the upcoming changes to the legal framework, and involvement of non-state actors in parliamentary deliberations through public hearings. Monitoring of this sub-indicator is based on the review of the strategic framework, regulations and websites and documents of relevant institutions. For the assessment of outcomes and impact, researchers conduct three key informant interviews with non-state actors, participants of public hearings organised by the parliament.

Table 5: Indicator elements under the sub-indicator 4

Indicator element: number and title	Type
E 4.1 There is a strategic document in force that envisages transparency and inclusiveness of policy monitoring and evaluation practices	Strategy and policy
E 4.2 Regulations envisage sending advance notifications to affected groups on the upcoming changes to the legal framework	Legislation
E 4.3 Parliamentary rules of procedure envisage participation of interested parties in parliamentary discussions, in the form of public hearings	Legislation
E 4.4 Lead ministries publish advance notifications to the affected groups on the upcoming changes to the legal framework	Practice in implementation
E 4.5 Lead ministries regularly publish monitoring reports on implementation of policy documents	Practice in implementation
E 4.6 Monitoring reports on implementation of policies are citizen friendly	Practice in implementation
E 4.7 Lead ministries publish ex-post evaluations on implementation of policies	Practice in implementation
E 4.8 Ex-post evaluations on implementation of policies use external data and information produced by non-state actors	Practice in implementation
E 4.9 Parliament involves stakeholders, affected groups, and other non-state actors in public hearings	Practice in implementation
E 4.10 Online transparency of the work of parliaments	Practice in implementation
E 4.11 Key non-state actors consider involvement of stakeholders in public hearings as effective	Outcomes and impact

II. TRANSPARENCY AND INCLUSIVENESS OF POLICY DEVELOPMENT AND COORDINATION

This section presents the assessment results for Serbia. Each sub-section presents the results for one sub-indicator (four in total), beginning with a brief overview of developments since the PAR Monitor 2021/2022. This is followed by a detailed assessment of the sub-indicator elements, starting with the policy, legislation and institutional framework, then moving to the practice in implementation, and ending with outcomes and impact. Each sub-indicator assessment concludes with the graph showing the awarded points.

The graph below displays the overall results for the Policy Development and Coordination area in Serbia, measured on a scale from 0 to 100 points.

Transparency and inclusiveness of policy development and coordination (score 0-100)



■ Awarded ■ Not achieved

II.1 Transparency and inclusiveness of government decision-making process

Principle 2: Public policies are coherent and effectively co-ordinated by the centre of government; decisions are prepared and communicated in a clear and transparent manner.

Awarded points per element in sub-indicator 1: Inclusiveness and transparency of government decision-making process⁵

Indicator elements	Element type	Score
E 1.1 There is a strategic document in force that envisages improvement of transparency of government decision-making process	Strategy and policy	0/0.5
E 1.2 Regulations stipulate transparency of government decision-making process	Legislation	0/1
E 1.3 Government regularly publishes agenda items, minutes, and press releases from its sessions online	Practice in implementation	0/2
E 1.4 Government regularly publishes decisions from its sessions online	Practice in implementation	0/2.5
E 1.5 Key non-state actors consider the Government's decision-making process as transparent	Outcomes and impact	0/3
Total score for sub-indicator 1		0/9

⁵ The first sub-indicator focuses on the following SIGMA sub-principles: The centre of government (CoG) enables and facilitates policy co-ordination across ministries and relevant institutions to ensure overall policy coherence and better and more sustainable policy outcomes; Government decisions are prepared, approved and followed up in a transparent, effective and timely manner, based on clear rules and procedures, through the relevant decision-making structures, including government sessions.

State of play

The state of plays remains largely unchanged since the previous monitoring cycle. SIGMA findings confirm that the level of openness and transparency of government decision-making is low.⁶ The SIGMA report notes that agendas of Government sessions are not made publicly available in advance, and records of decisions from these sessions are generally inaccessible to the public. The Government Office for Co-operation with the Media selectively communicates decisions from sessions based on considerations of public interest and current government priorities. Since session agendas are not published, it is not possible to determine which decisions and conclusions are disclosed and which remain unpublished.

Serbia has formal strategic documents in place that could address the transparency of government decision-making; however, they do not clearly outline concrete measures in this area. A review of the Action Plan for the Implementation of the Government Programme (APIGP) for 2025–2027⁷ and the Action Plan for Public Policy Management Improvement and Regulatory Reform for 2021–2025⁸ shows that neither document includes specific objectives, clearly defined measures or activities targeting increased transparency in decision-making processes of the Government. The absence of such explicit measures indicates that improvements in the transparency of governmental decision-making remains heavily underprioritized.

The regulatory framework formally recognises the principle of transparency in Government work, but it does not establish clear obligations to proactively publish key information from Government sessions. The Rules of Procedure of the Government (RoP) stipulate that the work of the Government is public and that transparency is ensured through press conferences, online communication, press releases, and other communication channels.⁹ At the same time, the Office for Cooperation with the Media is responsible for ensuring the transparency of the Government's work and informing the public about its decisions.¹⁰ However, the RoP does not require the systematic publication of agenda items, minutes, or press releases after each session. While minutes are formally kept and contain

⁶ SIGMA/OECD, Public Administration in Serbia 2024: Assessment against the Principles of Public Administration, pp. 25-27. Available at: <https://tinyurl.com/26pvjun3>.

⁷ Action plan for the implementation of the Government Programme 2025-2027, available at: <https://tinyurl.com/bdzfdnpx>.

⁸ Action Plan for Public Policy Management Improvement and Regulatory Reform (2021–2025), available at: <https://tinyurl.com/3cm8yszd>.

⁹ Government Rules of Procedure, Article 93, Official Gazette of the RS, No. 61/2006 - revised text, 69/2008, 88/2009, 33/2010, 69/2010, 20/2011, 37/2011, 30/2013, 76/2014, 8/2019 - other decrees and 106/2025, available at: <https://tinyurl.com/3s72f9dk>.

¹⁰ Government Rules of Procedure, Article 94.

detailed information on the course of the session and decisions taken,¹¹ their publication is not regulated. In addition, journalists and the public generally do not attend Government sessions, and statements made during sessions are considered strictly confidential unless the Prime Minister decides otherwise.¹² Government documents, including minutes, materials, and transcripts, are kept within the records of the General Secretariat of the Government (GSG) and may be accessed only with the consent of the Secretary-General.¹³ Overall, although transparency is recognised as a principle, the absence of explicit legal requirements to publish key information from Government sessions limits the transparency of the Government's decision-making in practice.

The Government of Serbia published limited information related to its sessions online. During the monitoring period, the Government held 22 sessions from 1 November 2025 to 1 February 2026. No agenda items were published for any of these sessions, either in advance or afterwards, and no session minutes were made publicly available. Press releases were issued for 16 out of the 22 sessions (73%), providing partial information about decisions taken. Taken together, the limited publication of materials, particularly the absence of agendas and minutes, speaks of highly opaque decision-making process and therefore restricted public access to relevant information.

For these reasons, it was not possible to determine whether the Government regularly publishes decisions adopted at its sessions online. A review of publicly available information on the Government's website did not allow identification of the total number of agenda items discussed during the monitoring period, nor the number of decisions taken and their confidentiality status. A FOI request was submitted to GSG as the data holder, requesting the list of agenda items per session, the list of adopted decisions, their confidentiality status, and the dates of publication of decisions. However, the GSG requested additional clarification in the first response to the request. After an additional clarification of the initial request, it denied the request as "not clear enough". Consequently, due to the absence of both publicly available information and an institutional response, it was not possible to verify the number of adopted decisions that were not formally labelled as confidential or to assess the extent to which such decisions were made publicly available online.

Finally, key informants confirm that the Government's decision-making process is non-transparent.¹⁴ Overall, they assess transparency as insufficient across all

¹¹ Government Rules of Procedure, Article 63.

¹² Government Rules of Procedure, Article 96.

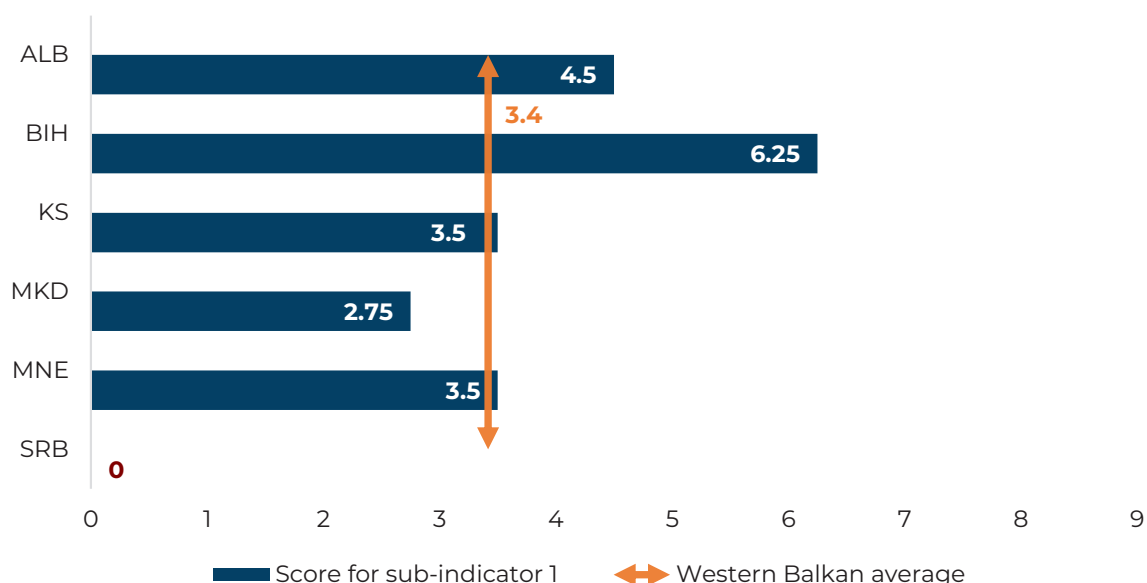
¹³ Government Rules of Procedure, Article 98.

¹⁴ Researchers identified and interviewed relevant non-state actors with experience and knowledge in the field (key informants). Non-state actors are selected among representatives of civil society organisations, academia, professional organisations, media associations, investigative journalism outlets, or thematic experts. As a rule, three non-state actors were interviewed for all statements. Key informant interviews were conducted on February 4th, 11th, and March 23rd. Two key informants

stages of the decision-making process and consistently highlight significant shortcomings. Information on Government sessions and agenda items is not communicated systematically through formal or institutional channels; it is instead obtained primarily through the media or selective disclosures, occasionally including announcements by the President. Access to information is further constrained by the central role of the GSG, which acts as a gatekeeper controlling the flow of information. All interviewees emphasised the lack of access to session minutes and the absence of insights into discussions preceding decisions. While some adopted legal acts are published, this is inconsistent, and certain types of decisions - particularly those that are politically sensitive - are perceived as less transparent, with procedures sometimes used to limit public scrutiny. Government press releases and media appearances were described as the primary sources of information, but are generally seen as selective, lacking detail, and focused on presenting outcomes without sufficient explanation or context. To address these shortcomings, interviewees suggested introducing more proactive and systematic disclosure practices, including advance announcements of sessions, a public calendar, comprehensive publication of agendas, materials, and adopted decisions, as well as improved access to information through a centralised, user-friendly platform.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Sub-indicator 1: Transparency and inclusiveness of the government decision-making process (maximum score 9)



responded with fully disagree and one responded with tend to disagree to the statement “Agenda items for the Government’s sessions are transparent.” The ratio of responses per agreement scale was the same for the statement “Minutes of the Government’s sessions are transparent”. All KIs fully disagree with the statement “Decisions from the Government’s sessions are transparent”. Two key informants responded with tend to disagree and one responded with tend to agree to the statement “The Government publicly informs on its decisions via press releases.”

II.2 Transparency of government planning and reporting

Principle 3: The government plans and monitors public policies in an effective and inclusive manner, in line with the government fiscal space.

***Awarded points per element in sub-indicator 2:
Transparency of government planning and reporting¹⁵***

Indicator elements	Element type	Score
E 2.1 There is a strategic document in force that envisages improvement of government planning and reporting practice	Strategy and policy	0.5/0.5
E 2.2 Regulations stipulate public availability of government planning documents and reports on their implementation	Legislation	0.5/0.5
E 2.3 Regulations stipulate public availability of government's European integration plans and reports on their implementation	Legislation	0/0.5
E 2.4 Government regularly and timely publishes its annual work plans	Practice in implementation	0/1.5
E 2.5 Government publishes its programme in a timely manner	Practice in implementation	1.5/1.5
E 2.6 Government's programmes and work plans contain performance indicators for monitoring achievement of results	Practice in implementation	0.75/1.5
E 2.7 Government regularly and timely publishes reports on the implementation of its work plans	Practice in implementation	1.5/1.5
E 2.8 Government regularly and timely publishes reports on the implementation of its programme	Practice in implementation	0/1.5
E 2.9 Government regularly and timely publishes its European integration plans	Practice in implementation	1.5/1.5

¹⁵ The second sub-indicator focuses on the following SIGMA sub-principles: Policy planning documents meet quality requirements and contain adequate analysis and information, including on policy objectives, indicators with targets and monitoring framework. They are developed in a participatory manner and are publicly available; Performance and results, including achievement of policy objectives and outcome indicators, are regularly monitored and reported on; monitoring reports are published on time to enable public scrutiny; The government effectively implements EI plans through prioritising and costing of EI-related commitments, taking into consideration the available resources and capacities of the administration.

E 2.10 Government regularly and timely publishes reports on implementation of its European integration plans	Practice in implementation	0/1.5
E 2.11 Government's reports on implementing its programmes and work plans include assessments of achievement of key results and performance indicators	Practice in implementation	0/2
E 2.12 Government plans and reports are citizen friendly	Practice in implementation	0.25/1.5
E 2.13 Data contained in the government's reports on implementing work plans are available in open format	Practice in implementation	0/1.5
E 2.14 Key non-state actors consider the Government's planning and reporting activities as transparent, timely and citizen friendly	Outcomes and impact	0/3
Total score for sub-indicator 2		6.5/20

State of play

No notable improvements have been registered since the previous monitoring cycle. The EC reinstates that the national development plan, due for adoption in 2020, is still not in place, stressing that the enforcement of the regulatory framework remains behind the legal deadlines.¹⁶ SIGMA confirms the challenges in implementing regulatory framework on the policy planning system with references to insufficient alignment among and costing of central planning documents. In addition, among other weaknesses to be addressed are untimely preparation of planning documents and their reports. Although noting that compliance between planned and approved draft laws by the Government has improved somewhat in the past period (78% in 2023), latest SIGMA report underscored untimely publishing of the report on the Government's Annual Work Plan.¹⁷

The PAR strategic framework in Serbia envisages measures to improve government planning and reporting practices. Specifically, the Programme for Improvement of Public Policy and Regulatory Reform Management, with its Action Plan for 2021-2025, aims to strengthen compliance between central planning documents. This includes linking the Action Plan for the Implementation of the Government Programme (APIGP) with the National Programme for the Adoption of the Acquis (NPAA), particularly regarding

¹⁶ European Commission, Serbia 2025 Report, pp. 26. Available at: https://enlargement.ec.europa.eu/serbia-report-2025_en.

¹⁷ SIGMA/OECD, Public Administration in Serbia 2024: Assessment against the Principles of Public Administration, pp. 29-30. Available at: <https://tinyurl.com/26pvjun3>.

regulations and deadlines for their adoption, and strengthening the technical capacities of the Ministry of European Integration for the NPAA preparation and monitoring, including its harmonisation with the Government Annual Work Plan (GAWP).¹⁸

Regarding the enhancement of government reporting practices, the Action Plan foresees several activities: establishing a mechanism for regular reporting, through GAWP reports, on by-laws not adopted within stipulated deadlines; adapting the Unified Information System module for the APIGP to the new format; organising trainings for public administration bodies on preparing and monitoring APIGP implementation; and preparing a report on consultation processes conducted through the eConsultation portal, as an integral part of GAWP reporting.¹⁹ These activities, with clearly assigned responsibilities for the Public Policy Secretariat (PPS) and the GSG, indicate an intention to gradually planning and reporting at the centre-of-government.

Transparency of central planning and reporting documents is partially embedded in the regulatory framework. The Law on the Planning System (LPS) establishes two planning documents related to the Government's work: GAWP, as an annual document, and the APIGP, as a multi-annual document. The LPS requires both to be published within seven days of their adoption. It also obliges the Government to publish reports on their implementation on its website no later than 15 days after their adoption.²⁰ In contrast, no such requirement exists for the main European integration planning document, the NPAA. The current Law on Ministries assigns the Ministry of European Integration responsibility for coordinating the preparation and implementation of the NPAA but does not explicitly require publication of the document or its implementation report.²¹ For this reason, transparency requirements for key central planning documents remain incompletely regulated.

In practice, central planning documents of the Government - GAWP, APIGP, and NPAA, as well as reports on their implementation, are not published consistently or in a timely manner. At the time of the assessment in November 2025, the most recent available GAWP was for 2023.²² By contrast, the APIGP in force at the time of the assessment (2025–2027) was available online and

¹⁸ Action Plan of the Programme pp.15, available at: <https://rsjp.gov.rs/sr/dokumenti-kategorija/program-ujpr/>.

¹⁹ Action Plan of the Programme pp.15-17.

²⁰ The Law on the Planning System, Articles 21-22, 44-45, available at: <https://pravnoinformacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/30/1/reg>.

²¹ The Law on Ministries Article, Article 16, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2020/128/1/reg>.

²² According to the Law on the Planning System, Article 22, the Government Annual Work Plan shall be produced and adopted by December of the current year for the next year and should be published at latest 7 days after adoption.

published in October 2025, within the seven-day deadline set by the LPS.²³ Similarly, the last two NPAA documents (2022–2025 and 2024–2027) were available on the website of the Ministry of European Integration and were both published within seven days of adoption, despite the absence of a legal deadline.²⁴

The publication of implementation reports also shows uneven practice. For the last two reporting cycles observed at the time of the assessment, reports on the implementation of the GAWP for 2023 and 2024 were available on the Government's website and published within the legal deadline of 15 days after adoption.²⁵ However, this reveals a significant discrepancy: the Government publicly reported on the implementation of its 2024 annual work despite not having publicly disclosed the 2024 GAWP. For APIGP annual reporting covering 2023 and 2024, only the 2023 report was available on the PPS's website and was published within the legal deadline, in April 2024.²⁶ Finally, the reporting on NPAA implementation is conducted quarterly. Although no deadlines are prescribed for adoption or publication, quarterly reports for 2024 and 2025 were observed and generally published in a timely manner. An exception was the report for the second quarter of 2024, which was not available online on the website of the Ministry of European Integration. Overall, the practice shows mixed results, with frequent instances of missing disclosures of central planning documents or their implementation reports, combined with delayed adoption. This undermines not only the transparency of government planning and reporting but also makes these processes unpredictable and unreliable.

23 Available at the Government's website at <https://www.srbija.gov.rs/prikaz/847735>, and the website of the Public Policy Secretariat at: <https://rsjp.gov.rs/sr/dokumenti-kategorija/program-vlade-i-apspv/>. It should be noted that the APIGP was adopted six months after the Government's programme was adopted in the National Assembly in April 2025. The legal deadline for producing and adopting the APIGP is three months after the election of the new Government by the National Assembly, Law on the Planning System, Article 21.

24 The assessment is based on information received via an FOI request sent on December 3rd, 2025. Available at: <https://tinyurl.com/5vn8upvx>.

25 Available at: <https://www.srbija.gov.rs/prikaz/583756>. It should be noted that the adoption of the GAWP report for 2023 was three months late and submitted to the Assembly on September 19th 2024. It should also be noted that, due to elections, the Government could not submit any documents to the Assembly until May 2nd 2024, when the new Government was formed, and thus this report was taken into consideration for point allocation. The report for 2024 was adopted and published in May 2025.

26 Available at: <https://rsjp.gov.rs/cir/dokumenti-kategorija-cir/program-vlade-i-apspv-cir/>.

Table 6: Public availability of central planning documents and reports on their implementation in practice

GAWP <i>valid at the time of assessment and previous plan</i>	X for 2025 X for 2024
APIGP <i>valid at the time of assessment</i>	✓ for 2025-2027
NPAA <i>valid at the time of assessment and previous plan</i>	✓ for 2024-2027 ✓ for 2022-2025
GAWP reports <i>for the last two reporting cycles</i>	✓ for 2024 ✓ for 2023
APIGP reports <i>for the last two reporting cycles</i>	X for 2024
	✓ for 2023
NPAA reports <i>for the last two reporting cycles</i>	X for 2025 ²⁷ X for 2024

Substantively, the Government’s planning and reporting framework does not consistently enable performance measurement and tracking. Comparing the GAWP and APIGP, only the latter incorporates performance indicators to monitor the achievement of results, defined for each result under priority objectives. Accordingly, the 2023 report on APIGP implementation includes information on results achieved based on these indicators. By contrast, the 2023 and 2024 GAWP implementation reports, in line with longstanding practice, primarily list regulations adopted by the respective public administration bodies, mirroring the structure of the GAWP itself. They contain limited narrative assessment and no references to key results. It should also be noted that data on the implementation of commitments from either the GAWP or APIGP are not available in open format on relevant websites, including the Open Data Portal. Overall, the current approach prioritises activity tracking more than results measurement, limiting the ability of the interested public to scrutinise the Government’s work and providing no opportunities for data reuse.

Additionally, government planning and reporting practices are not citizen-friendly, as concise and easy-to-understand key information - presented through dedicated sections or visual elements - is largely absent. Instead, the observed documents tend to move in the opposite direction. GAWPs present

²⁷ The reporting on the implementation of the NPAAs is conducted quarterly, for this purpose all quarterly reports for 2025 and 2024 are observed. Due to the fact that the report for the second quarter of 2024 was not available on the website of the Ministry of European Integration, this criterion was assessed as not met. Reports are available at: <https://tinyurl.com/5vn8upvx>.

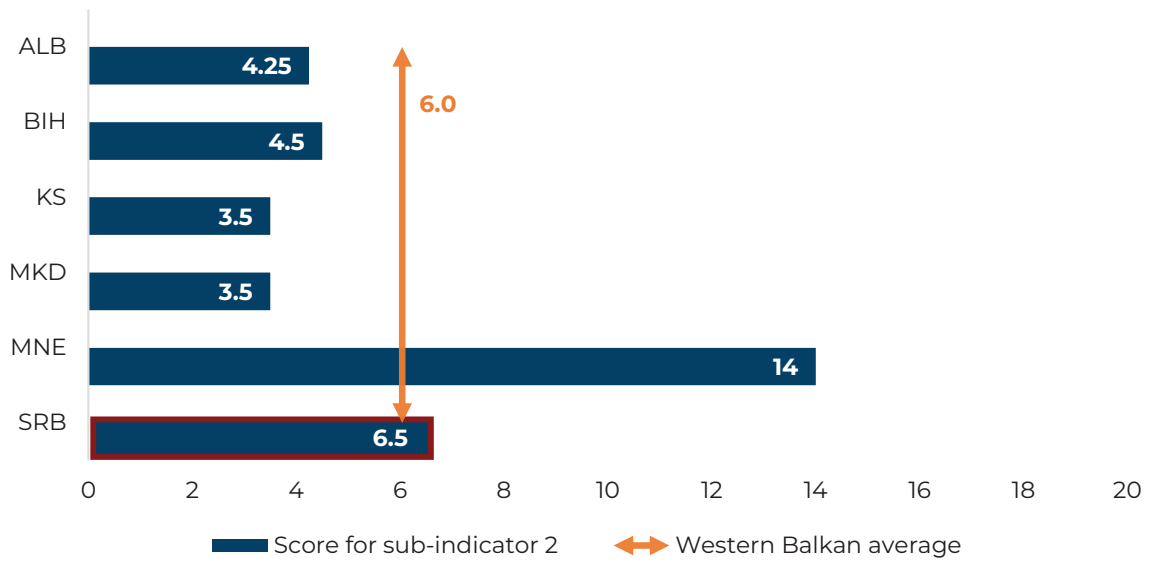
extensive overviews of planned activities by state administration body, further divided into acts submitted to the National Assembly, acts adopted by the Government, and regulations adopted by institutions, alongside listings of programmes and projects. This results in lengthy and cluttered documents. The same applies to GAWP implementation reports, which largely replicate this structure. Some isolated examples of more citizen-friendly approaches do exist. The 2023 APIGP implementation report includes visual data presentations, narrative explanations, and sections outlining unachieved results, together with recommendations for the following period. Similarly, quarterly NPAA implementation reports contain summaries presenting the total number and percentage of adopted acts by type, as well as the level of fulfilment of obligations in the reporting period. However, across all observed planning and reporting documents, citizen-friendly elements appear only sporadically and are not used systematically. As a result, commitments and achievements are not presented in a clear, accessible, and communicable manner for the wider public.

Key informants overwhelmingly assess the Government's planning and reporting activities as neither transparent and timely nor citizen friendly.²⁸ Although formal mechanisms and deadlines exist, they are often not respected in practice, making it difficult to monitor policy implementation or ensure accountability for missed deadlines. The absence of key national planning documents further undermines coherence and weakens the functioning of planning cycles. Interviewees also note that planning documents do not clearly present priorities, objectives, or expected results, largely because such priorities are not consistently defined. Frequent election cycles are perceived as contributing to inconsistencies between policy commitments and government work plans, resulting in limited delivery across policy areas. Communication of planning and reporting outcomes to the public is likewise viewed as inconsistent, limited, and selective, with key informants describing it as politically driven and focused on shaping public opinion rather than providing comprehensive information on results. Taken together, these views point to systemic weaknesses in the Government's practices, reducing planning and reporting processes to a largely formal exercise.

²⁸ Researchers identified and interviewed relevant non-state actors with experience and knowledge in the field (key informants). Non-state actors are selected among representatives of civil society organisations, academia, professional organisations, media associations, investigative journalism outlets, or thematic experts. As a rule, three non-state actors were interviewed for all statements. Key informant interviews were conducted on February 4th, 11th, and March 23rd. All three key informants tend to disagree to the statement "Government's planning and reporting activities are transparent." Two key informants tend to disagree, and one fully disagrees to the statement "Government's planning and reporting activities are timely." Finally, one key informant tend to disagree, and two fully disagree with the statement "Government's planning and reporting activities are citizen friendly."

HOW DOES SERBIA DO IN REGIONAL TERMS?

Sub-indicator 2: Transparency of government planning and reporting (maximum score 20)



II.3 Transparency and inclusiveness of policy making and legislation development process

Principle 4: Public policies are developed based on evidence and analysis, following clear and consistent rules for law making; laws and regulations are easily accessible.

Principle 5: All key external and internal stakeholders and the general public are actively consulted during policy development.

Awarded points per element in sub-indicator 3: Transparency and inclusiveness of policy making and legislation development process²⁹

Indicator elements	Element type	Score
E 3.1 There is a strategic document in force that envisages improvement in transparency and inclusiveness of policy making and legislation development process	Strategy and policy	0.5/0.5
E 3.2 Regulations envisage transparency and inclusiveness of policy making and legislative development process	Legislation	2.25/3
E 3.3 Regulations stipulate minimum consultation requirements	Legislation	2.25/3.75
E 3.4 Regulations envisage online and free of charge access to consolidated versions of all policy documents and legislation	Legislation	1.5/1.5

²⁹ The third sub-indicator focuses on the following SIGMA sub-principles: A whole-of-government policy to promote better regulation, evidence-based and inclusive policymaking is established and applied in practice during policy development and legislative drafting; Procedures are in place and consistently applied and monitored to enable pro-active and effective public consultations with stakeholders and the general public, allowing businesses, non-governmental organisations and citizens, including from vulnerable groups to participate in and inform government policymaking; All primary and secondary legislation, including consolidated versions, is easily accessible and available free of charge through a central online database(s). Administrative guidance documents, forms and materials essential for complying with regulations are easily available for businesses and citizens; Regulatory impact assessment (RIA), or other similar tool(s), is adopted and systematically used to support policy development, facilitate consultation and inform decision-making at all key stages of policymaking, covering both primary and secondary legislation, including the impact on the environment and climate where necessary; Consultation with the general public is conducted in an accessible and transparent manner; Ministries hold constructive dialogue with key external stakeholders and collect, analyse and use all responses when finalising the policy proposal. They transparently report on the outcome of the public consultation process and how consultees' views have shaped and influenced policy; All possible impacts of policy proposals are systematically analysed; reasonable efforts are made to quantify and monetise key impacts, including additional costs on the state budget, businesses and citizens; Ministries have clear internal rules and procedures for planning and managing effectively the development of policies and legislative drafting.

E 3.5 Regulations stipulate mandatory ex ante assessment of impacts - including on gender equality - during policy making, and publication of IA reports	Legislation	1.75/1.75
E 3.6 There is a designated government institution for checking compliance with consultations requirements	Institutional set-up	0/0.75
E 3.7 Ex ante impact assessments – including on gender equality - are consistently applied during the development of policy documents	Practice in implementation	1.5/1.5
E 3.8 Ex ante impact assessments – including on gender equality - are consistently applied during the development of primary legislation	Practice in implementation	0/2
E 3.9 Reports on implemented ex ante impact assessments during the development of primary legislation are regularly published online, together with the draft documents	Practice in implementation	0.75/1.5
E 3.10 Published reports on implemented ex ante impact assessments during the development of primary legislation contain key information	Practice in implementation	1.5/2.5
E 3.11 Non-state actors participate in the Government-led working groups for policy and legislative development	Practice in implementation	1/2
E 3.12 Procedures and decisions of working groups are transparent	Practice in implementation	0/2.5
E 3.13 Public consultations on policy documents and primary legislation are regularly held	Practice in implementation	1/2
E 3.14 Public consultations are conducted in an early phase of policy development	Practice in implementation	0.75/1.5
E 3.15 Reports on public consultations on policy documents are publicly available	Practice in implementation	0/1.5
E 3.16 Reports on public consultations on primary legislation are publicly available	Practice in implementation	0/1.5
E 3.17 Public consultation reports contain all elements of the implemented consultation process	Practice in implementation	3/3.75
E 3.18 Online, central consultation portal for the implementation of consultations is regularly used	Practice in implementation	0.75/2.25
E 3.19 Designated government institution regularly checks compliance with public consultation requirements	Practice in implementation	0/1.5
E 3.20 Lead ministries proactively inform on public consultations	Practice in implementation	2.5/2.5

E 3.21 Consolidated versions of primary and secondary legislation are easily accessible online, and available free of charge	Practice in implementation	1.5/1.5
E 3.22 Public consultation results have impact on final policy and legislative proposals	Outcomes and impact	0.75/3.75
E 3.23 Key non-state actors consider the work of the Government-led working groups as transparent and inclusive	Outcomes and impact	3/3
E 3.24 Citizens' perception of their opportunity to participate in the development of laws and strategies	Outcomes and impact	0.5/4
Total score for sub-indicator 3		26.75/52

State of play

Since the previous monitoring cycle, certain amendments have been introduced to the legal framework governing the area of policy development. New decrees on the methodology of public policy documents development and regulatory impact assessments (RIA) were adopted in March 2025, encompassing relevant articles covering impact assessment, consultations, monitoring, reporting and evaluation for both legal acts and public policy documents. In November 2025, amendments to the RoP of the Government were adopted, introducing significant changes. Primarily, the public debate is now recognised as the final stage of the consultation process. However, the RoP introduce a new basis for exemption from the obligation to conduct the public debate if consultations were conducted in a satisfactory manner. This new article gives significant discretionary power without clear criteria, especially given the fact that a quality control system has not been established, which remains one of the key shortcomings of the system. Finally, the practice of consultations has not significantly improved, according to the latest report of the European Commission, as 58% of draft laws and 30% of draft regulations underwent consultations in 2024.³⁰ This demonstrates that, although the legal framework is constantly developed, the key issue lies in its implementation. Amendments to the Decree on the Regulatory Impact Assessment and the Decree on the Methodology for Drafting Public Policy Documents, adopted in March 2026, now exclude all public policy documents and regulations adopted in the context of the EU accession process from the obligation to undergo RIA and abolish the current consultation framework, creating additional legal ground for lack of inclusive and transparent policymaking.

³⁰ European Commission, Serbia 2025 Report, pp. 27. Available at: https://enlargement.ec.europa.eu/serbia-report-2025_en.

Improvement of transparency and inclusiveness of policy and legislative development was envisaged in the latest PAR planning documents, valid until the end of 2025.³¹ The Programme for Improvement of Public Policy and Regulatory Reform Management, with an Action Plan, for the period 2021-2025, defined several measures and actions across the following key aspects: establishing a system for conducting and monitoring the quality of consultations and public debates; reporting on the implementation of the consultative process via the e-Consultations portal; conducting trainings for CSOs for participation in the process of adopting regulations and public policy documents; and building the capacity of civil society for their inclusion in the process of drafting public policy documents and regulations and monitoring their implementation.³² The fact that these measures and activities constitute a dedicated objective of the Programme signals that the aspect of consultations and CSO involvement are recognised as one of key PAR priorities.

Serbia's legal framework does not guarantee full transparency in policy and legislative development, nor does it set out all minimum requirements for consultation processes, but it does regulate most key aspects. The framework consists of eight regulations used in this analysis:

1. Law on the Planning System (LPS),
2. Law on Public Administration (LPA),
3. RoP of the Government,
4. Decree on the Regulatory Impact Assessment (hereinafter: Decree on the RIA),
5. Decree on the Methodology for Drafting Public Policy Documents,
6. Decision on the management and use of the "e-Consultations" Portal,
7. Rulebook on Good Practice Guidelines for Enabling Public Participation in the Preparation of Draft Laws and Other Regulations (hereinafter: Rulebook on Good Practice Guidelines), and
8. Guidelines for including CSOs in the working groups for developing draft public policy documents and draft legal acts (hereinafter: Guidelines for including CSOs in the WGs).

³¹ Due to the fact that the monitoring started in November 2025, these PAR planning documents were valid at that time and were, thus, used as a basis for point allocation. At the time of writing this report, new PAR planning documents that would cover the period from 2026 and onwards were not yet formally adopted.

³² Specific objective four of the Programme defines two measures, within which the presented activities are defined: Measure 4.1, *Establishing and implementing adequate mechanisms for controlling the quality of consultations and public debates and the efficiency and use of the electronic consultation portal* (Activities 5 and 6), and Measure 4.2, *Strengthening the capacity of civil society to participate in the adoption of regulations and planning documents* (Activities 1 and 3). Programme for Improvement of Public Policy and Regulatory Reform Management for 2021-2025, with an Action Plan for 2025, with an overview of previously implemented activities, is available at: <https://rsjp.gov.rs/sr/dokumenti-kategorija/program-ujpr/>.

Several aspects of the current framework negatively impact its effectiveness, primarily the fragmentation of specific segments across a high number of regulations. The main legal acts (LPS and LPA) are not updated to reflect the current state of play, as they refer to the eGovernment Portal for publishing consultations, instead of the currently valid eConsultation Portal. Furthermore, the consultations are not regulated as a unique matter within a single law, and its accompanying by-laws. It is covered by both relevant laws – LPS and LPA, depending on if they are conducted for public policy documents (PPDs) or laws. On the other hand, public debates are regulated within a single act (RoP), without differentiation based on the act type. Both the LPS and the LPA specifically point to the RoP for more detailed provisions on public debate. Finally, the legal framework is not consolidated. The amendments to the RoP from November 2025 introduced an exemption from the obligation to conduct a public debate where consultations were deemed successful, which is a provision not found in the LPS, LPA, or any other relevant regulation. Notably, these amendments were adopted during the Government’s session for which there was no publicly available information on the Government’s website. This exemption further deepens the incoherence of the legal framework. The table below provides an overview of regulation of key consultation requirements, separated into types of acts for a clearer presentation.

Table 7: Legal framework coverage of key consultation requirements

	PPDs	primary legislation	secondary legislation
Consultations with stakeholders and targeted groups (early consultations), including transparency of consultation results (reports)	✓	✓	✓
Public consultations on the draft proposals (consultations at the end of the process, for anyone interested), including transparency of consultation results (reports)	✓	✓	✓
Transparency of work of working groups, including composition and results of their work	X	X	X
Inclusiveness of work of working groups, i.e., involvement of non-state actors, including transparency of selection process	✓	✓	✓
Minimum duration of consultations	X	X	X
Timeliness of informing stakeholders and the public on holding consultations (advance notifications)	X	X	X
Documents to be published alongside drafts or materials under consultation	✓	✓	✓

Minimum two formats of consultations (submission via email, via post, through consultation portals, or websites of responsible authority, etc.)	✓	✓	✓
Mandatory reporting on implemented consultations, and mandatory provision of feedback on consultees' inputs	✓	✓	✓

The legal framework provides basic prerequisites for inclusiveness and transparency of policy and legal development, apart from the transparency of the work of working groups. Consultations for PPDs are prescribed by the LPS, along with the publication of reports.³³ For primary and secondary legislation, the LPA mandates consultations for draft laws and states that consultations are also carried out during the preparation of by-laws that elaborate specific provisions or determine the manner of implementing certain provisions of a law that significantly changes the legal regime in a given area or regulates matters of particular public interest.³⁴ Although the LPA does not cover reporting, the Rulebook on Good Practice Guidelines requires the relevant authority to produce a consultation report, while the Decree on the RIA states that the consultation report is an integral part of the material which the authority submits to the Government along with the draft legal act.³⁵

The LPS regulates both public debates and reporting for PPDs.³⁶ For primary legislation, the obligation to conduct a public debate is laid out in the LPA and the RoP. The LPA requires a public debate for a law that significantly changes the legal regime in a given area or regulates matters of particular public interest. The RoP mandate a public debate for new system laws, new laws (unless decided otherwise by the Government), laws amending existing laws (here the Government decides in each case if the debate will be organised), and laws confirming international agreements (only if the Government decides to conduct it). As previously mentioned, the newly introduced Article 41a of the RoP allows the Government to exempt authorised proposers from organising public debates for both PPDs and laws if they previously conducted consultations which were deemed as successful, giving significant discretionary power in deciding when a

³³ Article 34, Law on the Planning System, Official Gazette No. 30/2018. Available at: <https://tinyurl.com/3k96e3uz>.

³⁴ Article 77, Law on Public Administration, Official Gazette No. 47/2018. Available at: <https://tinyurl.com/4tbc98ay>.

³⁵ Article 12, Rulebook on Good Practice Guidelines for Enabling Public Participation in the Preparation of Draft Laws and Other Regulations, Official Gazette No. 51/2019. Available at: <https://tinyurl.com/y85udesd>. Article 30, Decree on the Regulatory Impact Assessment, Official Gazette No. 30/2026. Available at: <https://tinyurl.com/2p8xrnve>.

³⁶ The LPS also mandates the publication of reports on public debates (maximum 15 days after the debate is finalised) and prescribes all elements which the report must contain. Article 36, Law on the Planning System.

public debate can be skipped, without an established quality threshold.³⁷ Article 41 states that the public debate can be conducted for decrees and decisions. Finally, Article 41v of the RoP prescribes that reports on public debates are to be published at the latest 15 days after the debate is finalised.

No legal act governing this area regulates the transparency of the work of WGs. The RoP only states that the public call for participation in public debates contains information on the working group which prepared the draft act.³⁸ However, this does not encompass publishing other relevant material, such as meeting minutes and conclusions adopted during the meetings. On the other hand, the inclusiveness of WGs is regulated.³⁹ Guidelines for including CSOs in the WGs regulate the inclusion of CSOs and the transparency of the selection process, which is conducted through a public call, whose content is also prescribed by the Guidelines.⁴⁰

Minimal duration is prescribed only for public debates, for all types of acts. Namely, the RoP clearly states that a public debate lasts at least 20 days.⁴¹ The duration of consultations, however, is not clearly defined for PPDs or legal acts. This comes from the fact that there are several methods for conducting consultations, but only the minimal duration of calls for submission of written inputs is defined, and only in cases of certain law proposals.⁴² Since not all

37 Article 41a states: "The Government may, at the proposal of the authorised proposer and based on the report on the consultations conducted, adopt a conclusion stating that it is not necessary to conduct a public debate on a draft law or public policy document because open issues were agreed upon during the consultations, or if the text was agreed upon with the comments and suggestions made by the interested public during the consultations. It is considered that no open issues remain after the consultations have been conducted if no conceptual and substantive issues of importance for the implementation of social relations in the proposed manner, or the exercise of rights and the performance of obligations in the proposed manner, remain". Rules of Procedure of the Government, Official Gazette No. 106/2025. Available at: <https://tinyurl.com/56e5f4nb>

38 Article 41b, Rules of Procedure of the Government.

39 It is not mandated that all working groups established with the purpose of production or amendment of regulations and PPDs must involve non-state actors. However, Law on the Planning System (Article 35) envisages a possibility for non-state actors to become a part of working groups, while the Decree on the Methodology for Drafting Public Policy Documents (Article 25) and the Decree on the Regulatory Impact Assessment (Article 28) envisage the same possibility, with references to the Guidelines for including CSOs in the working groups.

40 The procedure is carried out by publishing a public call for submitting proposals of candidates for membership in the working group on the websites of the proposer of the PPD or legal act for whose development or amendment the WG is formed, and the Ministry for Human and Minority Rights and Social Dialogue. The Public Call contains: information on the title and purpose of the proposed public policy document and the draft or proposed regulation being prepared; the tasks of the working group; the purpose, scope, and eligibility for participation in the Public Call; the selection criteria for candidates, which may also include a scoring system; the required documentation demonstrating compliance with the criteria; as well as the deadline for submitting applications. Based on the implemented procedure and the evaluation of applications received in response to the Public Call, the Ministry for Human and Minority Rights and Social Dialogue submits to the head of the proposer a nomination proposal for appointing civil society representatives to the working group. Guidelines for including CSOs in the working groups for developing draft public policy documents and draft legal acts, Official Gazette No. 107/2021. Available at: <https://tinyurl.com/3hufwpxu>

41 Article 41b, Rules of Procedure of the Government.

42 Article 3 of the Rulebook on the Good Practice Guidelines states that the deadline for submitting comments and suggestions may not be shorter than 7 days from the date of publication on the

consultation methods and all types of acts are covered, existing provisions do not provide clear obligations. Similarly, the legal framework lacks provisions for timely publishing of notifications on holding consultations and public debates. The LPS and the Decree on the Methodology for Drafting PPDs both require authorities to notify the public within seven days of starting the development process, but neither defines when the process is considered to have started. The LPA states that public administration bodies are obliged to inform the public about the initiation of the drafting of a law, while the RoP indicates that a public debate begins by publishing a public call for participation.⁴³

The legal framework is somewhat more specific on which accompanying materials should be published with drafts of proposals under consultation. The LPS states that the relevant authority must publish the results of the conducted impact assessment together with the draft PPD a day after the public debate has started at the latest. The Decree on the Methodology for Drafting PPDs adds that, if a PPD previously existed in the area or part of the area of policy planning, the authority will publish the preliminary results of the implementation of that PPD when publishing a notification for the public that the consultation process began. The LPA mandates that the baseline document be published when a draft law is undergoing consultations. Finally, the RoP govern publishing the draft act during the public debate, along with other relevant information.⁴⁴

Channels for submission of inputs are also clearly outlined, although scattered across different regulations: LPS, LPA, RoP and the Decree on the Methodology for drafting PPDs. Still, all of them point to the same two channels: the website of the public administration body that is in charge of preparing the draft act, and the eConsultation Portal. All public administration bodies must report on the consultations and public debates and provide feedback on the inputs received during these processes. Again, this matter is scattered across the LPS, the Decree on the RIA, the RoP, and the Rulebook on Good Practice Guidelines.

proposer's website and the eConsultation Portal. If the draft law is of particular public interest (if it significantly alters the legal regime in a given area or contains substantial new provisions expected to bring notable improvements in the regulation of social and economic relations, thereby substantially changing and redefining the position, rights, and obligations of the subjects concerned, especially in cases related to environmental protection and the use of new technological solutions), the deadline for submitting comments may not be shorter than 15 days from the date on which the baseline document for preparing the draft law was published on the proposer's website and the eConsultations Portal.

43 Article 32, Law on the Planning System. Article 77, Law on Public Administration. Article 41, Rules of Procedure of the Government. Article 26, Decree on the Methodology for Drafting Public Policy Documents, Official Gazette No. 30/2026. Available at: <https://tinyurl.com/3punzvba>

44 The Rules of Procedure of the Government, Article 41b, state that the public debate programme must include: the draft act, together with the explanation and attachments prescribed by this Rules of Procedure (in Article 40: along with the draft law, the proposer shall submit an annex listing the regulations and other general acts relevant for implementing the draft law and the deadlines within which the regulations and other general acts should be adopted); the timeframe for conducting the public debate; key information on the activities (such as round tables, panel discussions, their addresses and times, etc.); the manner of submitting proposals, suggestions, initiatives, and comments; as well as other information relevant to its implementation.

The main takeaway from the legal framework analysis is that it is both complex and internally inconsistent. Finding an answer to a specific question (for example, is there a specified minimum duration of consultation) often requires consulting multiple different acts and, also often, there is no clear answer. The same provisions are frequently repeated in different legal acts, creating unnecessary duplication and ambiguities. In addition to the detailed regulation of the elements highlighted above as missing, the key to improving the legal framework requires consolidating provisions into the most appropriate act.

One aspect where the legal framework provides clear regulation is online access to legal acts and PPDs. Consolidated versions of primary and secondary legislation are available online and free of charge on the Legal-Information System portal. This System was established by the Law on Publishing Laws and Other Regulations and contains electronic editions of the Official Gazette of Serbia.⁴⁵ Online and free of charge access to PPDs is regulated by the LPS, which states that all PPDs are published on the website of the authority and the eConsultation Portal, with optional publication in the Official Gazette if the authorised proposer decides so.⁴⁶ In practice, the Legal-Information System enables all users, including those without a subscription, to search the database and access all necessary legal acts. The search engine allows search by type of act, adopting institution, number of the Official Gazette, and keywords in the title and text.⁴⁷ Both laws and decrees are available as consolidated versions, with annotations indicating when the relevant amendment was introduced.

While the legal framework elaborates on the majority of elements crucial for a sound policy development system, the institutional set-up does not support the aspect of quality control, which is essential for ensuring consistent implementation. More precisely, there is no institution designated to check compliance with consultation requirements. This area is only partially covered and divided among two institutions. The PPS is in charge of providing an opinion on the completeness of the content and quality of the conducted impact assessments.⁴⁸ However, the PPS does not have the jurisdiction to

45 Articles 2, 3 and 6 of this Law prescribe that all acts of the National Assembly, including laws, and acts of the Government, such as decrees and other general acts, are published in the Official Gazette. Article 28 regulates the establishment of the Legal-Information System, which contains the electronic edition of the Official Gazette, the archive of official publications, a database containing the register and texts of the applicable regulations and other acts of the Republic of Serbia published in the Official Gazette, etc. Article 29 further states that, in the database containing the register and texts of the applicable regulations and other acts of the Republic of Serbia published in the Official Gazette, the following are available to all internet users free of charge: unofficial consolidated texts of regulations; the original official gazettes in PDF format in which the basic texts of the regulations were published; and the official gazettes in which their amendments and supplements were published. Law on Publishing Laws and Other Regulations, Official Gazette No. 10/2023. Available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2013/45/4/reg>

46 Article 38, Law on the Planning System.

47 Available at: <https://pravno-informacioni-sistem.rs/slgIrsNP-search>

48 Article 38, Law on Ministries, Official Gazette No. 92/2023. Available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2020/128/1/reg>

assess the entirety of the consultation process, beginning with ex ante impact assessment, early phase consultations and public debates. The GSG only checks compliance with the requirement to conduct public debates.⁴⁹ Even in this limited scope, quality is not checked, only compliance. This set-up leaves crucial aspect uncovered, thus compromising the implementation of the legal provisions.

Impact assessment is more clearly prescribed than other stages of the policy cycle. The LPS obliges all public administration bodies to conduct ex-ante impact assessment (IA) before developing a PPD and to present the findings to the public.⁵⁰ The Decree on the RIA lists the regulations for which the impact assessment is not mandatory, implying it is mandatory for all other, while also mandating the publishing of a report on the conducted assessment.⁵¹ Finally, gender IA is envisaged as part of the IA for both PPDs and legal acts.⁵² However, the latest amendments to the Decree on the RIA and the Decree on the Methodology for Drafting PPDs, from March 2026, introduced a basis for exempting all regulations and PPDs adopted in the context of EU accession from the obligation to undergo the IA. It is yet to be seen how these amendments will affect the practice, but the manner in which the provisions are formulated opens a vast space for ambiguity and arbitrary interpretation of the obligation to conduct IA.

The analysis of the practice of conducting IA showed certain discrepancies between PPDs and laws in how it is applied and followed up on. The analysed sample included all laws enacted in the National Assembly, and PPDs adopted by the Government in the period from November 1st, 2024, until November 1st, 2025, providing a sample of five PPDs and 174 laws. All five PPDs contained the ex-ante impact assessment, within which gender impact was addressed.⁵³ On the other hand, out of 174 laws, only 48 (28%) contained IA and addressed gender impact. However, 102 of these laws were ratifications of international or borrowing agreements, which are exempt from the IA obligation under the

49 According to Article 48 of the Rules of Procedure of the Government, all materials for Government sessions (which include draft laws and reports on the public debates conducted during their development) are submitted to the Government via the General Secretariat. According to Article 50, the General Secretariat checks if the material has been prepared in accordance with these rules. If it is, the General Secretariat submits it to the relevant Government committee, and if not, it returns it to the proposer with instructions on how to correct the deficiencies, which also refers to public debates.

50 Article 31, Article 33, Law on the Planning System.

51 Article 3, Article 19, Decree on the Regulatory Impact Assessment.

52 The Decree on the Regulatory Impact Assessment, Article 12, prescribes that the gender impact assessment is conducted as a part of an analysis of impact on society, which is a part of the analysis of the impact of options and the risks of exercising options. The same Article states that the gender impact assessment is conducted by applying the Gender Equality Impact Test. Similarly, the Decree on the Methodology for Drafting Public Policy Documents, Article 12, prescribes that the gender impact assessment is conducted as a part of an analysis of the impact on society.

53 Action plans for the implementation of strategies and programmes and planning documents related to the budget system were not analysed here, as ex-ante impact assessments are not mandatory.

Decree on the RIA, and they account for the majority of annual legislative activity. When excluding those laws, the practice of conducting IA looks significantly different, as shown in Table 8 below. In this case, 67% of laws contain IA.

Table 8: Share of laws with conducted IA (including on gender equality) separated by proposer

Sample of 174 laws		
number of government-proposed laws	number of MP-proposed laws	number of laws prepared by other proposers
168	2	4
number and share of government-proposed laws with IA	number and share of MP-proposed laws with IA	number and share of laws prepared by other proposers with IA
46 (27%)	0%	2 (50%)
Sub-sample of 72 laws (excluding ratification laws)		
number of government-proposed laws	number of MP-proposed laws	number of laws prepared by other proposers
66	2	4
number and share of government-proposed laws with IA	number and share of MP-proposed laws with IA	number and share of laws prepared by other proposers with IA
46 (70%)	0%	2 (50%)

Importantly, almost all law proposals that did not contain the ex-ante impact assessment did not contain the rationale on why it was not conducted too. Specifically, only 6 out of 126 laws contained such a rationale which helps determine and document the basis for exemption from the obligation to conduct IA. However, as can be seen from this observed sample, such elaborations are almost non-existent in the packages of legislative proposals.

Even when IA is conducted, its results are rarely provided along with other materials under consultation. Namely, IA reports were published along with other materials during consultations and public debates for only 23% of observed laws (11 out of 48 for which IA was conducted). On the other hand, these reports are consistently published with the approved law proposal when the Government is the proposer, as they become available on the National Assembly's website when they enter the procedure, along with other material accompanying the submitted draft law. However, this ensures transparency

of IA results only at the late stage of the process, when the opportunity for meaningful public input has passed.

The comprehensiveness of sample IA reports is relatively satisfactory, with the main shortcoming being a lack of clearly referenced external sources of data. The analysis was conducted on IA reports for five laws: the Strategic Environmental Impact Assessment Law, the Law on Postal Services, the Law on Special Conditions for Recording and Registering Rights to Real Estate, the Law on amendments to the Energy Law, and the Law on Information Security.⁵⁴ The Law on Postal Services lacked the most key elements of the IA report, while reports for the Law on Special Conditions for Recording and Registering Rights to Real Estate and the Law on Information Security were most comprehensive, addressing all key elements of IA.⁵⁵ While IA reports generally cover the necessary structural elements (such as problem analysis, policy objectives and options, affected groups, etc.), the absence of references to external data suggests that IA processes are often conducted formally in practice, rather than used as a tool for high-quality, evidence-based legislative development. In addition, the lack of clear references also undermines the meaningful public scrutiny of the data used as a basis for determining the course of the legislative proposal.

Turning to other aspects of policy development process, the assessment points to another significant shortcoming in data availability: a lack of information on WGs. The sample observed for analysing this aspect consisted of both laws and PPDs: Strategic Environmental Impact Assessment Law, Law on Postal Services, Law on amendments to the Energy Law, Artificial Intelligence Development Strategy for 2025-2030 and Strategy for Improving the Position of Persons with Disabilities in the Republic of Serbia for the period 2025-2030.⁵⁶ Membership of non-state actors in WGs could be confirmed for both strategies and the Law

54 Sample selection is based on estimate of significance of impact of laws on society/affected groups, and five cases which are likely to have significant impact are chosen. The primary source for selection of this sample is the entire sample of laws adopted by the parliament from November 1st, 2024, until November 1st, 2025.

55 For the purpose of this assessment, key elements of IA reports were defined as:

- 1) Problem analysis
- 2) Policy objectives
- 3) Justification of government intervention/explanatory note
- 4) Policy options, including mandatory status quo option, and preferred option with justification
- 5) Affected groups
- 6) Assessment of all relevant impacts of intervention
- 7) Estimate of costs of preferred option, at least
- 8) Policy implementation and enforcement mechanisms
- 9) Monitoring and evaluation mechanisms
- 10) Use of external sources of information and data (at least a single, clear reference to third parties' reports, analyses and similar, e.g., publication title, with authors)

56 Sample selection is based on estimate of significance of impact of laws and PPDs on society/affected groups, and five cases which are likely to have significant impact are chosen. The primary source for selection of this sample is the entire sample of laws and PPDs adopted by the parliament and the government from November 1st, 2024, until November 1st, 2025.

on Postal Services, but none of the information was available online and had to be obtained through FOI requests. This includes decisions on establishing WGs, conclusions, meeting minutes, reports and other materials. Even when non-state actors are included, this participation is often invisible. Overall, the interested public is denied access to basic information on bodies tasked with developing PPDs and laws.

Despite the lack of proactive informing on WGs, lead ministries are relatively proactive in informing external stakeholders on consultations under their purview. For each of the above-listed sub-sample of PPDs and laws, five in total, the lead ministry utilised at least three communication channels to inform on consultations. Two channels were used for all five acts: the eConsultation Portal and the website of the lead ministry. Online media were used in three out of five cases, while social media was used only for advertising consultations on the Artificial Intelligence Development Strategy. While this level of outreach seems broad, the most widely used channels remain predominantly institutional, while more citizen-friendly channels, such as social media, are rarely utilised.

Similar to IA, the practice of organising consultations significantly varies between PPDs and laws.⁵⁷ Out of entire observed sample of PPDs and laws, some form of consultations (early phase consultations or public debate) was organised for all observed PPDs, but only 36 out of 174 laws (21%) underwent some form of consultations. Such a low share is also impacted by the high number of agreement ratification laws that are, as a rule, adopted without undergoing any form of consultation. However, even when they are excluded, the share of consulted laws rises to 50%, which is still only a half of the entire law-making activity observed.

Furthermore, the use of the eConsultation Portal for conducting consultations shows that some key elements of processes are lacking. Out of 41 PPDs and laws that underwent consultations, 37 were announced on the Portal, indicating a relatively high degree of usage. However, consultation reports were available for 27 processes, while only seven processes clearly outlined that the Portal should (or can) be used as a channel for submission of comments. In other cases, it was not specified how the comments should be submitted or only other channels for submission were listed: email addresses, postal addresses or during in-person events. This suggests that the Portal is mainly used as a notification tool rather than a tool for facilitating the entire process, including reporting.

Zooming in into the consultation practice in more detail, reveals additional issues. Again, PPDs are more often consulted in an early phase than laws, since all five PPDs went through early consultations, as opposed to only 8

⁵⁷ Assessed against the entire sample of acts adopted from November 1st, 2024, and November 1st, 2025.

out of 36 laws.⁵⁸ Reporting practices on conducted consultations are also uneven. In the case of PPDs, a comprehensive report was available for four out of five documents. In the case of laws, consultation reports were available for 31 laws, but 11 of said reports were not comprehensive, lacking information on stakeholder inputs from different formats of participation or lacking detailed documentation of inputs. The lack of early-phase consultations for laws is particularly significant, as it limits the possibility of stakeholder influence at the stage when policies are still open to substantive changes. Furthermore, the lack of standardised and comprehensive reporting prevents external stakeholders from analysing whether the process really served the purpose of gathering and considering stakeholder inputs or merely fulfilling formal requirements.

Reports for the analysed sub-sample of laws and PPDs (three sample laws and two PPDs) show better structure and process documentation.⁵⁹ Apart from the consultation report for the Artificial Intelligence Development Strategy, which was not available, in other sub-sample consultation reports all comments were listed individually, clear information on the feedback to each comment was provided i.e., proposal is partially or fully accepted or rejected, as well as rationale for the rejection, or partial approval or rejection of each comment. These are crucial components of reporting on consultations, as they show genuine engagement with stakeholder input. When each input is clearly outlined and addressed, it helps amplify the accountability of the institution conducting the process and potentially increases the public trust in the process.

The assessed impact of public consultations on final proposals is relatively low: for five sub-sample acts analysed above, only a third of comments (32%), on average, were accepted during consultations.⁶⁰ Majority of received inputs were accepted only in the case of the Law on Postal Services, with 84% accepted. While the overall acceptance rate is low, this figure alone is not sufficient for evaluating the quality or impact of public consultations, since not all comments submitted during consultations are necessarily substantive or legally feasible. What matters more is whether the process meets a set of broader quality

58 This refers to a sub-sample of laws for which some form of consultations was organised. The assessment of this element was done in the following way: researchers first checked publicly available reports (IA reports and consultation reports) to determine if the consultations were conducted in an early phase. If the reports clearly indicated that consultations were conducted only for draft documents, the assessment was negative. If it could not be determined from the reports with clarity if the consultations were organised before the draft document was produced, an FOI request was sent to relevant authorities to clarify.

59 Strategic Environmental Impact Assessment Law, Law on Postal Services, Law on amendments to the Energy Law, Artificial Intelligence Development Strategy for 2025-2030 and Strategy for Improving the Position of Persons with Disabilities in the Republic of Serbia for the period 2025-2030. Reports on public debates were used as a basis for analysis.

60 Strategic Environmental Impact Assessment Law, Law on Postal Services, Law on amendments to the Energy Law, Artificial Intelligence Development Strategy for 2025-2030 and Strategy for Improving the Position of Persons with Disabilities in the Republic of Serbia for the period 2025-2030. Reports on public debates were used as a basis for analysis. Since the report for the Artificial Intelligence Development Strategy was not available, this was taken as a value of 0%.

criteria: whether comments were meaningfully considered and responded to, whether rejections were accompanied by clear and reasoned explanations, and whether early-phase consultations enabled input that influenced the proposal before it reached its final form. The acceptance rate should, therefore, be taken together with other data related to the consultation process presented in this report.

Key informants who participated in WGs generally reported a positive experience on transparency and inclusiveness of their respective WGs, characterised by open dialogue, equal treatment of non-state and state actors, and openness to critical feedback.⁶¹ When proposals were not accepted, explanations were provided and grounded in legal feasibility, practical applicability, or compliance with EU regulations. However, interviewees' stances differed on the clarity of WG work outputs: one interviewee found the minutes sufficiently detailed to trace how contributions were reflected in the final text of the proposal, while another did not. When defining genuinely inclusive working groups, interviewees highlighted active and representative participation, equal treatment of inputs, transparency, and openness to reasoned discussion. One key informant pointed to an explicit distinction between formal and substantive inclusivity, noting that diverse composition does not guarantee actual influence on outcomes. The overall findings from these interviews suggest that the WGs functioned above this formal threshold. Nevertheless, the noted gap in work transparency represents a notable issue. Even when the process is substantively inclusive, insufficient documentation of how inputs shaped final decisions outweighs inclusivity and negatively affects accountability of work in WGs.

Finally, only one-third of citizens of Serbia perceive that opportunities for participation in developing laws and strategies are available to them.⁶² Specifically, 33% of citizens agree or strongly agree that they have the opportunity to participate in developing laws and strategies at the state level (see Chart 1 below). This finding emphasises an important distinction from the overall positive experience of key informants and points to a deep

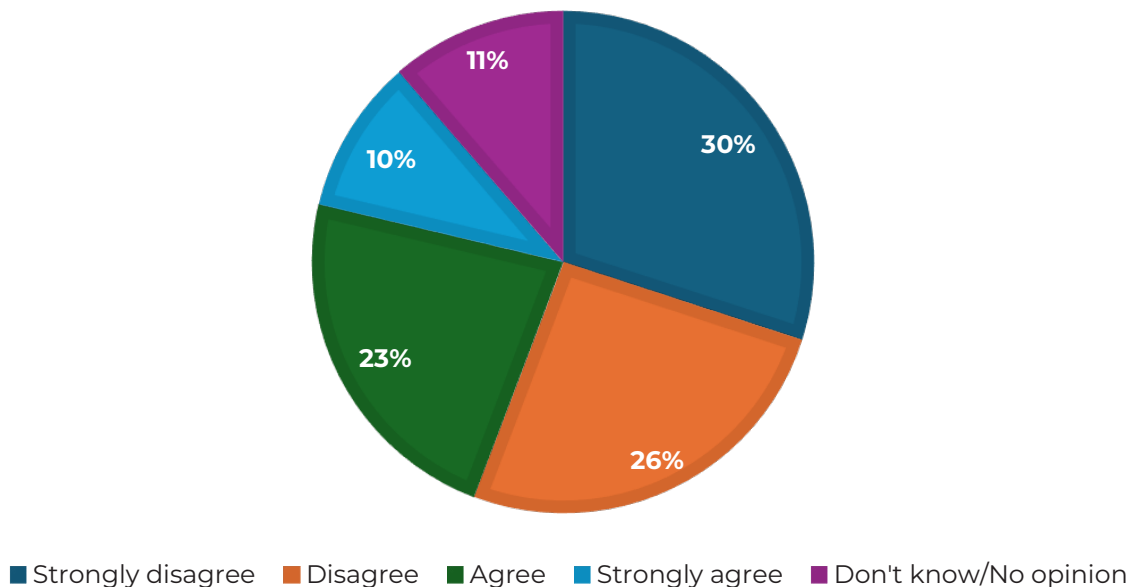
⁶¹ Researchers identified and interviewed relevant non-state actors who were members of the working groups tasked with the development of the five sample PPDs and laws. Key informant interviews were held on February 3rd, 6th, 18th and 19th, 2026. Three statements were used as a basis for point allocation, and the key informants' responses were the following:

1. In the work of the working groups, lead ministries decide on my proposals/proposals of my organisation (accept them or reject them) – three key informants fully agree, and one tends to agree.
2. In the work of the working groups, lead ministries provide reasons for decisions to accept or reject my proposals/proposals of my organisation – two key informants fully agree, and two tend to agree.
3. In the work of the working groups, decisions and documents that came as the result of working groups' proceedings are available to me/my organisation - three key informants fully agree, and one tends to agree.

⁶² Public perception survey in Serbia was conducted from the 15th of February until the 19th of February 2025. For more information on the sample and list of statements, please refer to the section *Methodology Appendix*.

disconnect in perspectives of organised non-state actors (such as CSOs) and the general public, which is largely unaware or excluded from certain participation opportunities (such as working groups). Low perceived opportunities for participation can be a consequence of transparency and outreach gaps, but they can also become self-reinforcing: if stakeholders constantly see limited chances for participation or do not feel their contributions have an impact, the belief that participation is neither possible nor meaningful tends to further solidify. In the absence of broader public participation in policy and law-making, enabling non-state actors, primarily organised citizens and affected groups, to participate in consultations or become members of the WGs becomes the only way of developing adequate, evidence-based policies.

Chart 1: Share of citizens' responses on an agreement scale to the statement "I have the opportunity to participate in developing laws and strategies of the Republic of Serbia." (%)

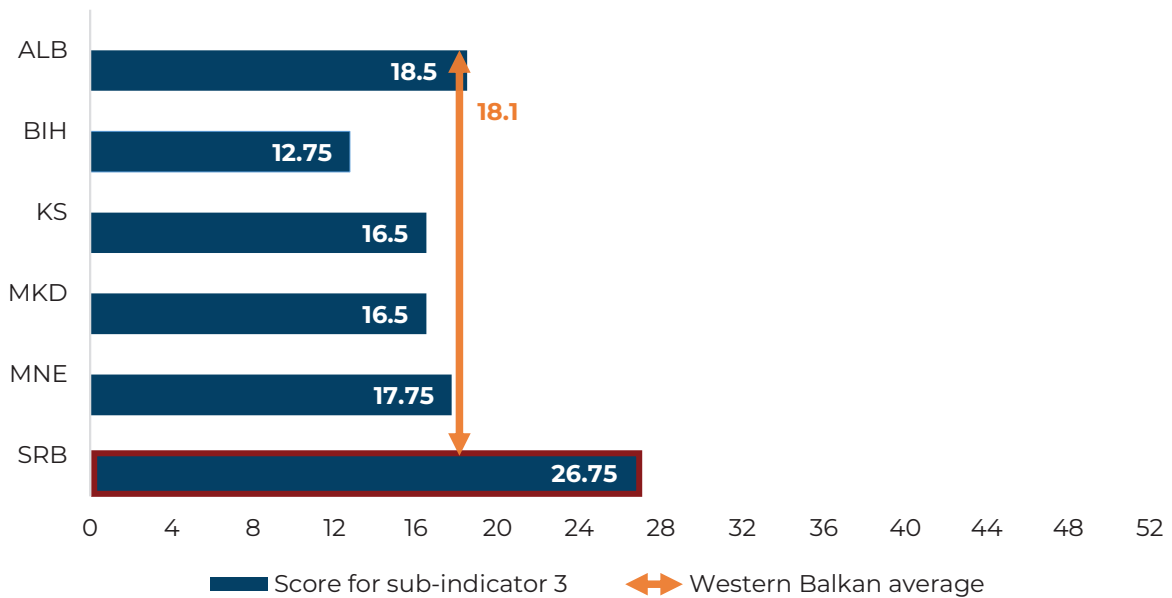


Note: All results are rounded to the nearest integer.
Due to rounding, percentages may not always appear to add up to 100%.
The base for these questions was N = 1006.

Ultimately, the documented shortcomings and issues can be tied back to the fragmented and ambiguous legal framework and the absence of a designated central institution with a mandate and authority to check and ensure compliance with consultation requirements. Such a framework leads to a system in which the quality of consultation processes remains entirely dependent on the discretion of individual institutions, with no systemic mechanism to identify shortcomings, ensure accountability or improvement.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Sub-indicator 3: Transparency and inclusiveness of policy making and legislation development process (maximum score 52)



II.4 Transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny

Principle 6: Public policies are effectively implemented and evaluated, enhancing policy outcomes and reducing regulatory costs and burdens.
Principle 7: The parliament effectively scrutinises the government policymaking and ensures overall policy and legislative coherence.

Awarded points per element in sub-indicator 4: Transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny⁶³

Indicator elements	Element type	Score
E 4.1 There is a strategic document in force that envisages transparency and inclusiveness of policy monitoring and evaluation practices	Strategy and policy	0.25/0.5
E 4.2 Regulations envisage sending advance notifications to affected groups on the upcoming changes to the legal framework	Legislation	0/0.5
E 4.3 Parliamentary rules of procedure envisage participation of interested parties in parliamentary discussions, in the form of public hearings	Legislation	0/0.5
E 4.4 Lead ministries publish advance notifications to the affected groups on the upcoming changes to the legal framework	Practice in implementation	0.5/1.5
E 4.5 Lead ministries regularly publish monitoring reports on implementation of policy documents	Practice in implementation	0.5/2.5
E 4.6 Monitoring reports on implementation of policies are citizen friendly	Practice in implementation	0/1.25

⁶³ The fourth sub-indicator focuses on the following SIGMA sub-principles: The responsible institutions effectively monitor policy implementation and ensure regulatory compliance, based on robust and relevant data, including evidence gathering through direct feedback and consultations with affected stakeholders; Ex post evaluation of major laws and policies is an integral part of the better regulation agenda and is linked to the analysis conducted during the development of the policy. The public administration makes evaluation results publicly available and uses them to inform future policy; Businesses and citizens receive advance notification about upcoming changes in the rules and regulations that will affect them, and sufficient time is allowed for the affected groups to adjust to and align with the new regulatory framework; Parliamentary committees debate and scrutinise legislative initiatives, with active participation of government ministers and senior public servants, and ensure consultation with key stakeholders, while also minimising any risks of undue external influence; The parliamentary services provide expert advice and support to members of parliament for initiating and drafting new laws based on evidence and with input from key stakeholders.

E 4.7 Lead ministries publish ex-post evaluations on implementation of policies	Practice in implementation	0.5/2.5
E 4.8 Ex-post evaluations on implementation of policies use external data and information produced by non-state actors	Practice in implementation	0/2.5
E 4.9 Parliament involves stakeholders, affected groups, and other non-state actors in public hearings	Practice in implementation	0/2.25
E 4.10 Online transparency of the work of parliaments	Practice in implementation	1/2
E 4.11 Key non-state actors consider involvement of stakeholders in public hearings as effective	Outcomes and impact	0/3
Total score for sub-indicator 4		2.75/19

State of play

According to SIGMA, despite the existence of a regulatory framework and available guidelines, the capacities of line ministries to implement sector strategies and integrate evaluations into the policymaking cycle remain underdeveloped. While regulations set requirements for policy planning, monitoring, and evaluation, actual implementation of policies, including sector strategies, is generally weak. Regarding parliamentary scrutiny, SIGMA notes that although mechanisms are in place, the openness and transparency of the National Parliament's legislative work could be improved. The parliamentary website only separates adopted laws from those in process, proposed amendments are not published, and limited supporting information, such as explanatory notes, opinions, and RIA reports, is provided alongside draft laws. The National Assembly does not issue regular reports on its legislative activities, and fewer than half of citizens consider the legislative process open and transparent.⁶⁴

PAR strategic framework addressing transparency and inclusiveness in policy monitoring and evaluation practices in Serbia is partially in place. The Programme for Improving Public Policy Management and Regulatory Reform 2021–2025, with the accompanying Action Plan,⁶⁵ includes Measure 3.4, which aims to improve the monitoring of policy implementation and reporting on public policy results, including their transparent presentation to the public

⁶⁴ SIGMA/OECD, Public Administration in Serbia 2024: Assessment against the Principles of Public Administration, pp. 38-43. Available at: <https://tinyurl.com/26pvjun3>.

⁶⁵ Action Plan for the Programme for Improving Public Policy Management and Regulatory Reform, available at: <https://tinyurl.com/2nxbmdh7>.

through progress reports on the achievement of policy objectives. However, inclusiveness of policy monitoring and evaluation practices is not systematically envisaged in the PAR strategic framework valid at the time of the assessment.

A review of the valid regulatory framework indicates that there are no legal provisions requiring advance notification to affected groups regarding upcoming changes to the legal framework. Relevant regulations governing the legislative process, including the RoP of the Government⁶⁶ and the LPS,⁶⁷ do not stipulate obligations for lead ministries or responsible bodies to publish or send advance notifications to affected stakeholders prior to the adoption of new primary legislation or amendments to existing laws. The absence of legally mandated mechanism for advance notifications of affected groups reduces chances of timely preparing for legal changes and limits their ability to contribute through inputs and suggestions.

The parliamentary RoP do not envisage the participation of external stakeholders in public hearings.⁶⁸ The chairman of a parliamentary committee may invite committee members, deputies, and other persons deemed important for the topic of the hearing.⁶⁹ There is no mechanism allowing affected groups or the general public to register or request attendance in public hearings independently. As a result, participation of external stakeholders is dependent on formal invitations, limiting thus inclusive engagement in parliamentary discussions.

In practice, the provision of advance notifications to affected groups by lead ministries was limited for the three laws observed. Based on responses to FOI requests, it was confirmed that only in the case of the Law on Postal Services competent ministry informed affected stakeholders in advance about upcoming amendments to the legal framework.⁷⁰ For the other two laws – the Law on amendments to the Energy, and the Law on Strategic Environmental Impact Assessment, no evidence of prior notifications to affected groups was established. In the case of the Law on Postal Services, the Ministry of Information and Telecommunication actively communicated activities on the Law preparation and forwarded draft materials to postal operators with significant market share, enabling early informing as well as active participation in the drafting process. All relevant stakeholders were given the opportunity to present proposals for regulatory amendments and to highlight operational challenges, while email submissions were accepted for additional inputs. This indicates that, while some ministries engage proactively with affected groups, the practice of advance notifications is not consistently applied across legislative initiatives.

66 Government Rules of Procedure, available at: <https://tinyurl.com/3s72f9dk>

67 Law on the Planning System, available at: <https://tinyurl.com/ycjmn6>.

68 Parliamentary Rules of Procedure, available at: <https://tinyurl.com/bd9mmpf7>.

69 Parliamentary Rules of Procedure, Article 84.

70 Law on Postal Services, Official Gazette of the Republic of Serbia, No. 19/25, available at: <https://tinyurl.com/urcavxrb>.

Across the five observed policy areas, the publication of monitoring reports on implementing sector strategies by lead ministries is uneven and inconsistent, as summarised in Table 9 below. Only in the area of transport, monitoring reports on implementing Traffic Safety Strategy 2023-2030 were available for both consecutive years observed, 2023 and 2024, while in the other sectors, availability of reports was partial or no reports were available. Moreover, those reports that are published are generally not citizen friendly. Most reporting documents are often presented solely as Excel tables, without narrative summaries or visual aids. Even when narrative components are included, they typically lack concise summaries, charts, graphs, or other visualisations that would make key results easier to understand for the interested public. Only isolated cases, such as the report on the implementation of the Education Development Strategy until 2030, demonstrate good practice, highlighting the need for more consistent, citizen-friendly reporting practices across all sectors. Coupled with the uneven publication of monitoring reports, the current practices of ministries are not systematically promoting transparency or facilitating easy public oversight of policy implementation.

Table 9: Availability of Monitoring Reports for Selected Policy Documents (2023 and 2024)

Area	Documents	Report availability
Education, employment and Social Policies	Education Development Strategy until 2030 with Action Plan	√ ⁷¹
	Occupational Health and Safety Strategy 2024–2027	×
	Employment Strategy 2021–2026	√ ⁷²
	Economic Migration Strategies 2021–2027	×
	Deinstitutionalization and Development of Community-Based Social Welfare Services Strategy 2022–2026	√ ⁷³
	Strategy for the Improvement of the Position of Persons with Disabilities 2020–2024	√ ⁷⁴

71 Report for 2024: <https://tinyurl.com/fed8bh3w> and 2023: <https://tinyurl.com/33782kae>

72 Report for 2024: <https://tinyurl.com/9rxcmtuj> and 2023: <https://tinyurl.com/z9a8ny4r>

73 Report for the period 2022-2024: <https://tinyurl.com/bdemjrut>

74 Report for period 2020-2024: <https://tinyurl.com/5b23auut>

Environment and Climate Action	Waste Management Program with Action Plan 2022–2031	Report for 2023 available ⁷⁵
	Sludge Management Program 2023–2032	X
	Air Protection Program 2022–2030 with Action Plan	X
	Climate Change Adaptation Program 2023–2030	X
	Water Management Strategy on the Territory of the Republic of Serbia until 2034	Report for 2023 available ⁷⁶
	Low-Carbon Development Strategy of the Republic of Serbia 2023–2030 with projections until 2050	X
	Circular Economy Development Program 2022–2024	√ ⁷⁷
Transport	Traffic Safety Strategy 2023–2030	√ ⁷⁸
Agriculture & Rural Development	Viticulture and Winemaking Development Program 2021–2031	X
Energy	Energy Development Strategy until 2040 with projections until 2050	X

A review of the websites of lead ministries responsible for the five observed policy areas (see Table 9 above),⁷⁹ shows that during the last three calendar years, including the year of measurement, ex-post evaluations of policies were largely absent. Among the areas covered, a single relevant ex-post evaluation was identified: the Analysis and Evaluation of Existing Social Protection Financing Mechanisms (2024) of the Ministry of Labour, Employment, Veterans, and Social Affairs.⁸⁰ The identified ex-post evaluation report does not incorporate data produced by non-state actors, such as civil society organisations, international organisations, professional associations, universities, or other stakeholders. Furthermore, the report does not include feedback from affected or target

75 Report for 2023: <https://tinyurl.com/mu72n83x>

76 Report for 2023: <https://tinyurl.com/42u23s2b>

77 Reports for 2023 and 2024: <https://tinyurl.com/y6js9bvb>

78 Reports for 2023 and 2024: <https://www.abs.gov.rs/rsc/strateska-dokumenta>

79 Ministry of Environmental Protection; Ministry of Mining and Energy; Ministry of Labour, Employment, Veteran and Social Affairs; Ministry of Education; Ministry of Construction, Transport and Infrastructure; the Ministry of Agriculture, Forestry and Water Management.

80 Analysis and Evaluation of Existing Social Protection Financing Mechanisms within the Ministry of Labour, Employment, Veteran and Social Affairs 2024, available at: <https://tinyurl.com/3mkjza2j>

groups. This indicates that not only do ministries rarely publish ex-post evaluations, which limits the systematic assessment of policy impact and lessons learned, but also that published evaluations rely exclusively on internal data and analysis without incorporating external perspectives when assessing policy implementation.

The limited stakeholder involvement extends to parliamentary public hearings. During the 12 months preceding the monitoring period,⁸¹ the National Assembly of the Republic of Serbia held 12 public hearings on proposed acts. However, no records of attendance were maintained, making it impossible to determine whether stakeholders, affected groups, or other non-state actors participated in these hearings.⁸² Therefore, the level of stakeholder engagement in the legislative process through public hearings cannot be established.

Still, a review of parliamentary website shows that information on law-making processes is generally available online, but with significant variation in the completeness of accompanying documentation. On February 1st, 2026, a total of 57 draft laws were in the parliamentary procedure.⁸³ In line with the RoP of the National Assembly, explanatory notes for draft laws were largely provided, with only two exceptions, indicating a relatively strong level of formal compliance with procedural requirements. However, the availability of other documentation supporting draft laws was less consistent. Impact assessment elements were present in just over half of the draft laws in the parliamentary procedure (56%) while public debates were conducted for only two out of eight draft laws for which the proposer was the Government - three draft laws concerned the ratification of international agreements and the other three drafts, although proposed by the Government, did not accompany information on consulting the stakeholders or general public, nor did they explain such a decision. Overall, the parliamentary practice on legal acts in procedure ensures basic transparency through publication of draft acts and their justifications; however, it mostly falls short of providing additional materials and insights.

The final element of this sub-indicator requires interviewing key non-state actors who participated in public hearings. However, the National Assembly informed it does not keep records of individuals attending public hearings.

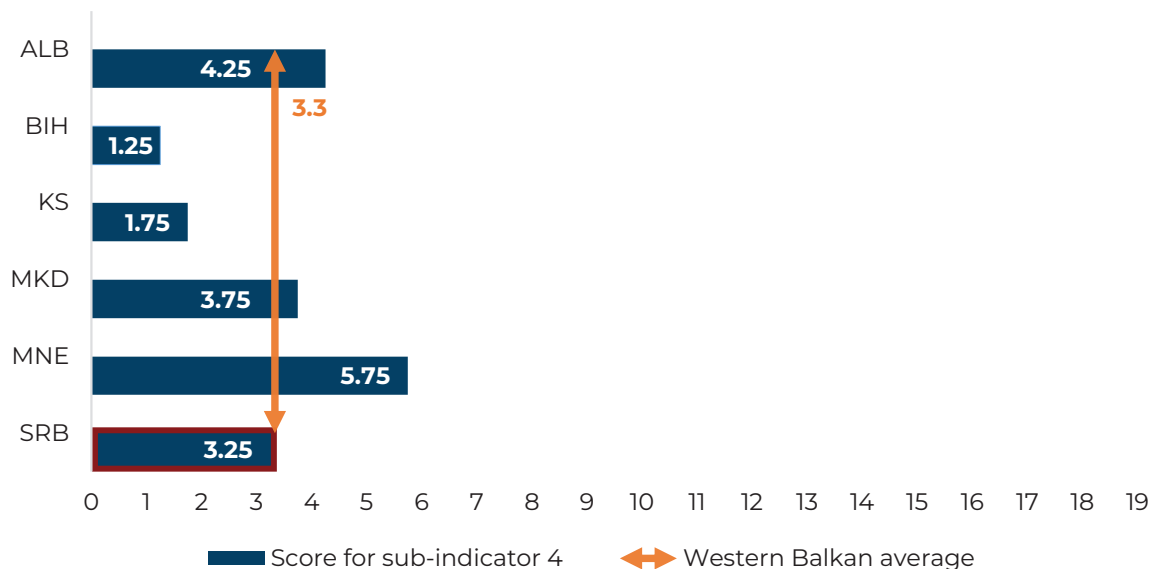
81 The monitoring period covered 1 November 2025 to 1 February 2026.

82 Information obtained through the FOI request; response received on 24 December 2025.

83 See: <https://tinurl.com/2m66ps5h>.

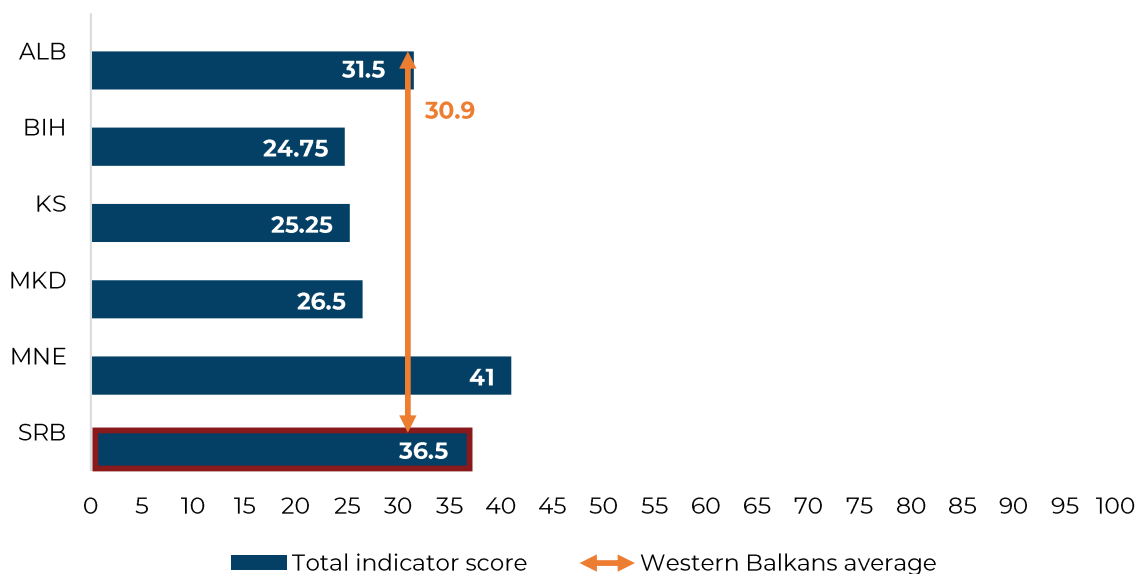
HOW DOES SEBIA DO IN REGIONAL TERMS?

Sub-indicator 4: Transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny (maximum score 19)



OVERALL SCORES COMPARISON IN THE POLICY DEVELOPMENT AND COORDINATION AREA

Indicator: Transparency and inclusiveness of policy development and coordination



Regional overview report for Policy Development and Coordination area, with results for all WB administrations is available at: www.par-monitor.org

II.5 Recommendations for the Policy Development and Coordination area

II.5.1 TRACKING RECOMMENDATIONS FROM PAR MONITOR 2021/2022

Recommendations	Type (short term medium term/long term)⁸⁴	Status	Explanation
GAWP annual implementation reports should be regularly published at the official Governments', or General Secretariats' website, visible and accessible from the homepages.	Short term	Partially implemented	The Report on the Government's Work for 2024 is accessible from the homepage of the General Secretariat's website, but the report for 2023 could not be found in the designated section. Regarding the Governments' website, the reports for 2023 and 2024 are available among the documents of the Government, but not accessible from the homepage.
GAWP annual reporting should include citizen-friendly descriptions of achievements by the Government as whole, in addition to or instead of the reporting as per existing GAWP structure.	Medium term	No action taken	Both reports on the Government's work for 2023 and 2024 include information presented per institution and the type of act, there are no citizen friendly parts describing achievements of the Government as a whole. ⁸⁵
GAWP annual reporting should be improved to include visible results achieved in different policy areas in the reporting period including relevant information on horizontal policy dimensions such as but not limited to gender mainstreaming, environment, sustainable development.	Medium term	No action taken	Both reports on the Government's work for 2023 and 2024 include information presented per institution and the type of act, there are parts describing achievements per policy area or horizontal dimensions.
The Government should start regularly publishing agenda items and meeting minutes for each session. Whereas it is preferable to publish an agenda in advance of individual session, minutes should be published timely, a week after the session at latest.	Short term	No action taken	The Government does not publish agenda items and meeting minutes from its sessions.

⁸⁴ Recommendations for which the assessed time for implementation is up to one year are labelled as short-term. Medium-term recommendations should be implementable within a period of one to three years. Long-term recommendations require more than three years to be implemented.

⁸⁵ Available at: <https://www.srbija.gov.rs/prikaz/583756>.

Press releases should be published or linked together with other materials, so all the information from individual session can be found and accessed at the single website location.	Short term	No action taken	Official press releases are still located on a section of the Government's website that is separate from the section dedicated to documents from Government sessions.
Structure and appearance of information on sessions should be revamped for easier access. Although this information is available via homepage banner, visibility should be improved and the download of documents in zipped format avoided.	Short term	No action taken	All documents on Government activities are still available from the homepage banner, but the specific documents from each session are still published in a zip format.
Ministries, and other public authorities organising public consultations (and public debates), should pursue timeliness and proactiveness in announcing them. That is, enough time should be dedicated for preparations of civil society and other interested stakeholders, and all the available channels should be used to announce consultations - including websites of responsible body, eGovernment portal, ministry/ body in charge for cooperation with civil society, social media of all the involved institutions, at least.	Medium term	Partially implemented	The analysis showed that public authorities are somewhat proactive in notifying on the consultations they organise. Specifically, the monitoring showed that the websites of institutions in charge and the eConsultation Portal are used for all sample acts. However, the use of social media channels is still a rare occurrence (with evidence found only in the case of one sample document), while the website of the Ministry for Human and Minority Rights and Social Dialogue is only used to publish open calls for membership in working groups tasked with the development of PPDs and regulations.
In this regard, keeping and updating the record of civil society organisations and individuals who previously participated in consultations and public debates should be practiced, ensuring continuity of inviting already engaged and interested organisation and individuals.	Short term	N/A	There are no publicly available records that would enable tracking this recommendation.
When organising consultations, inputs and comments from the civil society and the public should be sought as early as possible in the process, and preferably in the policy formulation phase.	Medium term	Partially implemented	The analysis showed that PPDs are more often consulted in an early phase than laws, since all five analysed PPDs went through early consultations, as opposed to only 8 out of 36 laws (22%). This analysis was based on a sample of acts for which any form of consultations was organised, indicating a better practice is in place when consultations are held for PPDs.

<p>Moreover, authorities should without exception inform the participants on consultation proceedings, be it public debate on draft documents or earlier held consultations. In other words, irrespective of types of consultation (online, face-to-face) consultation reports should be published in each case, addressing each input, and providing explanation for acceptance or dismissal, so the entire process is easily traceable from start to finish, transparent, and unambiguous.</p>	<p>Medium term</p>	<p>Partially implemented</p>	<p>The monitoring suggests that issues are still present when it comes to publishing consultation reports. In the case of PPDs, reports were available and comprehensive for four out of five documents. In the case of laws, reports were available for 31 laws out of 36, but 11 of said reports were not comprehensive. Furthermore, the reports are not consistently published on the eConsultation Portal, since they were available for only 27 out of 41 observed sample PPDs and laws.</p>
<p>Introduce an obligation to publish the Government's conclusions as a particular type of act that the Government of Serbia uses to endorse numerous and diverse decisions, often with important fiscal, social, or environmental impact. Exceptions from the publication of these acts should strictly follow the regulations on the classification of data secrecy, meaning that they should only be exempt from publication if they are formally classified as confidential.</p>	<p>Short term</p>	<p>No action taken</p>	<p>The RoP of the Government and the Law on Publishing Laws and Other Regulations and Acts do not mandate the publishing of Government's conclusion. The Law, in Article 6, only states the following: Decrees and other general acts of the Government are published in the Official Gazette. Other acts of the Government for which this is determined by a special law or for which the Government decides to be published in the Official Gazette and acts of the Prime Minister, in accordance with the law and other regulations, are published in the Official Gazette.⁸⁶</p>

86 Article 6, Law on Publishing Laws and Other Regulations and Acts, available at: https://www.paragraf.rs/propisi/zakon_o_objavljivanju_zakona_i_drugih_propisa_i_akata.html.

<p>The relevant government institutions (mostly the General Secretariat of the Government, the Ministry for Human Rights and Social Dialogue – Sector for CSO cooperation, and the Public Policy Secretariat) should organise online and face-to-face meetings and workshops with civil society organisations across Serbia, to disseminate information about opportunities for contributing/participating to the policy and legislative processes at the national level. Particularly in light of the eConsultation portal, which is currently in the launching process, a wide engagement with CSOs would help clarify expectations of the public regarding consultations and public debates as well as raise the interest and number of civil society actors who actively contribute to public consultations.</p>	<p>Medium term</p>	<p>Partially implemented</p>	<p>In 2025 the Ministry for Human and Minority Rights and Social Dialogue published a call for projects on the topic of raising capacities of CSOs for participating in the process of legislative and policy development and allocated funds for completing this activity.⁸⁷ Furthermore, the Programme for Improvement of Public Policy and Regulatory Reform Management for 2021-2025 contained three activities devoted to raising CSOs' capacities for participating in policy development, all assigned to the Ministry for Human and Minority Rights and Social Dialogue. The report on the implementation of the Programme's AP for 2024 reports on two out of three activities: CSO training on participation in the regulatory and public policy development process, including promotion of the eConsultations Portal, and social dialogue (organisation of meetings with various participants: CSOs, academia, international organisations, and other social actors depending on the area). The report states that they were ongoing in 2024. In the case of social dialogue, 15 dialogue sessions were held during 2024, with the participation of representatives of state bodies, local self-government units, embassies and international organisations, national minorities, the academic community, and CSOs. The sessions took place in Belgrade, Novi Sad, Kragujevac, Niš, Kruševac, and Sjenica.⁸⁸</p>
<p>The Government should introduce a legal obligation for a relevant state administration body to assure the quality of the procedures relating to public participation in the development of both policy documents and legislation.</p>	<p>Short term</p>	<p>No action taken</p>	<p>No such obligation was introduced in the currently applied legal framework. According to the latest amendments to the Decree on the RIA and the Decree on the Methodology for Drafting PPDs, the Public Policy Secretariat does not issue its official opinions for draft PPDs and legal acts that are prepared as part of the EU accession process.</p>

87 Available at: <https://minljmpdd.gov.rs/javni-konkurs-za-podizanje-kapaciteta-organizacija-civilnog-drustva-za-ukljucivanje-u-zakonodavni-proces/>.

88 Activities 1.4.2.1 and 1.4.2.2. Report for 2024 on the Implementation of the Action Plan for the Implementation of the Programme for Improvement of Public Policy and Regulatory Reform Management for 2021-2025, available at: <https://monitoring.mduls.gov.rs/dokumenta.html>.

II.5.2 RECOMMENDATIONS FROM THE 2024/2025 PAR MONITOR REPORT

Recommendations from the monitoring cycle 2024/2025 for the Policy Development and Coordination area are listed below. The recommendations are grouped into three types, according to the estimated time needed for their implementation. Recommendations for which the assessed time for implementation is up to one year are labelled as short-term. Medium-term recommendations should be implementable within a period of one to three years. Long-term recommendations would likely require more than three years to be implemented.

Short-term recommendations

- The Government publishes limited information related to its sessions.
 - Thus, the Government should establish clear legal obligations for the proactive publication of key information from its sessions including agendas, minutes, all adopted acts and decisions, as well as press releases.
 - It should ensure that agendas and relevant materials are published in advance, with minutes and decisions released promptly, so that the public and stakeholders can consistently follow the Government's decision-making activities.
 - Such a formal obligation should absolutely encompass regular publishing of government conclusions as a distinct type of act used to endorse a wide range of decisions, many of which carry significant fiscal, social, or environmental implications. Any exceptions to their publication should be strictly aligned with the legal framework on data classification, meaning that conclusions should be withheld from publication only where they have been formally designated as confidential.
- Publication of GAWP is highly inconsistent, which undermines transparency of and creates a discrepancy between planning and reporting activities (e.g., no public disclosure of GAWP for 2024, while its implementation report is made publicly available). The GSG should ensure the regular and timely publication of the Government Annual Work Plan immediately after adoption, in line with legal requirements.
- Central planning and reporting documents are lengthy with limited use of summaries, visualisations, or clear explanations of results achieved. Citizen-friendly elements are used only sporadically. The PPS, GSG and MEI should introduce mandatory citizen-friendly summaries for GAWP, APIGP, and NPAA, and their implementation reports, presenting key commitments, results achieved, and major deviations in the reporting

- period through concise narrative explanations and visual elements, and include these summaries as standardised sections in the published plans and reports.
- When announcing consultations and public debates they conduct, public administration bodies often do not list the eConsultation Portal as a channel for gathering comments, even if they post those processes on the Portal.
 - In order to facilitate a wider use of the eConsultation Portal, the PPS and the GSG should advise all institutions conducting consultations and public debate to list and utilise the Portal as the main channel for collecting inputs. This is crucial for unlocking its full potential as a tool for submission of comments and, subsequently, more thorough reporting, which would significantly improve the verifiability and accountability of the entire process.
 - The Rules of Procedure of the Government should be amended to support system-wide and consistent use of the eConsultation Portal. To that end, the GSG of the Government should be explicitly tasked with checking whether public debates were conducted via the Portal and consider that they were not organised if not published on the Portal. Effectively, the GSG should perform compliance checks and should refuse to include in a government session agenda any draft PPD or legal act for which the public debate was not conducted via the eConsultation Portal.
 - Participation of non-state actors in the National Assembly's activities is limited as there is no mechanism allowing affected groups or the general public to register, announce attendance, or request to participate in public hearings independently. To improve transparency and accountability in parliamentary processes, the National Assembly should amend its RoP to allow independent stakeholders and affected groups to participate in public hearings through open and transparent mechanisms and ensure systematic collection and publication of participation data.

Medium-term recommendations

- Data on the implementation of commitments established in the central planning documents of the Government, such as GAWP and APIGP, are not published in open format. The PPS, and GSG, in cooperation with the Office for Information Technologies and eGovernment, should publish such datasets in machine-readable open format on the Open Data Portal, and ensure their regular updating in line with reporting cycles.

- The legislative framework governing the area of public consultations is incoherent, fragmented across multiple acts, and does not regulate all relevant aspects of the consultation process. The Government, acting through the PPS, should prepare and adopt a clearly coordinated set of amendments to the existing framework. This would include, as a minimum: establishing a minimal consultation duration of 20 days, as in the case of public debates; introduction of mechanisms for timely notifications on upcoming consultations; repealing of Article 41a of the RoP which provides a basis for exception from the rule to conduct public debates; and prescribing in more detail how, when and which materials related to the work of WGs for policy development should be published. All of these steps are necessary in order to provide for a sound and coherent consultation system, which would, in turn, also improve the implementation in practice.
- Further to the recommendation on establishing a coherent legislative framework governing the area of public consultations, the latest amendments to the Decree on the RIA and the Decree on the Methodology for drafting PPDs should be abolished. This pertains to the amendments adopted in March 2026, which now exclude all PPDs and regulations adopted in the context of the EU accession process from the obligation to undergo RIA, effectively abolishing the current consultation framework and constraining inclusive and transparent policymaking.
- The absence of a central institution in charge of quality control of the consultation process additionally negatively influences the implementation of the legal framework. Even if the legal framework is amended to cover all key aspects of the consultation process, quality control remains the crucial point of the system. Thus, the Government should designate or establish a body with a clear mandate to monitor the quality (and not just the formal completion) of the full consultation cycle, covering impact assessments, early-phase consultations, and public debates, for PPDs, laws and bylaws. This body should have the authority to return materials that do not meet defined quality standards and to publish annual compliance reports. This can be achieved by expanding the mandate of the PPS or by establishing a dedicated unit within another existing institution.
- In order to facilitate the improvement of practice of conducting impact assessments and consultations, the PPS should develop and publish an all-encompassing checklist or procedural guide which outlines all necessary steps in the consultation process. This guide should emphasise the importance of conducting impact assessments, organising early-

phase consultations, thorough documentation of the process through reports and using the eConsultation Portal for the entire process. Once a quality control mechanism is established, this guide can be used as a tool to check if minimal requirements established by the legal framework are met.

- There are no legal provisions requiring advance notifications to affected groups regarding upcoming changes to the legal framework. Consequently, affected groups are not formally notified in advance about forthcoming legislative changes, which prevents them from adequately preparing for legal changes as well as limits their ability to contribute through timely input and suggestions. To ensure meaningful informing and timely preparation of affected stakeholders, the Government should introduce legal provisions requiring ministries to apply standardised procedures of early and proactive advance notification system on planned legislative changes.
- The publication of monitoring reports on implementing sectoral PPDs is uneven and inconsistent. Moreover, the published reports are generally not citizen friendly. To enhance transparency and strengthen public understanding and oversight of policy implementation, the authorities should regularly and consistently publish monitoring reports across all policy areas, adopting a unified approach to accessibility, and present these reports in a citizen-friendly format, including narrative summaries, key findings, and visual elements such as charts and graphs.
- Ex post evaluations of PPDs implementation are largely absent. Public administration bodies should establish a practice of regularly conducting and publishing ex post evaluations of PPDs, while ensuring the use of diverse data sources and the inclusion of external analyses and independent verification, in order to provide a comprehensive assessment of policy outcomes and impacts. This particularly refers to public administration bodies whose civil servants are expected to undergo relevant training in this area related to conducting ex post evaluations, as planned under the draft Action Plan of the Programme for the Improvement of Public Policy Management and Regulatory Reform for the period 2026–2030.⁸⁶

⁸⁶ See: <https://ekonsultacije.gov.rs/topicOfDiscussionPage/483/4> (draft version).

METHODOLOGY APPENDIX

For producing this report for Serbia the following research methods and tools were used for data collection and calculation of elements:

- Analysis of official documentation, data, and official websites
- Requests for free access to information
- Interviews with stakeholders and key informants
- Public perception survey.

Monitoring heavily relied on the analysis of official documents publicly available on the websites of administration bodies and on the data and information contained therein. However, in cases where the data was not available, researchers sent requests for free access to information to relevant institutions in order to obtain information necessary for awarding points for the elements.

Table 10. FOI requests sent in Serbia

Institution	Date of request	Date of reply to the request
Ministry of European Integration	3.12.2025.	12.12.2025.
Ministry of Environmental Protection	3.12.2025.	13.1.2026.
Ministry of Mining and Energy	3.12.2025.	No response
Ministry of Informing and Telecommunication	3.12.2025.	17.12.2025.
Ministry of Science, Technological Development and Innovation	5.12.2025.	19.12.2025.
Ministry of Labour, Employment, Veterans and Social Affairs	5.12.2025.	16.12.2025.
Ministry of Mining and Energy	10.12.2025.	22.12.2025.
Ministry of Information and Telecommunications	10.12.2025.	18.12.2025.
Ministry of Environmental Protection	10.12.2025.	19.12.2025.
National Assembly	10.12.2025.	24.12.2025.

Ministry of Finance	16.1.2026.	2.2.2026.
Ministry of Economy	16.1.2026.	No response
Ministry of Internal and Foreign Trade	16.1.2026.	28.1.2026.
Ministry of Education	16.1.2026.	22.1.2026.
Ministry of Agriculture, Forestry and Water Management	16.1.2026.	30.1.2026.
Ministry of Informing and Telecommunication	16.1.2026.	28.1.2026.
Ministry of Construction, Transport and Infrastructure	16.1.2026.	27.1.2026.
Ministry of European Integration	25.2.2026.	05.03.2026.
General Secretariat of the Government	02.02.2026.	18.02.2026.

Interviews with key informants were conducted and used as a base for point allocation for elements 1.5, 2.14, 3.14, 3.23 and 4.11. Additionally, they were used to collect qualitative, focused, and in-depth inputs on monitored phenomena. Selection of interviewees was based on purposive, non-probability sampling, targeting interlocutors based on their expertise on the topic or involvement in the observed processes. For element 3.23, selection of interviewees was based on their membership in the working groups tasked with the development of sample public policy documents and laws.

Key informant interviews were comprised of a set of up to four questions where the participants expressed their agreement on a four-point scale: fully disagree, tend to disagree, tend to agree and fully agree. Points under elements 1.5, 2.14, 3.14, 3.23 and 4.11 were allocated if all key informants stated that they tend to agree/fully agree with the statement. Additionally, a set of open-ended questions was used, allowing for a discussion with interviewees and on-the-spot sub-questions rather than strictly following a predetermined format. Interviewees were given full anonymity in terms of personal information and institutional/organisational affiliation.

Table 11. Interviews conducted in Serbia

Date	Interviewees
04.02.2026.	Key informant 1, non-state actor, elements 1.15 and 2.14
11.02.2026.	Key informant 2, non-state actor, elements 1.15 and 2.14
23.03.2026.	Key informant 3, non-state actor, elements 1.15 and 2.14
03.02.2026.	Key informant 1, non-state actor, element 3.23
06.02.2026.	Key informant 2, non-state actor, element 3.23
18.02.2026.	Key informant 3, non-state actor, element 3.23
19.02.2026.	Key informant 4, non-state actor, element 3.23

List of interview questions

- **Element 1.5**

The following questions are used for point allocation for element 1.5. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 0.75 points are allocated.

1. To what extent do you agree with the following statement: **Agenda items for the Government's sessions are transparent.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
2. To what extent do you agree with the following statement: **Minutes of the Government's sessions are transparent.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

3. To what extent do you agree with the following statement: **Decisions from the Government's sessions are transparent.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
4. To what extent do you agree with the following statement: **The Government publicly informs on its decisions via press releases.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. How are agenda items for Government sessions typically made known to the public or stakeholders?
2. Who usually has access to agenda items before sessions take place, and how does that affect transparency or participation?
3. How useful are the existing records of meeting minutes for understanding how decisions were reached? Additionally, does the current level of transparency of meeting minutes contribute to accountability?
4. Do you find that the decisions made at Government sessions are presented clearly and understandably to the public?
5. Are there types of decisions that are more or less transparent than others? If so, why do you think that is the case?
6. How would you describe the tone and level of detail of Government press releases — are they informative, selective, or general?
7. Do you think the press releases reflect the actual content and rationale of Government decisions?
8. In your opinion, what should a fully transparent and accountable Government decision-making process look like?

- **Element 2.14**

The following questions are used for point allocation for element 2.14. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 1 point is allocated.

1. To what extent do you agree with the following statement: **Government's planning and reporting activities are transparent.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
2. To what extent do you agree with the following statement: **Government's planning and reporting activities are timely.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
3. To what extent do you agree with the following statement: **Government's planning and reporting activities are citizen friendly.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. Do Government planning documents explain and present clearly Government priorities, objectives, and expected results?
2. Are there opportunities for external stakeholders or the public to provide input during the planning stage? Does this practice vary among planning documents?
3. When it comes to timeliness, are there mechanisms to ensure that planning and reporting cycles are respected and aligned with budgetary or policy cycles?
4. Can you recall a case where the timeliness of reporting (or lack of it) had an impact on policy follow-up or accountability?
5. How effectively does the Government communicate the outcomes of its planning and reporting to citizens, in terms of conveying key messages and results? How do you assess citizens' awareness or interest in these documents?

- **Element 3.23**

The following questions are used for point allocation for element 3.23. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 1 point is allocated.

1. To what extent do you agree with the following statement: **In the work of the working groups, lead ministries decide on my proposals/proposals of my organisation (accept them or reject them).**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
2. To what extent do you agree with the following statement: **In the work of the working groups, lead ministries provide reasons for decisions to accept or reject my proposals/proposals of my organisation.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
3. To what extent do you agree with the following statement: **In the work of the working groups, decisions and documents that came as the result of working groups' proceedings are available to me/my organisation.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. Reflecting on your experience in participating in working groups, how would you describe the overall atmosphere and dynamics of cooperation?
2. What was the usual process after you submitted a proposal, how was it recorded or followed up?
3. Can you recall examples of proposals that were accepted and others that were not? If there were examples of your proposals being rejected,

can you identify if the reasons for rejecting proposals were usually linked to policy priorities, legal constraints, or other factors?

4. Did you feel that your input was considered equally to the inputs provided by representatives of government bodies?
5. Did you find that the lead ministry/institution was open to alternative perspectives or critical feedback?
6. Were there topics or issues where discussion seemed less open or pre-decided?
7. When it comes to decisions and outputs of the working group, when did you usually receive the documents (draft laws/policy documents, meeting minutes, preparatory material, conclusions, etc.): during the process, after each meeting, or only once the final product was published?
8. Were the documents clear enough to understand how different inputs were reflected in the final version?
9. What would you say distinguishes a genuinely inclusive working group from one that is only formally inclusive?

- **Element 4.11**

The following questions are used for point allocation for element 4.11. Point allocation is determined based on fully agree/tend to agree responses. If all key informants fully agree/tend to agree with the statement, 3 points are allocated.

1. To what extent do you agree with the following statement: **During public hearings, parliamentary committees consider my proposals/proposals of my organisation.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. How often have you or your organisation taken part in such hearings, and in what policy areas?
2. In your experience, do all participants have equal opportunities to express their opinions?

3. When you or your organisation submitted comments or recommendations, how were they received and treated by members of the committee?
4. After a hearing, do you receive any follow-up information on how your contributions were treated?
5. Do you think that the current feedback mechanisms are sufficient to ensure accountability of parliamentary committees?

The public perception survey is based on a questionnaire targeting the general public (18+ permanent residents) of Serbia. The survey was conducted through computer-assisted telephone interviewing (CATI) in combination with computer-assisted web interviewing (CAWI). The survey was conducted between the 15th and 19th of February 2025. The margin of error for the sample of 1006 citizens is $\pm 3,52\%$, at the 95% confidence level.

Table 12: Public perception survey questions in the area of Policy Development and Coordination

Statement 1	Strongly disagree	Disagree	Agree	Strongly agree	Don't know/No opinion
I have the opportunity to participate in developing laws and strategies of the [country name].	1	2	3	4	99

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