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SERBIA

Reform Agenda Update - Reform Monitor

JUNE 2026



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Publisher:
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Author:
Marko Todorović, CEP

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This publication is part of the series “Reform Agenda Updates”, national monitoring reports that track the implementation of the Reform Agendas as part of the Reform and Growth Facility for the Western Balkans (RGF), within the Western Balkan Reform and Growth Monitor project (Reform Monitor).

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

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

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

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

The cut-off date for data collection and assessment for this update is 30.06.2026. Further policy developments may shift the status of currently pending reforms and will be reflected in subsequent updates.

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



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The monitoring findings for the first semester of 2026 indicate that Serbia's Reform Agenda has entered its most consequential phase with implementation lagging well behind schedule. Of the 21 reform steps monitored in this update across eight policy domains, only six had been claimed by the Government and were under Commission review at the cut-off date; none was assessed by the Commission during the semester, and none of the steps first due in June 2025 or December 2025 had been confirmed as achieved. For the June 2025 steps for which funds have been requested, the Commission's assessment is still pending. Among the monitored steps of that cohort, the counter-terrorism programme was adopted only on 30 June 2026, the SALW strategy and the state-aid action plan await the Commission's verdict, whereas the organised-crime legislative package and the Law on Internal Affairs had not been adopted by the cut-off date. This is in line with the broader picture: the NCEU's first independent monitoring report¹, covering all 34 steps due by December 2025, found only six achieved.

In the reported semester, Serbia received its first performance-based disbursement, tied to the first payment request. However, no second and third performance-based disbursements have followed. Serbia met its procedural obligations – the third payment request was submitted on 15 January 2026² and supplemented on 26 February, and a fourth request³ covering 22 steps and EUR 309.1 million, including steps already claimed in earlier requests, followed on 15 July – but the Commission's assessment of the second and third requests, pending since July 2025 and January 2026 respectively, was not completed during the period, although the Facility Agreement foresees its completion within 90 calendar days of the receipt of a request, subject to interruption when the Commission asks for supplementary information. The cause lay at the level of the preconditions rather than of individual reform steps. The amendments to five judicial laws adopted on 28 January 2026 in urgent procedure and without consultation⁴, which the Venice Commission⁵ found to have removed safeguards of prosecutorial autonomy introduced by the 2023 constitutional reform, engaged the Facility's general precondition on the

- 1 National Convention on the European Union, First Independent Monitoring Report on the Implementation of the Reform Agenda (Belgrade: European Policy Centre, 2026), <https://cep.org.rs/en/publications/first-independent-monitoring-report-on-the-implementation-of-the-reform-agenda/>, Accessed 2 October 2026.
- 2 Government of the Republic of Serbia, Third Payment Request under the Reform and Growth Facility, https://www.mei.gov.rs/upload/documents/plan_rasta_reformska_agenda/Third_Payment_Request.pdf, Accessed 2 October 2026.
- 3 Government of the Republic of Serbia, Fourth Payment Request under the Reform and Growth Facility, 15 January 2026, https://www.mei.gov.rs/upload/documents/plan_rasta_reformska_agenda/Fourth_Payment_Request.pdf, Accessed 2 October 2026.
- 4 Official Gazette of the Republic of Serbia, No. 9/2026.
- 5 European Commission for Democracy through Law (Venice Commission), Urgent Opinion on the Amendments to the Laws Governing the Judiciary and the Prosecution Service, Opinion no. 1274/2026, <https://www.coe.int/en/web/venice-commission/-/opinion-1274>, Accessed 2 October 2026.

rule of law; on 30 April the Enlargement Commissioner⁶ stated that payments had been stopped until the judiciary was ‘repaired’, a statement subsequently qualified by the Commission to the effect that no decision to freeze the funds had been taken and that the assessment was ongoing. While Albania, Montenegro and North Macedonia received EUR 158.9 million⁷ under their third requests on 20 May, cumulative disbursements to Serbia remained at around EUR 167.5 million – pre-financing and a first tranche net of the pre-financing clearance, with the amounts attached to unfulfilled steps withheld.

The obstacle was removed in form before the cut-off date but not in effect. On 25 June 2026 the National Assembly adopted corrective amendments to the five laws, and the Venice Commission’s follow-up opinion of 16 June⁸ found seven of its nine key recommendations implemented in the draft, with the treatment of temporarily assigned prosecutors, the autonomy of the Special Department for Cybercrime and the judicial map still outstanding. The Commission welcomed the correction as one of the ‘recent positive developments’ on which it based its renewed recommendation of 7 July⁹ to open Cluster 3, but the Council did not follow, with eight-member states declining to agree¹⁰. Moreover, the Commission had not adopted any decision on Serbia’s second or third payment requests by the time of writing. With the deadline for the December 2024 steps’ grace period on 31 December 2026, after which funds attached to unfulfilled steps of that cohort are at risk of permanent loss, the assessment backlog has become the single largest risk to the predictability of the Facility for Serbia.

Across policy domains, the pattern identified in previous updates has hardened into a late-delivery model. Reform steps due in June and December 2025 were addressed in a compressed burst between April and July 2026: the Law on the Prevention and Suppression of Trafficking in Human Beings, the Action Plan 2026–2028 for the Anti-Corruption Strategy, the counter-terrorism programme, the Law on Weapons and Ammunition, the Criminal Code amendments on firearms and the corrective judicial amendments were all adopted in

6 European Western Balkans, “Commission to Withhold Growth Plan Funding for Serbia until It Reverses Controversial Judicial Laws,” 4 May 2026, <https://europeanwesternbalkans.com/2026/05/04/commission-to-withhold-growth-plan-funding-for-serbia-until-it-reverses-controversial-judicial-laws/>, Accessed 2 October 2026.

7 New Union Post, “EU Growth Plan Funds for Albania and Montenegro,” 20 May 2026, <https://newunionpost.eu/2026/05/20/eu-growth-plan-funds-albania-montenegro/>, Accessed 2 October 2026.

8 Venice Commission, Follow-up Opinion on the Amendments to the Judicial Laws of Serbia, CDL-AD(2026)017, 16 June 2026, <https://www.coe.int/en/web/venice-commission/-/cdl-ad-2026-017-e>, Accessed 2 October 2026.

9 N1, “Kos: EC Renewed Recommendation to Open Cluster 3,” 7 July 2026, <https://n1info.rs/english/news/kos-ec-renewed-recommendation-to-open-cluster-3/>, Accessed 2 October 2026.

10 European Western Balkans, “Eight EU Member States Oppose Opening of Cluster 3 for Serbia,” 8 July 2026, <https://europeanwesternbalkans.com/2026/07/08/eight-eu-member-states-oppose-opening-of-cluster-3-for-serbia/>, Accessed 2 October 2026.

that window, in most cases after months of inactivity and in two cases (amendments to the Law on Internal Affairs and the Criminal Code), ten days after the cut-off date. Adoption was secured on paper while its effect was deferred: the THB Law applies from January 2027, the firearms provisions and the weapons law nine months after entry into force, and the Digital Corners, the eIDAS law, the NIS2 entity list and the energy-performance bylaws remained at the stage of drafts, systems under design or institutional claims without a verifiable legal act, while work on the renewable-permitting law had not progressed beyond a consultation on its starting points.

The manner of adoption has deteriorated as its pace has increased. In late March 2026 the Government amended¹¹ the regulations on regulatory impact assessment and on the methodology of public policy management, exempting acts adopted in the EU accession process from impact assessment, the standard consultation rules and the quality control of the Public Policy Secretariat. Four major laws in Chapters 23 and 24 were put to simultaneous public debates of the statutory minimum length in April 2026, one of them announced on the morning it opened and spanning the Easter holiday; post-consultation texts sent to the Commission were not published before adoption; and the January judicial amendments were introduced as a floor amendment that was not on the public record when it was voted.

Transparency of the process itself improved in one important respect: on 27 May 2026, following sustained NCEU advocacy, Serbia began publishing its payment requests on the website of the Ministry of European Integration¹², so that for the first time the Government's own account of which steps it considers fulfilled, and on what evidence, is on the public record; the fourth request¹³ has since been published as well. The gains are nonetheless partial: the 2025 Annual RGF Implementation Report remains unpublished, the supporting documentation submitted to the Commission is still not shared with the civil society member of the Monitoring Committee, and materials for the Committee's second meeting were provided seven working days in advance rather than the ten foreseen by its Rules of Procedure. Independent verification of reform steps therefore continues to depend on freedom-of-information requests and on the sporadic disclosure practices of individual institutions.

11 Independent Journalists' Association of Serbia (NUNS), "NKEU: Amendments to regulations on public policies reduce transparency and public participation (NKEU: Izmene uredbi o javnim politikama smanjuju transparentnost i učešće javnosti)," <https://nuns.rs/nkeu-izmene-uredbi-o-javnim-politikama-smanjuju-transparentnost-i-ucesce-javnosti/>, Accessed 2 October 2026.

12 Ministry of European Integration of the Republic of Serbia. "EU Growth Plan for the Western Balkans: documents." <https://www.mei.gov.rs/srl/dokumenta/eu-plan-rasta-za-zapadni-balkan/>, Accessed 2 October 2026.

13 Government of Serbia, Fourth Payment Request.

Since the cut-off date, the political climate surrounding the EU integration process has deteriorated, both externally and internally. Externally, the funeral of the former Bosnian Serb military commander¹⁴ on 7 September 2026, attended by senior officials and accompanied by military honours, drew statements of shock from the Presidents of the European Commission and the European Council; the Enlargement Commissioner cancelled her visit to Belgrade, the European Parliament held a dedicated debate, and the Commission President omitted Serbia from her Western Balkans tour of 30 September – 2 October¹⁵, officially on account of the elections. Internally, early parliamentary elections were called¹⁶ on 9 September for 25 October, the National Assembly was dissolved and the Government entered a caretaker mandate. For the Reform Agenda this means that no law can be adopted before a new Assembly is constituted and a new Government elected – realistically not before late November – so that the steps due in December 2026, the December 2024 steps whose grace period expires on 31 December 2026 and the outstanding December 2025 steps will have to be completed within a matter of weeks, or not at all. For that reason, it is of utmost importance that the administration retains the capacity to finalise drafts, complete consultations, and transmit texts to the Commission, so that adoption can follow immediately once the new institutions are in place.

In the next implementation period, therefore, priority should be placed on unblocking the Commission's assessment of the pending payment requests by closing the residual Venice Commission recommendations and refraining from any measure that would reopen the general precondition; on using the caretaker period to bring every step with a December 2026 deadline or grace-period expiry to adoption-ready stage; and on ensuring that the speed of adoption does not continue to be purchased at the expense of the consultation, transparency and merit-based procedures that give the reforms their value and that the Facility Regulation¹⁷ itself requires of the Reform Agenda process, which is to be inclusive and transparent and to involve relevant stakeholders, including civil society. Failure on the first would leave three semesters of performance-based funding blocked; failure on the second would expose Serbia to the permanent loss of funds attached to unfulfilled steps, a risk flagged in the previous update.

14 European Western Balkans, "Ursula von der Leyen: The Images from Ratko Mladić's Funeral Were Shocking," 8 September 2026, <https://europeanwesternbalkans.com/2026/09/08/ursula-von-der-leyen-the-images-from-ratko-mladics-funeral-were-shocking/>, Accessed 2 October 2026.

15 Balkan Insight, "EU President to Skip Serbia and Bosnia on Balkan Tour," 18 September 2026, <https://balkaninsight.com/2026/09/18/eu-president-to-skip-serbia-and-bosnia-on-balkan-tour/bi/>, Accessed 2 October 2026.

16 Government of the Republic of Serbia, "President of Republic Calls Parliamentary Elections for 25 October," <https://www.srbija.gov.rs/vest/en/287130/president-of-republic-calls-parliamentary-elections-for-25-october.php>, Accessed 2 October 2026.

17 Regulation (EU) 2024/1449 of the European Parliament and of the Council of 14 May 2024 on the Reform and Growth Facility for the Western Balkans, OJ L, 2024/1449, <https://eur-lex.europa.eu/eli/reg/2024/1449/oj/eng>, Accessed 2 October 2026.

Key Recommendations:

Procedural and Governance

- **Keep the Reform Agenda operational through the caretaker period.** The Government and line ministries should treat the electoral period as preparation time rather than a pause: finalise and publish drafts of the laws and public policy documents already sent to the Commission, complete outstanding consultations and transmit final texts, so that the new Government can adopt the bills without delay and the new National Assembly can take them up in its first sessions, and the fifth payment request in January 2027 can claim them.
- **Complete the publication regime for RGF documentation.** Building on the publication of the first four payment requests, the Ministry of European Integration should publish every subsequent request within a month of submission, publish the 2025 Annual RGF Implementation Report and each subsequent one, and share the supporting documentation submitted to the Commission with the civil society member of the Monitoring Committee, in line with the tripartite governance model, and circulate the Monitoring Committee materials within the deadline set by its Rules of Procedure.
- **End compressed and parallel public debates.** Laws under Chapters 23 and 24 should not be put to simultaneous statutory-minimum debates, and the post-consultation text of every act should be published before its submission to the Government and the Commission. The working groups for remaining Reform Agenda acts should include civil society, selected through open calls, and independent expertise, and their proposals should be answered in published reports.

RGF Funding Continuity

- Ensure that the preconditions for the Facility are met. The authorities should implement the Venice Commission's remaining recommendations¹⁸ on temporarily assigned prosecutors, the Special Department for Cybercrime and the judicial and prosecutorial map, and refrain from any legislative or political act that would again engage the Facility's preconditions on the rule of law and fundamental EU values. Three semesters of performance-based funding now depend on the Commission being able to close the question of the preconditions.

18 Venice Commission, CDL-AD (2026)017.

- Prioritise the steps whose funds are most at risk. Of the December 2024 steps not yet confirmed as achieved by the Commission, the Action Plan 2026–2028 for the Anti-Corruption Strategy (adopted on 4 June 2026) and the state-aid inventory (adopted on 25 June 2026) now require only the Commission's assessment. The remaining ones and the outstanding December 2025 steps, including the increase in the number of judges and prosecutors, the filling of vacant anti-corruption and organised-crime posts, the operational plan on financial investigations, the energy-performance framework and the cyber-security entity list, should be sequenced for adoption or decision as soon as the new institutions are in place. Late adoption, as with the firearms legislation in July 2026, exposes the related funds to the risk of reduction once the Commission completes its assessment.
- Use the Reform Agenda amendment procedure where a step cannot be met as drafted. Steps whose indicators the responsible institutions have themselves declared unattainable within the Facility's horizon should be re-specified with the Commission through the amendment procedure foreseen by the Facility, with measurable interim indicators, rather than carried forward as certain losses.

During the reporting period, the legal and institutional framework enabling access to funding under the Reform and Growth Facility remained in place. The core arrangements established in earlier semesters – including the Commission’s approval¹⁹ of Serbia’s Reform Agenda on 23 October 2024²⁰, the entry into force of the Facility Agreement²¹ on 6 December 2024 and of the Loan Agreement²² on 19 March 2025, the coordination mechanism²³ for the management of the Facility, the establishment of the tripartite RGF Monitoring Committee²⁴, together with the arrangements securing civil society participation in its work, and the adoption of the Communication and Visibility Plan²⁵ – continued to apply without change during this semester.

The tripartite governance model of the Monitoring Committee continued to function as designed, bringing together national institutions, the European Commission, and civil society. Civil society is represented by a full member delegated by the National Convention on the European Union (NCEU)²⁶, with speaking and voting rights and the right to issue a formal dissenting opinion, as well as by additional NCEU-nominated delegates with speaking rights. The Committee remained fully operational, having held two regular (annual) meetings and two *ad hoc* meetings to date, complemented by ongoing written correspondence. Two of these meetings fell within the reporting period.

19 European Commission, Commission Staff Working Document: Serbia 2025 Report, https://enlargement.ec.europa.eu/commission-staff-working-document-serbia_en, Accessed 2 October 2026.

20 Government of the Republic of Serbia, Reform Agenda of the Republic of Serbia 2024–2027, 23 October 2024, https://www.mei.gov.rs/upload/documents/nacionalna_dokumenta/reformska_agenda_rs_2024_2027.pdf, Accessed 2 October 2026.

21 Facility Agreement between the European Union, represented by the European Commission, and the Republic of Serbia, represented by the Government of the Republic of Serbia, on the Rules for Implementing the Financial Assistance of the European Union to the Republic of Serbia under the Reform and Growth Facility, signed in Belgrade on 22 November 2024, ratified by the Law on the Ratification of the Facility Agreement (Zakon o potvrđivanju Sporazuma o Instrumentu), https://www.parlament.gov.rs/upload/archive/files/lat/pdf/zakoni/14_saziv/2788-24%20-%20Lat..pdf, Accessed 2 October 2026.

22 Loan Agreement between the European Union, represented by the European Commission, as lender, the Republic of Serbia as borrower and the National Bank of Serbia as the borrower’s fiscal agent, under the Reform and Growth Facility for the Western Balkans, signed on 28 November 2024, ratified by the Law on the Ratification of the Loan Agreement (Zakon o potvrđivanju Sporazuma o zajmu), <https://www.mei.gov.rs/srl/vesti/3205/detaljnije/w/0/izglasana-zakon-o-potvrdivanju-sporazuma-o-zajmu-izmedju-eu-i-srbije/>, Accessed 2 October 2026.

23 Decree on the Coordination Mechanism for the Implementation of the Reform Agenda (Uredba o koordinacionom mehanizmu za sprovođenje Reformske agende), Official Gazette of the Republic of Serbia, <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/31/2/reg>, Accessed 2 October 2026.

24 Ministry of European Integration of the Republic of Serbia, “First Meeting of the Monitoring Committee for the Reform and Growth Facility Held in Belgrade” (U Beogradu održan prvi sastanak Odbora za praćenje Instrumenta za reforme i rast), <https://www.mei.gov.rs/srp/vesti/3399/detaljnije/w/0/u-beogradu-odrzan-prvi-sastanak-odbora-za-pracenje-instrumenta-za-reforme-i-rast/>, Accessed 2 October 2026.

25 Government of the Republic of Serbia and Ministry of European Integration, Communication Plan on the Reform Agenda of the Republic of Serbia and the Growth Plan for the Western Balkans, 2025, https://www.media.srbija.gov.rs/medeng/documents/comms_plan_on_gp_and_rs_mei_2025.pdf, Accessed 2 October 2026.

26 Monitoring Committee for the Reform and Growth Facility, Rules of Procedure of the Monitoring Committee for the Reform and Growth Facility, adopted 2 October 2025.

The first, an *ad hoc* trilateral meeting²⁷ held on 13 May 2026, served primarily as an information-sharing exchange ahead of the annual meeting, allowing the Delegation of the European Union, DG ENEST, the Government and the participating CSOs to review the state of play in reform implementation. The second was the Committee's second annual meeting²⁸, held on 3 June 2026, which constituted the Committee's formal review of progress under its established agenda.

Information-sharing with civil society ahead of the Committee's second meeting improved compared with the arrangements for the first meeting. The documents shared with the NCEU representative included the draft agenda and, subsequently, the final agenda, the minutes of the first Committee meeting, the 2025 Annual Report on the Implementation of the RGF, the Commission Implementing Decision²⁹ on the first release of funds, the lists of reform steps submitted under the second and third payment requests, and the indicative list of WBIF projects. Although the draft agenda was shared 15 working days before the Committee meeting, in line with the Rules of Procedure, the mentioned supporting materials were provided only seven working days in advance, rather than the ten working days foreseen by the Rules of Procedure.

However, beyond the formal Committee cycle, civil society organisations working collectively within the NCEU framework maintained independent oversight of the process. The NCEU's Intersectoral Working Group for Reform Agenda Monitoring (NCEU IWG) produced the independent civil society monitoring report³⁰ on Serbia's Reform Agenda. Building on the *Reform Agenda Updates*³¹ developed under the *Reform Monitor*³² project, the report expanded the scope of monitoring to cover all reform steps under implementation in the country, thereby providing an independent assessment of progress. It was published in time to inform the European Commission's assessment of Serbia's second and third payment requests.

27 National Convention on the European Union, "Second Trilateral Meeting on the Reform Agenda: Civil Society Raises Substantive Concerns," 13 May 2026, <https://eukonvent.org/second-trilateral-meeting-on-the-reform-agenda-civil-society-raises-substantive-concerns/>, Accessed 2 October 2026.

28 Ministry of European Integration of the Republic of Serbia, "Second Meeting of the Monitoring Committee for the Reform and Growth Facility Held (Održan drugi sastanak Odbora za praćenje Instrumenta za reforme i rast)," <https://www.mei.gov.rs/srp/vesti/3569/detaljnije/w/0/odrzan-drugi-sastanak-odbora-za-pracenje-instrumenta-za-reforme-i-rast/>, Accessed 2 October 2026.

29 European Commission, Commission Implementing Decision of 12 January 2026 approving the first release of funds to Serbia under the Reform and Growth Facility, C (2026) 18, https://enlargement.ec.europa.eu/commission-implementing-decision-12012026-approving-first-release-funds-serbia-under-reform-and_en, Accessed 2 October 2026.

30 National Convention on the European Union, First Independent Monitoring Report on the Implementation of the Reform Agenda, May 2026.

31 Reform and Growth Monitor, "Serbia: Reform Agenda Updates," <https://reform-monitor.org/country-specific/serbia/>, Accessed 2 October 2026.

32 Reform and Growth Monitor, "The Project," <https://reform-monitor.org/the-project/>, Accessed 2 October 2026.

On 27 May 2026, following sustained NCEU advocacy, Serbia began publishing its payment requests on the website of the Ministry of European Integration, making publicly available all three requests³³ submitted by that date. This marked the first time that Serbia's payment requests had been made publicly accessible. By contrast, the above-mentioned Annual RGF Implementation Reports remain unpublished. The 2025 report was submitted to the European Commission on 1 March 2026 and shared with civil society on 20 March 2026, but neither the 2025 nor the 2026 report has been made publicly available.³⁴

With regard to transparency in the assessment of completed reform steps, publicly available information remains limited to the Government's official account of the steps reported as fulfilled, presented in the payment-request fiches published on the Ministry's website since 27 May 2026. These fiches include hyperlinks to underlying documents only where those documents are themselves publicly accessible, such as legislation published in the Official Gazette or materials available on institutional websites.

The additional supporting documentation submitted to the European Commission as part of each payment request remains unavailable to the public. This may include, for example, draft documents transmitted to the Commission before their formal adoption. Where such materials are not proactively disclosed, information on the state of implementation can be obtained only sporadically and retrospectively, through individual institutional websites or public statements by officials, rather than from a single, systematic and timely source. Continued, timely and substantive information-sharing with civil society therefore remains essential to meaningful independent oversight.

33 Ministry of European Integration, "EU Growth Plan: documents."

34 As the report was shared with civil society only after its submission to the European Commission, civil society comments could no longer influence the submitted version. Nevertheless, through written correspondence within the Monitoring Committee, the NCEU submitted its comments on the 2025 Annual Report to the Government and the European Commission on 30 April 2026.

LEGAL AND INSTITUTIONAL ARRANGEMENTS

Procedural Step	Status	Progress Details
Reform Agenda Submission to the EU	Achieved	Formally submitted on 9 July 2024.
Reform Agenda Implementing Decision	Achieved	Adopted on 23 October 2024.
Facility Agreement Ratification and Entry Into Force	Achieved	Entered into force on 4 December 2024.
Loan Agreement Ratification and Entry Into Force	Achieved	Entered into force on 19 March 2025.
Reform Agenda Amendment Procedure	N/A	N/A
National RA Coordinator Appointment	Achieved	The Minister of European Integration appointed as the National RA Coordinator.
Anti-Fraud Coordination Service	Achieved	The Anti-Fraud Coordination Service (AFCOS), established under IPA III, fulfils RGF-related obligations. ³⁵
RGF Monitoring Committee Establishment	Achieved	Established and convened for the first time on 2 October 2024.
RGF Monitoring Committee Functioning	Achieved	The second Monitoring Committee meeting took place on 3 June 2026.
Civil Society Participation in the RGF Monitoring Committee	Achieved	A NCEU representative holds full membership status. Additional CSO representatives nominated by the NCEU participate as participants, with speaking rights.
Technical Infrastructure for Monitoring and Reporting	Achieved	The Regulation establishes a clear institutional framework for monitoring and reporting, centred on the National Coordinator's Technical Secretariat. However, it does not confirm that the envisaged internal progress-tracking database is operational,
Communication and visibility plan	Achieved	The Communication and Visibility Plan is published on the MEI website.

³⁵ The AFCOS is institutionalised as an internal unit under the direct authority of the Minister of Finance and is responsible for coordination with the European Commission in preventing, detecting, and reporting fraud and other irregularities involving EU funds.

Serbia met its own procedural obligations in the funding cycle: all three payment requests were submitted in time – the first³⁶ on 14 March 2025, the second³⁷ on 15 July 2025, and a third³⁸, supplemented request on 26 February 2026.³⁹ Access to and timing of disbursements, however, depend not on submission alone but on the Commission's assessment that the preconditions, the general payment conditions and the individual reform steps have been met. During the semester the Commission adopted Implementing Decision C (2026) 18⁴⁰ on 12 January 2026, confirming compliance with the preconditions and general conditions and finding three of the seven payment conditions satisfactorily fulfilled.

The second and third requests for payments, for the June 2025 and December 2025 deadlines, respectively, remained unassessed. The delay in these assessments sits on the EU side, but is driven by the lack of fulfilment of the RGF general preconditions. Following the adoption, on 28 January 2026, of controversial amendments to five laws governing the judiciary and the prosecution, the Venice Commission concluded⁴¹ that the changes had removed previously existing safeguards protecting prosecutorial autonomy and called for a series of corrective measures. On 30 April, the Enlargement Commissioner said⁴² that EU Growth Plan payments to Serbia had been halted over judicial backsliding. The European Commission later clarified⁴³ that no formal freeze or suspension had been decided and that Serbia's compliance was still being assessed. Serbia's chief EU negotiator made the same distinction⁴⁴. The Enlargement Commissioner subsequently acknowledged⁴⁵ that while no payments had been made since the judicial laws were adopted, there had been no formal decision to withhold the funds.

36 Government of the Republic of Serbia, First Payment Request under the Reform and Growth Facility, https://www.mei.gov.rs/upload/documents/plan_rasta_reformska_agenda/First_Payment_Request.pdf, Accessed 2 October 2026.

37 Government of Serbia, First Payment Request.

38 Government of the Republic of Serbia, Third Payment Request under the Reform and Growth Facility (resubmission), January 2026, https://www.mei.gov.rs/upload/documents/plan_rasta_reformska_agenda/Third_Payment_Request_-_Resubmission.pdf, Accessed 2 October 2026.

39 The third payment request was initially submitted on 15 January 2026 but it was resubmitted on 26 February 2026 because, according to the Ministry of European Integration, the European Commission requested further clarification.

40 European Commission, Implementing Decision C (2026) 18.

41 Venice Commission, Opinion no. 1274/2026.

42 Vreme, "EU, Serbia and the Growth Plan," <https://vreme.com/en/vesti/eu-srbija-plan-rasta-zamrzavanje-kos/>, Accessed 2 October 2026.

43 Tanjug, "EC: No Decision on Freezing EU Funds for Serbia," <https://www.tanjug.rs/english/politics/249447/ec-no-decision-on-freezing-eu-funds-for-serbia/vest>, Accessed 2 October 2026.

44 Radio Television of Serbia (RTS), "Abolition of EU Funds, Serbia, and the Recommendations of the Venice Commission (Ukidanje sredstava EU, Srbija i preporuke Venecijanske komisije)," <https://www.rts.rs/lat/vesti/politika/5940554/ukidanje-sredstava-eu-srbija-preporuke-venecijanska-komisija-odir.html>, Accessed 2 October 2026.

45 Radio Free Europe/Radio Liberty, "Marta Kos: EU, Serbia and the Growth Plan (Marta Kos: EU, Srbija i Plan rasta)," <https://www.slobodnaevropa.org/a/marta-kos-eu-srbija-plan-rasta/33754321.html>, Accessed 2 October 2026.

The legal situation changed before the end of the reporting period. On 25 June 2026, the National Assembly adopted⁴⁶ corrective amendments to the five laws concerned, based on draft provisions reviewed by the Venice Commission. In its follow-up opinion⁴⁷, the Venice Commission found that seven of its nine key recommendations had been fully implemented in the draft amendments, while certain elements concerning temporarily assigned prosecutors, the operational autonomy of the Special Department for Cybercrime, and the judicial and prosecutorial map remained outstanding. The January legislation therefore no longer constituted an unresolved obstacle in its original form. Nevertheless, the corrective amendments did not automatically trigger disbursement, as the Commission still had to assess their implementation, Serbia's compliance with the general preconditions and the fulfilment of the individual reform steps covered by the pending payment requests.

Procedural Step	Status	Progress Details
Pre-Financing request	Achieved	Submitted on 14 March 2025.
Pre-Financing disbursement	Achieved	Released on 21 June 2025.
Semi-annual payment request submission	Achieved	Submitted on 15 January 2026. Resubmitted on 26 February 2026.
Supporting documentation for reform completion (national semi-annual reporting)	Achieved	Submitted with the third payment request. Reform step fiches available on MEI website.
EC assessment on RA implementation	Partially achieved	The first payment request assessment was adopted on 12 January 2026. The second and third payment requests are still under review.
Annual RGF Implementation Report Prepared and Submitted	Not Achieved	Kosovo has only submitted the semi-annual report and can submit the first annual report by January 2027.
General Conditions met	Achieved	The Implementing Decision approving the first release of funds to Serbia confirms that the general conditions are maintained.
Pre-Conditions met	Achieved	The Implementing Decision approving the first release of funds to Serbia confirms that the pre-conditions are maintained.
Annual RGF Implementation Report Prepared and Submitted	Achieved	The 2025 RGF Implementation Report was submitted on 1 March 2026. Not made public.

During the reporting semester, a total of EUR 651.15 million under the RGF envelope was potentially available to Serbia, pre-financing together with the three performance-based tranches linked to the payment requests, representing the maximum that could have been drawn had all reform steps and procedural conditions been met. In practice, Serbia requested less than this

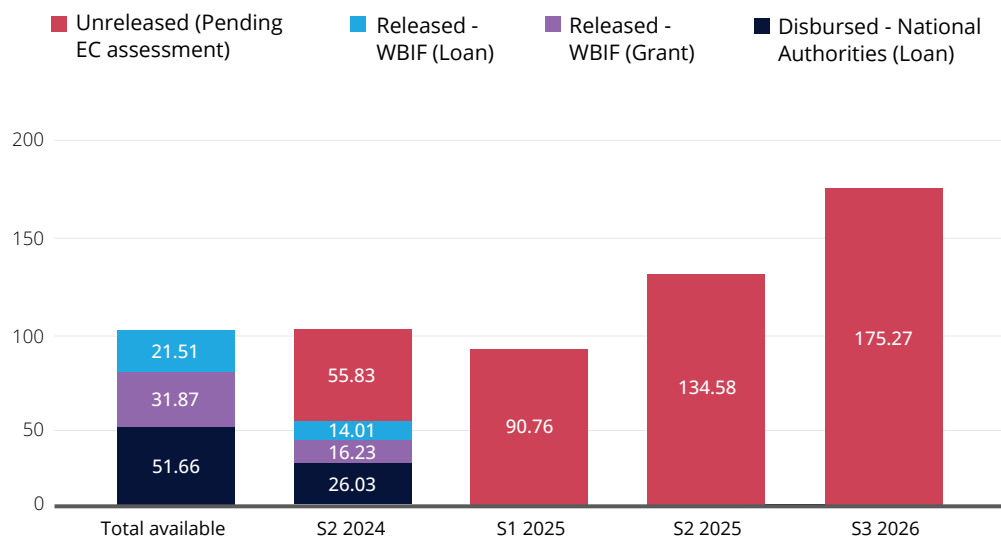
46 National Assembly of the Republic of Serbia, "Adopted Laws (Doneti zakoni)," <https://www.parlament.gov.rs/akti/doneti-zakoni/doneti-zakoni.1033.html>, Accessed 2 October 2026.

47 Venice Commission, Follow-up Opinion, Opinion no. 1290/2026, <https://www.coe.int/en/web/venice-commission/-/opinion-1290>, Accessed 2 October 2026.

ceiling and received less still, reflecting reform steps not yet completed and assessments still pending. Pre-financing of EUR 111.04 million had been released earlier, of which EUR 51.66 million was disbursed to the state budget and the remainder, allocated to WBIF projects, has not yet been disbursed. Of the performance-based amounts requested – EUR 67.93 million under the first request, EUR 105.30 million under the second, and EUR 173.24 million under the third request⁴⁸ – only the first was assessed and approved during the semester, for a net EUR 56.27 million. The second and third remained unassessed and undisbursed by the cut-off date.

The broader RGF allocation picture therefore shows a widening gap between funds notionally available to Serbia and those actually released. For the S2 2024 allocation, the graph records around EUR 56.3 million as having been made available: EUR 26.03 million was disbursed to the national authorities, while EUR 16.23 million in grants and EUR 14.01 million in loans was released through the WBIF. A further EUR 55.83 million remained unreleased pending Commission assessment. The amounts still pending then rise sharply in subsequent periods, to EUR 90.76 million for S1 2025, EUR 134.58 million for S2 2025 and EUR 175.27 million for S3 2026. In other words, while pre-financing had already provided substantial upfront liquidity, the performance-based component increasingly accumulated as unreleased funding as assessments lagged behind Serbia's successive payment requests.

Serbia allocations and use of RGF funds, as of 31 June 2026



⁴⁸ Payment requests are not mutually exclusive. Where the Commission assesses a reform step claimed in one request as not satisfactorily fulfilled, Serbia may revise or re-adopt the underlying measure and claim the same step again in a later request; the same step – and the funding attached to it – therefore recurs across successive requests, and the requested amounts must not be read as cumulative. The third (supplemented) request, for instance, re-includes the four December 2024 steps and ten June 2025 steps carried over from the first and second requests, alongside twenty new December 2025 steps.

In this update, the Reform Monitor tracked 21 reform steps across the selected policy domains, out of 21 reform steps scheduled for implementation by the cut-off date. The coverage includes reform steps with deadlines in the reporting semester (June 2026) as well as outstanding steps from earlier deadlines (December 2024, June 2025, and December 2025) that remain relevant for implementation and RGF assessment.

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

Policy area (harmonised)		
Reform (ID & Title)	Progress Details	In focus [due and monitored]
Fundamentals and Rule of Law		
Judicial reforms	Reform of justice system	1/2
Anti-corruption	Improved fight against and prevention of corruption	3/4
Fight against organised crime	Tackling of organised and serious crime	6/8
Digital Transition		
Digital public services	Further digitalisation of public services and administrative procedures for businesses and citizens: Digital identity and trust services compliant with the EU Digital Identity Regulation and eIDAS Regulation	2/3
	Further digitalisation of public services and administrative procedures for businesses and citizens: Improvement of availability of digital public services for businesses and citizens	0/1
	Further digitalisation of public services and administrative procedures for businesses and citizens: Digitalisation of documents and procedures for spatial and urban planning	0/1
	Strengthen adult education, training, and relevant up-skilling opportunities of Digital Skills and Literacy	1/1
Cyber resilience	Setting-up a comprehensive framework for cyber resilience and artificial intelligence	3/5
Energy and Green Transition		
Energy efficiency	Implementation of the Energy Efficiency Directive, The Energy Performance of Building Directive, Ecodesign and energy labelling legislation	1/3
Renewables	Ensure transparent and competitive procedures for the deployment of renewable energy	0/2
	Implementation of the Renewable Energy Directive (permitting, guarantees of origin, prosumers)	2/2

REFORMS IN FOCUS: REFORM MONITOR POLICY DOMAINS

Human Capital		
Vocational education and training (VET)	Reduce the skills mismatch on the labour market and facilitate school-to-work transitions, including by stepping up further VET, including dual VET, strengthening adult education, training, and relevant up-skilling	0/4
Business Environment and Private Sector Development		
Competition policy /State aid	Enhanced investment and development opportunities for entrepreneurs and private sector	2/4
State- owned enterprises (SOEs)	Improvement of public investment management and sustainable and efficient management of business entities owned by the Republic of Serbia	0/6

The *Judicial Reforms* domain in the Reform Agenda rests on the premise that an independent, accountable and adequately staffed judiciary is a precondition for every other reform in the Fundamentals cluster. Its two steps are quantitative: a 10 per cent increase in the number of elected judges and public prosecutors against the Reform Agenda baselines (2,718 judges and 689 prosecutors) by December 2025, and a 55 per cent reduction of disposition time in first-instance cases before the Administrative Court by June 2027. Both go to the core of the interim benchmarks for Chapter 23.

One reform step fell within the scope of this reporting period, as set out in the table: the December 2025 staffing step, which is now in its grace period until December 2026. The semester brought the first real progress on the judicial side since the adoption of the Reform Agenda. The High Judicial Council, in its new composition in office since 6 April 2026, appointed judges at an unprecedented pace compared to the previous two years. However, the total number of judges in office at the cut-off date remained near the baseline, roughly 260 short of the target. Furthermore, these appointments were made without the candidate interviews prescribed by the Council's own Rulebook, a omission the Judges' Association views as having undermined the merit-based nature of the procedure. On the prosecutorial side, the numerical threshold identified in the previous report continued to be met based on the officeholder count used there. Nevertheless, the High Prosecutorial Council remained unable to make appointment decisions due to a lack of quorum. In addition, the January 2026 amendments to the judicial laws—criticised by the Venice Commission and only partially corrected by June—disrupted the Prosecutor's Office for Organised Crime for most of the semester. Consequently, Serbia has not claimed this step.

The next semester is the last in which the step can be recovered. With 394 judicial posts vacant against the Councils' own systematisation, the arithmetic is possible only if the High Judicial Council completes the pending competitions at the current pace, and only if the High Prosecutorial Council regains the ability to decide. The risk that the Reform Monitor will continue to track is that speed is purchased at the expense of merit-based procedure. The Administrative Court step will enter the scope of assessment in the next reporting period.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Reform of justice system			
Number of elected judges and public prosecutors increased by 10%	December 2025	Review not initiated Funding not requested	Judges: 2,733 in office as of June 2026 against a target of 2,990 – below target, around baseline; prosecutors: the High Prosecutorial Council unable to make appointments since May 2025.

REFORM OF JUSTICE SYSTEM

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

This step requires a 10 per cent increase in the number of elected judges and public prosecutors against the Reform Agenda baselines of 2,718 judges and 689 public prosecutors, i.e. at least 2,990 judges and 758 prosecutors. The step was not achieved by its December 2025 deadline and remains in its grace period until 31 December 2026; Serbia did not claim it in the third payment request of January 2026, nor in the fourth payment request of 15 July 2026, in which the Government itself records the step as not achieved.

On the judicial side the picture changed during the semester without reaching the target. The High Judicial Council began operating in its new composition on 6 April 2026, with five new judge-members, and in its first month elected 112 judges over four sessions; according to the Commission's 2026 Rule of Law Report⁴⁹, the Council took decisions appointing 205 judges between 1 January and 1 June 2026, so that 2,733 judicial positions were filled as of June 2026, with 394 vacant against the systematisation of 3,127 posts. This compares with 2,658 judges in office on 26 February 2026 and lifts the number back to roughly the baseline, but leaves it about 260 short of the target. These figures count filled positions rather than judges actually exercising judicial office, and the distinction matters for this step: in response to a freedom of information request submitted by a member of the NCEU Inter-Sectoral Working Group, the High Judicial Council stated that 2,621 judges were performing judicial functions as of 24 July 2026, with a further 121 appointed judges still awaiting assumption of office. On that measure the number of sitting judges remained 3.6 per cent below the Reform Agenda baseline and 12.3 per cent below the target. The Council itself applies a third and more favourable measure, reporting to the Government that 320 judges were elected for the first time between October 2024 and June 2026 and concluding on that basis that this sub-step has been fully achieved, a count of appointment decisions accumulated over twenty months rather than of judges in office, and one that cannot be reconciled with either of the preceding figures.

The Judges' Association of Serbia⁵⁰ has criticised the manner of these appointments: the Council elected judges without taking account of the proposals of its own commissions for the basic, misdemeanour and commercial courts

49 European Commission, 2026 Rule of Law Report: Country Chapter on the Rule of Law Situation in Serbia, 17 July 2026, https://commission.europa.eu/document/download/b0b87aac-b88d-405b-bdc5-4e32f0765926_en?filename=Country+report+-+Serbia+-+EN.pdf, Accessed 2 October 2026.

50 Peščanik, "Judges Must Do Better (Sudije moraju bolje)," <https://pescanik.net/sudije-moraju-bolje/>, Accessed 2 October 2026.

and without conducting the candidate interviews required by the Rulebook on the Procedure for the Election of Judges⁵¹, which undermines the merit-based character of the procedure that the Reform Monitor credited in the previous report.

On the prosecutorial side, the High Prosecutorial Council, however, has been unable to take any appointment decision since May 2025: all procedures either ended without result or were postponed for lack of quorum, and the fourth payment request confirms the mechanism behind this, stating that the competitions for 20 chief public prosecutors and 88 public prosecutors failed because the Council could not assemble the qualified majority required to elect them and must now repeat the entire procedure through new competitions. The Council's new composition, in office since 6 April 2026, was constituted only after the December 2025 election of prosecutor-members was partly annulled by the Constitutional Court and re-run in January and February 2026, and on 23 June 2026 it announced a competition for 133 prosecutorial positions, which corresponds to the failed competitions it is required to repeat. As of June 2026, 164 of the 899 systematised prosecutor posts were vacant⁵², up from 139 in May 2025; the Government reports 735 prosecutorial posts filled, together with 62 of the 90 chief prosecutor positions, and states that the 51 prosecutors elected in 2025 who had not taken office pending constitutional appeals have since assumed their duties, those appeals having been rejected. The prosecutorial component therefore remains below the target of 758, and the Government's own conclusion on this component is that the step has not been achieved. The amendments to five judicial laws adopted by the National Assembly on 28 January 2026 under urgent procedure⁵³, and without consultation, ended the secondment of eleven out of twenty prosecutors of the Prosecutor's Office for Organised Crime from 11 March 2026. the Venice Commission's urgent opinion of April 2026⁵⁴ found that these amendments removed safeguards of prosecutorial autonomy and judicial independence introduced by the 2023 constitutional reform, and its follow-up opinion of 16 June 2026, the Venice Commission considered seven of its nine key recommendations to have been addressed in the corrective amendments, which the National Assembly adopted on 25 June 2026⁵⁵.

51 Rulebook on the Procedure for the Election of Judges and Court Presidents (Pravilnik o postupku za izbor sudije i predsednika suda] ("Official Gazette of the Republic of Serbia", Nos. 34/2024 and 33/2026), <https://www.paragraf.rs/propisi/pravilnik-o-postupku-za-izbor-sudije-i-predsednika-suda.html>, Accessed 2 October 2026.

52 European Commission, 2026 Rule of Law Report: Serbia.

53 Official Gazette of the Republic of Serbia, No. 9/2026.

54 Council of Europe, "Venice Commission Assesses Legislative Amendments to Laws Governing the Judiciary and the Prosecution," April 2026, <https://www.coe.int/en/web/portal/-/venice-commission-assesses-legislative-amendments-to-laws-governing-the-judiciary-and-the-prosecution>, Accessed 2 October 2026.

55 Official Gazette of the Republic of Serbia, No 56/2026.

Transparency of the two Councils' work remained formally sound throughout the semester. Both published calls, candidate lists and decisions on their websites, and the High Judicial Council began publishing recordings of its sessions⁵⁶ within 24 hours. However, this openness concerns the documentation of the procedure rather than its substance, as the judicial appointments proceeded without the interviews prescribed by the Council's own Rulebook, while on the prosecutorial side, the published calls and candidate lists produced no appointment decisions at all.

⁵⁶ High Judicial Council of the Republic of Serbia, "Sessions (Sednice)," <https://vss.sud.rs/sednice>, Accessed 2 October 2026.

The *Anti-Corruption* domain addresses corruption through a new strategic framework and stronger institutional capacity for its prevention, investigation and prosecution: the National Anti-Corruption Strategy 2024–2028 and its Action Plan, the filling of all vacant judicial and prosecutorial positions in the specialised anti-corruption departments and the organised-crime bodies, and an improved track record of investigations, prosecutions, final judgments, seizure and final confiscation in corruption cases, including high-level corruption. These measures coincide with Serbia’s Chapter 23 interim benchmarks on corruption and aim to reverse a corruption perception score that has fallen from 35 to 33 since the Anti-Corruption Strategy was adopted.

Three reform steps fell within the scope of this reporting period, as set out in the table: the December 2024 strategic step, still in its 24-month grace period, the December 2025 staffing step in its grace period until the end of 2026, and the first of the two track-record steps, due in June 2026. The semester delivered the one piece the strategic framework was missing – the Action Plan 2026–2028, adopted on 4 June 2026 after eighteen months of delay, which completes the formal condition the Commission set when it rejected the step in January 2026 – but it delivered it by carrying over four-fifths of the activities of a plan that the Agency for the Prevention of Corruption itself found had not achieved its general objective. The staffing step remains unverifiable from public data, and the one measurable development in the specialised bodies was negative for most of the semester, as the January 2026 judicial amendments removed eleven seconded prosecutors from the Prosecutor’s Office for Organised Crime before they were gradually reinstated. On the track record, the Ministry of Justice itself told the trilateral meeting that the step is not aligned with the Reform Agenda’s time horizon, since final judgments in such cases take four to five years. That holds for judgments and confiscation, but not for the investigations and prosecutions the step equally requires, which are measurable within a year and whose 2025 figures show indictments in high-level corruption falling for a second year and final convictions falling in both categories. Of the three steps, only the strategic one was claimed; the Government’s fourth payment request of 15 July 2026 records the other two as not achieved.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Improved fight against and prevention of corruption			
Following consultations with the Commission, the strategy and action plan for 2025-2028 are adopted	December 2024	EC assessment pending	Action Plan 2026–2028 adopted by the Government on 4 June 2026; the formal condition set in the Commission’s negative assessment of January 2026 is now met.

All vacant positions for prosecutors and judges in anti-corruption departments and in special prosecutor's office for organised crime, and special department of the higher court and of the appellate court in Belgrade for organised crime are filled in accordance with the Annual Schedule of Judges (adopted by the HJC) and the Decision of the High Prosecution Council on the number of public prosecutors and trained	December 2025	Review not initiated. Funding not requested	No consolidated public data on anti-corruption departments; Prosecutor's Office for Organised Crime disrupted by the January 2026 amendments and restored to 24 of 25 prosecutors only by June 2026; High Prosecutorial Council unable to appoint.
The track record of effective and efficient investigations, prosecutions, final judgements, seizure, and final confiscations in corruption, including high-level corruption cases is improved	June 2026	Review not initiated. Funding not requested	No consolidated 2025 statistics published by the cut-off date; the Ministry of Justice acknowledged that final judgments cannot materialise within the Reform Agenda horizon; the 2025 anti-corruption operation produced no significant judicial outcome.

IMPROVED FIGHT AGAINST AND PREVENTION OF CORRUPTION

- **4.5.1.1 Following consultations with the Commission, the strategy and action plan for 2025-2028 are adopted – EC assessment pending**

This step requires the adoption, following consultations with the Commission, of an anti-corruption strategy and an action plan covering the whole 2025–2028 period. The Commission assessed it as not achieved in its Implementing Decision of 12 January 2026 because the Action Plan adopted in December 2024 covered only 2024–2025, and set the grace period to 31 December 2026. The missing element was delivered during the semester: after the Commission's final comments confirmed the draft as mature for adoption, the Government adopted the Action Plan 2026–2028 for the implementation of the National Anti-Corruption Strategy 2024–2028 on 4 June 2026, and it was published in the Official Gazette of the Republic of Serbia, No. 52/2026⁵⁷ on 10 June 2026 – unlike the 2024–2025 plan, which was published only on the Government website. The Ministry of Justice announced that a coordination body of all relevant ministers, which the Strategy foresees and which has not existed until now, would be established immediately after adoption; no decision establishing it had been published by the cut-off date. In formal terms the step is therefore complete, and the Government included it in the fourth payment request of 15 July 2026, where it is recorded as fully achieved. That request also documents the consultation chain the step requires: the translated draft was sent to the Commission on 12 November 2025, comments from the Commission and a

⁵⁷ Official Gazette of the Republic of Serbia, No. 52/2026, <https://www.paragraf.rs/glasila/rs/sluzbeni-glasnik-republike-srbije-52-2026.html>, Accessed 2 October 2026.

TAIEX expert mission followed on 16 January 2026, a revised draft was submitted on 11 February 2026, and the Commission's final assessment of 27 March 2026 opened the way to adoption.

The Action Plan 2026–2028 operationalises the Strategy through five specific objectives: improving the normative framework, strengthening the institutional framework, increasing transparency, reinforcing integrity in the public sector and in the bodies responsible for countering corruption, and raising awareness of the harm corruption causes. It covers the twelve risk areas identified in the Strategy, among them health, education, taxation, customs, local self-government, public enterprises, the police, privatisation, construction and public procurement, and it is the instrument through which the outstanding GRECO fourth- and fifth-round recommendations and the remaining Chapter 23 interim benchmarks were to be addressed, the 2024–2025 plan having covered only part of them. Planned spending on its implementation exceeds ten million euro over the three years.

The substance is weaker than the form, however. The Agency for the Prevention of Corruption's⁵⁸ review of the Action Plan 2024–2025 found that of 143 activities 43 per cent were fully implemented and 56 per cent were not, and that the plan's general strategic objective was not achieved; according to the same review, around 80 per cent of the activities were carried over into the new plan. The Commission's 2026 Rule of Law Report notes that effective implementation will depend on coordination mechanisms, budgetary resources and a monitoring system that were absent under the previous plan, and that the outstanding GRECO fourth- and fifth-round recommendations are only now being addressed – GRECO's second compliance report⁵⁹ under the fifth round, adopted in June 2026, was not yet public. The procedural findings of the previous report stand, and the criticisms voiced during drafting have been restated publicly since adoption. The working group included civil society representatives selected through a public call, but Transparency Serbia, which took part in the drafting, states⁶⁰ that most of its proposals were rejected, including those it considered most important for improving the anti-corruption

58 Agency for the Prevention of Corruption, Report on the Implementation of the National Anti-Corruption Strategy and the Accompanying Action Plan for the Period 2024–2025 (Izveštaj o sprovođenju Nacionalne strategije za borbu protiv korupcije i pratećeg Akcionog plana za period 2024–2025. Godine), https://www.acas.rs/storage/page_files/Izve%C5%A1taj%20o%20sprovo%C4%91enju%20Nacionalne%20strategije%20D0%B7%D0%B0%20borbu%20protiv%20korupcije%20i%20prate%C4%87eg%20Akcionog%20plana%20za%20period%202024-2025.%20godine_1.pdf, Accessed 2 October 2026.

59 Group of States against Corruption (GRECO), "Evaluations: Serbia," <https://www.coe.int/en/web/greco/evaluations/serbia>, Accessed 2 October 2026.

60 N1, "Millions for the Fight Against Corruption, but Worse Results: The Anti-Corruption Action Plan" (Milioni za borbu protiv korupcije, a rezultati sve lošiji: Akcioni plan za borbu protiv korupcije), July 2026, <https://n1info.rs/vesti/milioni-za-borbu-protiv-korupcije-a-rezultati-sve-lošiji-akcioni-plan-za-borbu-protiv-korupcije/>, Accessed 2 October 2026.

legal framework and practice, and the public-debate report was obtained only through a freedom-of-information request.

Since the Strategy's adoption, Serbia's score on the Corruption Perceptions Index⁶¹ has fallen from 35 to 33, its lowest in two decades and the lowest in the region.

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

The step was not achieved by its December 2025 deadline and remains in its grace period until 31 December 2026, and Serbia did not claim it in the third payment request. As in the previous report, it cannot be verified from independent public sources: neither the annual schedules of the Higher Public Prosecutors' Offices nor consolidated staffing data for the four anti-corruption departments are published. Of the four higher prosecutors' offices, only Novi Sad publishes the composition of its anti-corruption unit⁶², listing twelve prosecutors against fifteen envisaged. The two instruments named in the step also do not govern what it measures. The Annual Schedule of Judges is adopted by each court president under Article 35 of the Law on the Organisation of Courts⁶³, not by the High Judicial Council as the step assumes, while the High Prosecutorial Council's decision on the number of prosecutors has not changed since October 2023 and covers only the Prosecutor's Office for Organised Crime, leaving the anti-corruption departments of the higher prosecutors' offices outside its scope.

In the fourth payment request of 15 July 2026 the Government itself records the step as not achieved, while reporting staffing figures that are not otherwise public: 21 judges in the anti-corruption department of the Higher Court in Belgrade, 7 in Novi Sad, 6 in Niš and 5 in Kraljevo, with 12 in the special department of the Appellate Court, against baselines of 4, 6, 5, 6 and 11 respectively, and 18 prosecutors in the anti-corruption unit of the Higher Public Prosecutor's

61 Transparency Serbia, "Corruption Perceptions Index 2025: Serbia's Worst Result in Two Decades (Indeks percepcije korupcije 2025: najlošiji rezultat Srbije u poslednje dve decenije)," <https://www.transparency.org.rs/sr/aktivnosti-2/naslovna/13012-indeks-percepcije-korupcije-2025-najlosiji-rezultat-srbije-u-poslednje-dve-decenije>, Accessed 2 October 2026.

62 Higher Public Prosecutor's Office in Novi Sad, "Special Department for the Suppression of Corruption (Posebno odeljenje za suzbijanje korupcije)," <https://vst.jt.rs/1206-2/>, Accessed 2 October 2026.

63 Law on Organisation of Courts (Zakon o uređenju sudova), Official Gazette of the Republic of Serbia, no. 10/2023, art. 35, https://www.paragraf.rs/propisi/zakon_o_uredjenju_sudova.html, Accessed 2 October 2026.

Office in Belgrade, 12 in Novi Sad, 9 in Niš and 11 in Kraljevo. On that basis the High Judicial Council considers its own component of the step fully achieved. These figures cannot be independently confirmed and are difficult to reconcile with the annual schedules themselves: although every one of the five relevant court presidents amended the schedule for 2026, the number of judges assigned to corruption cases remained unchanged in each court, and the schedule for the Higher Court in Kraljevo has not been made available at all. The reported figure for Belgrade, more than five times the baseline, suggests a wider count than the anti-corruption department alone.

The only well-documented development concerns the Prosecutor's Office for Organised Crime, and it ran in the wrong direction for most of the semester. The amendments to the Law on the Public Prosecutor's Office adopted on 28 January 2026 ended, with effect from 11 March, the secondment of eleven of the twenty prosecutors then working in the Office, against an establishment of 25. The same amendments transferred the power to second prosecutors to the Office from the Supreme Public Prosecutor to the High Prosecutorial Council, a body that decides by qualified majority, so that the Office's staffing became dependent on a vote the Council has repeatedly been unable to assemble. The Council restored the secondments in stages over the following three months, renewing seven on 6 March⁶⁴, two on 4 May and the last two on 18 June⁶⁵, and seconded four further prosecutors. By the cut-off date the Office was again operating with 24 of its 25 positions covered, but only 9 of those prosecutors are elected to the Office and 15 are seconded, one of the nine is due to retire in October 2026, and the election procedure opened by public call in December 2024⁶⁶ was never completed, a further call⁶⁷ having been issued in June 2026. The Office therefore remains staffed largely through temporary assignments that legislation proved able to withdraw at a stroke in January, which is the condition the step was meant to end.

At the same time the Council remained unable to make permanent appointments for lack of quorum, and the Commission's 2026 Rule of Law Report⁶⁸ records that cooperation with the police deteriorated, with officers withdrawn from prosecution-led task forces and the police organised-crime unit investi-

64 High Prosecutorial Council, "Session Agenda (Dnevni red sednice)," 6 March 2026, <https://vst.jt.rs/wp-content/uploads/2026/04/Dnevni-red-5.pdf>, Accessed 2 October 2026.

65 High Prosecutorial Council, "Session Agenda (Dnevni red sednice)," 18 June 2026, <https://vst.jt.rs/wp-content/uploads/2026/06/Dnevni-red-4.pdf>, Accessed 2 October 2026.

66 High Prosecutorial Council, "Public Call for the Election of Public Prosecutors (Javni konkurs za izbor javnih tužilaca)," December 2024, <https://vst.jt.rs/wp-content/uploads/2024/12/Javni-konkurs-za-izbor-javnihtuzilaca-sajt-1.pdf>, Accessed 2 October 2026.

67 High Prosecutorial Council, "Public Call for the Election of Public Prosecutors (Javni konkurs za izbor javnih tužilaca)," June 2026, <https://vst.jt.rs/wp-content/uploads/2026/06/Javni-konkurs-za-izbor-javnihtuzilaca.pdf>, Accessed 2 October 2026.

68 European Commission, 2026 Rule of Law Report: Serbia.

gating high-level corruption lacking staff. In response to questions on this step, the Ministry of Justice cited the same aggregate figure of 165 judges and 52 prosecutors elected that it had given in response to questions on the 10 per cent increase step and on the track-record step, without indicating how many of those appointments concern the anti-corruption units; the Commission, for its part, reports 205 judicial appointment decisions in the first five months of 2026.

- **4.5.1.2 The track record of effective and efficient investigations, prosecutions, final judgements, seizure, and final confiscations in corruption, including high-level corruption cases is improved – Review not initiated. Funding not requested**

This step, due for the first time in June 2026 and repeated in June 2027, requires an improved year-on-year track record in corruption cases, including high-level corruption, across investigations, prosecutions, final judgments, seizure and final confiscation. It could not be verified as achieved. At the cut-off date no consolidated 2025 statistics for the four anti-corruption departments and the Prosecutor's Office for Organised Crime were publicly available, the High Judicial Council's annual report had not been published, and the Agency for the Prevention of Corruption's data were described by civil society as insufficient. What is published comes once a year and in forms that resist comparison: the Supreme Public Prosecutor's Office reports as a scanned document, the Ministry of Justice covers only thirteen corruption offences and without year-on-year comparison, and neither reports adequately on confiscation.

The figures that have since emerged do not show an improved record. In the fourth payment request of 15 July 2026 the Government reported 2025 data to the Commission showing, for corruption other than high-level, indictments against 374 persons (313 in 2024) but new investigations against 560 (607 in 2024) and final convictions down for a second year, to 214 from 259 in 2024 and 326 in 2023. In high-level corruption, investigations rose to 35 persons from 18 and parallel financial investigations to 31 from 5, while indictments fell for a second year, to 25 from 45 and 74, and final convictions fell to 16 from 28 and 31, with no plea agreements at all against 19 in each of the two preceding years. Confiscated assets were valued at some €9.8 million, with a number of properties left unvalued. Independent comparison of the public sources yields a different picture again, with reported persons up 17 per cent and convictions up 5 per cent, which illustrates how far the classification and reporting of corruption offences still prevent reliable trends from being established. On the Government's own assessment, the step is not achieved.

The scope of what is counted is itself contested. Cases falling to the Prosecutor's Office for Organised Crime are treated as the measure of high-level corruption, although the President of the Republic, members of Parliament, the heads of the pension and health funds and directors of state-owned companies not appointed by the Government fall outside its jurisdiction. The offence of violation of the law by a judge or prosecutor is excluded from the corruption statistics altogether, while offences such as embezzlement and abuse of position by a responsible person are included although they frequently lack any corruption element.

Qualitative evidence points the same way. The Commission's 2026 Rule of Law Report confirms that challenges remain in establishing a robust track record and that the anti-corruption operation of February–April 2025, in which over 153 persons were arrested, produced no significant judicial outcome. The anti-corruption drive announced from the highest political level at the start of 2025 was promptly taken up by all four higher prosecutors' offices, while the Office for Organised Crime's investigations into one serving and two former ministers met with a lack of support from the police and other executive bodies; the investigation into the Novi Sad railway station collapse stalled after seventeen officers were withdrawn from the prosecution's task force in September 2025. Civil society continues to report reluctance to investigate suspects linked to political and economic power, and the cases documented publicly but never opened remain outside every statistic.

The Ministry of Justice offered a defence of a different kind at the trilateral meeting of 13 May 2026, conceding that the step "was not aligned with the period of implementation of the Reform Agenda" because cases of this kind take four to five years to reach a final judgment and subsequent confiscation. For final judgments and confiscation, the point has force. It does not extend to the step as a whole, which also requires an improved record in investigations and prosecutions, measurable within a single year and duly measured, nor to the stock of cases already pending when the Reform Agenda was adopted, on which no data were provided. The step speaks of investigations that are effective and efficient, which is a measure of how long proceedings take rather than a reason why they take long. The deeper problem is the yardstick: year-on-year change means little from a low base and without targets, and the last attempt to set one, a 30 per cent increase in convictions under the 2013–2018 Strategy, ended with performance weaker than in the baseline year.

The *Fight against Organised Crime* domain covers the strategic and legislative backbone of Chapter 24 in the Reform Agenda: a new strategic framework for the control of small arms and light weapons (SALW), a Law on Internal Affairs guaranteeing the operational autonomy of the police and implementing the recommendations of the Committee for the Prevention of Torture (CPT), a legislative package on trafficking in human beings (THB), weapons trafficking, and civilian firearms, an operational plan on financial investigations, and a counter-terrorism and prevention of violent extremism programme. These instruments are expected to translate into a measurable track record in organised crime cases, and they sit at the centre of the interim benchmarks Serbia must meet in the accession negotiations.

Six reform steps fell within the scope of this reporting period, as set out in the table: four carried over from the June 2025 deadline, whose twelve-month grace period expired on 30 June 2026, one carried over from December 2025, and the first of the two track-record steps, due in June 2026. The semester was marked by a late acceleration: after months of inactivity, the draft Law on Weapons and Ammunition and the draft Law on Internal Affairs were put through compressed public debates in April and sent to the Commission in May, and the weapons law and the Criminal Code amendments on firearms were adopted by the National Assembly in July – ten days after the end of that twelve-month period. Within the deadline itself, only the THB Law and the counter-terrorism programme were formally adopted, the latter published on the very last day of that period. The Law on Internal Affairs and the Criminal Code and firearms legislation were not adopted in time, the operational plan on financial investigations remained with the Commission, and the Ministry of the Interior itself acknowledged that the track-record indicators cannot be generated before the new criminal provisions are in force. In disbursement terms, the fourth payment request of 15 July 2026 claims the SALW step, the legislative package and the counter-terrorism programme as achieved, while the Government itself records the Law on Internal Affairs, the operational plan on financial investigations, and the track-record step as not achieved.

The next semester will show whether the July adoptions are treated as fulfilment of the June 2025 legislative step, which the Facility rules do not provide for, and whether the Law on Internal Affairs – still not before the National Assembly at the cut-off date – can be adopted in a form that actually secures police autonomy rather than restating ministerial control. The operational plan on financial investigations must be adopted before its grace period expires in December 2026, and the December 2026 step on the radicalisation risk-assessment team and terrorist-attack response methodology enters the scope of assessment in the next reporting period. The main structural risk is

that adoption is being secured on paper while the substantive requirements – transparency of drafting, meaningful consultation and enforceable safeguards – are compressed or bypassed.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Tackling of organised and serious crime			
Following consultations with the Commission, new strategic document and accompanying Action Plan *(2025-2030) for the control of Small arms and light weapons (SALW) in line with the provisions of the revised Regional SALW Roadmap for Western Balkans are adopted.	June 2025	EC assessment pending	No change: Programme 2025–2030 and Action Plan 2025–2027 adopted on 26 December 2025; claimed in the third payment request; Commission assessment pending.
New legislative framework is adopted, notably: a new Law on suppression and prevention of THB by Parliament; criminal code is amended in order to criminalise effectively the trafficking of weapons, in line with the provisions of the Convention on transnational organised crime and firearms protocol; adoption of a new Law on weapons and ammunition, in line with EU acquis	June 2025	EC assessment pending (claimed in the fourth payment request of 15 July 2026)	THB Law adopted on 23 April 2026; Criminal Code amendments and the Law on Weapons and Ammunition not adopted by the cut-off date (adopted on 10 July 2026, after expiry of the grace period).
The Law on internal affairs addressing the issue of police autonomy from the Ministry of Interior during pre-investigation and investigation phases and recommendations from the Committee for Prevention of Torture is adopted;	June 2025	Grace period expired	Draft published and put to a 20-day public debate in April 2026 and sent to the Commission on 11 May 2026; not submitted to the National Assembly by the cut-off date; grace period expired.
Adoption of operational plan on financial investigations.	December 2025	Review not initiated Funding not requested.	Revised draft sent to the Commission in May 2026 after the public debate; not adopted by the Government; revised text not made public.
Both Actions plans continuously implemented, leading to (i) increased number of investigations, indictments and final convictions in organised crime cases (track record), (ii) Increased number of investigations, indictments and final convictions for trafficking of weapons (track record), (iii) Increased number and value of seized and confiscated assets in serious and organised crime cases, (iv) Increased number of tracing of firearms and investigations on origin of seized weapons (track record), (v) Increased number of victims of THB granted especially vulnerable witness status in line with the Code of Criminal Procedure.	June 2026	Unverifiable	No consolidated official statistics for 2025 published by the cut-off date; the Ministry of the Interior acknowledged in May 2026 that the firearms-related indicators cannot be generated before the Criminal Code amendments are in force.

Tackling of the security and migration challenges			
A new strategic document and accompanying action plan that covers counter terrorism and all forms of radicalization and violent extremism (irrespective of political, religious or ethno-nationalist so-called justification) are adopted in line with EU policies, including envisaging concrete steps to prevent recruitment and participation of Serbian citizens as foreign fighters and to prosecute returning foreign fighters returned to Serbia.	June 2025	EC assessment pending (claimed in the fourth payment request of 15 July 2026)	Programme 2026–2030 and Action Plan 2026–2027 adopted by the Government following a positive Commission opinion of 22 April 2026 and published in the Official Gazette No. 58/2026 on 30 June 2026, the last day of the twelve-month period following the deadline.

TACKLING OF ORGANISED AND SERIOUS CRIME

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

No change since the previous report, see the RA update S2 2025⁶⁹ update for details. The Programme for the Control of SALW, Ammunition and Explosives 2025–2030 and its Action Plan 2025–2027 were adopted on 26 December 2025 and published in the Official Gazette of the Republic of Serbia, No. 119/2025⁷⁰ with no comments submitted during either the consultation phase or the public debate. Serbia claimed the step as fully achieved in the third payment request of January 2026, citing SEESAC's opinion and the Commission's confirmation of 29 October 2025. The Commission's assessment of the third payment request was still ongoing at the cut-off date. The question raised in the previous report that the Action Plan covers only the first three of the Programme's six years remains open; the NCEU's first independent monitoring report⁷¹ likewise assessed the step as achieved while noting residual gaps on gender-responsive measures and the accountability of weapons-surrender campaigns.

⁶⁹ European Policy Centre, Reform Agenda Update: Serbia, Second Semester 2025 (Belgrade: European Policy Centre, 2026), https://cep.org.rs/wp-content/uploads/2026/03/RA_Pilot-Reform-Monitor_2nd-Semester-2025-2.pdf, Accessed 2 October 2026.

⁷⁰ Official Gazette of the Republic of Serbia, No. 119/2025, <https://www.paragraf.rs/glasila/rs/sluzbeni-glasnik-republike-srbije-119-2025.html>, Accessed 2 October 2026.

⁷¹ National Convention on the European Union, First Independent Monitoring Report on the Implementation of the Reform Agenda, May 2026, <https://cep.org.rs/wp-content/uploads/2026/06/First-Independent-Monitoring-Report-on-the-Implementation-of-the-Reform-Agenda-1.pdf>.

- **4.3.1.1 New legislative framework is adopted, notably: a new Law on suppression and prevention of THB by Parliament; criminal code is amended in order to criminalise effectively the trafficking of weapons, in line with the provisions of the Convention on transnational organised crime and firearms protocol; adoption of a new Law on weapons and ammunition, in line with EU acquis – EC assessment pending**

This step required three cumulative deliverables by June 2025, with the twelve-month period following that deadline running to mid-2026. Only one was delivered in time. The Government determined the proposal of the Law on the Prevention and Suppression of Trafficking in Human Beings and Protection of Victims at an extraordinary session on 14 April 2026 and the National Assembly adopted it on 23 April 2026 with 142 votes in favour of 170 present; The law was published in the Official Gazette of the Republic of Serbia, No. 35/2026⁷² the same day and entered into force eight days later. The law applies from 1 January 2027, with the bulk of the implementing regulations due within six months of entry into force. The law establishes a national institutional mechanism, the 'social path' principle for identification independent of criminal proceedings, a catalogue of victims' rights and a formal identification procedure led by the Centre for the Protection of Victims. Civil society organisations that had taken part in the working group disputed the Ministry of the Interior's account of the process at the May 2026 trilateral meeting, in particular the refusal to share the final revised draft before its submission to the Government; the post-consultation text was never published on the e-Consultation Portal.

The other two requirements of this reform step were not delivered within that period. The draft Law on Weapons and Ammunition was placed in public debate at the end of March 2026, with the written phase closing on 20 April 2026, with comments collected in writing only and no round table held. The text and its transposition tables for Directive (EU) 2021/555 were sent to the Commission on 11 May 2026. The Criminal Code amendments on firearms offences, which the Ministry of Justice carved out of the broader Criminal Code package still under Commission assessment, were determined by the Government on 18 June 2026, following the Commission's final assessment concerning Article 348 received on 29 May 2026, and were debated at an extraordinary parliamentary session held from 6 to 10 July 2026. Both laws were adopted on 10 July 2026 and published in the Official Gazette No. 63/2026⁷³ on the same day

72 Law on the Prevention and Suppression of Trafficking in Human Beings and Protection of Victims (Zakon o sprečavanju i suzbijanju trgovine ljudima i zaštiti žrtava), Official Gazette of the Republic of Serbia, No. 35/2026, <https://www.paragraf.rs/propisi/zakon-o-sprecavanju-i-suzbijanju-trgovine-ljudima-i-zastiti-zrtava.html>, Accessed 2 October 2026.

73 Official Gazette of the Republic of Serbia, No. 63/2026, <https://www.paragraf.rs/glasila/rs/sluzbeni-glasnik-republike-srbije-63-2026.html>, Accessed 2 October 2026.

– ten days after the end of the twelve-month period following the deadline. Substantively, the amendments replace Article 348 of the Criminal Code with five separate offences, including unlawful possession and carrying; unlawful production, including 3D printing, unlawful trade and smuggling with aggravated forms for groups and organised criminal groups; unauthorised testing and marking; and forgery of proof marks, mirroring the UN Firearms Protocol. However, both the new offences and the new firearms law have deferred application. The Criminal Code provisions apply nine months after entry into force and the Law on Weapons and Ammunition from 18 April 2027, so that the framework the step was meant to deliver by mid-2025 will not be operative before spring 2027. The Ministry of Justice’s own announcement described the deadline as ‘the month of July’, which does not correspond to the Reform Agenda. On the basis of the July adoptions the Government claimed the step as fully achieved in the fourth payment request of 15 July 2026.

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

The step was not achieved and its grace period expired on 30 June 2026, although the law went through three drafting cycles since 2021, including the one of the working group of Ministry of Interior units, the Police Directorate and three police unions set by the Reform Agenda. After the NCEU had declined a three-day informal consultation on the August 2025 working version, the Ministry of the Interior published a 287-article draft on the e-Consultation Portal and its website on 2 April 2026. It then ran a minimal statutory public debate from 3 to 24 April 2026, which spanned the Easter holidays. Round tables were held in Leskovac (announced the morning the debate opened), Belgrade, and Subotica. On 8 April, the NCEU working groups for Chapters 23 and 24 publicly objected that four major laws had been placed in simultaneous, minimal-length debates⁷⁴. The draft was sent to the Commission on 11 May 2026 alongside a plan for implementing the 2024 CPT recommendations, and three Commission experts were engaged to review it. On 29 May, the Minister of Interior informed⁷⁵ the competent parliamentary committee that the

74 Paragraf, “NCEU Working Groups for Chapters 23 and 24 on Public Debates (NKEU radne grupe za poglavlja 23 i 24 o javnim raspravama),” 22 April 2026, <https://www.paragraf.rs/dnevne-vesti/220426/220426-vest11.html>, Accessed 2 October 2026.

75 Tanjug, “Dačić: Law on Internal Affairs Replacing Current One Soon Before Deputies (Dačić: Uskoro pred poslanicima Zakon o unutrašnjim poslovima koji zamenjuje dosadašnji),” 29 May 2026, <https://www.tanjug.rs/srbija/politika/255588/dacic-uskoro-pred-poslanicima-zakon-o-unutrasnjim-poslovima-koji-zamenjuje-dosadasnji/vest>, Accessed 2 October 2026.

law would soon be before the National Assembly. However, no Government proposal had been submitted to the National Assembly by the cut-off date, nor was the revised post-consultation text published.

On substance, the draft states that the police are operationally independent of the Ministry of Interior in pre-investigation, criminal and misdemeanour proceedings. However, the architecture that undermines that guarantee in the 2022 draft remains largely intact. The Police Director remains accountable to the Minister, may be dismissed by the Government on the Minister's reasoned proposal. Furthermore, the Director may be reappointed for a second term without a public competition. The head of the Internal Control Sector still answers to the Minister, whose internal general acts continue to direct the organisation of work. While the draft introduces police negotiation and the 'Find Me' missing-child alert, and drops earlier biometric surveillance and warrantless-entry provisions, it adds a controversial new power. for The Minister could ban assemblies in an area for fifteen renewable days, after a large-scale breach of public order, a measure civil society considers open to abuse. The Commission's 2026 Rule of Law Report, published on 17 July 2026⁷⁶, repeats that the police still lack sufficient operational autonomy from the Ministry's political influence and that recent senior police appointments were not perceived as merit-based. Alignment with the CPT recommendations is already incomplete on the face of the published draft. It introduces no mandatory audio and video recording of police interviews, no mandatory suspension of officers against whom proceedings for torture are pending and no clear rules on the medical examination of persons in detention. Additionally, the composition and working methods of the new commission on the prevention of torture are left to the Minister to determine. In the fourth payment request the Government states that the draft is being aligned with comments the Commission has provided on two occasions.

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

The step was not achieved by the cut-off date and remains within its grace period until December 2026. The draft Operational Plan for Financial Investigations and Confiscation of Property 2026–2028⁷⁷ went through a public debate between 22 October and 11 November 2025. Following this, it entered an ongoing bilateral exchange with the Commission. A translated version was sent on 25 November 2025, comments were received, and a revised version followed in early May 2026. The Ministry of Justice has made adoption condi-

⁷⁶ European Commission, 2026 Rule of Law Report: Serbia.

⁷⁷ Ministry of Justice of the Republic of Serbia, "Public Sessions (javne rasprave)," <https://mpravde.gov.rs/javne-rasprave>, Accessed 2 October 2026.

tional on the outcome of that exchange. At the trilateral meeting of 13 May, the Ministry stated it was awaiting the Commission's final assessment before launching the adoption procedure. Later, at the Monitoring Committee of 3 June, it reported only that work was "advancing in coordination with the Commission". By 30 June 2026, no public-debate report, revised draft, or Government decision had been published.

The previous report recorded three procedural shortcomings in the drafting of the plan: no civil society or academic participation in the working group, a public debate of twenty calendar rather than twenty working days, and a revised text that was never made public. None of them has been remedied. When asked at the trilateral meeting whether a broader consultation would precede adoption, the Ministry pointed only to the standard inter-ministerial opinion procedure, which involves no external participants. As a result, the text is expected to reach the Government without the public ever seeing the version slated for adoption. Additionally, the document's legal identity under the Law on the Planning System, which refers to itself both as an operational plan and a strategy, remains unresolved.

- **4.3.1.4 Both Actions plans continuously implemented, leading to (i) increased number of investigations, indictments and final convictions in organised crime cases (track record), (ii) Increased number of investigations, indictments and final convictions for trafficking of weapons (track record), (iii) Increased number and value of seized and confiscated assets in serious and organised crime cases, (iv) Increased number of tracing of firearms and investigations on origin of seized weapons (track record), (v) Increased number of victims of THB granted especially vulnerable witness status in line with the Code of Criminal Procedure – Review not initiated. Funding not requested**

This step, due for the first time in June 2026 and repeated in June 2027, requires a year-on-year increase across five sets of indicators. These results depend on implementing two action plans that the step itself does not identify. Performance is measured against the average of the three preceding years based on data submitted to the Commission's Organised Crime and Corruption Track Record e-platform, which is not public. It could not be verified as achieved. By the cut-off date, no official, consolidated statistics for 2025 against 2024 covering the five indicators had been published. The High Judicial Council's annual report had not been issued, and the Ministry of Justice publishes its judicial statistics only at the end of June. Furthermore, neither the Prosecutor's Office for Organised Crime nor the Directorate for the Management of Seized Assets publishes data with the disaggregation the step requires. More fundamentally, the Ministry of the Interior made a key concession at the trilateral meeting of

13 May 2026.⁷⁸ It acknowledged that firearms-related indicators, including investigations and convictions for weapons trafficking and firearms tracing, presuppose Criminal Code amendments that were not yet in force. For trafficking in human beings (THB), the Ministry noted that the only currently reportable indicator is the number of victims granted especially vulnerable witness status, to be reported by the prosecution. The prosecutorial side of the track record faced further disruption during the semester. The secondment of eleven out of twenty prosecutors at the Prosecutor's Office for Organised Crime was ended following the January 2026 amendments to the judicial laws. The office was restored to near-full strength only between March and June 2026.

TACKLING OF THE SECURITY AND MIGRATION CHALLENGES

- **4.4.1.1 A new strategic document and accompanying action plan that covers counter terrorism and all forms of radicalization and violent extremism (irrespective of political, religious or ethno-nationalist so-called justification) are adopted in line with EU policies, including envisaging concrete steps to prevent recruitment and participation of Serbian citizens as foreign fighters and to prosecute returning foreign fighters returned to Serbia – EC assessment pending**

The step was formally completed on the last day of the twelve-month period following its deadline. After a third round of consultation with the Commission on the post-public-debate text, the Commission issued a positive opinion on 22 April 2026. The Government adopted the Programme for Combating Terrorism and All Forms of Radicalisation and Violent Extremism 2026–2030, with an Action Plan 2026–2027, at the end of June 2026 and it was published in the Official Gazette of the Republic of Serbia, No. 58/2026⁷⁹ on 30 June 2026 available on the Ministry of the Interior website. Compared with the draft put to public debate in 2025, the period covered has shifted from 2025–2030 to 2026–2030 and the Action Plan from 2025–2027 to 2026–2027, so that the first year of the original planning horizon has been lost. Although the drafting was procedurally presented as open, independent monitors continue to characterise the process as neither inclusive nor transparent⁸⁰. The working group included no civil society organisations, the eight-day written consultation and the nineteen-day public debate attracted a single submission, and the consol-

78 National Convention on the European Union, "Second Trilateral Meeting on the Reform Agenda: Civil Society Raises Substantive Concerns," 13 May 2026, <https://eukonvent.org/second-trilateral-meeting-on-the-reform-agenda-civil-society-raises-substantive-concerns/>, Accessed 2 October 2026.

79 Official Gazette of the Republic of Serbia, No. 58/2026, <https://www.paragraf.rs/glasila/rs/sluzbeni-glasnik-republike-srbije-58-2026.html>, Accessed 2 October 2026.

80 National Convention on the European Union, First Independent Monitoring Report on the Implementation of the Reform Agenda, May 2026.

dated post-debate text was not published before adoption. On content, the adopted Programme establishes a coherent architecture aligned with EU and Council of Europe standards and provides for a National Coordination Body to steer implementation, which the Government re-established on 10 August 2026 under the Secretary of the Ministry of the Interior. Civil society has questioned the appointment of the head of the criminal police as its deputy coordinator in light of unresolved allegations concerning the policing of protests. The gaps identified in the draft output-oriented measures with few outcome indicators, activities costed at zero because they fall under regular institutional work, donor-funded measures left unquantified and weak independent oversight of counter-terrorism powers have not been addressed. The Government claimed the step as fully achieved in the fourth payment request of 15 July 2026.

The *Digital Public Services* domain brings together three strands of the Reform Agenda: alignment of the legal framework with the eIDAS and EU Digital Identity Regulations, the expansion of end-to-end digital services for businesses and citizens, and the strengthening of adult digital skills through the establishment of Digital Corners. Taken together, these reforms support Serbia's participation in the EU Digital Single Market. Without aligned trust services, cross-border digital transactions remain legally unsecured, while the skills component determines whether digitalised services are actually usable by the population they are designed for.

Three reform steps fell within the scope of this reporting period, as set out in the table: two carried over from the December 2025 deadline and one due by June 2026. The three steps share a similar implementation pattern. Technical preparation has advanced in each case. A draft law on electronic identification and trust services was submitted to the Commission for review, while the procurement models for Digital Corners are currently under design. As a result, no payment condition in this domain has yet been met, and the funds attached to these steps remain unclaimed two reporting periods after the first deadline fell due.

Success in the next semester will hinge on the adoption of the law and a positive Commission opinion on the amended implementing acts. This would remove the principal obstacle to the Digital Identity Wallet step due in 2027. A continued delay would leave both eIDAS-related steps facing the expiry of their grace period at the end of 2026. For Digital Corners, the Ministry's internal target coincides with the final month of its own grace period, leaving no margin for procurement or rollout delays.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor finding
urther digitalisation of public services and administrative procedures for businesses and citizens: Digital identity and trust services compliant with the EU Digital Identity Regulation and eIDAS Regulation			
Compliance with the EU digital identity Regulation and eIDAS Regulation is achieved through the adoption of the amendments of the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business (or a new law depending on % of amendments) by the National Parliament	December 2025	Review not initiated. Funding not requested	Draft law prepared and went through public debate; not adopted by the National Assembly as of the cut-off date.
Serbia has joined the EU Third Countries trusted list for the validation of electronic signatures as advanced electronic in the EU as a first step towards pursuing mutual recognition of qualified trust services	December 2025	Review not initiated Funding not requested	Assessment Checklist submitted to the European Commission; of four drafted implementing acts, one submitted to the Commission for comments and three still in the domestic opinion procedure; none published.

Strengthening adult education, training and relevant up-skilling opportunities of digital skills and literacy			
Digital Corners (adult digital skills training centers) are established and operative in 50+ municipalities by June 2026	June 2026	Review not initiated. Funding not requested	Preparatory phase only; no locations confirmed, no equipment procured; Ministry's internal target is June 2027, one year beyond the Reform Agenda deadline.

FURTHER DIGITALISATION OF PUBLIC SERVICES AND ADMINISTRATIVE PROCEDURES FOR BUSINESSES AND CITIZENS

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

This step requires the National Assembly to adopt amendments to the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business. A working group was formed on 9 July 2024. However, its composition—predominantly public authorities, with a single representative each from the business and academic sectors and one civil society organisation (NALED)—was disclosed only on 26 December 2025, when the public debate opened. No early-stage consultations were held during those 17 months. The draft law was published on 26 December 2025 alongside the full public-debate documentation package. While this technically met the minimum statutory period of 20 days for consultations, it fell almost entirely within the winter holiday period.

Independent expert analysis assesses the draft as reflecting the formal alignment with the eIDAS and EU Digital Identity Regulations. However, it identifies substantive shortcomings⁸¹, that are critical for the future implementation. These include a largely mechanical transposition without adaptation to the Serbian institutional context, vague normative standards, and unresolved data-protection questions (including an unjustified 10-year data-retention ceiling). Furthermore, transitional provisions defer the establishment of key system elements by up to two years. As of the cut-off date, the draft law had not been adopted by the Government or submitted to the National Assembly. A freedom of information request submitted by a member of the NCEU Inter-Sectoral Working Group established that, as of late July 2026, the draft remained in harmonisation with the European Commission, with no official opinion received yet.

⁸¹ National Convention on the European Union, First Independent Monitoring Report on the Implementation of the Reform Agenda, May 2026.

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

This step requires Serbia's inclusion in the EU Trusted List for Third Countries as a first step toward mutual recognition of qualified trust services. According to information obtained via a Freedom of Information request to the Ministry of Information and Telecommunications, the procedure was formally initiated with DG CNECT on 4 April 2025. The Ministry submitted the Article 14 Assessment Checklist to the European Commission in December 2025, together with English translations of relevant legislation, and held follow-up working meetings with the Commission. Discussions identified the need to amend certain implementing acts, particularly those concerning qualified electronic certificates and signatures, maintenance of the trusted list, and application of ETSI standards. By late July 2026, according to a freedom of information reply obtained by a member of the NCEU Inter-Sectoral Working Group, four implementing acts had been drafted, three were in the domestic opinion procedure and one had been submitted to the European Commission for comments; none has been published. Finally, Serbia has not been listed⁸² among the Third Countries Trusted List as of the cut-off date.

STRENGTHENING ADULT EDUCATION, TRAINING AND RELEVANT UP-SKILLING OPPORTUNITIES OF DIGITAL SKILLS AND LITERACY

- **2.2.3.1 Digital Corners (adult digital skills training centers) are established and operative in 50+ municipalities by June 2026 – Review not initiated. Funding not requested**

As of the cut-off date, no Digital Corners have been established or made operational. According to a report by the Ministry of Information and Telecommunications, shared with the NCEU Inter-Sectoral Working Group, implementation remains at the preparatory stage. The Ministry has been assessing spatial, organisational, and logistical models for establishing the corners, with locating them within the existing Serbian Post Office network under consideration as a potential solution. Work is also ongoing on defining a public procurement model and preparing technical specifications and tender documentation for equipment, software, and related services. No specific locations have yet been selected or confirmed, no equipment has been procured, no staff have been

⁸² European Commission, "Third Country Trusted Lists," eIDAS Dashboard, <https://eidas.ec.europa.eu/efda/trust-services/browse/tc-tls>, Accessed 2 October 2026.

trained, and no promotional activities or citizen training have begun. Critically, the Ministry's own report states that the target is for more than 50 Digital Corners to be established and operational at the latest by June 2027, a full year after the Reform Agenda deadline of June 2026. Although the original deadline was not achieved, this internal timeline still falls within the grace period horizon.

The *Cybersecurity* domain covers the establishment of a comprehensive national framework for cyber resilience aligned with the EU cybersecurity acquis, in particular with the NIS2 Directive. It runs from primary legislation through to the institutions and instruments that give it effect. These include a supervisory authority with real capacity, a defined perimeter of regulated entities, and functioning mechanisms for vulnerability disclosure, incident response, and crisis management. National and governmental CERTs, as well as a standalone Office for Information Security, are due in later periods. The stakes are both domestic and European: the framework determines whether operators of essential services are actually obliged, supervised, and supported, and whether Serbia can participate credibly in cooperation with EU cybersecurity structures.

Three reform steps fell within the scope of this reporting period, all carried over from the December 2025 deadline, as set out in the table. The pattern across them is one of legislative delivery without operational follow-through. The Law on Information Security has been adopted and is in force, and the organisational unit performing the functions of the Office for Information Security has been established and staffed to the required threshold. Beyond that point, however, implementation thins out markedly. The staffing threshold was reached without any public competition, through reassignments and time-limited contracts. These were concluded expressly to buy time for a permanent-employment procedure that had not been carried out by the cut-off date, and no supervisory checks have been evidenced. The regulation defining which entities fall within the scope of the law was still awaiting a Commission opinion, the Coordinated Vulnerability Disclosure (CVD) framework was still in drafting, and the crisis-response plan showed no traceable sign of preparation at all. In disbursement terms, the domain is accordingly split: two steps have been claimed and remain under review, while for the third, the authorities have not requested funds—effectively confirming their own assessment that it is unfinished.

The next semester will be decisive on two fronts simultaneously. The Commission opinions on the entity-list and CVD regulations, along with their subsequent adoption, are the precondition for closing the outstanding step. Furthermore, the grace period for all three steps expires at the end of December 2026, leaving no further reporting period in which to recover them. At the same time, a new step falls due in December 2026 requiring the national and governmental CERTs to be operational and certified. Additionally, the standalone Office for Information Security is to be established by 1 January 2027 under the Law itself. The principal risk is that the operational layer of the framework continues to lag behind its legal foundation.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor finding
Setting-up a comprehensive framework for cyber resilience and artificial intelligence			
The Law on Information Security is adopted by Parliament and fully aligned with the NIS2 Directive	December 2025	EC assessment pending	Law adopted and in force; core NIS2 architecture transposed; implementing acts and related legislative amendments pending.
The Office for Information Security (within the Office for IT and e-Government) is operational (sufficiently staffed with at least 20 employees, equipped with supervisory powers, performing supervisory checks)	December 2025	EC assessment pending	Department established and staffing threshold reached, but without public competition; supervisory checks not evidenced.
List of entities in the scope of the national law corresponding to the NIS2 Directive is finalized and Frameworks introduced by NIS2 alignment (CVD framework, crisis management framework), are in place and use	December 2025	Review not initiated. Funding not requested yet	Entity list regulation awaiting Commission opinion; CVD framework in drafting; crisis-management plan without traceable preparation.

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

- **2.2.4.1 The Law on Information Security is adopted by Parliament and fully aligned with the NIS2 Directive – EC assessment pending**

This reform step requires the adoption of a new Law on Information Security aligned with the NIS2 Directive. This law establishes a modernised national cybersecurity framework that expands the scope of regulated entities, introduces specific obligations for operators of priority and important ICT systems, sets out mandatory risk assessment and protective measures, and strengthens incident reporting requirements and supervisory powers. This step has been largely completed in legislative terms. The Government adopted the Proposal Law on 27 February 2025, and the National Assembly adopted the Law on 22 October 2025. It was subsequently published in the Official Gazette of the Republic of Serbia No. 91/2025⁸³ on 23 October 2025 and entered into force seven days later. The enacted Law follows the core NIS2 architecture. It envisions risk-based obligations, clearer categorisation of covered entities, strengthened oversight, and a reinforced CERT function. It is accompanied by a clause-by-clause correspondence table; provisions that were not transposed

⁸³ Law on Information Security (Zakon o informacionoj bezbednosti), Official Gazette of the Republic of Serbia, No. 91/2025, https://www.paragraf.rs/propisi_download/zakon-o-informacionoj-bezbednosti-2025.pdf, Accessed 2 October 2026.

are those addressed to EU Member States by nature and are not applicable to a non-member state. Several provisions of the Law, however, depend on secondary legislation that has yet to be adopted. Additionally, certain matters are intended to be regulated through amendments to other laws which have not yet been made. As such, while the core NIS2 architecture has been transposed, the correspondence table indicates that certain elements, notably the sanctions regime, are not yet fully aligned with the Directive. Furthermore, the practical effect of the Law remains contingent on the completion of the implementing framework. The drafting process was open in its consultative dimension, with two rounds of public debate conducted from 27 July to 30 August 2023, accompanied by roundtables in Belgrade on 18 August 2023 and in Kragujevac on 21 August 2023, and from 3 to 23 July 2024, with an online roundtable on 17 July 2024. Public-debate reports⁸⁴ were issued for both consultation rounds, setting out the comments received alongside the Ministry's responses. Several substantive amendments were incorporated into the final text as a result. However, documentation supporting independent verification was less consistent: the Regulatory Impact Assessment report was not published and the composition of the working group was described only in general categories, without a nominal membership list on official channels. Progress in this domain will now depend on adopting the secondary legislation foreseen by the Law and amending related legislation, both of which condition the operational steps due in subsequent periods.

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

This reform step requires the Office for Information Security, established within the Office for IT and eGovernment, to become operational in three cumulative respects: staffing of at least 20 employees, supervisory powers in force, and supervisory checks actually being performed. The formal organisational framework has been established. A Rulebook on Internal Organisation and Systematisation⁸⁵ adopted in December 2025 provides for a dedicated Department for Information Security and foresees 20 positions within it, each with clearly defined job descriptions and qualification requirements. How those positions were filled, however, departs from the procedures that would make the arrangement verifiable and durable. In a written response to a Freedom of

84 Republic of Serbia, eKonsultacije portal, consultation on the draft Law on Information Security, <https://ekonsultacije.gov.rs/topicOfDiscussionPage/337/4>, Accessed 2 October 2026.

85 Office for IT and eGovernment, Rulebook on Internal Organisation and Systematisation (Pravilnik o unutrašnjem uređenju i sistematizaciji radnih mesta), <https://www.ite.gov.rs/tekst/124/pravilnik-o-unutrasnjem-uredjenju-i-sistematizaciji-radnih-mesta.php>, Accessed 2 October 2026.

Information request submitted on 9 March 2026, the Office for IT and eGovernment explicitly confirmed that no public competition was held for any of the 20 positions. Staffing was secured instead through the internal reassignment of civil servants previously performing related CERT functions and through contractual engagement. The latter arrangement was consulted with the Ministry of European Integration and the EU Delegation to Serbia, justified by the short deadlines involved and the length of the standard procedure for permanent employment. No competitive or publicly announced appointment procedure has been identified for any of these positions. The consequence is that a qualification-based framework exists on paper while the selection that populated it was neither open nor competitive, which weakens both the transparency of the appointments and the assurance that the Department commands the specialised expertise its supervisory mandate requires. Contractual engagements also offer weaker guarantees of continuity than established civil service posts, leaving the staffing threshold formally met but institutionally fragile. On the supervisory dimension, the Office adopted a Plan of Expert Supervision for 2026⁸⁶ on 6 April 2026, indicating that supervisory activity has been programmed. However, no record of supervisory checks carried out by the cut-off date has been identified. Moreover, the supervisory powers on which such checks rest derive from the Law on Information Security, whose implementing acts, including the regulation listing the entities within its scope, had not been adopted by the cut-off date. The step therefore remains unfulfilled in its operational core. The organisational preconditions are in place, the staffing threshold has been reached by means that fall short of merit-based recruitment, and the demonstration of a functioning supervisory capacity is still outstanding.

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

This reform step requires three deliverables: a finalised list of entities falling within the scope of the national law corresponding to the NIS2 Directive, a Coordinated Vulnerability Disclosure framework, and a crisis-management framework. Crucially, the latter two are not merely to be adopted, but demonstrably in use. None of these deliverables had been achieved by the cut-off date, and the authorities did not request disbursement for this step in the payment request of 26 February 2026.

86 Office for IT and eGovernment, Plan of Expert Supervision for 2026 (Plan stručnog nadzora za 2026. Godinu), 6 April 2026, https://www.ite.gov.rs/extfile/sr/12326/Plan-strucnog-nadzor_042026.pdf, Accessed 2 October 2026.

The regulation establishing general and sector-specific criteria for designating operators of priority and important ICT systems remains in the adoption procedure. The legislative acts were submitted to the European Commission for an opinion on 6 March 2026. However, the Commission raised additional questions, and its final opinion was still pending by the cut-off date. Consequently, no official list of entities has been published. This leaves the obligations introduced by the Law on Information Security without identified addressees, and the supervisory function assessed under the preceding step without a defined scope of application. The regulation on Coordinated Vulnerability Disclosure remains at the drafting stage, with submission to the Commission for an opinion expected by the end of May 2026 and no submission to the Government yet made. As a result, the framework is neither in place nor in use. The crisis-management component is the least advanced. Under the Law on Information Security, a plan for responding to high-level incidents and information security crises is to be proposed by the Office for Information Security (a function performed on an interim basis by the Office for IT and eGovernment until 1 January 2027) and adopted by the Government.

Neither the payment requests, nor the Freedom of Information response of 6 March 2026, nor the mid-May trilateral meeting makes any reference to the plan. Furthermore, a dedicated Freedom of Information request submitted to the Ministry of Information and Telecommunications received no response by the time of this assessment. The step illustrates the sequencing problem running through this domain: the primary legislation is in force, but the secondary acts that would give it operational content are either awaiting a Commission opinion, still in drafting, or without trace of preparation. The status quo leaves the enforcement architecture of the national NIS2 framework unbuilt, with the grace period expiring at the end of 2026.

The *Energy efficiency* policy domain covers the implementation of the Energy Performance of Buildings Directive, the Energy Efficiency Directive, and eco-design and energy labelling legislation. It runs from the regulatory layer, minimum energy performance standards, nearly zero-energy building standards, energy performance certification, and independent control, through measurement, verification, and consumption-based billing. Ultimately, it extends to the measurable outcome of annual building renovation rates, including Reform Agenda commitments on energy poverty and domestic heating aligned with the Air Quality Programme.

One reform step fell within the scope of this reporting period, carried over from its December 2025 deadline and within its grace period until 1 December 2026, as set out in the table. Its delay is a matter of sequencing rather than capacity. Almost every element of the step, the recast minimum energy performance standards, nearly zero-energy building standards, EPBD-compliant certification, and independent certificate control, alongside implementing by-laws, depends on a single national methodology for calculating building energy performance. However, the competent ministry contracted this methodology only on 23 February 2026 on a twelve-month term. Completion within the grace period is therefore constrained by the Government's own contractual timetable, with the outcome resting on a single contract awarded on a single bid. Consequently, the Government did not claim this step as achieved in its own payment request submission.

The next semester will carry the weight of the whole domain. The grace period for the carried-over step expires in December 2026, coinciding with the deadline for the second step. This second step requires measurement and verification systems aligned with the EED, a defined increase in consumption-based billing, and eco-design market surveillance alongside an operational domestic heating replacement scheme. The principal risk is that this delay propagates, as the renovation-rate targets due in June 2027 rely on the very building energy performance data that the pending framework is meant to generate.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Implementation of the Energy Efficiency Directive, The Energy Performance of Building Directive, Ecodesign and energy labelling legislation			
The EPBD is implemented: recast of minimum energy performance standards for non-residential buildings and setting nearly zero energy building standards for new buildings, issuing of EPC in line with EPBD; independent control systems for EPC and inspection reports for heating and cooling systems	December 2026	Review not initiated	Core regulation with the updated calculation methodology not adopted; methodology only contracted in February 2026 on a twelve-month term, excluding completion within the grace period. Independent control established for heating and cooling inspections only, not for EPCs.

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

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

The step remains in an early stage of implementation. The regulation on minimum energy performance requirements and building certification, incorporating an updated national methodology for calculating the energy performance of buildings as core legislative component had not been adopted by 30 June 2026. No draft text or public consultation appeared during the reporting period. As such, the baseline remains the 2011 and 2012 rulebooks (Official Gazette 61/2011⁸⁷ and 69/2012⁸⁸, last amended 102/2025). These pre-date the recast EPBD and classify buildings by heating demand rather than overall primary-energy performance. The single documented development concerns procurement. On 23 February 2026 the Ministry of Construction, Transport and Infrastructure contracted⁸⁹ the development of the methodology (RSD 31.8 million excluding VAT) to a consortium of Prointer Sistem, Belit and the Faculty

87 Rulebook on Energy Efficiency of Buildings (Pravilnik o energetske efikasnosti zgrada), Official Gazette of the Republic of Serbia, No. 61/2011, <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2011/61/6>, Accessed 2 October 2026.

88 Rulebook on Energy Efficiency of Buildings (Pravilnik o energetske efikasnosti zgrada), Official Gazette of the Republic of Serbia, No. 69/2012, <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2012/69/4/reg>, Accessed 2 October 2026.

89 Public Procurement Office, procurement documentation for the methodology for calculating the energy performance of buildings, contract of 23 February 2026, Portal javnih nabavki, <https://jnportal.ujn.gov.rs/>, Accessed 2 October 2026.

of Mechanical Engineering. This contract was awarded in a single bid at 99.4 per cent of the estimated value, with a twelve-month completion term. That places delivery in early 2027. Since the recast MEPS, the nZEB standards, and five implementing by-laws identified by the Ministry all depend on the formal approval of this methodology, the Government's own contractual timetable rules out completion within the grace period expiring on 1 December 2026. Of the step's components, only the sub-step under the Ministry of Mining and Energy is met. By September 2025 three economic operators had been authorised to carry out inspections of heating and cooling systems. They were entered into the official registry and served by a functioning electronic reporting system, although the public record documents operational coverage more clearly for heating than for cooling installations. No independent control system for energy performance certificates has been established. A draft rulebook on the independent control of energy performance certificates, covering sampling, the eligibility and independence of control bodies, the classification of errors, and reporting obligations, was presented in March 2025 under the EU-funded PLAC IV project. However, no evidence of its adoption has been identified. The Central Registry of Energy Passports remains operational and certificates continue to be issued, but in pre-recast form. Process transparency remained weak. The October 2025 amendments to the Law on Planning and Construction were adopted under an expedited procedure without public consultation, and no version of the core regulation was made public at any stage.

The *Renewables* domain covers the implementation of the Renewable Energy Directive in the areas of permitting, guarantees of origin, and prosumers, alongside the deployment of alternative fuels infrastructure and the installation of new generating capacity. The Reform Agenda frames the underlying challenge as one of procedure rather than ambition. While renewable capacity has been rising and the number of prosumers has grown several-fold, registration and permitting procedures remain slow and inert. Furthermore, the growing share of renewables in final consumption is offset by rising overall energy demand. The domain therefore turns on whether Serbia can build the administrative machinery to convert investor interest into connected capacity.

Two reform steps fell within the scope of this reporting period, as set out in the table. Both concern the permitting architecture, and both show the same gap between institutional claims and verifiable legal acts. The Single Contact Point due in December 2025 was reported by the National Coordinator's Technical Secretariat as fully achieved. However, no formal act of legal designation could be identified in the public evidence base. What the contact point does in practice—informational and coordinative support for large strategic projects—falls short of the single procedural interface that RED II requires. This leaves smaller investors and prosumers, the very constituency the Reform Agenda identifies as the bottleneck, outside its coverage. This report accordingly revises its own earlier assessment of that step downwards. The framework for renewable acceleration areas due in June 2026 was not achieved: drafting was announced only eleven days before the deadline, and no draft text existed at the cut-off date, despite a February payment request describing the work as well underway.

The domain's one clear positive lies in how the second step began. The Ministry published its background document and opened consultations before any draft text existed, responding in itemised form to all comments received from a wide range of business, investor, and civil society submitters—a sequence that compares favourably with legislative processes monitored elsewhere in this report. Whether that openness survives into the drafting and adoption stages is the test for the next reporting period. That period will also carry the December 2026 deadlines for the alternative fuels framework and for 1.5 GW of cumulative solar and wind capacity. The permitting delays documented here bear directly on the latter, as capacity targets must be met through the very procedures that remain unreformed.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Implementation of the Renewable Energy Directive (permitting, guarantees of origin, prosumers)			
Designation of a Single Contact Point in line with the RED II Directive	December 2025	EC assessment pending	No formal act of legal designation identified; the only evidence provided is an inter-ministerial cooperation agreement. The contact point operates in an informational and coordinative capacity, rather than as a single procedural interface, and its remit covers only large strategic projects.
Adoption of the legal and institutional framework for designating renewable acceleration areas and permit-granting procedures in line with Directive (EU) 2023/2413	June 2026	Review not initiated	No draft law text existed at the cut-off; drafting was announced on 19 June 2026, eleven days before the deadline. Early-stage transparency and stakeholder involvement were nonetheless strong, with open consultation on the background document before any draft text.

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

- **2.1.5.1 Designation of a Single Contact Point in line with the RED II Directive – EC assessment pending**

The step was reported as achieved by the authorities, but the evidence base does not support that conclusion, and this report revises its own earlier assessment downwards, reflecting stronger independently verified evidence. Specifically, while the S2 2025 report rated the designation of the Single Contact Point as achieved on the basis of information provided directly by the Ministry of Mining and Energy, subsequent independent legal analysis, as part of the NCEU First Independent Monitoring Report⁹⁰, assessed it against the standard of a formal act of legal designation and found none in the public evidence base. Serbia's payment request refers to a formal decision establishing a Single Administrative Contact Point adopted in October 2025. However, the only supporting document provided is an inter-ministerial Agreement on the establishment and⁹¹ functioning of a contact point, signed by the ministries

⁹⁰ National Convention on the European Union, First Independent Monitoring Report on the Implementation of the Reform Agenda, May 2026.

⁹¹ Ministry of European Integration, "EU Growth Plan: documents."

responsible for energy, construction and environmental protection. This agreement is a cooperation arrangement rather than a legal act conferring mandate and scope. Two substantive shortcomings against Article 16 RED II persist. First, the Single Contact Point's described role is purely informative and coordinative rather than serving as a single procedural interface, meaning applicants must still deal with several competent authorities in parallel. Second, its remit is confined to large strategic projects, leaving smaller investors, prosumers and community-scale projects outside its coverage. No rulebook, standard forms or service charter with binding time limits covering the full permitting process has been published. One transparency merit should be recorded: the Ministry states the limits of the mechanism explicitly on its own web page, preventing the contact point from being mistaken for a procedural authority it does not possess.

- **2.1.5.2 Adoption of the legal and institutional framework for designating renewable acceleration areas and permit-granting procedures in line with Directive (EU) 2023/2413 – Review not initiated**

The step was not achieved by its deadline, although the twelve-month grace period running to 30 June 2027 leaves room for completion. No draft law text existed as of 30 June 2026, let alone an adopted legal and institutional framework. The first public trace of drafting activity is the Ministry of Mining and Energy's notice of commencement⁹², published on 19 June 2026, together with a background document setting out the problems to be addressed, the objectives and eight guiding principles for the future law. This contrasts sharply with Serbia's payment request of February 2026, which described the step as advancing according to schedule with legislative analysis and drafting well underway. That characterisation was not reflected in anything publicly traceable until the final days of the reporting period. The process is nonetheless a positive outlier on transparency and participation. The Ministry opened consultations on the background document before any draft text existed, running from 22 June to 7 July 2026. On 17 July 2026 it published an itemised report⁹³ responding to all 94 comments received from 15 submitters, including business associations, foreign investors, environmental and civil society organisations and individual experts. Although both dates fall after the cut-off, the consultation report is cited here because it documents a process that began within the reporting period and indicates the trajectory on which completion by the

92 Paragraf, "Notice on the Commencement of Drafting the Law on Renewable Energy Acceleration Areas (Obaveštenje o početku izrade zakona o akceleracionim zonama)," 23 June 2026, <https://www.paragraf.rs/dnevne-vesti/230626/230626-vest4.html>, Accessed 2 October 2026.

93 Ministry of Mining and Energy, Report on the Public Consultation on the Starting Points for the Law on Renewable Energy Acceleration Areas, 17 July 2026, eKonsultacije portal, <https://ekonsultacije.gov.rs/topicOfDiscussionPage/718/1>, Accessed 2 October 2026.

end of grace period (June 2027) depends. Alignment with the Directive cannot yet be assessed in the absence of a legal text. The Reform Agenda notes that RED III is not incorporated into the Energy Community framework and is thus not legally binding on Serbia, while still committing Serbia to prepare the framework. Consistent with that scope, the Ministry maintained during consultations that only the elements covered by the Reform Agenda commitment will be transposed. Industry submissions advocating for a broader adoption of RED III provisions were declined on that basis.

Within the Reform Agenda, vocational education and training sits under the *Human Capital* policy area, where it serves as the principal instrument for reducing skills mismatches on the labour market and easing the transition from school to work. The Agenda treats VET not as a self-contained sector but as the connective tissue between general secondary education, higher education and adult learning, with a lifelong learning perspective running through it. Its commitments concentrate on three fronts: modernising qualification standards so that they apply consistently across all levels of education, expanding dual and work-based learning so that students acquire competences in real workplaces, and deepening cooperation between education providers and employers, in line with EU practice. The Agenda is explicit that the last of these is the hardest, since companies must be willing to host, supervise and verify the learning of students placed with them, and since applying qualification standards fully requires sustained dialogue with academia, the private sector and institutions that have yet to converge on a shared understanding of what the standards demand.

No reform steps in the VET domain were due during the reporting semester. The domain's substantive targets fall due from the end of 2026 onwards: by December 2026, all vocational profiles offered in secondary education are to be based on qualification standards, and the adult education system is to certify 7,000 adults annually through publicly recognised organisers of adult education, at least half of them women, with a further 3,000 adults completing short cycles at higher education institutions; by June 2027, at least 15 per cent of students are to follow dual secondary education and at least 5 per cent of students in non-dual vocational programmes are to complete substantial on-the-job training amounting to at least a quarter of programme duration; and by December 2027, 60 qualification standards are to be adopted in higher education and five study programmes based on them accredited.

The Reform Monitor will continue to track legislative amendments, the rollout of dual VET measures, the development and application of qualification standards, and alignment with EU frameworks, and will provide a detailed assessment once concrete reform steps become due in subsequent reporting periods. Because these commitments are expressed almost entirely as outcome rates rather than as acts to be adopted, their verification will depend on the timely publication of education statistics and on the transparency of the methodology used to calculate them.

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

By the cut-off date, two reform steps in this domain were due, both carried over from earlier deadlines under an active grace period: the finalisation of the state aid inventory (originally due in December 2024) and the adoption of a time-bound action plan for its alignment with the EU acquis (originally due in June 2025). Both saw substantive domestic progress during the reporting semester, with the Government adopting an updated Inventory and the accompanying Action Plan at its 100th session on 25 June 2026. However, both remain formally pending European Commission assessment. They were submitted for disbursement as part of the second payment request and reiterated as still under review in the resubmitted third payment request.

In the next semester, progress will depend on whether the European Commission confirms its assessment of the Inventory and Action Plan. To date, the process has unfolded largely as a bilateral exchange between the Serbian authorities and the Commission, with limited public documentation. The sole opening to the public, a two-week comment period on the draft Action Plan held outside the eConsultation portal and closing just two days before adoption, did little to alter that pattern.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Enhanced investment and development opportunities for entrepreneurs and private sector			
Final inventory submitted in line with the European Commission's comments from March 2024	December 2024	EC assessment pending	Inventory finalised and updated (June 2026). Compliance with EC comments claimed by the Government; not independently verifiable.
A time-bound action plan for alignment of state aid schemes with the EU acquis, based on a final inventory, is adopted and approved by the European Commission	June 2025	EC assessment pending	Action Plan adopted (June 2026), following EC comments exchange. Formal EC approval not yet confirmed.

ENHANCED INVESTMENT AND DEVELOPMENT OPPORTUNITIES FOR
ENTREPRENEURS AND PRIVATE SECTOR

- **1.2.1.1 Final inventory submitted in line with the European Commission's comments from March 2024. – EC assessment pending**

This reform step requires submission of a final inventory of state aid measures that fully addresses the European Commission's comments on earlier drafts, provided in March 2024. According to Serbia's payment request documentation, the inventory went through at least four successive drafts incorporating Commission feedback between 2024 and mid-2025. The inventory was adopted by the Government on 10 July 2025, covering the 2017-2025 period. During the current reporting semester, the Government adopted a further-updated Inventory⁹⁴ at its 100th session on 25 June 2026, incorporating 2026 decisions taken by the Commission for State Aid Control since the previous adoption. The updated Inventory was published in full on the website of the Commission for State Aid Control⁹⁵. It comprises 285 individually documented measures across state aid schemes, individual aid awards, and measures not constituting state aid. Each measure records its legal basis, CSAC decision reference, and compatibility assessment. Of 199 schemes assessed, 192 (96%) are recorded as compatible and 7 as non-compatible, each accompanied by a specific CSAC recommendation for alignment. This level of detail supports an assessment that the Inventory is substantively complete and transparently documented. In Serbia's third payment request (resubmission, February 2026), the Government's own assessment considers this step as fully achieved. The step had also been submitted for disbursement earlier, as part of the second payment request, but formal European Commission assessment remains pending as of the cut-off date. Because submission occurred well after the original December 2024 deadline, the step remains outstanding pending the Commission's assessment. Because submission occurred well after the original December 2024 deadline, the step remains outstanding, pending the Commission's assessment.

94 Ministry of Finance of the Republic of Serbia, "Adopted State Aid Inventory 2017-2026 and Action Plan for Alignment of State Aid Schemes (Usvojen Inventar državne pomoći 2017-2026 i Akcioni plan za usklađivanje šema državne pomoći)," <https://mfin.gov.rs/sr/aktivnosti-1/usvojen-inventar-dravne-pomoi-2017-2026-i-akcioni-plan-za-usklaivanje-ema-dravne-pomoi-1>, Accessed 2 October 2026.

95 Commission for State Aid Control, "Government of the Republic of Serbia Adopted State Aid Inventory 2017-2026 and Action Plan for Alignment of State Aid Schemes (Vlada Republike Srbije usvojila Inventar državnih pomoći 2017-2026 i Akcioni plan za usklađivanje šema državne pomoći)," <https://www.kkdp.gov.rs/vest/3943/vlada-republike-srbije-usvojila-inventar-drzavnih-pomoci-20172026-i-akcioni-plan-za-uskladjivanje-sema-drzavne-pomoci.php>, Accessed 2 October 2026.

- **1.2.1.5 A time-bound action plan for alignment of state aid schemes with the EU acquis, based on a final inventory, is adopted and approved by the European Commission. – EC assessment pending**

This step required a time-bound Action Plan for aligning non-compliant state aid schemes with the EU acquis, building on the finalised Inventory. According to payment request documentation, a first draft was sent to the European Commission on 28 April 2025 to which the Commission provided comments in May 2025. A final version was submitted to the Commission on 3 July 2025 and the Commission provided further comments on 25 July 2025. The final Action Plan, incorporating this exchange, was adopted by the Government together with the updated Inventory on 25 June 2026. The draft Action Plan was made available for public comment between 10 and 23 June 2026, but only through the Ministry of Finance⁹⁶ website rather than the eConsultation portal, with comments collected by e-mail. Furthermore, no consultation report was published, and the Government adopted the Plan two days after the comment period closed, leaving no evident scope for the submissions received to be reflected in the adopted text. The adopted Plan sets out 27 individual alignment measures across three categories, assigning clear responsibility to named authorities (including the Ministries of Finance, Economy, Environmental Protection, Culture, Labour, Mining and Energy, the Innovation Fund, and the Film Centre Serbia). It is published in full⁹⁷, in both Serbian and English, both on website of the Ministry of Finance⁹⁸ and the Commission for State Aid Control. Three of the 27 measures were already fully implemented and confirmed compliant by the Commission for State Aid Control before or around the Plan's formal adoption. The remainder carry implementation deadlines running through late 2026 and into 2027. As with the Inventory, this step was submitted for disbursement as part of the second payment request and remains formally pending European Commission assessment. The Reform Agenda requires the Action Plan to be "approved by the European Commission." However, no such approval has been confirmed as of the cut-off date. A Freedom of Information request seeking confirmation of this approval was submitted to the Commission for State Aid Control, which responded that it does not possess such confirmation from the European Commission.

96 Ministry of Finance of the Republic of Serbia, Action Plan with Deadlines for Alignment of Non-Compliant State Aid Schemes (Akcioni plan sa rokovima za usklađivanje neusklađenih šema državne pomoći), https://www.mfin.gov.rs/upload/media/v8n6hi_6a43bac5e633c.docx, Accessed 2 October 2026.

97 Ministry of Finance of the Republic of Serbia, "Adopted State Aid Inventory 2017–2026 and Action Plan for Alignment of State Aid Schemes (Usvojen Inventar državne pomoći 2017–2026 i Akcioni plan za usklađivanje šema državne pomoći)", <https://mfin.gov.rs/aktivnosti/usvojen-inventar-dravne-pomoi-2017-2026-i-akcioni-plan-za-usklaivanje-ema-dravne-pomoi>, Accessed 2 October 2026.

98 Ministry of Finance, Action Plan with Deadlines (Akcioni plan sa rokovima).

