



TÜRKİYE ODALAR VE BORSALAR BİRLİĞİ

Dumlupınar Bulvarı No:252 (Eskişehir Yolu 9. Km.) 06530 /ANKARA

www.tobb.org.tr - tobb@hs01.kep.tr

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Konu : Yabancı Yatırımcılar Konseyi - FIC Beyaz Kitap

TÜM ODA VE BORSALARA (Genel Sekreterlik)

İlgi : Ticaret Bakanlığı'nın 28.11.2023 tarihli ve E-68460249-458.99-00091381714 sayılı yazısı.

İlgide kayıtlı yazıda, 2023 itibarıyla 23 farklı sektörde, 44 milyar avronun üzerinde yatırım ve 115.000'in üzerinde istihdam sağlayan 122 yabancı yatırımcının üye olduğu bir kuruluş olan Sırbistan Yabancı Yatırımcılar Konseyi (Foreign Investors Council-FIC) tarafından Sırbistan'daki mevcut iş ortamının değerlendirilerek geliştirilmesi amacıyla çeşitli tavsiyeler içeren "Beyaz Kitap-White Book" adlı bir çalışmanın yayımlandığı ifade edilmektedir.

Yazıda devamla, söz konusu çalışmaya <https://fic.org.rs/WhiteBook2023.pdf> adresinden ulaşılmakta olup, Beyaz Kitap 2023 Özeti ve 2023 Yılı FIC İndeksi yazımız ekinde gönderilmektedir.

Bilgilerinizi ve konunun ilgili üyelerinize duyurulmasını rica ederim.

Saygılarımla,

e-imza

Ali Emre YURDAKUL
Genel Sekreter Yardımcısı

EK:

- 1- Yabancı Yatırımcılar Konseyi - FIC Beyaz Kitap_Ek_2023 Yılı FIC İndeksi (1 sayfa) (1 sayfa)
- 2- Yabancı Yatırımcılar Konseyi - FIC Beyaz Kitap_Ek_Beyaz Kitap 2023 Özet (20 sayfa) (20 sayfa)



Evrakı Doğrulamak İçin : <https://belgedogrula.tobb.org.tr/belgedogrulama.aspx?eD=BSR5MPA2JB>

Tel : +90 (312) 218 20 00 (PBX) - Faks : +90 (312) 219 40 90 -91 -92... - E-Posta : info@tobb.org.tr

Bilgi İçin: Mustafa Eren ÖZTÜRK - Tel : - E-Posta : eren.ozturk@tobb.org.tr

FIC INDEX FOR 2023

Ranking by progress in implementing recommendations in 2023

Rating in 2023		Average score in 2023	Average score in 2022	Change of scores in 2023	Significant progress 2023	Certain progress 2023	No progress 2023	Average time of delayed recommendations 2023	Rating in 2022
Sectors									
1	Energy sector	2.30	2.50	-0.20	4	5	1	3.40	2
2	Protection of users of financial services	2.11	1.50	0.61	3	4	2	3.11	11
3	Fiscalization and electronic invoicing	2.00	NA	NA	5	1	5	1.00	NA
4	Illicit trade prevention and inspection oversight	2.00	1.57	0.43	2	5	2	2.33	10
5	Customs	2.00	1.20	0.80	2	1	2	4.20	25
6	Labour legislation: Employment of foreigners	2.00	1.00	1.00	1	2	1	4.75	40
7	Consumer protection	2.00	2.00	0.00	0	3	0	6.67	3
8	E-commerce and digitalization	1.83	2.57	-0.74	2	1	3	2.17	1
9	Real estate: Cadastral procedures	1.82	1.73	0.09	1	7	3	2.00	5
10	Telecommunications	1.79	1.57	0.21	3	5	6	2.21	8
11	State aid	1.71	1.57	0.14	1	3	3	5.86	9
12	Trade	1.67	NA	NA	0	2	1	3.00	NA
13	Pharmaceuticals	1.64	1.71	-0.07	2	10	10	5.00	6
14	Capital market trends	1.60	1.50	0.10	1	1	3	6.00	12
15	Prevention of money laundering	1.50	1.25	0.25	0	2	2	6.25	19
16	Law on payment transactions	1.40	1.80	-0.40	0	2	3	1.60	4
17	Protection of competition	1.38	1.33	0.04	0	3	5	6.33	16
18	Foreign exchange operations	1.33	1.38	-0.04	1	1	7	5.38	14
19	Central registry of real owners	1.33	1.33	0.00	0	1	2	2.00	15
20	Public procurement	1.33	1.33	0.00	0	1	2	4.00	17
21	Real estate: Construction land and development	1.33	1.18	0.15	1	1	7	1.89	26
22	Human capital	1.33	1.17	0.16	0	2	4	6.67	28
23	Real estate: Restitution	1.33	1.00	0.33	0	1	2	6.00	37
24	Labour legislation: Safety and Health at Work	1.33	1.00	0.33	0	2	4	1.83	49
25	Environmental regulations	1.25	1.43	-0.18	0	2	6	1.75	13
26	Insurance: Motor third party liability	1.25	1.00	0.25	0	1	3	2.50	36
27	Leasing	1.20	1.10	0.10	0	1	4	3.17	32
28	Taxes: Personal income tax	1.20	1.00	0.20	0	2	8	5.30	38
29	Taxes: Property tax	1.20	1.00	0.20	0	1	4	5.80	42
30	Labour legislation: Labour Law	1.20	1.00	0.20	0	1	4	5.20	50
31	Private security industry	1.20	1.17	0.03	0	1	4	6.00	27
32	Dual education	1.14	1.33	-0.19	0	1	6	3.14	18
33	Intellectual property	1.14	1.00	0.14	0	1	6	3.17	39
34	Public-private partnerships	1.08	1.58	-0.50	0	1	11	4.67	7
35	Food& Agriculture: Declarations on food products	1.00	1.25	-0.25	0	0	4	4.25	20
36	Arbitration proceedings	1.00	1.25	-0.25	0	0	4	5.50	21
37	Law on bankruptcy	1.00	1.22	-0.22	0	0	9	6.00	22
38	Oil and gas sector	1.00	1.22	-0.22	0	0	6	1.83	23
39	Investment and business climate	1.00	1.20	-0.20	0	0	4	6.00	24
40	Company law	1.00	1.17	-0.17	0	0	8	5.10	29
41	Food& Agriculture: Food safety law	1.00	1.14	-0.14	0	0	7	5.29	30
42	Taxes: Tax procedure	1.00	1.11	-0.11	0	0	12	5.00	31
43	Taxes: Parafiscal charges	1.00	1.00	0.00	0	0	6	7.67	33
44	Labour legislation: Staff leasing	1.00	1.00	0.00	0	0	3	3.00	34
45	Law on personal data protection	1.00	1.00	0.00	0	0	11	3.55	41
46	Judicial proceedings	1.00	1.00	0.00	0	0	5	9.40	43
47	Taxes: Value added tax	1.00	1.00	0.00	0	0	7	5.29	44
48	Food&Agriculture: Sanitary and phyto. inspections	1.00	1.00	0.00	0	0	4	5.00	45
49	Insurance: Related legislation	1.00	1.00	0.00	0	0	7	1.57	46
50	Labour regulations: Secondment abroad	1.00	1.00	0.00	0	0	3	6.33	47
51	Health insurance	1.00	1.00	0.00	0	0	7	1.57	48
52	Law on whistleblowers	1.00	1.00	0.00	0	0	3	7.33	51
53	Insurance: Law	1.00	1.00	0.00	0	0	6	1.50	52
54	Central Register of Temporary Restriction of Rights	1.00	1.00	0.00	0	0	2	7.25	53
55	Real estate: Mortgages and real estate financial leasing	1.00	1.00	0.00	0	0	4	6.50	54
56	Labour legislation: Employment of disabled persons	1.00	1.00	0.00	0	0	3	14.67	55
57	Taxes: Corporate income tax	1.00	1.00	0.00	0	0	9	6.22	35
58	Tourism	1.00	NA	NA	0	0	6	1.00	NA
AVERAGE/TOTAL		1.36	1.31	0.04	29	78	276	4.50	
Areas									
Real estate		1.48	1.36	0.12	2	9	16	4.10	
Human capital and dual education		1.23	1.38	-0.14	0	3	10	4.91	
Food and agriculture		1.00	1.13	-0.13	0	0	15	4.85	
Taxes		1.29	1.04	0.25	7	5	53	5.64	
Labour law		1.29	1.00	0.29	1	5	18	5.96	
Insurance		1.04	1.00	0.04	0	1	23	1.79	

WHITE

Proposals for improvement of the business environment in Serbia

BOOK

2023

Essentials



Foreign Investors Council

DEAR READER,

DRAGI ČITAOČE,

It is our great privilege to present you this year's "The White Book Essentials" – an executive summary of the White Book edition for 2023. The White Book publication is a comprehensive overview of the business environment in Serbia, which covers a wide range of topics and provides a set of recommendations for each of them. The purpose of the "The White Book Essentials" is to shed light on the main conclusions of the publication and highlight the areas which we see as priorities for the future economic development of Serbia.

Browsing through this booklet you will be able to get acquainted with key macroeconomic data, learn what the White Book is, and familiarize yourself with the main findings of the edition for 2023. We will portray developments in the ten areas we consider priorities and provide the main recommendations on how to accelerate future progress in each of them. You will have the opportunity to inform on the Foreign Investors Council (FIC), our members, and representatives.

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

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

Aleksandar Ljubic
FIC Executive Director



By screening the QR Code, you may
download White Book 2023

Velika nam je čast da Vam predstavimo ovogodišnju brošuru „Bela knjiga: rezime“ – rezime izdanja „Bele knjige“ za 2023. godinu. Publikacija „Bela knjiga“ daje sveobuhvatni prikaz poslovne klime u Srbiji, koji uključuje veliki broj tema i skup preporuka za svaku od njih. Svrha brošure „Bela knjiga: rezime“ je da se predstave glavni zaključci i ukaže na oblasti koje mi vidimo kao prioritetne za budući ekonomski razvoj Srbije.

Prelistavajući ovu brošuru, bićete u prilici da se upoznate sa makroekonomskim pokazateljima, saznate šta je „Bela knjiga“ i koji su glavni nalazi izdanja za 2023. godinu. Predstavićemo dešavanja u deset oblasti koje smatramo prioritetima i dati glavne preporuke kako da se u svakoj od njih ubuduće ubrza napredak. Imaćete priliku da saznate više informacija o Savetu stranih investitora, našim članicama i predstavnicima.

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

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

Aleksandar Ljubić
izvršni direktor Saveta



Učitavanjem QR koda, možete
preuzeti Belu knjigu 2023

WHAT IS THE WHITE BOOK?

- An annual publication, first issued in 2003
- Gives an overview of the business climate and provides a set of recommendations on how to improve it
- Promotes EU economic integration and open market economy
- Written by FIC members, promoting their common interests
- A mechanism to create consensus among members
- A platform for dialogue with stakeholders
- Each topic has a score card which tracks the response to the recommendations given in the previous year
- Based on the score card results, each topic is given a grade, where 1 is the lowest score and 3 is the highest score
- The publication has an independent Editor-in-Chief, who also provides macroeconomic input and prepares the ranking data. The Editor for the 2023 edition is Prof. Miroljub Labus

Structure of the White Book text
Score card tracking results in implementation of recommendations from White Book 2022.

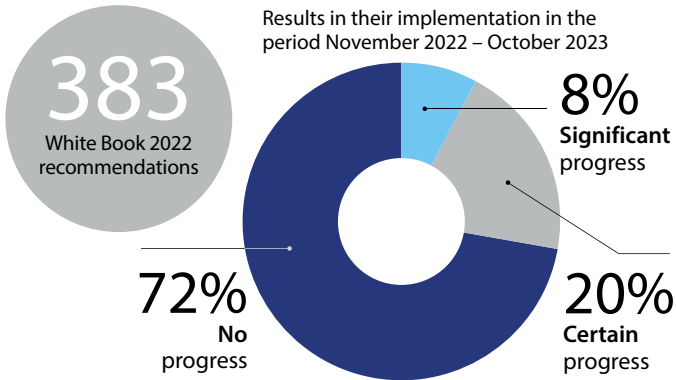
Current Situation
Positive Developments
Remaining Issues
Recommendations

White Book 2023 in numbers



Recommendations

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



Grades

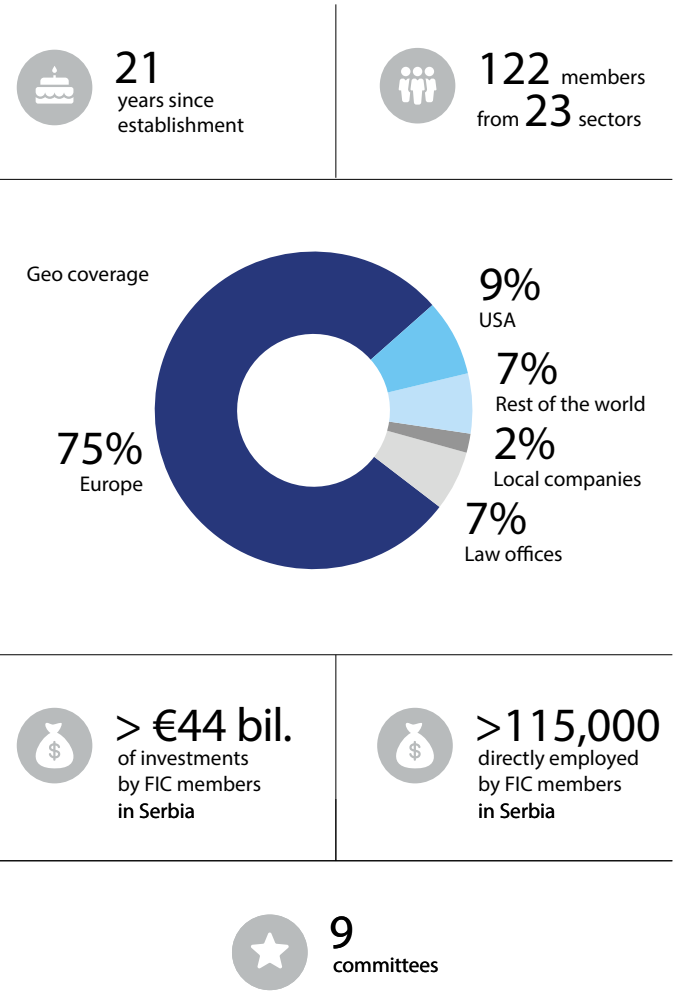
Based on the score card results, each topic is given the grade, where 1 is the lowest and 3 is the highest score.

FIC – PARTNER FOR GROWTH

Key characteristics and values of FIC

Independence	Regulatory expertise
Consistency	Best Practices
EU promotion	Cooperation

Key figures



MAIN RECOMMENDATIONS

Taxes

1.29

Results in implementation of recommendations from the White Book 2022				
	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Taxes – total	1.29	7	5	53
Latest Developments – Parafiscals	1.00	0	0	6
Personal Income Tax	1.20	0	2	8
Value Added Tax	1.00	0	0	7
Corporate Income Tax	1.00	0	0	9
Tax Procedure	1.00	0	0	12
Property Tax	1.20	0	1	4
Customs	2.00	2	1	2
Fiscalization and E-Invoicing	2.00	5	1	5

Positive developments in the period Nov 2022 – Oct 2023

Efficient harmonization with EU regulations and more flexible rules were accepted on the origin of goods between the Republic of Serbia, CEFTA countries and PAN-EU members.

The E-Invoicing System (“SEF”) has been introduced as an information technology solution for sending, receiving, recording, processing and storing e-Invoices, followed by periodical technical improvements and the introduction of a unified Rulebook.

Main recommendations for the future

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

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

Labour Regulations

1.27

Results in implementation of recommendations from the White Book 2022				
	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Labour – total	1.27	1	7	28
Employment of Foreigners	2.00	1	2	1
Secondment Abroad	1.00	0	0	3
Staff Leasing	1.00	0	0	3
Vocational Rehabilitation and Employment of Persons with Disabilities	1.00	0	0	3
Labour Law	1.20	0	1	4
Human Capital	1.33	0	2	4
Safety and Health at Work	1.33	0	2	4
Dual Vocational Education	1.14	0	1	6

Positive developments in the period Nov 2022 – Oct 2023

Key novelties and positive developments include work and residence of foreigners simplification process and adopting new Law on Safety and Health at Work.

Main recommendations for the future

It is necessary to amend key laws and enact appropriate bylaws, which regulate the field of labor, such as the Labor Law and bylaws on the Law on Safety and Health at Work. The changes should include digitization of labor law documents, more flexible working conditions outside the employer’s premises, rationalization of salary structure and salary compensation, more flexible conditions and procedures for employment termination.

1,29

	PROŠEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Porezi – ukupno	1,29	7	5	53
Najnovije tendencije – parafiskalni nameti	1,00	0	0	6
Porez na dohodak građana	1,20	0	2	8
Porez na dodatu vrednost	1,00	0	0	7
Porez na dobit pravnih lica	1,00	0	0	9
Poreski postupak	1,00	0	0	12
Porez na imovinu	1,20	0	1	4
Carine	2,00	2	1	2
Fiskalizacija i E-fakturisanje	2.00	5	1	5

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

1,27

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Rad – ukupno	1,27	1	8	28
Rad stranaca	2,00	1	2	1
Privremeni rad u inostranstvu	1,00	0	0	3
Iznajmljivanje radne snage	1,00	0	0	3
Zapošljavanje osoba sa invaliditetom	1,00	0	0	3
Zakon o radu	1,20	0	1	4
Ljudski kapital	1,33	0	2	4
Bezbednost i zdravlje na radu	1,33	0	2	4
Dualno obrazovanje	1,14	0	1	6

Neophodno je izmeniti ključne zakone I doneti odgovarajuća podzakonska akta, koja regulišu radno pravo, poput Zakona o radu, podzakonskih akata koja se odnose na bezbednost i zdravlje na radu i tako dalje. Izmene bi trebalo da obuhvate digitalizaciju radnopravnih dokumenata, fleksibilnije uslove rada van prostorija poslodavca, racionalizaciju strukture I obračuna zarade, fleksibilnije uslove i procedure prestanka radnog odnosa.

Digitalization and E-Commerce

1.83

Results in implementation of recommendations from the White Book 2022				
	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Digitalization & E-Commerce	1.83	2	1	3

Positive developments in the period Nov 2022 – Oct 2023

Implementation of elnvoices has contributed to a significant administrative relief and transparency of transactions.

The Serbian Government and the Office for IT and eGovernment continued to implement the digital agenda.

Consent ID - a simple and affordable digital identity for the widest range of citizens.

By integrating eid.gov.rs with the Agency for Business Registers (apr.rs), digital identity users are enabled to establish companies, submit all types of applications and records etc.

Digitalization of financial services continued, through a series of decisions that the regulator, the National Bank of Serbia, prescribed in the previous period.

Main recommendations for the future

In order to improve the efficiency and security of business operations, it is necessary to enable the automated data exchange between the public and private sectors.

Reduce the cost of electronic archiving of company documentation through the amendments of regulations along the lines of excluding the largest part of business documentation as it is not relevant for culture, art, science and other categories of the Law on Archival Material and Archival Activities.

To enable the development and roll-out of the second generation video identification encompassing biometric safeguards within the client validation framework with the aim of further enhancing client security and promoting the development of digitalization in Serbia.

In the implementation of the Law on Electronic Communications, the Rules of Procedure on prepaid registration of mobile users should enable simple electronic registration of customers.

Real Estate

1.48

Results in implementation of recommendations from the White Book 2022				
	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Real Estate – total	1.48	2	9	16
Construction Land and Development	1.33	1	1	7
Restitution	1.33	0	1	2
Cadastral Procedure	1.82	1	7	3
Mortgages and Real Estate Financial Leasing	1.00	0	0	4

Positive developments in the period Nov 2022 – Oct 2023

Amendments to the Law on Planning and Construction are expected to contribute to the further growth of the construction sector.

Conversion of construction land with a fee for certain categories of individuals has been abolished, and “green construction” and other elements of the green agenda have been defined.

The introduction of the “E-space” information system for spatial planning and construction is expected to streamline the processes of issuing construction permits and other necessary licenses.

Amendments to the Law on State Survey and Cadastre and Amendments to the Real Estate and Utility Cadastre Procedure have been adopted, which are expected to improve operations and the commencement of work on the introduction of an infrastructure registry.

Main recommendations for the future

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

Continue with intensive work to achieve uniform practice and clear application of the law for further acceleration of operations and predictability of cadastral procedures.

Amendments to the Mortgage Law and Financial Leasing Law.

Digitalizacija i elektronsko poslovanje

1,83

Rezultati u sprovođenju preporuka
iz „Bele knjige 2022“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Digitalizacija i elektronsko poslovanje	1,83	2	1	3

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

Primena eFaktura u privredi je doprinela velikom administrativnom rasterećenju i transparentnosti transakcija.

Vlada Republike Srbije i Kancelarija za IT i elektronsku upravu nastavile su sa sprovođenjem digitalne agende.

Consent ID - jednostavan i pristupačan digitalni identitet za najširi krug građana.

Integracijom eid.gov.rs sa Agencijom za privredne registre (aprrs) korisnicima digitalnog identiteta je omogućeno osnivanje kompanija, podnošenje svih vrsta prijava i evidencija idr.

Nastavljena je digitalizacija finansijskih usluga, kroz niz odluka koje je regulator, Narodna banka Srbije, propisala u prethodnom periodu.

Glavne preporuke za budućnost

U cilju veće efikasnosti i bezbednosti poslovanja potrebno je omogućiti automatizovanu razmenu podataka između javnog i privatnog sektora.

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

Omogućiti razvoj i uvođenje druge generacije video identifikacije u vidu biometrijske zaštite u sklopu procesa verifikacije klijenata, a sa ciljem dodatnog unapređenja bezbednosti klijenata i podsticanja daljeg razvoja digitalizacije u Srbiji.

U primeni Zakona o elektronskim komunikacijama, pravilnik o pripejd registraciji korisnika mobilne telefonije treba da omogući jednostavnu registraciju korisnika elektronskim putem.

Nekretnine i izgradnja

1,48

Rezultati u sprovođenju preporuka
iz „Bele knjige 2022“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Nekretnine i izgradnja – ukupno	1,48	2	9	16
Građevinsko zemljište i izgradnja	1,33	1	1	7
Restitucija	1,33	0	1	2
Katarstarski postupak	1,82	1	7	3
Hipoteke i finansijski lizing nekretnina	1,00	0	0	4

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

Od novog Zakona o izmenama i dopunama Zakona o planiranju i izgradnji se očekuje da će doprineti daljem rastu građevinskog sektora.

Ukinuta je konverzija građevinskog zemljišta uz naknadu za određene kategorije lica, definisana je „zelena gradnja“ i drugi elementi zelene agende.

Uvođenjem informacionog sistema za prostorno planiranje i izgradnju „E-prostor“ očekuje se da će se olakšati procesi izdavanja dozvola za gradnju i drugih potrebnih dozvola.

Usvojeni su Zakoni o izmenama i dopunama Zakona o državnom premeru i katastru i Zakon o izmenama i dopunama Zakona o postupku upisa u katastar nepokretnosti i vodova, te se može očekivati unapređenje rada i početak rada na uvođenju registra infrastrukture.

Glavne preporuke za budućnost

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

Nastaviti sa intenzivnim radom radi postizanja ujednačenosti prakse i jasne primene zakona radi dodatnog ubrzanja i predvidljivosti katastarskih procedura.

Izmeniti Zakon o hipoteci i Zakon o finansijskom lizingu.

Illicit Trade Prevention
and Inspection Oversight

2.00

Results in implementation of recommendations from the White Book 2022				
	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Illicit Trade Prevention and Inspection Oversight	2.00	2	5	2

Positive developments
in the period Nov 2022 – Oct 2023

In December 2022, a new convocation of the Coordination Body for Suppressing Grey Economy was formed, along with Expert Group and the Coordination Commission for Harmonizing i.e. Coordinating Inspection Supervision. Programme for Suppressing Grey Economy in 2023-2025 and Action Plan for the Implementation of the Programme for Suppressing the Grey Economy in 2023-2024 were adopted.

Functionality of the Single Contact Centre and e-Inspektor were expended.

Main recommendations for the future
Introduce the specialization of judges for misdemeanor offences in business.
Establishing a system of reporting on the measures and effects of Action Plans (flowcharts), while communicating the results of controls to stakeholders from the economy.
Improve the level of fiscal burden on businesses operating in the Republic of Serbia with further regulation of parafiscal charges by creating a registry of fees payable by businesses.

Food and Agriculture

1.00

Results in implementation of recommendations from the White Book 2022				
	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Food and Agriculture – total	1.00	0	0	15
Food Safety Law	1.14	0	0	7
Sanitary and Phytosanitary Inspections	1.00	0	0	4
Quality Assurance and Declarations	1.33	0	0	4

Positive developments
in the period Nov 2022 – Oct 2023

No improvements were noted in Food and Agriculture area.

Main recommendations for the future
Align the Law on Food Safety and all accompanying bylaws with EU regulations (178/2002 / EC and accompanying bylaws).
Establish a transparent and comprehensive risk analysis system by all inspection services, with the establishment of a functional IT system and digitization of supervision.
Establish uniform rules in the procedures of inspection services by adopting the rulebook.
Adopt the new Law on Sanitary Supervision and executive regulations on the work of sanitary and phytosanitary inspection harmonized with the Law on Inspection Supervision and EU regulations.

2,00

Borba protiv nedozvoljene trgovine i inspekcijski nadzor

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

1,00

Usvajati novi Zakon o sanitarnom nadzoru i izvršne propise o radu sanitarne i fitosanitarne inspekcije usaglašene sa Zakonom o inspeksijskom nadzoru i propisima EU.

Environmental Regulations

1.25

Results in implementation of recommendations from the White Book 2022				
	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Environmental Regulations	1.25	0	2	6

Positive developments in the period Nov 2022 – Oct 2023

Amendments to the Law on Waste Management were recently adopted to provide further elaboration and specification on certain issues and to better align the Law with EU regulations.

Important strategic documents have been adopted: the Low-Carbon Development Strategy for the period 2023 to 2030, the Air Protection Program for the period 2022 to 2030 with an action plan, the Circular Economy Development Program for the period 2022-2024, and the Water Management Plan for the territory of the Republic of Serbia for the period 2021 to 2027.

Main recommendations for the future
Permanent and proactive improvement of the regulatory framework concerning environmental protection - adopt the missing strategic documents (including the Environmental Protection Strategy and Waste Sludge Management Strategy) and accompanying planning documents, and start their implementation. Continue with the transposition and implementation of regulations in this area.
Create an economic model to motivate local governments to use sanitary landfills and expedite the closure and rehabilitation of illegal landfills - rubbish dumps.
Secure the implementation of the "polluter pays" principle by calculating a municipal waste tax based on the quantity of waste generated and/or the frequency of collection.
Provide adequate and purposeful financing of nature protection from the Green Fund, with criteria for determining priorities for the allocation of funds.
Accelerate the transposition and implementation of regulations related to climate change.

Foreign Exchange Regulations

1.33

Results in implementation of recommendations from the White Book 2022				
	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Foreign Exchange Regulations	1.33	1	1	7

Positive developments in the period Nov 2022 – Oct 2023

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

Main recommendations for the future
Amend the Law to implement already published interpretations by the NBS with relaxation of positivistic manner of setting Law provisions.
In the context of the ongoing integration processes in the region, the regime within Open Balkan area should be gradually liberalised, at least at the same level as awarded in relations with the non-residents from the EU, especially as statistically the highest number of mother companies are seated in the Republic of Serbia which enables easier control important for macroeconomic monitoring.
Further relaxation of administrative requirements (e.g., delivering of documentation via e-mail instead in hard copy), and particularly switching to ex post reporting of cross-border financial loans.
Simplify the set-off rules for all types of current and capital transactions and allow, with prescribing adequate conditions, cash pooling between affiliated parties

1,25

Zaštita životne sredine

Ubrzati transpoziciju i implementaciju propisa koji se odnose na klimatske promene.

1,33

Devizno poslovanje

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

Pharmaceuticals

1.64

Results in implementation of recommendations from the White Book 2022				
	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Pharmaceuticals	1.64	2	10	10

Positive developments in the period Nov 2022 – Oct 2023

By increasing the number of employees and enabling submission of all medicine requests electronically, Agency for Medicine and Medical Devices has improved operations and reduced delays.

NHIF ensured timely direct payment to suppliers for delivered medicines and medical devices, as well as timely payment to pharmacies for prescription drugs.

The Law on Fees for the Use of Public Assets has been amended in the part of fees for medicines that remain in possession after the expiration date and are collected from citizens.

Main recommendations for the future

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

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

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

Tourism and Hospitality

1.00

Results in implementation of recommendations from the White Book 2022				
	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Tourism and Hospitality	1.00	0	0	6

Positive developments in the period Nov 2022 – Oct 2023

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

Main recommendations for the future

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

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

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

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

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

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

1,64

Rezultati u sprovođenju preporuka iz „Bele knjige 2022”				
	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Farmaceutska industrija	1,64	2	10	10

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

1,00

Rezultati u sprovođenju preporuka iz „Bele knjige 2022”				
	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Turizam i ugostiteljstvo	1,00	0	0	6

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

FIC COMMITTEES

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

Anti-Illicit Trade & Food Committee

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

Financial Services Committee

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

Human Resources Committee

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

Infrastructure & Real Estate Committee

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

Legal Committee

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

Pharma Industry Committee

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

Taxation Committee

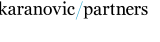
Taxation Committee, that gathers members from virtually all fields, contributes to upgrading tax system to align it with international practices and OECD guidelines and improve consistency in implementation and work of the Tax Administration.

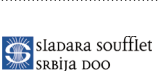
Telecommunications & Digital Economy Committee

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

Tourism and Hospitality Committee

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

 A1 SRBIJA D.O.O.	 A1 TOWERS INFRASTRUCTURE D.O.O. BEOGRAD – NOVI BEOGRAD	 ACB D.O.O. BEOGRAD – DRUŠTVO ZA POSREDOVANJE U OSIGURANJU	 ADDIKO BANK A.D. BEOGRAD	 ADECCO OUTSOURCING D.O.O.	 AIRPORT CITY BELGRADE
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Koviljka Nikolić	Office Manager
Tamara Kapor	Regulatory Associate



Foreign Investors Council

The Foreign Investors Council

Gospodar Jevremova 47, IV Floor, 11000 Belgrade, Serbia

T: +381 11 3281 958, 3281 965,

E: office@fic.org.rs, www.fic.org.rs