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Regulatory environment quality in Serbia 2024/2025

Regulatory index of Serbia

ABOUT THE DONOR

The Regulatory Index of Serbia 2024/2025 is prepared within the "Efficient public procurements and sustainable supply chains for improved competitiveness" project that is conducted by NALED with the support of the Swedish International Development Agency (SIDA).

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INTRODUCTION

Monitoring regulations and tracking legislative changes are of essential importance for businesses, as it is precisely the regulations that define the rules of market operations. A stable and predictable business environment that fosters economic development implies consistent application of laws, efficient administration, open and transparent communication with public authorities, as well as an economic policy that does not undergo frequent and abrupt changes. Given the significance of these elements for the functioning of the economy, NALED has developed the Regulatory Index of Serbia (RIS), a tool that enables its members and the general public to gain clearer insight into the quality of the process of lawmaking and implementation.

RIS is a composite index made up of six components, with each component tracking a specific phase of the legislative process and consisting of multiple individual indicators (a total of 25):

1. **Planning the adoption or amendment of laws** is a prerequisite for the predictability of the regulatory environment in the Republic of Serbia – **Component 1: Regulatory Predictability**

2. **Pre-regulatory impact assessments** contribute to the decision being grounded and well justified, i.e., to the adoption of regulations with the best cost-benefit ratio – **Component 2: Quality of Regulatory Drafting**

3. **The quality of stakeholder involvement** reflects the level of transparency and openness in the process of preparing and adopting legislation – **Component 3: Public Involvement in the Lawmaking Process**

4. **The manner of law implementation** is primarily reflected in the efficiency and timeliness of adopting by-laws that enable the application of laws – **Component 4: Timeliness of Law Implementation**

5. **Institutional openness during law implementation**, which shows whether and to what extent institutions are open to resolving uncertainties related to laws within their jurisdiction during the implementation process – **Component 5: Institutional Responsiveness**

6. **Monitoring the effects of laws**, primarily the extent of regulatory burden imposed by laws – **Component 6: Regulatory Burden**

METHODOLOGY

The methodology of the Regulatory Index of Serbia (RIS) was developed in 2012. However, over the years, the regulatory environment has evolved—some challenges have been overcome, while new ones have emerged. Since the first edition of the Index, the methodology underwent only minor changes until 2023, when a revised version of the RIS methodology was developed through the project "Public Procurement and Good Governance for Greater Competitiveness," implemented by NALED with the support of the Swedish International Development Cooperation Agency (SIDA).

The aim of the new, improved methodology was to adjust the indicators to reflect legislative changes and to shift the focus toward measuring the quality of regulatory drafting and implementation, rather than merely tracking whether institutions fulfilled their legal obligations.

The revision expanded the number of indicators that make up the RIS, ensuring more comprehensive monitoring of the regulatory environment. This is the second annual report based on the new, revised methodology, which allows full comparability of results with the previous year, but comparisons with earlier years should be avoided.

RIS consists of six components, which, through 25 indicators, monitor the life cycle of over 200 regulations relevant to the economy, many of which are also important for Serbia's EU accession negotiations. The detailed methodology is available on **NALED's website**. The methodological annex presents the calculation method for each individual indicator.

RESULTS SUMMARY

The total value of the Regulatory Index of Serbia (RIS) for 2024 amounts to 50 out of a maximum of 100 points, representing a decrease of 5 index points compared to 2023. The value of all components declined, except for the regulatory burden and the quality of regulatory drafting, which recorded results that were nearly unchanged from 2023. The Index value reflects a halfway score in creating a regulatory environment conducive to economic development, indicating the presence of systemic issues in the lawmaking and implementation process, and highlighting the need for systemic solutions to address them.

RIS component and indicator values	2023 (0 - 100)	2024 (0 - 100)
Component 1 - Regulatory Predictability	**53**	**44**
1. Legislative Activity Plan Fulfillment	32	13
2. Share of Planned Regulations	70	34
3. Government Program Fulfillment	45	48
4. Frequency of Legal Changes	67	82
Component 2 - Quality of Regulatory Drafting	**63**	**64**
1. Regulatory Impact Analysis Presence	98	100
2. Regulatory Impact Analysis Content	57	52
3. Regulatory Impact Analysis Quantifications	35	30
4. Core Legal Concepts Justification Quality	61	73
Component 3 - Public Involvement in the Lawmaking Process	**59**	**45**
1. Public Debates and Consultation Presence	83	64
2. Public Debate Report Quality	83	60
3. Transparency of the Law-Making Process	33	28
4. Parliamentary Debate Quality	36	29
Component 4 - Timeliness of Law Implementation	**31**	**27**

1. By-laws Adoption Rate	22	8
2. By-laws Adoption Delays	5	2
3. Timeliness in Providing Opinions on Legal Provisions	67	71
Component 5 - Institutional Responsiveness	**78**	**72**
1. Institutional Communication with Citizens and Businesses	82	65
2. Websites and Social Media Information	73	80
Component 6 - Regulatory Burden	**46**	**46**
1. Share of administrative costs in GDP	70	70
2. Administrative burden of a typical business	57	57
3. Share of 10 largest parafiscal charges in GDP	12	12
Total RIS value	**55**	**50**

The overall value of the Regulatory Index of Serbia (RIS) for 2024 stands at 50 out of a maximum of 100 points, representing a drop of 5 index points compared to 2023. Although this may not appear to be a significant decrease, it is in fact the largest annual drop recorded in over five years. **Poor planning of legislative activities, a slower pace of regulation adoption, and a reduction in public participation in consultations are the main reasons why the quality of the regulatory framework was rated lower than in 2023.**

The decrease in value across almost all components is primarily the result of significantly weaker planning of legislative activities in 2024, notably the failure to adopt the Government Legislative Activity Plan for the year. Inadequately planned activities can substantially impede their implementation - including regulation drafting, impact analysis, organization of public debates and consultations, and more. Given that government institutions operate with limited resources, inadequate planning further hampers the creation of high-quality regulations and the inclusion of the public in the drafting process, ultimately affecting these indicators. In addition,

only eight sessions of the National Assembly were held in 2024 (four regular, two extraordinary, one special, and one inaugural), compared to ten in 2023, and an average of 24 sessions annually over the past decade. During the second regular session, on November 27, 2024, 54 laws were adopted in a single day. Such a legislative pace is inadequate, as it forces state institutions to draft and adopt laws, perform impact analyses, involve the public, hold public debates, and prepare by-laws - all within an unreasonably short time frame. Rushed adoption of legislation can significantly impact the quality of proposed regulatory solutions, potentially leading to difficulties in implementation, frequent amendments, or failure to resolve the intended issue. For businesses, this results in shorter adjustment periods and increased compliance costs.

The components with the highest scores in 2024 were **Institutional Responsiveness** (Component 5) at 72 points and **Quality of Regulatory Drafting** (Component 2) at 64 index points.

- Although direct communication between public institutions and the business sector and citizens received slightly lower scores in 2024, the informative quality of ministry websites improved by 7 index points compared to the previous year. Ministry websites increasingly contain updated documents such as current regulations, organizational charts, active project lists, and news updates. However, while ministries responded to requests for access to public information within legal deadlines in 80% of cases, they responded to general letters and requests from citizens and businesses in only 50% of cases— significantly less than in 2023.

- Component 2: Quality of Regulatory Drafting remained almost unchanged compared to the previous year, with a slight increase of 1 index point. As in the

previous year, almost all new laws and amendments for which the institution responsible determined that a Regulatory Impact Assessment (RIA) was needed were formally accompanied by such analysis. However, the quality of submitted assessments was somewhat lower. Of the 28 new regulations requiring RIA, only 8 were rated as complete, while 20 were considered partial. Furthermore, only 4 of the 28 assessments included complete cost quantification for both private and public sectors; 9 included estimates for only one of the two sectors, while 15 contained no cost quantification at all.

The lowest-scoring components in 2024 were **Timeliness of Law Implementation** (Component 4) at 27 points and **Regulatory Predictability** (Component 1) at 44 points.

- The long-standing trend of poor timeliness in law implementation continued in 2024, making Component 4 the lowest scoring one, highlighting chronic delays in the adoption of by-laws. To implement the 52 selected laws relevant to the economy in 2024, a total of 277 by-laws were required, of which only 22 were adopted (8%). Alarmingly, only 6 of these were adopted on time, and the average delay was 303 days.

- One of the fundamental problems in the legislative process in 2024 was the poor predictability of lawmaking, primarily due to the failure to adopt the Government Legislative Activity Plan for 2024. Although the Government Rules of Procedure (Articles 76 and 77) require the Plan to be adopted by the end of the current year, this did not happen. As a result, it was assumed that the Government would operate according to the previous year's plan—in this case, the 2023 plan. However, only 13% of the pending laws and amendments from that plan were adopted. Two-thirds of laws passed in 2024 were not foreseen in the Plan, while only one-third (34%) were planned. While the extraordinary

parliamentary elections in December 2023 may explain some delays, they do not justify the failure to adopt the this document - especially considering that the new Government, which took office in May 2024, maintained political continuity with the previous one.

The score for Component 3: **Public Involvement in the Lawmaking Process** fell significantly from 59 to 45 points in 2024.

- Public consultation processes were rated much lower in 2024 than in the previous year and this was the component with the largest decline. This drop is mainly due to a lower share of new laws and amendments that underwent public debate with the legally prescribed duration. Among the 28 adopted laws affecting the economy, 6 were new laws and 22 were amended. Of the 6 new laws, 5 underwent public debate lasting more than 20 days, as required. Of the 22 amendments, only 5 underwent public debate. According to RIS methodology, this means that public consultation was conducted in about 60% of cases where it was required—significantly lower than the over 80% recorded in 2023. Furthermore, transparency in the lawmaking process also declined, given that most laws were passed within 15 - 20 days and that public hearings were held for almost none of them.

I REGULATORY INDEX OF SERBIA – RIS 2023/2024

Component 1: Regulatory Predictability

For business entities, a predictable business environment is of critical importance, as it enables more secure planning and more stable business management. When there is clear insight into when and how the legal framework will change, companies can timely adjust their strategies, organize resources, and make long-term investment decisions. The key to achieving such stability lies in a planned approach to regulatory changes and their early announcement. The degree of timeliness and planning of regulatory changes is precisely what the first component of the Regulatory Index of Serbia (RIS) assesses.

The total value of Component 1 in 2024 was 44 out of a maximum of 100 points, indicating that the predictability of legislative activity is at a relatively low level. Moreover, this result represents a significant drop of 9 index points compared to the previous year, making it the component with the second-largest decrease in value.

This component consists of four individual indicators whose values are depicted in the Graph 1: Component 1 – indicator values in 2024 and 2023:
1. Legislative Activity Plan Fulfillment
2. Share of Planned Regulations
3. Government Program Fulfillment
4. Frequency of Legal Changes

Graph 1: Component 1 – indicator values in 2024 and 2023
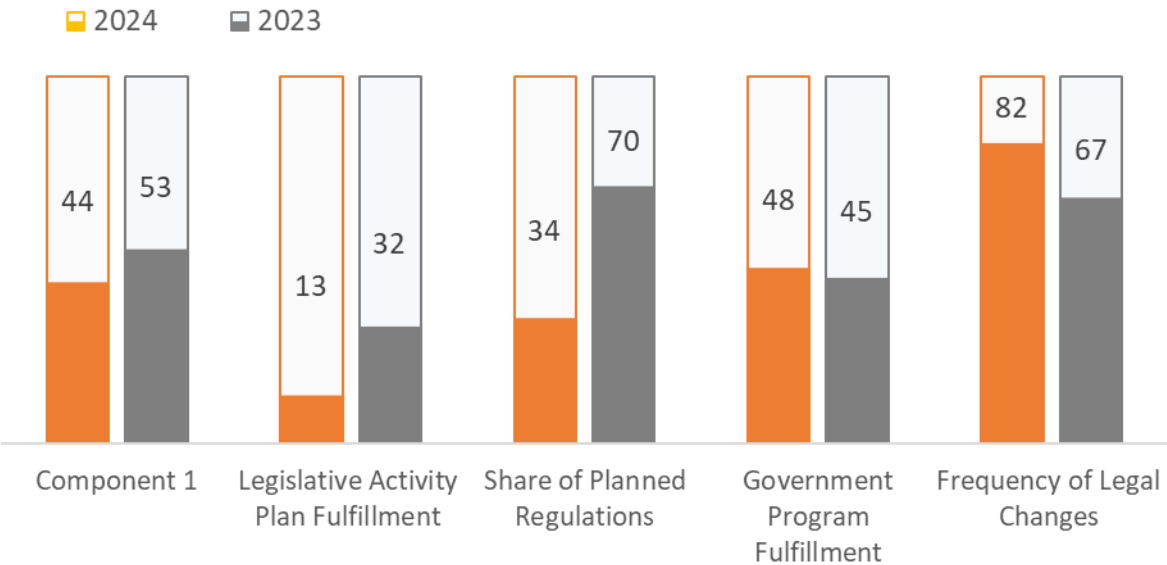
A major issue that primarily contributed to the decline in the value of this component is the fact that the Government of the Republic of Serbia did not adopt its Legislative Activity Plan for 2024. According to the Law on the Planning System, the Government is required to adopt by the end of the current year a work plan for the following year, listing the regulations to be adopted during that period — which did not occur for 2024.

The timely adoption of the Government Work Plan is a key mechanism for ensuring a predictable regulatory environment for businesses, as it lists the planned legal changes they can expect. However, the mere existence of a Legislative Activity Plan is necessary but not sufficient — it is also essential that the plan is respected and that the planned legislative changes are implemented.

When the Legislative Activity Plan is not adopted for the coming year, it is assumed that the Government will continue adopting the laws planned for the previous year — i.e., those from the last adopted plan that were not implemented during their planned timeframe. Accordingly, in 2024, it was expected that the Government would adopt laws from the 2023 Plan that had not been passed in 2023, and these data were used to calculate the first two indicators of this component for the current year.

The Government Legislative Activity Plan for 2023 envisaged a total of 346 laws for adoption, of which 114 were adopted during that year. This means that 232 laws remained to be adopted in 2024, and these formed the basis for calculating the first two indicators of this component.

In 2024, only 13% of the regulations planned under the legislative activity plan were adopted — in other words, just one in eight of the laws that remained from the 2023 plan. In total, 91 laws were adopted in 2024, although 232 were required to fulfill the plan, with the number of adopted laws accounting for roughly two-fifths of the laws remaining in the 2023 plan. The value of the first indicator of this component is only 13 index points, less than half its value from the previous year.

Of the 91 laws adopted in 2024, 60 (66%) were not included in the legislative activity plan — meaning that two-thirds of the adopted laws were unplanned, while only one-third were planned. This is reflected in the second indicator value of 34 index points, which is half of the 70 index points recorded the previous year.

Monitoring the implementation of the Action Plan for the Implementation of the Government Program (APIGP) is also a tool for evaluating the predictability of the regulatory environment. For this reason, the Regulatory Index of Serbia tracks not only the fulfillment of the legislative activity plan, but also the fulfillment of the Government Program — through the third indicator of this component.

Out of a total of 71 public policy documents planned in the Action Plan for Implementation of the Government Program, 38 were adopted, or 53%. This indicator monitors both the adoption of legislation and the adoption of public policy documents (strategies, programs, action plans) relevant to the Government's priority objectives. In addition to adoption, it is important that regulations are passed within specified deadlines. For this reason, RIS also tracks delays in adoption. Of the 38 adopted documents, 19 were passed on time, while 19 were delayed. Depending on the extent, delays reduce the value of the indicator. For 2024, this value is 48 out of 100, an increase of 3 index points compared to the previous year.

A predictable business environment implies that there is not a high frequency of legal changes that hinder business compliance and adjustment to the regulatory framework. The frequency of legal amendments is tracked through a sample of 77 systemic laws relevant to the economy. However, it should be noted that some regulations do require amendments due to economic, technological, and social changes, as well as the need to harmonize with EU legislation. Therefore, it is assumed that optimally, up to 10 of the 77[1] laws should be amended annually, with each additional amendment proportionally lowering the value of the indicator.

In conclusion, during 2024, a total of 22 amendments to the 77 relevant economic laws were adopted (29%), resulting in a value of 82 index points for the final indicator of this component — an increase of 15 points compared to the previous year.

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[1] It is assumed that over a three-year period, 40% of the monitored regulations will be amended or supplemented, primarily to align with EU policies. In other words, over three years, 30 out of the 77 tracked regulations are expected to be amended or supplemented, which corresponds to 10 regulations per year. More information is available in the methodological annex, which provides a detailed explanation of the indicator calculation.

Component 2: Quality of Regulatory Drafting

In order to ensure that adopted regulations achieve their intended effects - namely, improving business conditions for economic entities and enhancing citizens' well-being - the Law on the Planning System and its accompanying by-laws establish the obligation to conduct a Regulatory Impact Assessment (RIA). The RIA process includes the drafting of regulations, starting with a precise definition of the problem and objectives, as well as the consideration of possible regulatory options and their expected consequences. When circumstances allow, this process also involves a quantitative assessment of costs and benefits. The more thorough and consistently implemented the analysis, the higher the likely quality of the regulation itself. In other words, the quality level of the impact analysis can be seen as a reliable indicator of the overall preparedness and thoughtfulness of the proposed regulation.

The total value of Component 2 in 2024 is 64 index points, which represents an almost unchanged result compared to the previous year, when it stood at 63.

This component consists of four individual indicators, whose values are shown in Graph 2: Component 2 – Indicator Values in 2024 and 2023:
1. Regulatory Impact Assessment Presence
2. Regulatory Impact Assessment Content
3. Regulatory Impacts Quantifications
4. Core Legal Concepts Justification Quality.

Graph 2: Component 2 – indicator values in 2024 and 2023
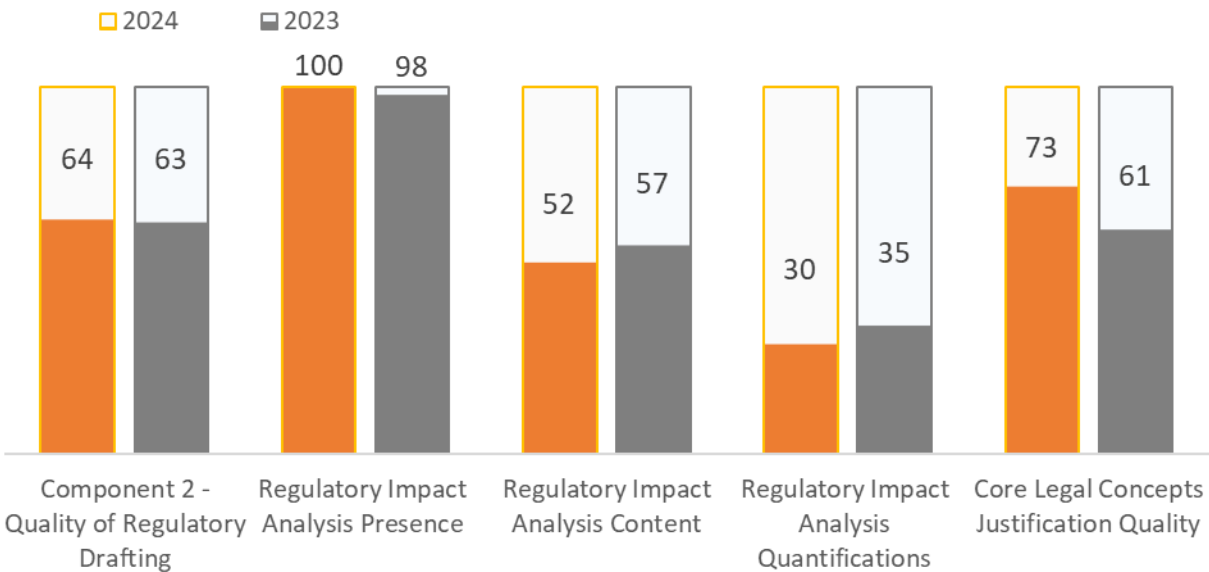
A more detailed look at the individual indicators shows that ministries formally submit Regulatory Impact Assessments (RIA) in almost all cases where such assessments are deemed necessary. However, more detailed data reveal that the submitted analyses are often of questionable quality and content, with the most significant shortcoming being the lack of cost estimates for implementing the regulations.

In 2024, an RIA was conducted for all laws for which it was assessed as necessary. The first individual indicator in this component measures the share of laws for which a RIA was prepared out of the total number of adopted regulations for which, according to the Decree on the Methodology for Public Policy Management, an RIA was required. In 2024, the Republic Public Policies Secretariat (PPS) determined that 28 adopted laws required an RIA, and these analysis were prepared and submitted for each of

them. This result represents a slight improvement of 2 percentage points compared to the previous year. In other words, for two consecutive years, RIAs have been prepared for almost all adopted laws for which the competent institution assessed them as necessary.

The importance of the quality of submitted analyses lies in the fact that the second indicator of this component is calculated based on the quality assessment of the submitted analyses by the RSPP as the competent authority. The vast majority of the submitted analyses were rated as partial (71%, or 20 analyses), while only just under 30% (or 8 analyses) were rated as complete. As a result, the value of this indicator stands at 52 points, representing a decrease of 5 index points compared to 2023. Additionally, it should be noted that 9 laws adopted in 2024 were not submitted to the RSPP for review.

One of the key questions during the adoption of laws that significantly impact the business environment is whether, and to what extent, new regulations generate costs for the private and public sector alike - something that must be determined and quantified through the RIA. This forms the third indicator of this component. The data show that less than one-third of the RIAs prepared for adopted regulations in 2024 contain any quantitative estimates of implementation costs. Specifically, for each adopted law for which a RIA was deemed necessary, the chapters within the RIA relating to key financial and economic issues were analyzed to identify whether they quantify effects for the private and public sectors. If effects are quantified for both sectors, the draft law receives a score of 100 for this indicator; if only one sector is covered, the score is 50; and if neither is addressed, the score is 0. The analysis shows that only 4 (14%) of the 28 RIAs prepared in 2024 contain full cost estimates, 9 (32%) include partial estimates, and a worrying 15 (54%) contain no cost estimates at all. Based on these findings, the value of the indicator on quantification of regulatory effects for 2024 is 30 points, a 5-point drop compared to the previous year.

Legal justifications must contain adequate explanations of the legal concepts being introduced or amended by the new regulation. This is tracked through the fourth indicator of Component 2. For 73% of the introduced or amended legal provisions, the accompanying justifications were written appropriately, with quality descriptions of the amended provisions. On the other hand, in 27% of cases, the justifications merely repeated the legal text from the draft law, which prevents an understanding of the reasons behind specific changes. This represents a 12-point improvement in the indicator compared to the previous year.

Component 3: Public Involvement in the Lawmaking Process

The third component of the Regulatory Index of Serbia (RIS) focuses on one of the key aspects of a quality regulatory framework – the level and quality of involvement of interested stakeholders in the process of drafting and adopting regulations, particularly those relevant to the economy. According to the assessment of the Republic Secretariat for Public Policies (RSPP), a total of 91 laws were adopted during the observed period, of which 28 were identified as requiring a Regulatory Impact Assessment. Accordingly, we can assume that these particular laws are more likely to have a significant impact on citizens and the business sector.

The total value of Component 3 for 2024 is 45 points. This marks a significant decrease compared to 2023, when the component scored 59 points. A decline was recorded across all four individual indicators that comprise this component.

This component consists of four individual indicators, the values of which are shown in Chart 3: Component 3 – Indicator Values in 2024 and 2023:
1. Public Debates and Consultation Presence
2. Public Debate Report Quality
3. Transparency of the Lawmaking Process
4. Parliamentary Debate Quality

Graph 3: Component 3 – indicator values in 2024 and 2023
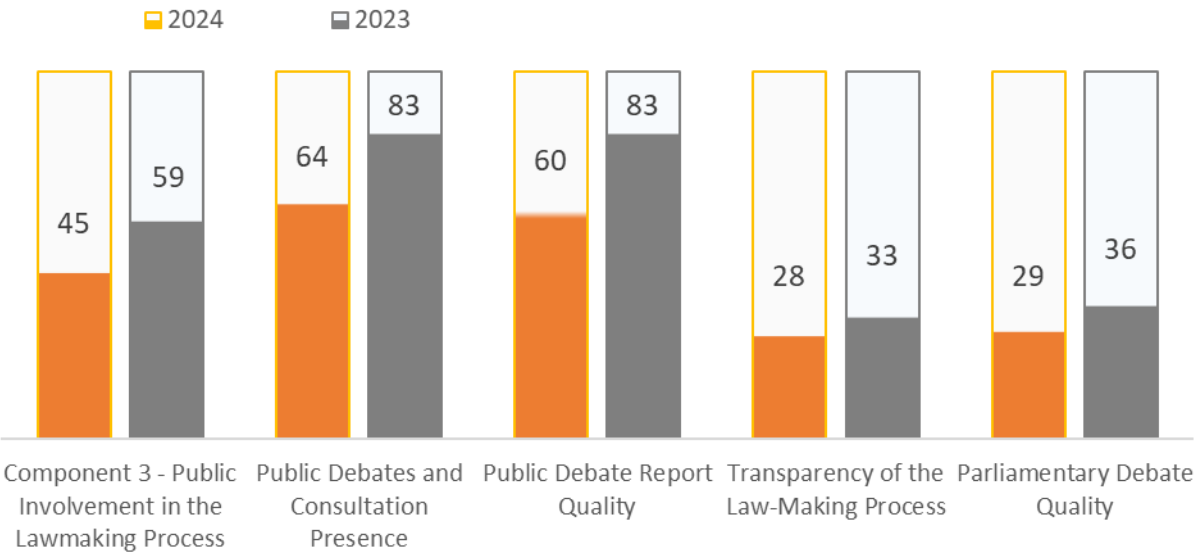
A closer look at the individual indicators reveals that the greatest issues relate to the transparency of the legislative drafting process and the quality of parliamentary debate on laws. The indicators for public consultations and the quality of public consultation reports show slightly higher values, though still significantly lower than in the previous year.

According to Article 41 of the Rules of Procedure of the Government of the Republic of Serbia, the institution proposing new regulation is obliged to conduct a public consultation when drafting a law that significantly alters existing rules or addresses a matter of particular public interest. Public consultations may also be conducted during the preparation of certain strategic documents or by-laws, such as development strategies, decrees, and decisions. Public consultations are one of the tools for ensuring transparency in the work of public authorities and are intended to enhance

democratic participation of citizens and their representatives in the legislative and by-law drafting process. The practice of organizing public consultations is also a crucial anti-corruption mechanism, as it allows experts to point out problematic provisions or provisions that serve the interests of certain individuals or groups at the expense of public interest.

The **Public Consultations and Hearings indicator** scored 64 points. Of the 28 adopted laws that affect the economy, 6 were new laws and 22 were amendments to the existing laws. Public consultations were held for 5 out of 6 new laws and, in accordance with the Government's Rules of Procedure, lasted more than 20 days. Of the 22 amendments, consultations were held for only 5.

It is crucial that public consultation reports be available to the public and contain all the necessary information to ensure transparency in the consultation process. According to business community feedback, in previous years consultations were often organized merely as a formality, with comments ignored or consultations scheduled "too late." The **Quality of Public Consultation Reports indicator** assumes that if an institution makes the effort to produce a good report, it has genuinely reviewed all submitted comments and explained why each of them was accepted or rejected.

Of the 10 public consultations held, only 6 (60%) were followed by a quality report. Across the 28 laws analyzed and the 10 consultations that were conducted, reports were publicly available for 6, and only 1 was accessible via the eConsultation portal.

Of the available reports, 4 met all six evaluation criteria (see methodological annex), and two reports met five out of six. The criteria are:

a) Whether the report lists received proposals;
b) Number of accepted proposals or their identification;

c) Number rejected proposals of their identification;
d) Whether reasons for acceptance/rejection are given;
e) Whether consultation participants are listed (people or organization);
f) Whether working group members are listed (people or organizations).

Transparency in the drafting process is a key indicator within this component, as it reflects the openness of government and the accessibility of information to citizens, businesses, and other stakeholders. This indicator examines the publication date and accessibility of the draft law, as well as information about the working group and its contact people. The score for this indicator in 2024 decreased year-over-year to 28 points. None of the 28 analyzed laws met all four evaluation criteria:

a) Was the start of the drafting process publicly announced?
b) Is the draft law publicly available?
c) Was the composition of the working group published?
d) Is the contact person for the working group publicly available?

Of the 28 laws, 19 (68%) met only one criterion - the draft was published before adoption. Only 6 laws (21%) had publicly available drafts, but the consultation period for those was very short - just 7 days (October 16–23). The composition of the working group and the contact person were not published for any of the laws.

For **parliamentary discussion and the legislative adoption process** to be of high quality, several preconditions must be met. First, a public hearing should be held, enabling committee members and other MPs to obtain relevant information, expert opinions, and stakeholder comments on draft laws, implementation issues, or matters within the committee's scope. Second, the discussion should not be excessively short or long, allowing proper review of all comments, deadlines, and proposals. In this regard, the **Quality of Parliamentary Debate** indicator remained low in 2024 - scoring 29 points. Most laws - 24 of the 28 (86%) were adopted within fewer than 30 days.

Only 4 laws followed the full time requirement (from introduction to adoption) of at least 30 days. Furthermore, many these laws were adopted on the same day - on November 27th, 2024, despite being introduced on November 8, 2024.

Component 4: Timeliness of Law Implementation (By-Law Barometer)

Reports on the quality of the regulatory environment have, for many years, pointed to one of the most persistent problems in the legislative process - **the implementation of laws**, particularly **the failure to adopt and delays in adopting by-laws (secondary legislation)** necessary for the proper enforcement of legal provisions. An additional challenge lies in the practice where the **expiration or amendment of a law** is not followed by the timely adjustment of by-laws previously adopted based on earlier versions of that law. Such misalignment creates **legal uncertainty** for all business entities subject to those regulations. The **efficiency and timeliness of the competent ministries** in adopting and adjusting by-laws in line with the legislative framework is monitored through **Component 4** of the Regulatory Index of Serbia.

The total score of Component 4 for 2024 is **27 out of a possible 100 points**. This component has consistently ranked among the lowest within the RIS, indicating that **delays and omissions in adopting by-laws are chronic issues** in Serbia's legislative process. Moreover, this score represents a **drop of 4 index points** compared to the previous year.

This component consists of three individual indicators, the values of which are shown in Chart 4: Component 4 – Indicator Scores for 2023 and 2024:
1. By-law Adoption Rate
2. By-law Adoption Delays
3. Timeliness in Providing Opinions on Legal Provisions

Graph 4: Component 4 – indicator values in 2023 and 2024

Legend: ■ 2024 ■ 2023

Values shown:
- Component 4 - Timeliness of Law Implementation: 27 (2024), 31 (2023)
- By-laws Adoption Rate: 8 (2024), 22 (2023)
- By-laws Adoption Delays: 2 (2024), 5 (2023)
- Timeliness in Providing Opinions on Legal Provisions: 71 (2024), 67 (2023)
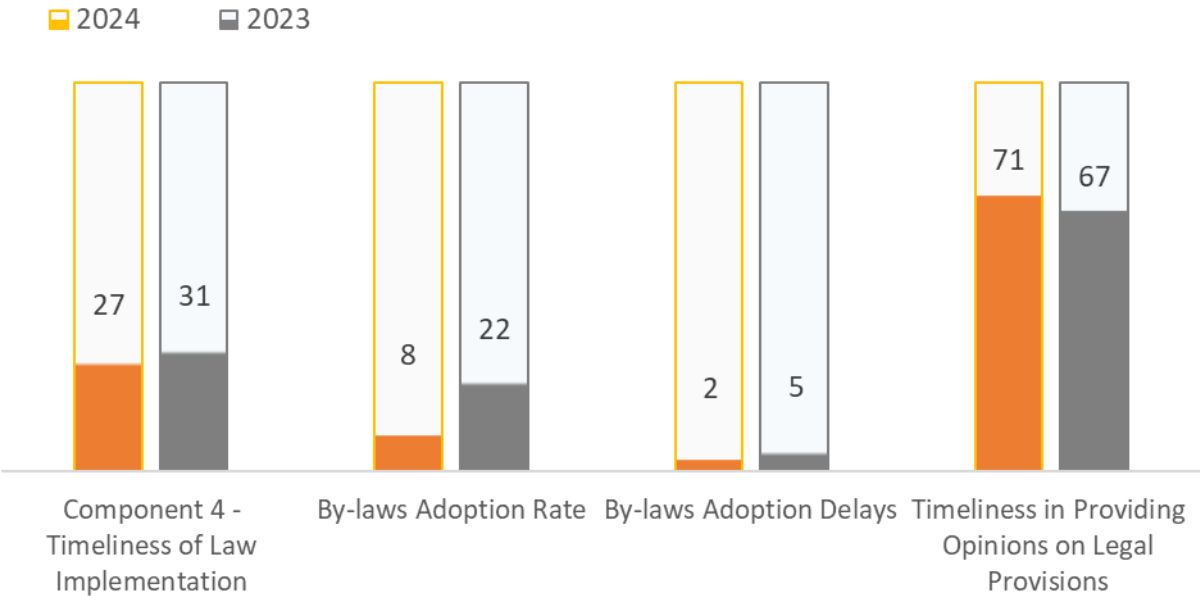
Out of 277 by-laws that were supposed to be adopted in 2024, only 22 (or just 8%) were actually adopted. More specifically, the By-law Barometer tracks a total of 40 laws and 923 by-laws (decrees, rulebooks, decisions) that were necessary (or still are) to ensure effective implementation of those laws. Over the past 22 years, a total of 668 by-laws have been adopted, meaning that 255 still remain to be adopted. In 2024, it was possible to adopt 277 by-laws, 208 of which were "carried over" from previous years, while 69 were planned for adoption in 2024. In 2023, this indicator stood at 22%, while in 2024 it dropped significantly - by 14 percentage points.

Only six out of the 22 adopted by-laws were adopted on time, and the average delay in adopting by-laws in 2024 was 303 days. Compared to 2023, when the average delay was 421 days, this represents a noticeable improvement. However, a higher

percentage of by-laws were adopted on time in the previous year. Moreover, in 2024, only two by-laws were adopted with a delay of less than three months. Taking everything into account, the value of this indicator is just 2 points, down from 5 points in the previous year—making it the lowest-scoring indicator within the entire Regulatory Index of Serbia.

A more detailed analysis of the individual indicators shows that ministries, faced with challenges in implementing laws and delays in adopting by-laws, attempt to compensate for these shortcomings by issuing opinions on legal provisions within their jurisdiction. This mechanism is typically used when legal or sub-legal provisions are unclear to businesses or citizens, in an effort to mitigate legal uncertainty in practice. However, this represents only a partial solution, since opinions issued by ministries are not legally binding (except those from the Ministry of Finance for the Tax Administration), there is no public registry of issued opinions, and that opinions may differ in cases where regulations fall under the jurisdiction of multiple ministries.

To assess the effectiveness of individual ministries in issuing opinions on laws, all ministries were sent a request to provide data on the number of legal opinions issued in 2024, as well as the timeframes of their issuance. Based on the average response time, the value of the third indicator of Component 4 of RIS was calculated. Out of 25 ministries, 17 responded to the request. The data reveals that ministries do not maintain up-to-date records on the issuance of legal opinions.

The 17 ministries that responded reported issuing over 2,136 legal opinions on provisions within their jurisdiction during 2024. In fewer than one-third of the cases, opinions were issued within 15 days. Specifically, the Timeliness of Issuing Opinions on Legal Provisions indicator evaluates whether and within what timeframe ministries issue interpretations of legal provisions. The overall score for this third indicator is 71 points, a slight increase from 67 points in 2023.

The following ministries achieved the maximum score of 100 - meaning all opinions were issued within 15 days or less:

- Ministry of Tourism and Youth
- Ministry of Justice
- Ministry of Science, Technological Development and Innovation
- Ministry of Public Administration and Local Self-Government
- Ministry of Culture
- Ministry for Family and Demography

However, it should be noted that all of these ministries issued fewer than 40 opinions throughout the year - except for the Ministry of Public Administration and Local Self-Government, which issued more than 500 opinions, with an average response time of under 15 days, making it the most efficient in this regard.

Component 5: Institution Responsiveness – Information Availability

Availability of information and institutional openness are crucial for enabling businesses to align their operations with existing regulations. Component 5 specifically tracks the responsiveness of institutions in directly or indirectly providing necessary information related to the application of regulations.

The overall score of Component 5 in 2024 is 72 out of a possible 100 points. This represents a notable decline compared to 2023, when the score was 78. As in the previous year, this component remains the highest-scoring element in the entire Index.

Component 5 consists of two composite indicators with a total of seven individual indicators, as shown in Graph 5: Component 5 – Indicator values in 2023 and 2024.

1. Composite Indicator 1: Institutional Communication with Citizens and Businesses

    a. Direct communication - mystery shopper - via email with an unknown correspondent
    b. Direct communication – mystery shopper - via telephone with an unknown interlocutor
    c. Direct communication via email with a known correspondent (via e-mail)
    d. Public Information Availability

2. Composite Indicator 2: Websites and Social Media Information

    a. Website Content Quality
    b. Transparency and Availability of Website Information
    c. regularity of Social Media Accounts

Graph 5: Componenta 5 – indicator values in 2024 and 2023
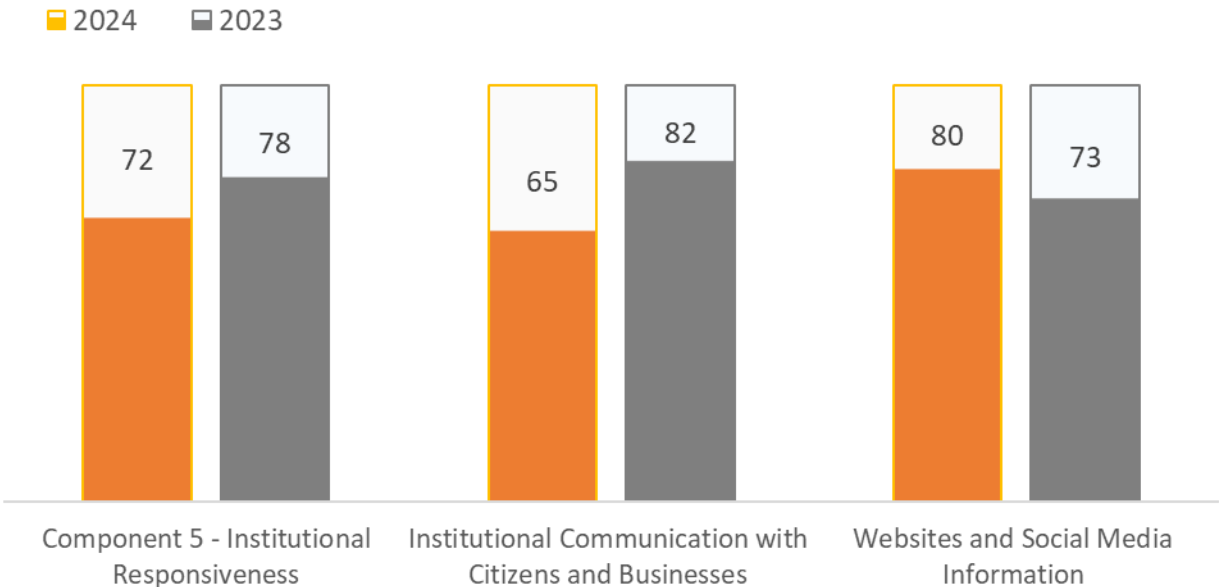
According to recorded data, ministries were more proactive, accessible, and responsive in indirect communication, marking a significant shift compared to 2023. The value of the sub-indicator covering direct communication by ministries decreased from 82 to 65, while the sub-indicator covering indirect communication increased from 73 to 80. Ultimately, the larger decline in formal communication channels between public institutions and the public contributed to the overall decrease in this component's score.

The value of the first indicator – Institutional Communication with Citizens and Businesses for 2024, which tracks the quality of direct communication with users, stands at 65 points. Compared to the previous year, the responsiveness of ministries

through this channel decreased across all segments. The highest response rate was achieved via telephone inquiries to ministries – 84%, and in response to requests for access to information of public importance submitted by individuals – 80%. On the other hand, ministries significantly underperformed in responding to inquiries from unknown businesses via the mystery shopper method (only 52% response rate) and to requests from business associations (44% response rate).

The value of the second indicator – Websites and Social Media Information, which evaluates the quality of indirect communication between ministries and the public/business sector, amounts to 80 points in 2024. In practice, websites and social media have proven to be important channels of indirect communication.

Website quality is assessed based on the fulfillment of the following criteria: a) Content, including the availability of up-to-date regulations, the "Information Booklet," current projects, and adequate contact details for further inquiries; b) Clarity, i.e., ease of finding the mentioned information and documents.

Ministries have made progress in this segment and strengthened this communication channel. Specifically, 82% of ministries maintained updated social media accounts. Almost all websites were of high quality, but two weak points were identified:
- Lists of current projects were available on only 24% of websites
- Up-to-date regulations, laws, and news were available on 62% of websites.

Looking at Component 5 overall, four ministries stood out as top performers:
- Ministry of Science, Technological Development and Innovation (96 out of 100 points)
- Ministry of Labor, Employment, Veteran and Social Affairs
- Ministry of Education
- Ministry of Public Administration and Local Self-Government (all three with 92 out of 100 points)

Graph 6: Component 5 by ministries

Ministry	Percentage
Ministry of Science, Technological Development and Innovation	96%
Ministry of Labour, Employment, Veterans and Social Affairs	92%
Ministry of Education	92%
Ministry of State Administration and Local Self-Government	92%
Ministry of Information and Telecommunications	88%
Ministry of Foreign Affairs	88%
Ministry of Defense	88%
Ministry for European Integration	85%
Ministry of Environmental Protection	83%
Ministry of Agriculture, Forestry and Water Management	83%
Ministry of Family Care and Demography	79%
Ministry of Tourism and Youth	75%
Ministry of Rural Care	75%
Ministry of Internal Affairs	75%
Ministry of Finance	75%
Ministry of Mining and Energy	71%
Ministry of Culture	67%
Ministry for Human and Minority Rights and Social Dialogue	67%
Ministry of Justice	63%
Ministry of Construction, Transport and Infrastructure	58%
Ministry of Economy	58%
Ministry of Public Investments	48%
Ministry of Health	46%
Ministry of Sports	44%
Ministry of Internal and Foreign Trade	38%

Component 6: Regulatory Burden

Establishing a business environment that is conducive to economic growth and development requires that the regulations governing it do not impose unnecessary administrative costs on businesses. For this reason, Component 6 of the RIS captures, through three indicators, the level of direct or indirect costs that businesses incur in adjusting to regulations - i.e., the level of administrative burden faced by the private sector.

Administrative burden not only creates explicit business costs but also requires entrepreneurs to allocate their time to fulfilling administrative obligations - time that could otherwise be spent on their core business activities.

The overall value of Component 6 in 2024 stands at 46 out of 100 points, indicating that businesses in Serbia are facing a significant administrative burden that needs to be reduced. The score is unchanged compared to the previous year.

Component 6 consists of the following three individual indicators, whose values are shown in Graph 7: Component 6 – Indicator values in 2024 and 2023:
1. Share of administrative costs in GDP
2. Administrative Burden on a Typical Enterprise
3. Share of the 10 Largest Parafiscal Charges in GDP

Graph 7: Component 6 – indicator values u 2024 and 2023

Legend: ■ 2024 ■ 2023

Component 6 - Regulatory Burden	Share of administrative costs in GDP	Administrative burden of a typical business	Share of 10 largest parafiscal charges in GDP
44 / 44	70 / 70	52 / 52	12 / 12
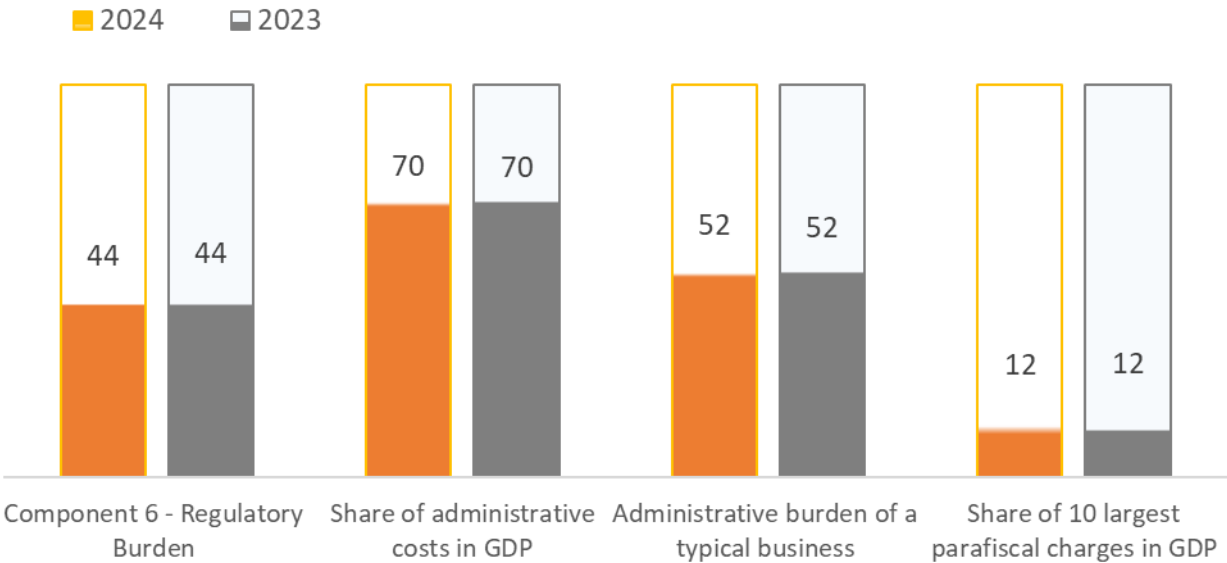
The first indicator within Component 6 is based on the estimated share of administrative costs in GDP provided by the Public Policy Secretariat of the Republic of Serbia (PPS). During 2024 and the first four months of 2025, PPS did not publish a new estimate of the share of administrative costs in GDP. As a result, the value of this indicator in the current edition of the Regulatory Index of Serbia (RIS) is based on the 2022 estimate.

According to the most recent available estimate by PPS, the share of administrative costs in GDP in 2022 was 2.91%. The value of this indicator is inversely proportional to the level of these costs:

1. A share of up to 2% results in a score of 100,
2. A share of 5% or higher results in a score of 0,
3. Within the 2% to 5% range, a proportional value is used.

Based on this calculation and the applicable methodology, the value of this indicator is 70 index points.

The second indicator, which also relates to the share of administrative costs, is calculated based on quantitative research conducted via survey methodology on a sample of 200 businesses and 50 representatives of accounting agencies. The survey collects data on the most frequent administrative procedures businesses face each year. This burden is then translated into index points according to the RIS indicator criteria.

The most recent survey was conducted during 2024, and its findings are used to determine the current indicator value in this edition of the RIS. **For a typical enterprise in Serbia, the administrative burden for the 10 most frequent procedures amounts to 2.6% of business revenues.**

Administrative burden varies by enterprise size. Micro and small enterprises often face relatively higher burdens because they lack dedicated compliance teams. For this reason, the RIS report monitors the administrative burden on a model enterprise, defined as follows:

1. A microenterprise,
2. Up to 10 employees,
3. VAT registered,
4. Issues 500 invoices annually.

The average annual cost of regulatory compliance for a typical microenterprise was calculated based on a survey of 58 accounting agencies, each serving on average

around 30 microenterprises, bearing in mind the list of the 10 most frequent procedures businesses must perform.

The indicator's value is derived from the estimated share of administrative burden in business revenues, using the following scale:

1. Up to 2% = 100 points
2. 3.5% or more = 0 points
3. In the range of 2% to 3.5%, a proportional score is applied.

ADMINISTRATIVNI ZAHTEV	Average Annual Cost in RSD
Businesses books accounting on an annual basis	164.615
Average cost of preparing financial statements	18.698
VAT calculation and tax return submission	96.571
Corporate income tax calculation and tax return submission	21.812
Statutory changes (2 changes on an annual basis)	10.450
Employee registration on social security system (6 times on an annual basis)	5.648
Issuance and receipt of invoices via the SEF system (500 annually)	35.365
Environmental tax registration (once a year)	6.000
Preparation of documentation for submitting requests for compensation due to temporary work incapacity (4 times a year)	32.332
PPP PD individual tax return on calculated tax and contributions	50.417
TOTAL	441.908

The total amount of administrative costs is compared to the average business revenues of microenterprises, which in 2022 amounted to 16,711,940 RSD, or just over €142,000. Based on this, the share of administrative costs is calculated at 2.6% of total business revenues. **According to the RIS methodology, the value of this indicator is 57 out of a possible 100 points**.

Finally, **the share of the 10 largest non-tax charges paid by businesses in GDP in 2024 amounts to 1.1%, which is virtually unchanged compared to the previous year.** The most substantial non-tax charges paid by businesses to the state are:

- Fee for land development – 26 billion RSD
- Fees for the use of resources and reserves of mineral raw materials – 26 billion RSD
- Fees for organizing games of chance – 22 billion RSD

Graph 9: Total collected government income from the 10 largest parafiscal charges, in billions of RSD, for 2023 and 2024, shows the public revenues under this category. According to the RIS methodology, the value of this indicator is 12 points, which remains unchanged compared to 2023.

Graph 8: Total Government Income from 10 Largest Parafiscal Charges, in billion RSD, in 2023 and 2024

Charge	Total income in 2024	Total income in 2023
Contribution for arranging construction land	RSD 26,1	RSD 23,2
Fee for the use of resources and reserves of mineral raw materials (including exploitation on the territory of AP)	RSD 22,0	RSD 17,0
Fees for organizing games of chance	RSD 20,7	RSD 17,7
Funds in the name of participation in financing the earnings of persons with disabilities	RSD 10,0	RSD 8,6
Fee for the formation of mandatory reserves of oil and oil derivatives during marketing and importation	RSD 9,8	RSD 9,7
Water usage fee	RSD 5,7	RSD 3,4
Municipal tax for highlighting the company on the business premises	RSD 5,5	RSD 5,5
Fee for protection and improvement of the environment	RSD 4,0	RSD 3,8
Fee for emissions of CO2, HO2, powdery substances and produced or disposed waste	RSD 2,9	RSD 1,9
Fee for use of space on the public surface	RSD 1,8	RSD 1,7

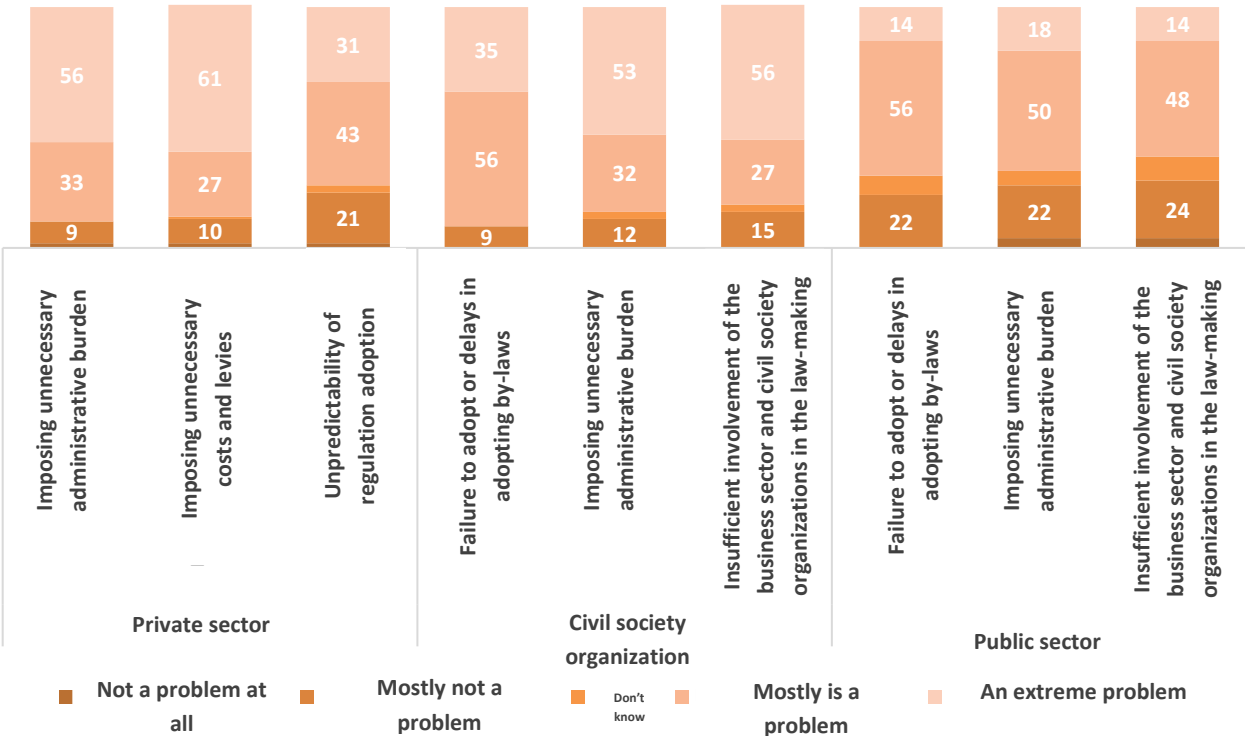# BUSINESS PERCEPTION OF THE STATE OF THE REGULATORY ENVIRONMENT

Since 2019, NALED has been conducting a survey among representatives of the business sector, government institutions, and civil society organizations to assess the quality of public-private dialogue and the legislative process, in cooperation with the IPSOS agency. The objective of the research is to gain insights into the current situation, identify pressing issues, and propose measures to improve the quality of dialogue between the public and private sectors, as well as the process of adopting regulations.

This year's survey was conducted on a representative sample of 260 business representatives, along with 34 representatives of civil society organizations and 50 representatives of the public sector, during the period February - March 2025.

As in the previous wave of research, the results show a high level of agreement among business, public sector, and civil society representatives that excessive administrative burden is the biggest challenge in Serbia's regulatory environment. This view is shared by 89% of business representatives, 85% of civil society representatives, and 68% of public sector respondents. In addition, 88% of business representatives point to unnecessary costs and financial levies imposed by regulations as a major issue.
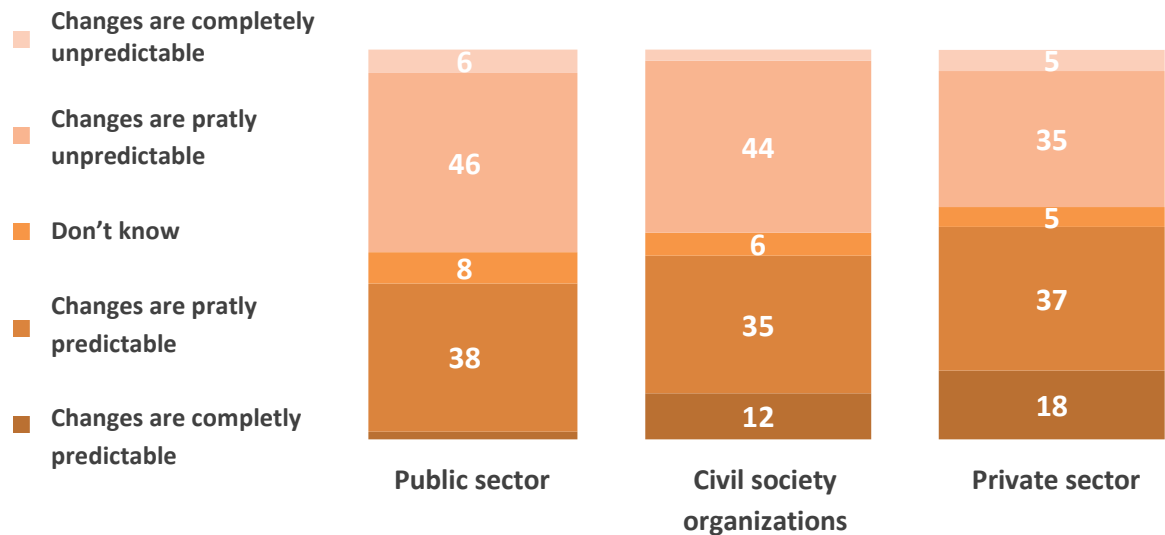
The unpredictability of the legislative process, as well as delays or omissions in adopting by-laws, further concerns the civil society sector - 91% of its representatives see these aspects as key obstacles in the law-making process, a sentiment echoed by 70% of respondents from the public sector.

Graph 9: Biggest problems in the regulatory environment in Serbiai

	Private sector			Civil society organization			Public sector		
Not a problem at all	9	10	21	9	12	15	22	22	24
Mostly not a problem	33	27	43	56	32	27	56	50	48
Mostly is a problem	56	61	31	35	53	56	14	18	14

Legend: Not a problem at all | Mostly not a problem | Don't know | Mostly is a problem | An extreme problem

When it comes to the predictability and transparency of the regulatory drafting process, the majority of business representatives (55%) and around half of the civil society sector (47%) believe that changes are mostly or completely unpredictable, while the public sector, to a somewhat greater extent (52%), believes that regulatory changes are mostly or completely predictable.
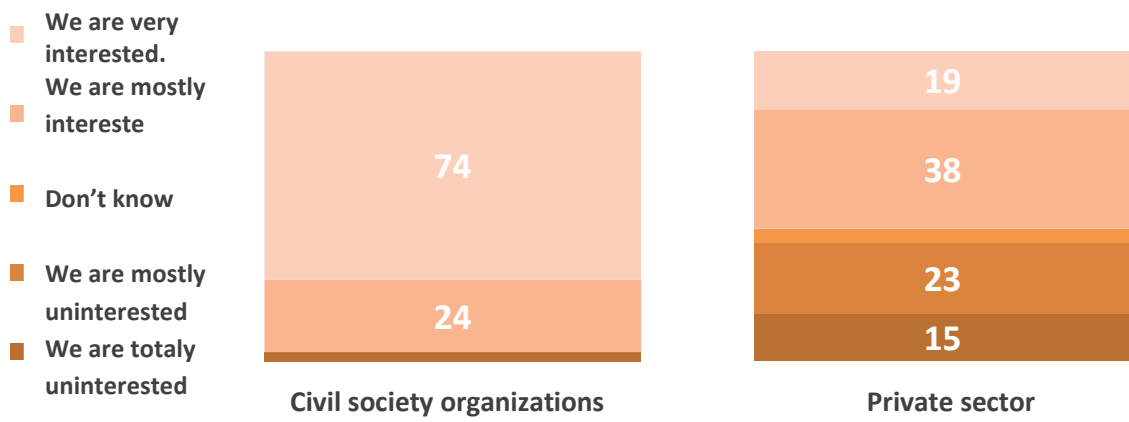
Graph 10: To what extent do you believe that regulations/laws affecting the business environment are adopted and amended in a predictable manner?

Legend:
- Changes are completely unpredictable
- Changes are pratly unpredictable
- Don't know
- Changes are pratly predictable
- Changes are completly predictable

Public sector: 6, 46, 8, 38
Civil society organizations: 44, 6, 35, 12
Private sector: 5, 35, 5, 37, 18

Almost all representatives of civil society organizations (98%) expressed interest in engaging in dialogue with institutions during the regulatory drafting process. In contrast, significantly less enthusiasm was observed among business representatives—only 19% reported a high level of interest in directly participating in this process. This result represents a slight decline compared to the previous year.

Given that the representative sample of the business sector includes as much as 62% of microenterprises, which often lack the capacity to actively engage in dialogue with government institutions, such an outcome is not surprising.
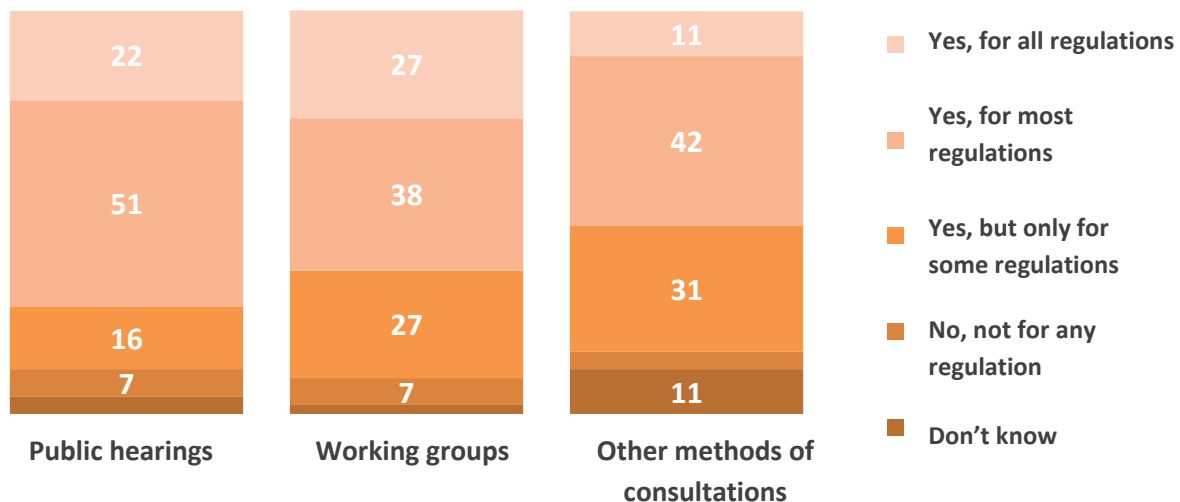
Graph 11: To what extent are you interested in engaging in dialogue with institutions during the adoption of regulations related to the activities of your company/association?

Legend:
- We are very interested.
- We are mostly intereste
- Don't know
- We are mostly uninterested
- We are totaly uninterested

Civil society organizations: 74, 24
Private sector: 19, 38, 23, 15

In 2024, as many as 90% of public institutions that participated in the survey stated that they had been involved in the preparation, adoption, or amendment of regulations within the past 12 months. Among them, the majority (73%) organized public consultations for most or all of the regulations they worked on, while an additional 16% reported that they held consultations for specific regulations only. Just 7% of institutions stated that they did not organize any public consultations.

A similar pattern was observed with regard to the formation of working groups - 65% of institutions formed working groups for most or all of the regulations they were involved in preparing.
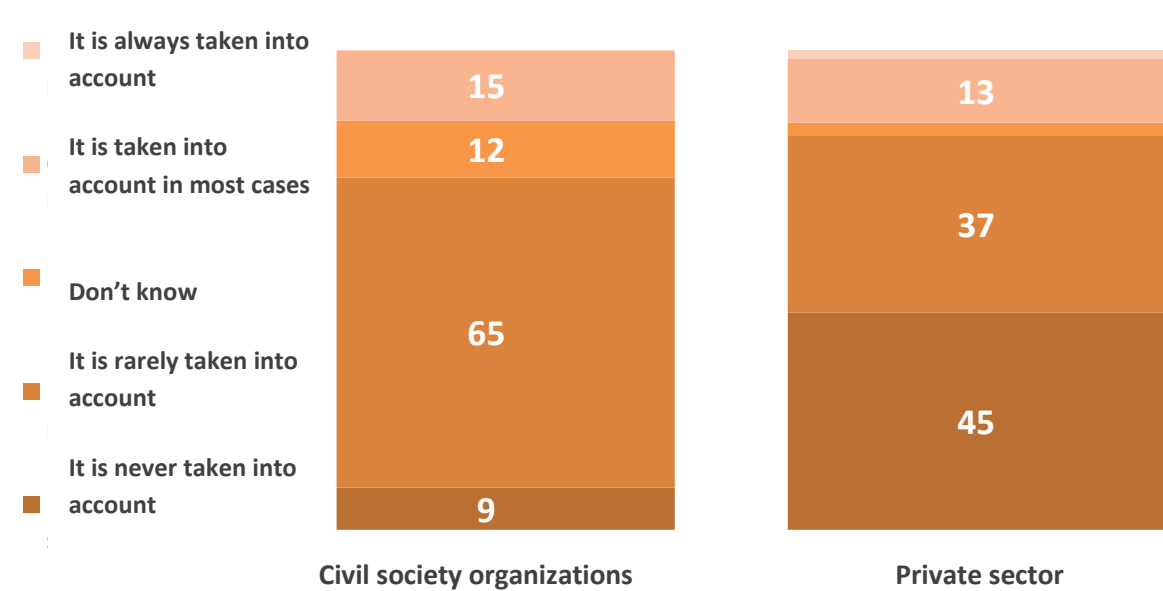
Graph 12: Did you organize public consultations during regulation drafting in 2023?

Legend:
- Yes, for all regulations
- Yes, for most regulations
- Yes, but only for some regulations
- No, not for any regulation
- Don't know

	Public hearings	Working groups	Other methods of consultations
Yes, for all regulations	22	27	11
Yes, for most regulations	51	38	42
Yes, but only for some regulations	16	27	31
No, not for any regulation	7	7	11

This year's analysis recorded a notable decline in the perception of business and civil society representatives regarding the consideration of economic impacts in the adoption of new regulations. More than four-fifths (82%) of business representatives and three-quarters (74%) of civil society representatives believe that the costs imposed on businesses are only partially or not at all taken into account during the regulatory drafting process.

These results point to a significant deterioration in perception, especially among business representatives, compared to the previous year. Similar trends were observed in the results of Component 2 – Quality of Regulatory Preparation, where, despite most regulations being formally accompanied by impact assessments, the quality of those assessments was deemed questionable.

Graph 13: Are the costs imposed on businesses taken into account when adopting regulations?

Legend:
- It is always taken into account
- It is taken into account in most cases
- Don't know
- It is rarely taken into account
- It is never taken into account

Civil society organizations: 15, 12, 65, 9
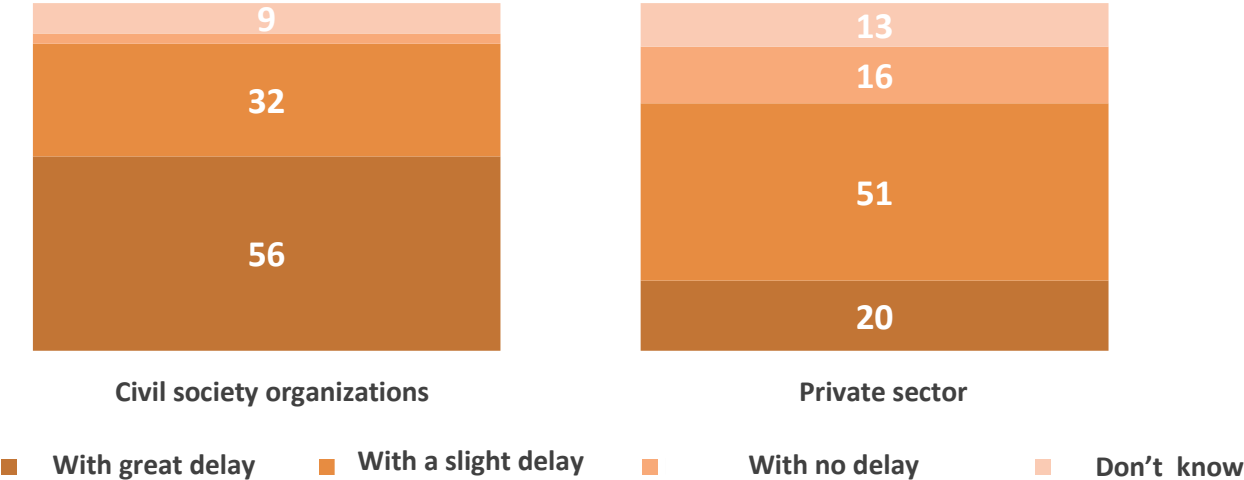
Private sector: 13, 37, 45

Regarding the implementation of regulations, both the business sector and civil society organizations agree that one of the key problems in Serbia's regulatory environment is the failure to adopt by-laws or delay in their adoption. According to the survey results, 88% of civil society organizations state that such delays occur, with 56% describing the delays as very long. A similar view is shared by 71% of business representatives, 20% of whom believe the delays are extremely long.

Compared to previous years, these findings point to a slight deterioration in perception among business representatives. Among those who consider the delays to

be significant, 70% believe the impact on their business is moderately negative, while 30% report that the consequences are serious and significantly hinder operations.

Graph 14: By-law are adopted with (u %)...

Civil society organizations   **Private sector**

■ **With great delay**   ■ **With a slight delay**   ■ **With no delay**   ■ **Don't know**

Regarding perceptions of the cost trends related to regulatory implementation, business representatives are divided on whether these costs have increased or decreased during 2024. More than half of them believe that the monetary costs have increased compared to the previous year.

Graph 16: Assessment of the trend in explicit monetary costs for regulatory compliance in 2025 compared to 2024

	Less money	Same amount of money	More money	Don't know

2025 — 9 | 29 | 54 | 8

2024 — 20 | 38 | 27 | 15
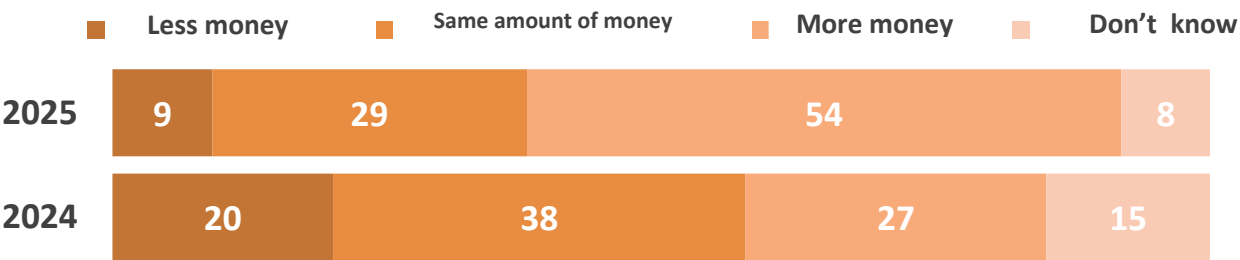
ANNEKS 1: RIS COMPONENT OVERVIEW BY MINISTRIES

The following table presents the values of RIS components by ministry, which may partially reflect the quality level of regulation preparation, adoption, and implementation within each ministry. Component 6 is not monitored at the ministry level, and therefore its score is not included.

Ministries	Component 1	Component 2	Component 3	Component 4	Component 5
Ministry of Finance	33,4	62,6	46,1	0.0	75,0
Ministry of Economy	100,0	N/A	N/A	16,7	58,3
Ministry of Agriculture, Forestry and Water Management	69,2	70,8	37,5	0,0	83,3
Ministry of Environmental Protection	46,7	69,4	46,4	26,2	83,3
Ministry of Construction, Transport and Infrastructure	70,4	N/A	N/A	11,8	58,3
Ministry of Mining and Energy	77,7	70,8	58,3	26,2	70,8
Ministry of Internal and Foreign Trade	72,2	58,3	8,3	0.0	37,5
Ministry of Justice	33,3	58,3	25,0	33,3	62,5
Ministry of Public Administration and Local Self-Government	0,0	N/A	N/A	33,3	91,7
Ministry for Human and Minority Rights and Social Dialogue	N/A	N/A	N/A	50,0	66,7
Ministry of Internal Affairs	1,1	70,8	16,7	50,0	75,0
Ministry of Defense	13,1	45,8	16,7	33,3	87,5
Ministry of Foreign Affairs	15,5	N/A	N/A	N/A	87,5
Ministry for European Integration	N/A	N/A	N/A	N/A	85,4
Ministry of Education	0,0	N/A	N/A	50,0	91,7
Ministry of Health	75,0	N/A	N/A	0.0	45,8
Ministry of Labor, Employment, Veteran and Social Affairs	100,0	N/A	N/A	50,0	91,7
Ministry for Family and Demography	N/A	N/A	N/A	100,0	79,2
Ministry of Sport	N/A	N/A	N/A	N/A	43,8
Ministry of Culture	100,0	N/A	N/A	100,0	66,7

Ministry for Rural Welfare	N/A	N/A	N/A	N/A	75,0
Ministry of Science, Technological Development and Innovation	N/A	N/A	N/A	100,0	95,8
Ministry of Tourism and Youth	88,9	N/A	N/A	100,0	75,0
Ministry of Information and Telecommunications	33,3	N/A	N/A	21,9	87,5
Ministry for Public Investments	N/A	N/A	N/A	N/A	47,9

ANNEKS 2: REGULATIONS IMPORTANT FOR THE EUROINTEGRATION PROCESS

A new feature in this year's edition of the RIS is the special focus on the state's commitments concerning legislation related to the EU integration process and the alignment of the regulatory framework with the EU acquis or other strategic EU initiatives. This segment of RIS is presented as an annex, with the aim of preserving the comparability of RIS scores over the years which would not be the case if a new component is introduced to cover the adoption of legislation aligned with EU regulation.

In this segment, we track the adoption of regulations listed in the **National Program for the Adoption of the Acquis (NPAA) 2024–2027**, as well as in the **Reform Agenda**. The fifth revised NPAA was adopted in late October 2024, along with the mentioned Reform Agenda - a new type of public policy document that outlines the commitments undertaken by the Government in the process of EU accession. Among other measures, these commitments include changes to the regulatory framework through the adoption of new laws or amendments to existing ones.

Although the NPAA and Reform Agenda contain a wide array of measures, we decided to monitor progress solely through the **adoption of new regulations or amendments to existing ones**, and by tracking their **timeliness**. This partial approach is based on two reasons: it applies a previously used method for evaluating RIS components and allows for straightforward comparison between planned and actual outcomes - something much harder to quantify in the case of "soft" measures, such as strengthening administrative capacity by hiring additional staff or conducting training sessions.

Timeliness is evaluated based on the **delay in adopting a regulation relative to the scheduled timeframe**: each regulation adopted on time is awarded **1 point**, while **each quarter of delay reduces the score by 0.1 points**.

Given the overlap of two NPAA documents during 2024 (the fourth, in effect until October, and the fifth, which replaced it at that point), and that regulatory deadlines of the Reform Agenda start in March 2025 - the true additional value of tracking the progress of EU-aligned legislation will only

become apparent in the next RIS edition, which will cover a full year of implementing these reform documents.

In this edition of the RIS, we therefore provide only a review of the **implementation of the fifth revised NPAA for the third and fourth quarters of 2024**, during which the adoption of **82 individual regulations** was planned (11 in Q3 and 71 in Q4). However, only **7 of those regulations were actually adopted**, or **less than 9%** of the planned number.

Considering that all 7 adopted regulations were passed **within the originally scheduled quarter**, the **accompanying EU RIS indicator for 2024** is scored at **7 points**, which, when normalized on a 0–100 scale, results in a **final score of only 8.5 points**.

Regulation	Envisaged adoption quarter	Adoption quarter	Number of Points
Law on Services	Q4/2024	Q4/2024	1
Decree on the Harmonization of the Customs Tariff Nomenclature for 2025	Q4/2024	Q4/2024	1
Law on Environmental Impact Assessment	Q4/2024	Q4/2024	1
Law on Strategic Environmental Impact Assessment	Q4/2024	Q4/2024	1
Rulebook on Technical and Other Requirements for Marine Fuels	Q4/2024	Q4/2024	1
Law on Control of Major Accident Hazards Involving Dangerous Substances	Q4/2024	Q4/2024	1
Rulebook on Eco-design Requirements for Vacuum Cleaners	Q3/2024	Q3/2024	1
Total			7

ANEKS 3: METODOLOŠKI ANEKS

Regulatory Index of Serbia is calculated by using 25 indicators divided in 6 components:
1) Regulatory Predictability
2) Quality of Regulatory Drafting,
3) Public Involvement in the Lawmaking Process,
4) Timeliness of Law Implementation,
5) Institution Responsiveness – Information Availability,
6) Regulatory Burden.

Each of the six components contains between two and four individual indicators that describe a specific segment of the regulatory process or an aspect of the regulatory environment. The data sources used for calculating the RIS values include the website of the National Assembly of the Republic of Serbia, the websites and social media profiles of ministries, the website of the Government of the Republic of Serbia, data provided by the Republic Secretariat for Public Policies and the Treasury Administration, as well as the eConsultation portal. The methodology for calculating the indicators, including notes on this year's methodological changes, is presented in the following tables.

COMPONENT 1: REGULATORY PREDICTABILITY

Indicators	Parameters	Formula
1. Legislative Activity Plan Fulfillment	A – Total number of laws and amendments planned for adoption in the current year B – Number of adopted laws and amendments that were planned for adoption in the current year	B/A*100
2. Share of Planned Regulations	A – Total number of laws and amendments adopted in the current year B – Number of adopted laws and amendments in the last two years that were not planned	100 - B/A*100
3. Government Program Fulfillment	A – Number of adopted regulations B – Delay coefficient = 1 – 0.1 × number of delayed quarters C – Weight = Number of adopted regulations / Number of regulations scheduled for adoption by the observed quarter	∑A x B x C

4. Frequency of Legal Changes	A – Number of law amendments in one year B – Number of law amendments considered necessary; B = 10 C – Unpredictability coefficient; C = 1.49	100- (A-B)*C

COMPONENT 2: QUALITY OF REGULATORY DRAFTING

Indicators	Parameters	Formula
1. Regulatory Impact Assessment Presence	A – Number of laws and amendments adopted in the current year B – Number of adopted laws accompanied by a RIA	B/A*100
2. Regulatory Impact Assessment Content	A – Number of draft laws submitted for RSPP opinion B – Number of those drafts with a complete RIA C – Number of those drafts with a partial RIA	0.3*(C/A)*100 + (B/A) *100
3. Regulatory Impact Assessment Quantification	A – Number of draft laws submitted for RSPP opinion B – Number of RIAs with quantified impacts for both public and private sectors C – Number of RIAs with quantified impacts for only one sector	0.5*(C/A)*100 + (B/A) *100
4. Core Legal Concepts Justification Quality	A_i – For each law (i), justification is rated: - If $\geq 2/3$ of articles are copy-pasted = 0 - If between 1/3 and 2/3 = 50 - If <1/3 = 100	Average A_i

COMPONENT 3: PUBLIC INVOLVEMENT IN THE LAWMAKING PROCESS

Indicators	Parameters	Formula
1. Transparency of the Law-Making Process	For each law (i), it is determined whether it meets the following criteria: A_i – Whether the initiation of drafting a new law was publicly announced (Yes – 25 points; No – 0 points); B_i – Whether the draft law is publicly available (Yes – 25 points; No – 0 points); C_i – Whether the composition of the working group for drafting the law is publicly announced/available (Yes – 25 points; No – 0 points); D_i – Whether information on the contact person representing	Average $(A_i+B_i+C_i+D_i)$

	the working group is publicly available (Yes – 25 points; No – 0 points);	
2. Public Debates and Consultation Presence	A – Total number of laws adopted by the National Assembly that affect the business environment B – Total number of adopted amendments to laws by the National Assembly that affect the business environment C – Total number of public debates lasting at least 20 days in relation to the number of adopted laws affecting the business environment D – Total number of public debates lasting at least 20 days in relation to the number of adopted amendments to laws affecting the business environment	0.5(C/A)*100+ 0.5(D/B/2)*100
3. Public Debate Report Quality	A – Total number of public debates held during the year; B – Sum of quality assessment scores of public debates; Criteria for assessing quality: 1. Whether the report includes the proposals received; 2. The number of accepted proposals or specification of which proposals were accepted; 3. The number of rejected proposals or specification of which proposals were rejected; 4. Whether explanations for the acceptance/rejection of proposals are provided; 5. Whether the names or organizations of participants in the public debates and consultations are listed; 6. Whether the names or organizations of the working group members are listed. If the report contains more than 2/3 of the listed elements, it receives a positive quality rating. If it contains at least 1/3 of the elements, it receives a partial quality rating. If it contains less than 1/3 of the elements, it receives a rating of not of satisfactory quality.	B/A*100
4. Parliamentary Debate Quality	For each law (i), the following criteria are evaluated: Ai – Whether a public hearing on the law was organized = 50 points; Bi – Duration of the period between the law entering procedure and its adoption:	Average (Ai + Bi)

	1. Less than 15 days = 0 points
	2. Between 15 and 30 days = 25 points
	3. More than one month = 50 points

COMPONENT 4: TIMELINESS OF LAW IMPLEMENTATION

Indicators	Parameters	Formula
1. By-Law Adoption Rate	A – Number of by-laws that were supposed to be adopted in the current year B – Number of by-laws adopted in the current year	B/A*100
2. By-Law Adoption Delays	A – Number of by-laws that were supposed to be adopted in the current year B – Number of by-laws adopted within the legally prescribed deadline in the current year C – Number of by-laws adopted in the current year with a delay of less than 3 months	0.3*(C/A)*100 +(B/A)*100
3. Timeliness in Providing Opinions on Legal Provisions	Ai – For each ministry (i), the timeliness of issuing individual opinions on the application of legal provisions is monitored according to the following criteria: 1. Opinion issued in less than 15 days = 100 points 2. Opinion issued within 15 to 30 days = 50 points 3. Opinion not issued within the legal deadline or not issued at all = 0 points .	Average Ai

COMPONENT 5: INSTITUTIONAL RESPONSIVENESS

Indicators	Parameters	Formula
1. Institutional Communication with Citizens and Businesses		
PI1: Direct Communication - mystery shopper (via e-mail)	A – Total number of ministries that received an inquiry from an unidentified business entity B – Number of duly received responses from ministries to the inquiry of an unidentified business entity	B/A*100
PI2: Direct Communication – mystery shopper (via phone)	A – Total number of ministries contacted by an unidentified business entity B – Number of duly received responses from ministries to the inquiry of an unidentified business entity	B/A*100

PI3: Public Information Availability	A – Total number of ministries that received a request for access to information of public importance B – Number of duly received responses from ministries based on submitted requests	B/A*100
PI4: Direct communication with a known interlocutor (via e-mail)	A – Total number of ministries that received a request from a business association B – Number of duly received responses from ministries to the request of the business association	B/A*100

2. WEBSITE AND SOCIAL MEDIA INFORMATION

PI5: Website Content Quality	Ai – Evaluation of each ministry (i) based on the following criteria: 1. Whether the website contains downloadable regulations (Yes – 25 points; Partially – 12.5 points) 2. Whether the "Information Booklet" (Informator o radu) on the website has been updated within the past year (Yes – 25 points) 3. Whether the website includes a list of current projects (Yes – 25 points) 4. Whether the website provides adequate contact information (Email contacts available at the cabinet and department level – 25 points; General email and/or contact form only – 12.5 points)	Average Ai
PI6: Transparency and Availability of Website Information	Ai – Evaluation of each ministry (i) based on the following additional criteria: 1. Whether key content (regulations, contact, projects, Information Booklet) is visible and accessible (within one scroll and no more than two clicks). 2. All content within visible field – 50 points 3. Requires 2–3 scrolls/clicks – 25 points Whether the website is up to date (latest versions of regulations available, news section regularly updated): 1. Everything is up to date – 50 points 2. Either regulations or news not updated – 25 points	Average Ai
PI7: Regularity of Social Media Accounts	Ai – Evaluation of ministries' (i) accounts on Facebook and Instagram based on the following criteria:	Average Ai

1. The ministry has accounts on both platforms and has published at least 24 posts (i.e., 2 per month) over the past year – 100 points
2. The ministry has only one account, or both accounts but with limited activity (1–2 posts per month, 12–24 annually) – 50 points
3. The ministry has one or both accounts, but with low activity (fewer than 12 posts in the year) – 25 points
4. The ministry has no accounts – 0 points

COMPONENT 6: REGULATORY BURDEN

Indicators	Parameters	Formula
1. Share of Administrative Costs in GDP	A – Total percentage of administrative costs in GDP according to defined intervals: Up to 2% = 100 points 5% and above = 0 points In the range between 2% and 5%, a proportional score is applied.	A
2. Administrative Burden of a Typical Business	A – Percentage of administrative costs for 10 procedures in relation to average total business revenues: Up to 2% = 100 points 3.5% and above = 0 points In the range between 2% and 3.5%, a proportional score is applied.	100 – A
3. 3. Share of 10 largest Parafiscal Charges in GDP	A – Percentage of the sum of the 10 most burdensome non-tax charges in GDP according to defined intervals: Up to 0.25% = 100 points 1.25% and above = 0 points In the range between 0.25% and 1.25%, a proportional score is applied.	A