CHAMBER OF COMMERCE
AND INDUSTRY
OF SERBIA
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Letter to the Members of the Chamber of Commerce and Industry of Serbia

Doing business in the transition period until the formation of the new Government of the Republic of Serbia

Belgrade, November 2026

Dear members of the Chamber of Commerce and Industry of Serbia, dear business leaders,

In the parliamentary elections held on 25 October 2026, the citizens of Serbia expressed their will for political change. The National Assembly was dissolved on 9 September; since then the Government has been conducting current affairs, in accordance with Article 17 of the Law on the Government, and the new Government will, within the time limits laid down by the Constitution, be elected by early March 2027 at the latest. The Chamber of Commerce and Industry of Serbia has asked the institutions operating under a caretaker mandate to ensure that businesses can operate without disruption and that the new Government is formed as soon as possible, because production, investment, wages and contractual obligations cannot wait for the political processes to be completed.

With this letter we inform our members of how the Chamber is working during the transition period, of the problems that companies report to us every day, of the issues that must remain in focus for the institutions operating under a caretaker mandate, and of the European regulations on which decisions are being taken in this very period.

1. How the Chamber works during the transition period

The principal task of all of the Chamber's expert services during the transition period is communication between companies and the decision-makers in the caretaker administration. For this purpose the Chamber is not establishing any new bodies; it relies on the bodies and channels through which members inform us of their problems every day: the Business Parliaments, the sector associations, the Centre for Business Initiatives and Rapid Response and the Business Info Centre (telephone 0800 808 809, e-mail bis@pks.rs). Every reported delay is recorded by the expert services, verified with the competent authority and raised at the level at which the decision is taken, and the company is informed of the outcome.

The Chamber will submit a request to the Government and the line ministries to pay close attention to the expiry dates of the terms of office of acting officials and to the timely issuance of authorisations to sign current acts, so that the issuing of decisions, certificates and permits is not interrupted. A caretaker Government cannot appoint civil servants to senior positions; it can only appoint acting officials. If the term of office of an acting official, or an authorisation to sign, expires without being extended, all decisions of that authority come to a halt. The Chamber will press this issue throughout the transition period, in every communication with the Government, the ministries and the administrative directorates.

Through its sector associations, the Chamber is paying particular attention to developments in the following sectors: food and agriculture; building materials and construction; the metal and automotive industries; chemicals, pharmaceuticals and plant protection; transport and logistics; energy; information technology and services; and trade. The associations collect information from members, consolidate joint requests and present them to the competent directorates and ministries.

For regulations that expire by 31 December or are adopted on an annual basis, the Chamber will submit to the competent ministries initiatives with an explanation of the reasons for their adoption by the caretaker Government.

The Chamber will provide information on the problems of its members both to the caretaker Government and to the team that will be preparing the formation of the new Government. The Chamber has begun preparations to elect its own new governing bodies as soon as the formation of the new Government begins, so that dialogue with the new Government, state institutions and the administration can start from day one.

2. Problems in day-to-day business and the experience of the first days of the transition period

The register of the GDP Council and the Centre for Business Initiatives and Rapid Response contains 491 specific problems recorded following visits to 51 companies; 123 of them have been resolved and 134 are being processed. The enquiries that members have submitted in the first days after the elections show that the procedures most affected are those that depend on a signature in a directorate or a ministry. In order of priority, these are:

- import permits issued by the Veterinary Directorate (milk powder, industrial butter, meat for processing, genetic material and the like) and phytosanitary certificates issued by the Plant Protection Directorate; delays and insufficient approved quantities are among the most frequent problems of the food industry;
- opinions and permits of the Ministry of Environmental Protection for the import of secondary raw materials;
- single permits for foreign workers (Ministry of the Interior and National Employment Service, around 67,000 applications a year) and residence permits; the Border Police Directorate was already understaffed and overburdened even before the elections; the recommended deadline for submitting applications for extension is 15 December.

We recommend that members draw up an inventory of all permits, certificates, licences and decisions that expire by the end of March 2027 and submit their applications for extension immediately. Individual administrative acts are not regulations, and the competent authorities are obliged to issue them within the statutory deadlines, including during the caretaker mandate. All contacts with an authority should be made in writing and dated.

3. Issues that must remain in focus for the caretaker Government and the expert services of the administration

- the operation of customs posts (public holidays, Sundays, 24-hour service), proportionate sampling of consignments with a short shelf life, and the availability of phytosanitary inspection at a larger number of border crossings;
- the Government's annual decision on the reduction of customs duties on production inputs and equipment (milk powder and butter for the confectionery industry, cocoa, plastics, rubber, textiles, metal and electronic components, soya and other goods) applies to 2026; without a new decision, full customs duties will be payable from 1 January;
- the import quotas for cement and steel (Official Gazette of the Republic of Serbia, Nos. 120/2025, 34/2026 and 58/2026) are valid until 31 December 2026; without an extension, imports from

third countries will enter without the additional duty, at the risk of a decline in domestic cement and steel production;

- the temporary reduction of excise duty on petroleum products is being extended week by week (currently until 8 November), and the decree capping the prices of petroleum products is valid until 31 December 2026; without a Government session, both the price cap and the excise reduction will lapse at the same time;
- veterinary export certificates and lists of approved establishments (EU, China, EAEU and other markets); market-opening procedures (poultry meat, eggs) require correspondence at ministerial level, which comes to a standstill during the transition period;
- the Medicines and Medical Devices Agency of Serbia (ALIMS): marketing authorisations, variations and imports (RIMS mandatory from 1 November 2026); medicine prices and the List of Medicines of the National Health Insurance Fund (RFZO) require the Government's consent; without a Government session there can be no price adjustments and no new medicines added to the List;
- registration of plant protection products, chemicals and animal feed; designation of conformity assessment bodies; accreditations;
- excise duties: excise stamps, the annual indexation of excise amounts in January, and decisions on minimum excise duties on tobacco products by 15 February;
- the rulebooks implementing the amendments to the Law on Value Added Tax and the Law on Electronic Invoicing (the Ministry of Finance's deadline is 15 December 2026); electronic delivery notes: the error-tolerance period ends on 1 January 2027 (private sector: 1 October 2027); VAT refunds within the statutory deadlines;
- ECMT and bilateral permits for 2027: applications by 30 November, allocation plans of the Ministry of Construction, Transport and Infrastructure by 25 December, collection of permits by 15 January 2027; without an allocation plan there will be no permits from 1 January;
- the 90/180-day rule and the Entry/Exit System (EES): according to the data presented at the meeting with the Transport Community on 15 October, around 80% of the fleet engaged in international transport is currently idle and the sector is operating at around 20% of capacity; the transitional measures under way (long-stay visas, re-counting of days, the Authorised Economic Operator (AEO) regime, dedicated lanes at the Batrovci and Horgoš border crossings, Toll4All) must not be suspended because of changes in the ministries.

4. Companies' ongoing investment projects

For investments that are under way, the following is of particular importance:

- the unified procedure (CEOP e-permitting system): location conditions (valid for two years), building permits, notification of works and occupancy permits; the five-working-day deadlines apply during the caretaker mandate as well; the Chamber is requesting the holders of public authorisations (Elektrodistribucija Srbije – EDS, Srbijagas, water utilities and PE Roads of Serbia) to issue their conditions within the deadline;
- environmental impact assessment, integrated permits and waste management permits under the new laws (Official Gazette of the Republic of Serbia, Nos. 94/2024, 109/2025 and 63/2026); the deadlines are running, but the work of the technical commissions and the signing of decisions

depend on acting officials; the notification of an installation under the new Law on Integrated Prevention and Control of Environmental Pollution must be submitted within six months (January 2027);

- energy permits (30-day deadline; appeals are lodged with the Government), connections to the distribution and transmission grids (the deadline for transmission-grid connection studies is 31 December 2026; bank guarantees within 60 days; for self-consumption, active customer status and solar power plants of up to 1 MW without location conditions), and cadastre registrations;
- planning documents (detailed regulation plans, urban design projects): municipal assemblies should not postpone their decisions; companies are advised to request in writing that a plan be placed on the agenda or that an urban design project be drawn up at the investor's request.

5. European regulations and the work of the caretaker Government

The European Union is deciding on regulations that directly determine the business conditions of exporters from Serbia. Companies from Serbia must comply with EU regulations without any say in them and without transition periods; 62% of Serbia's exports go to the European Union (EUR 21.85 billion in 2025). If the institutions operating under a caretaker mandate and the new Government do not continue the initiatives already launched, the interests of companies from Serbia will go unrepresented at the very moment when decisions about them are being taken. The Chamber will pursue the initiatives already launched, working through the Ministry of European Integration, the Delegation of the European Union, the Western Balkans 6 Chamber Investment Forum (WB6 CIF) and Eurochambres, irrespective of the composition of the Government.

Industrial Accelerator Act. The European Commission's proposal of 4 March 2026 introduces European-origin requirements in public procurement and support schemes (applicable after 1 January 2029) and low-carbon content requirements for steel, cement and aluminium. Under Annex III, an electric vehicle is treated as European only if it is assembled in the EU and at least 70% of its components are of European origin; vehicles produced in Kragujevac (with an EU component share of around 50%) and their suppliers are directly exposed.

New EU safeguard measures for steel (from 1 July 2026). Duty-free quotas have been reduced by 47%, a 50% tariff applies above the quota, and proof of the country of melt and pour is mandatory. Serbia has not been exempted despite the request of the Government and the Chamber; an invitation from DG Trade to negotiate quotas by product category is expected; the allocation of quotas for January–June 2027 has not yet been adopted; CBAM applies at the same time.

CBAM. The definitive period has applied since 1 January 2026; certificates for 2026 imports will be purchased from 1 February 2027, and the declaration must be submitted by 30 September 2027. Around 2,200 exporters from Serbia are covered; there is no accredited verifier in Serbia; guarantees of origin for the roughly 30% of electricity generated from renewable sources are not recognised in the EU; buyers are passing the cost on to producers; extension to further (downstream) products is envisaged from 2028.

EUDR (the Regulation on deforestation-free products). Applicable from 30 December 2026 for large and medium-sized enterprises and from 30 June 2027 for micro and small enterprises: wood, furniture, paper and packaging, rubber, soya, beef, coffee and cocoa. Serbia is classified as a low-risk country, but EU buyers demand documentation as if it were a high-risk country; there is no national traceability system; there is uncertainty regarding the EORI number for companies with no establishment in the EU.

PPWR (the Packaging and Packaging Waste Regulation). Applicable from 12 August 2026: restrictions on PFAS and heavy metals, technical documentation, an authorised representative for extended producer responsibility in each Member State; labelling from 2028, recyclability and recycled content from 2030. The region has neither laboratories for assessing recyclability nor a deposit return system.

Import of refuse-derived fuel (RDF) from the EU (the new Waste Shipments Regulation). In November 2026 the European Union will publish the list of non-OECD countries to which the export of non-hazardous waste is permitted. Serbia submitted its application in February 2025 and a supplementary application for RDF in April 2026; the decision is important for the cement industry, the waste-to-energy plant in Prahovo and decarbonisation projects in the transformation of electricity and heat generation for industry.

Regulations applicable in 2027–2028. Omnibus I (CSRD and CSDDD) has narrowed the obligations, but EU buyers demand data under the VSME standard; batteries (battery passport from 18 February 2027), machinery (20 January 2027), the Cyber Resilience Act (full application from 11 December 2027), Euro 7 (29 November 2026), ETIAS (2027), the customs reform and ICS2; CISAF, the State aid framework for electricity prices for energy-intensive industry (up to 50% of consumption, up to EUR 50 per MWh, subject to a reinvestment obligation).

6. The Chamber's experience in crisis situations

In every crisis of the past ten years, the Chamber of Commerce and Industry of Serbia has acted in the same way: it has opened a single point of contact for companies, brought together representatives of the competent authorities at the level at which decisions are taken, and provided the state with prepared draft acts. We recall a few examples:

- the COVID-19 pandemic (2020–2021): an information service for businesses opened on 12 March 2020 (around 22,000 calls by 1 May); a list of 105 carriers for transporting employees during the curfew; a letter to the European Commission after which the Western Balkans were included in the Green Lanes system within four days; participation in preparing the Government's package of measures; the return of 80,000 employees to work by 8 May; the organisation of vaccination in production plants;
- the Agrokor crisis (2017–2018): daily contact with 660 suppliers of the group's companies in Serbia and advocacy for controlled restructuring; not one of the group's companies in Serbia went bankrupt, and around 11,000 jobs were preserved;
- the energy crisis (2021–2023): the business community's demand for a predictable electricity price; a price of EUR 75 per MWh for businesses in the first half of 2022, four times lower than the wholesale market price; contract extensions and reserve supply;
- the war in Ukraine (2022): the Chamber's crisis team and call centre as a single point of contact for companies with vehicles and goods in Ukraine, Russia and Belarus; a proposal for export quotas instead of a ban on grain exports, which the Government adopted within six weeks;
- the tariffs and the import ban in Kosovo and Metohija (2018–2024): a reaction in Brussels and in the capitals of the Member States on the first day, an assessment of the damage, the resumption of business by 441 companies within two months of the lifting of the tariffs; constant contact with the Kosovo Chamber of Commerce;

- the EES and the 90/180-day rule (2025–2026): a joint appeal by the six Western Balkans chambers through the WB6 CIF, a joint letter with Eurochambres (40 chambers, 20 million companies), an assessment of the economy's exposure, a list of critical raw materials in the event of a suspension of transport, and work in the working group with the institutions, the EU Delegation and the Member States;
- the institutional standstill of 2025: the Centre for Business Initiatives and Rapid Response (March 2025) and the GDP Council, a dialogue mechanism that continued to operate even after the change of Prime Minister; the register contains 491 cases, of which 123 have been resolved and 134 are being processed.

The Chamber is applying that experience today as well: the same point of contact, the same register of cases and the same principle that companies' cases are discussed with those who take the decisions. As an institution, the Chamber of Commerce and Industry of Serbia will do everything in its power to help member companies preserve their business, jobs and investments during the transition period.

Once again, we call on the authorities operating under a caretaker mandate to act responsibly, within their powers and without delay: to adopt the acts that have been prepared, to extend the regulations that are expiring, and not to suspend the procedures that are under way. We also ask that the National Assembly be constituted and the new Government formed as soon as possible, because stable business operations, the development of domestic companies, the removal of obstacles and the attraction of new investment require a Government with a full mandate. For its part, the Chamber has begun preparations to elect its new governing bodies as soon as the formation of the new Government begins, so that from the very first day it can establish a continuous dialogue with the new Government, state institutions and the administration and immediately present the concrete proposals of the business community.

We thank our members for their trust and for every piece of information they provide to the Chamber's expert services.

Yours sincerely,

Marko Čadež
President of the Chamber of Commerce and Industry of Serbia