

WHITE

Proposals for improvement of the business environment in Serbia

BOOK

2023

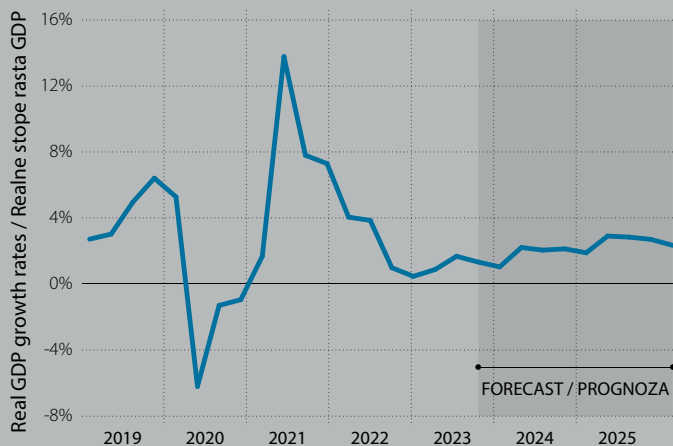
Essentials



Foreign Investors Council

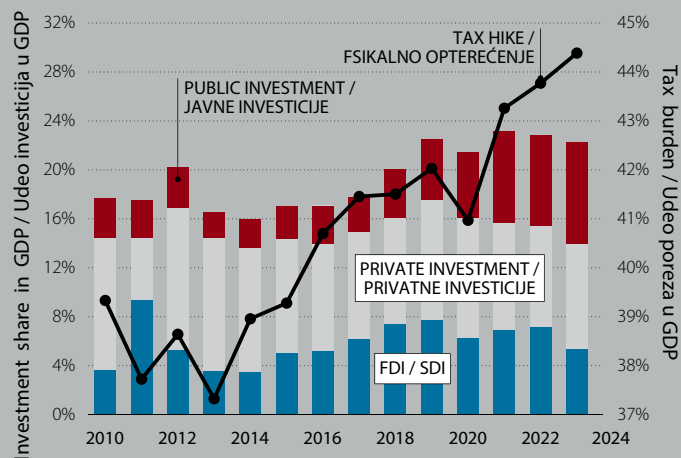
MACRO DATA / MAKROEKONOMSKI PODACI

Business cycle in Serbia / Privredni ciklus u Srbiji



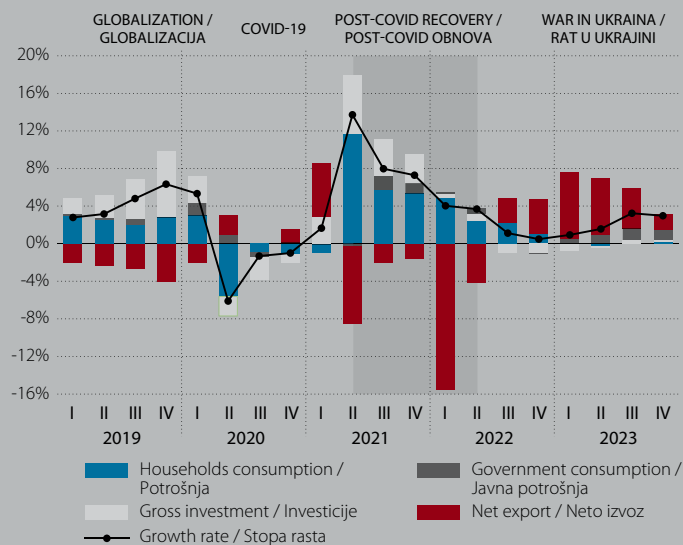
Source / Izvor: Belox

Tax burden and share of investments in GDP / Poresko opterećenje i udeo investicija u GDP

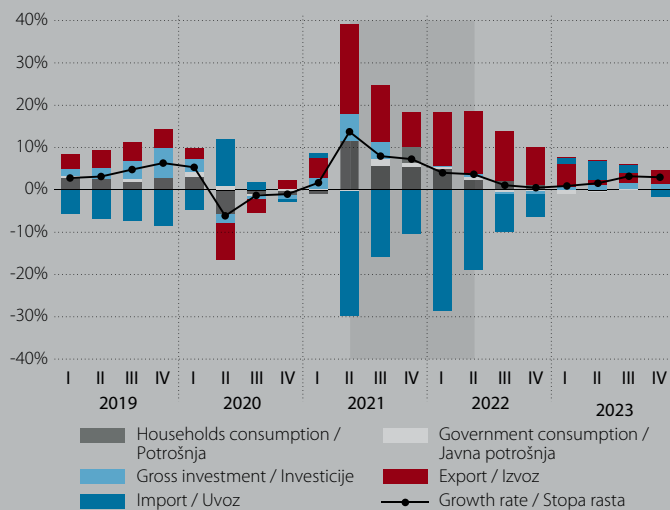


Source / Izvor: SORS, NBS, Belox

Contributions to economic growth in Serbia / Doprinosi privrednom rastu u Srbiji



Source / Izvor: SORS



DEAR READER,

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

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

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

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

Aleksandar Ljubic
FIC Executive Director



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

DRAGI ČITAOČE,

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

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

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

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

Aleksandar Ljubić
izvršni direktor Saveta



Učitavanjem QR koda, možete
preuzeti Belu knjigu 2023

WHAT IS THE WHITE BOOK?

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

Structure of the White Book text

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

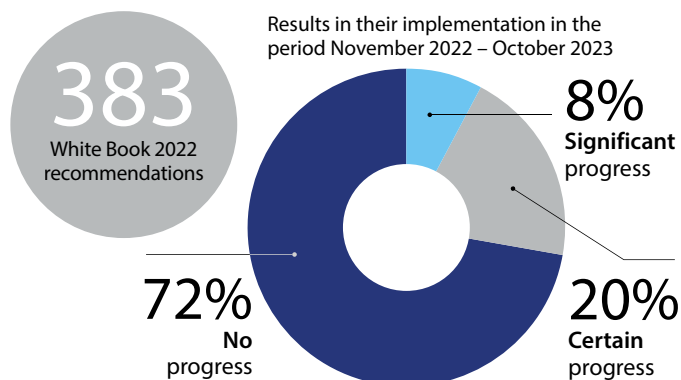
Current Situation
Positive Developments
Remaining Issues
Recommendations

White Book 2023 in numbers



Recommendations

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



Grades

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

FIC – PARTNER FOR GROWTH

Key characteristics and values of FIC

Independence	Regulatory expertise
Consistency	Best Practices
EU promotion	Cooperation

Key figures

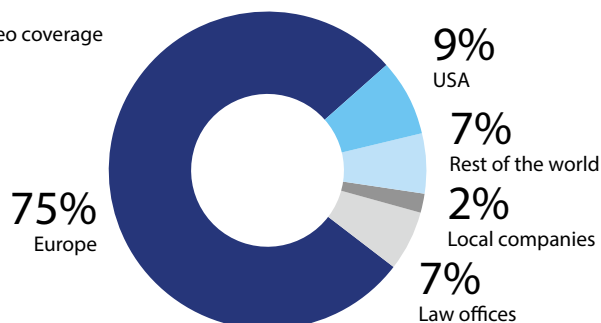


21 years since establishment



122 members from 23 sectors

Geo coverage



> €44 bil. of investments by FIC members in Serbia



> 115,000 directly employed by FIC members in Serbia



9 committees

ŠTA JE BELA KNJIGA?

- Godišnje izdanje, prvi put objavljeno 2003. godine;
- Daje prikaz poslovne klime i nudi skup preporuka za njeno unapređenje.
- Promoviše ekonomsku integraciju sa EU i otvorenu tržišnu privredu.
- Pišu je članice Saveta i promoviše njihove zajedničke interese.
- Mehanizam za stvaranje konsenzusa među članicama.
- Platforma za dijalog sa drugim akterima.
- Svaka tema je upotpunjena pregledom realizacije preporuka datih u prethodnoj godini.
- Na osnovu rezultata u realizaciji, svaka tema dobija ocenu u rasponu od 1 (najniža) do 3 (najviša).
- Publikacija se priprema uz angažman nezavisnog urednika, koji takođe daje makroekonomske podatke i priprema FIC indeks. Urednik za izdanje u 2023. godini je prof. Miroljub Labus.

Struktura teksta iz Bele knjige

Pregled realizacije preporuka iz Bele knjige 2022.

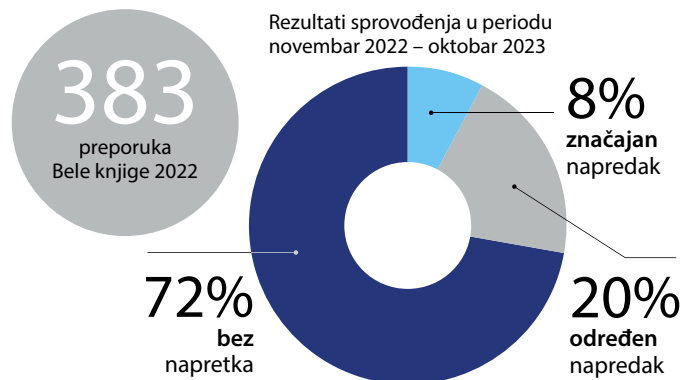


Bela knjiga 2023. u brojevima



Preporuke

U svakoj oblasti je dat „Pregled realizacije preporuka“ koji prati mere preduzete kao odgovor na preporuke date u prethodnoj godini.



Ocene

Na osnovu rezultata u realizaciji, svaka tema dobija ocenu, pri čemu je 1 najniži skor, a 3 najviši skor.

SAVET – PARTNER ZA RAST

Ključne karakteristike i vrednosti Saveta

Nezavisnost	Regulatorna stručnost
Doslednost	Najbolje prakse
Promocija EU	Saradnja

Ključne brojke



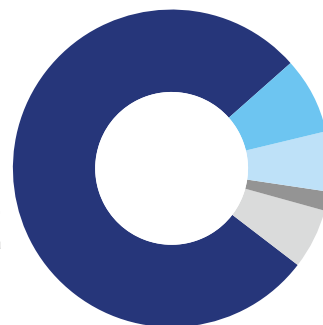
21
godina
postojanja



122 članice
iz 23 sektora

Geografska
pokrivenost

75%
Evropa



> €44 mlrd.
investicija u Srbiju
od strane
članica Saveta



> 115,000
direktno zaposlenih
u Srbiji od strane
članica Saveta



9
odbora

MAIN RECOMMENDATIONS

Taxes

1.29

Results in implementation of recommendations from the White Book 2022

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

Positive developments

in the period Nov 2022 – Oct 2023

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

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

Main recommendations for the future

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

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

Labour Regulations

1.27

Results in implementation of recommendations from the White Book 2022

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

Positive developments

in the period Nov 2022 – Oct 2023

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

Main recommendations for the future

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

Porezi

1,29

Rezultati u sprovođenju preporuka iz „Bele knjige 2022”

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

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

Efikasno se pristupilo usvajanju i usklađivanju sa propisima EU i prihvatanju fleksibilnijih pravila o poreklu robe između Republike Srbije, CEFTA zemalja i PAN-EU članica.

Uveden je Sistem elektronskih faktura („SEF”) koji predstavlja informatičko-tehnološko rešenje preko koga se vrši slanje, prijem, evidentiranje, obrada i čuvanje e- faktura, sa periodičnim tehničkim unapređenjima SEF, a usvojen je i objedinjeni Pravilnik.

Glavne preporuke za budućnost

Organizovati pravovremene javne rasprave o svim novim propisima uz redovan dijalog sa poslovnim zajednicom.

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

Radno-pravni propisi

1,27

Rezultati u sprovođenju preporuka iz „Bele knjige 2022”

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

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

Značajne novine i poboljšanja uključuju pojednostavljenje procesa dobijanja radne i boravišne dozvole, kao i usvajanje Zakona o bezbednosti i zdravlju na radu.

Glavne preporuke za budućnost

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

Digitalization and E-Commerce

1.83

Results in implementation of recommendations from the White Book 2022

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Digitalization & E-Commerce	1.83	2	1	3

Positive developments in the period Nov 2022 – Oct 2023

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

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

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

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

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

Main recommendations for the future

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

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

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

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

Real Estate

1.48

Results in implementation of recommendations from the White Book 2022

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Real Estate – total	1.48	2	9	16
Construction Land and Development	1.33	1	1	7
Restitution	1.33	0	1	2
Cadastral Procedure	1.82	1	7	3
Mortgages and Real Estate Financial Leasing	1.00	0	0	4

Positive developments in the period Nov 2022 – Oct 2023

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

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

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

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

Main recommendations for the future

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

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

Amendments to the Mortgage Law and Financial Leasing Law.

Digitalizacija i elektronsko poslovanje

1,83

Rezultati u sprovođenju preporuka
iz „Bele knjige 2022“

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

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

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

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

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

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

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

Glavne preporuke za budućnost

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

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

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

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

Nekretnine i izgradnja

1,48

Rezultati u sprovođenju preporuka
iz „Bele knjige 2022“

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

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

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

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

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

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

Glavne preporuke za budućnost

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

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

Izmeniti Zakon o hipoteci i Zakon o finansijskom lizingu.

Illicit Trade Prevention and Inspection Oversight

2.00

Results in implementation of recommendations from the White Book 2022

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Illicit Trade Prevention and Inspection Oversight	2.00	2	5	2

Positive developments

in the period Nov 2022 – Oct 2023

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

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

Main recommendations for the future

Introduce the specialization of judges for misdemeanor offences in business.

Establishing a system of reporting on the measures and effects of Action Plans (flowcharts), while communicating the results of controls to stakeholders from the economy.

Improve the level of fiscal burden on businesses operating in the Republic of Serbia with further regulation of parafiscal charges by creating a registry of fees payable by businesses.

Food and Agriculture

1.00

Results in implementation of recommendations from the White Book 2022

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Food and Agriculture – total	1.00	0	0	15
Food Safety Law	1.14	0	0	7
Sanitary and Phytosanitary Inspections	1.00	0	0	4
Quality Assurance and Declarations	1.33	0	0	4

Positive developments

in the period Nov 2022 – Oct 2023

No improvements were noted in Food and Agriculture area.

Main recommendations for the future

Align the Law on Food Safety and all accompanying bylaws with EU regulations (178/2002 / EC and accompanying bylaws).

Establish a transparent and comprehensive risk analysis system by all inspection services, with the establishment of a functional IT system and digitization of supervision.

Establish uniform rules in the procedures of inspection services by adopting the rulebook.

Adopt the new Law on Sanitary Supervision and executive regulations on the work of sanitary and phytosanitary inspection harmonized with the Law on Inspection Supervision and EU regulations.

Borba protiv nedozvoljene trgovine i inspeksijski nadzor

2,00

Rezultati u sprovođenju preporuka iz „Bele knjige 2022“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Borba protiv nedozvoljene trgovine i inspeksijski nadzor	2,00	2	5	2

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

U decembru 2022. godine formiran je nov saziv Koordinacionog tela za suzbijanje sive ekonomije, zajedno sa Stručnom grupom i Koordinacionom komisijom za usklađivanje, odnosno koordinaciju inspeksijskog nadzora.

Usvojeni su Program za suzbijanje sive ekonomije 2023-2025. godine i Akcioni plan za sprovođenje Programa za suzbijanje sive ekonomije 2023-2024. godine.

Proširene su funkcionalnosti Jedinostvenog kontakt centra za prijavljivanje neregularnosti republičkim inspekcijama i e-Inspektora.

Glavne preporuke za budućnost

Uvesti specijalizaciju sudija za prekršaje u privredi.

Uspostaviti sistem izveštavanja o merama i efektima Planova aktivnosti (hodograma), a rezultate kontrola komunicirati sa zainteresovanim stranama iz privrede.

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

Hrana i poljoprivreda

1,00

Rezultati u sprovođenju preporuka iz „Bele knjige 2022“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Hrana i poljoprivreda – ukupno	1,00	0	0	15
Zakon o bezbednosti hrane	1,14	0	0	7
Sanitarna i Fitosanitarna inspekcija	1,00	0	0	4
Kontrola kvaliteta i deklarisanje	1,33	0	0	4

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

Nije zabeležen napredak u oblasti hrane i poljoprivrede.

Glavne preporuke za budućnost

Uskladiti Zakon o bezbednosti hrane i sve prateće podzakonske akte sa EU regulativom (178/2002/EC i prateći podzakonski akti).

Uspostaviti transparentan i sveobuhvatan sistem analize rizika od strane svih inspeksijskih službi, uz uspostavljanje funkcionalnog IT sistema i digitalizaciju nadzora.

Donošenjem pravilnika uspostaviti jedinstvena pravila u procedurama inspeksijskih službi.

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

Environmental Regulations

1.25

Results in implementation of recommendations from the White Book 2022

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Environmental Regulations	1.25	0	2	6

Positive developments

in the period Nov 2022 – Oct 2023

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

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

Main recommendations for the future

Permanent and proactive improvement of the regulatory framework concerning environmental protection - adopt the missing strategic documents (including the Environmental Protection Strategy and Waste Sludge Management Strategy) and accompanying planning documents, and start their implementation. Continue with the transposition and implementation of regulations in this area.

Create an economic model to motivate local governments to use sanitary landfills and expedite the closure and rehabilitation of illegal landfills - rubbish dumps.

Secure the implementation of the "polluter pays" principle by calculating a municipal waste tax based on the quantity of waste generated and/or the frequency of collection.

Provide adequate and purposeful financing of nature protection from the Green Fund, with criteria for determining priorities for the allocation of funds.

Accelerate the transposition and implementation of regulations related to climate change.

Foreign Exchange Regulations

1.33

Results in implementation of recommendations from the White Book 2022

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Foreign Exchange Regulations	1.33	1	1	7

Positive developments

in the period Nov 2022 – Oct 2023

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

Main recommendations for the future

Amend the Law to implement already published interpretations by the NBS with relaxation of positivistic manner of setting Law provisions.

In the context of the ongoing integration processes in the region, the regime within Open Balkan area should be gradually liberalised, at least at the same level as awarded in relations with the non-residents from the EU, especially as statistically the highest number of mother companies are seated in the Republic of Serbia which enables easier control important for macroeconomic monitoring.

Further relaxation of administrative requirements (e.g., delivering of documentation via e-mail instead in hard copy), and particularly switching to ex post reporting of cross-border financial loans.

Simplify the set-off rules for all types of current and capital transactions and allow, with prescribing adequate conditions, cash pooling between affiliated parties

Zaštita životne sredine

1,25

Rezultati u sprovođenju preporuka iz „Bele knjige 2022“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Zaštita životne sredine	1,25	0	2	6

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

Usvojene su izmene i dopune Zakona o upravljanju otpadom, sa ciljem da se pojedina pitanja dodatno razrade i/ili preciziraju, kao i da se Zakon dodatno uskladi sa EU regulativom

Usvojena su važna strateška dokumenta: Strategija niskougledničkog razvoja za period od 2023. do 2030, Program zaštite vazduha za period 2022. do 2030. sa akcionim planom, Program razvoja cirkularne ekonomije za period 2022- 2024. godine, Plan upravljanja vodama na teritoriji Republike Srbije za period od 2021. do 2027. godine

Glavne preporuke za budućnost

Permanentno i proaktivno unapređenje zakonodavnog okvira koji se tiče zaštite životne sredine -usvojiti nedostajuće strateške dokumente (uključujući Strategiju o zaštiti životne sredine i Strategiju upravljanja otpadnim muljem) i prateće planske dokumente, i otpočeti sa njihovom primenom. Nastaviti sa transpozicijom i implementacijom propisa iz ove oblasti.

Stvoriti ekonomski model koji će motivisati lokalne samouprave da otpad odlažu na sanitarne deponije i da ubrzaju proces zatvaranja i sanacije divljih deponija – smetlišta.

Obezbediti primenu načela „zagađivač plaća“, kroz naplatu takse za komunalni otpad, obračunatu u odnosu na količinu proizvedenog otpada i/ili broja odvoženja.

Obezbediti odgovarajuće i svrsishodno finansiranje zaštite prirode iz Zelenog fonda sa kriterijumima za određivanje prioriteta za dodelu sredstava.

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

Devizno poslovanje

1,33

Rezultati u sprovođenju preporuka iz „Bele knjige 2022“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Devizno poslovanje	1,33	1	1	7

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

Pozitivan trend uveden kada je Narodna banka otpočela sa objavljivanjem na svojoj web-stranici odgovora na najčešće postavljana pitanja o primeni propisa o deviznom poslovanju značajno doprinosi pravnoj sigurnosti i potrebno ga je kontinuirano nastaviti u budućnosti.

Glavne preporuke za budućnost

Izmene Zakona u smislu implementacije izdatih tumačenja NBS uz ublažavanje pozitivističkog načina definisanja odredbi Zakona.

U kontekstu trenutnih procesa regionalne integracije, režim za zemlje u regionu Otvorenog Balkana treba da bude postepeno liberalizovan, bar na nivou koji je dostupan nerezidentima iz zemalja članica EU, posebno imajući u vidu da je procentualno najveći broj majki kompanija u Republici Srbiji čime je olakšana kontrola važna za makroekonomsko praćenje.

Dalje ublažavanje administrativnih zahteva (npr. dostavljanje dokumentacije putem e-mail-a umesto u papiru), a posebno preći na naknadno izveštavanje o prekograničnim finansijskim kreditima.

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

Pharmaceuticals

1.64

Results in implementation of recommendations from the White Book 2022

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Pharmaceuticals	1.64	2	10	10

Positive developments

in the period Nov 2022 – Oct 2023

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

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

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

Main recommendations for the future

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

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

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

Tourism and Hospitality

1.00

Results in implementation of recommendations from the White Book 2022

	AVERAGE GRADE	SIGNIFICANT PROGRESS	CERTAIN PROGRESS	NO PROGRESS
Tourism and Hospitality	1.00	0	0	6

Positive developments

in the period Nov 2022 – Oct 2023

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

Main recommendations for the future

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

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

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

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

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

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

Farmaceutska industrija

1,64

Rezultati u sprovođenju preporuka
iz „Bele knjige 2022“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Farmaceutska industrija	1,64	2	10	10

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

ALIMS je povećanjem broja zaposlenih i omogućavanjem podnošenja zahteva za lekove elektronskim putem unapredio poslovanje i smanjio kašnjenja.

RFZO je osigurao blagovremeno direktno plaćanje dobavljačima za isporučene lekove i medicinska sredstva, kao i blagovremeno plaćanje apotekama za lekove izdate na recept.

Izmenjen je Zakon o naknadama za korišćenje javnih dobara u delu naknada za lekove koji posle isteklog roka ostaju u posedu i sakupljaju se od građana.

Glavne preporuke za budućnost

Obezbediti stabilno finansiranje inovativnih lekova kao i generičkih lekova uz proširenje indikacija namenskim transferom budžetskih sredstava prema RFZO i time nadomesti očigledan manjak istih u finansijskom planu RFZO-a.

RFZO treba da osigura dobijanje iz centralnog budžeta potrebnih sredstava za uvođenje novih lekova na Listu lekova

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

Turizam i ugostiteljstvo

1,00

Rezultati u sprovođenju preporuka
iz „Bele knjige 2022“

	PROSEČNA OCENA	ZNAČAJAN NAPREDAK	ODREĐEN NAPREDAK	BEZ NAPRETKA
Turizam i ugostiteljstvo	1,00	0	0	6

Poboljšanja

u periodu novembar 2022 – oktobar 2023.

Tokom 2023. godine pokrenut je razvoj novog strateškog okvira za sektor turizma u Srbiji, posebno definisanje tržišnog pozicioniranja, vizije, misije, ciljeva rasta, izazova/mogućnosti itd., čije se usvajanje očekuje u narednom periodu.

Glavne preporuke za budućnost

Donošenje nove Strategije razvoja turizma uz promenu koncepta upravljanja turističkim destinacijama;

Uvođenje nove metodologije za procenu deviznog priliva sektora turizma kroz primenu metodologije satelitskih računa u turizmu;

Izmene i dopune Zakona o pojednostavljenom radu u sezonskim poslovima u pojedinim delatnostima u pravcu proširenja obuhvaćenih delatnosti na sektor turizma i ugostiteljstva;

Izmene Zakona o porezu na dodatu vrednost radi proširenja delatnosti koje bi se oporezovale po posebnoj, sniženoj stopi radi povećanja konkurentosti Srbije kao turističke destinacije;

Izmene i dopune Zakona o autorskom i srodnim pravima u pogledu načina utvrđivanja visine tarife za autorska i srodna prava u sektoru ugostiteljstva;

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

FIC COMMITTEES

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

Anti-Illicit Trade & Food Committee

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

Financial Services Committee

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

Human Resources Committee

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

Infrastructure & Real Estate Committee

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

Legal Committee

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

Pharma Industry Committee

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

Taxation Committee

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

Telecommunications & Digital Economy Committee

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

Tourism and Hospitality Committee

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

ODBORI SAVETA STRANIH INVESTITORA

Odbori su okosnica rada Saveta i najzaslužniji za pripremu Bele knjige, platforme na kojoj članovi Saveta razmenjuju ideje, dele najbolje prakse i zajednički formulišu predloge kako da se prevaziđu postojeće regulatorne prepreke. Trenutno u okviru Saveta radi 9 odbora:

Odbor za borbu protiv nedozvoljene trgovine i hranu

Cilj odbora je unapređenje regulatornog okvira koji se odnosi na prehrambenu industriju i poljoprivredu, kao i intenziviranje borbe protiv nedozvoljene trgovine kroz regulatorne promene i efikasnije sprovođenje zakona.

Odbor za finansijske usluge

Odbor je posvećen unapređenju regulatornog okvira sektora finansijskih usluga u Srbiji kako bi se modernizovalo tržište i omogućio ekonomski rast sa fokusom na digitalizaciju, tržište kapitala, sprečavanje pranja novca, osiguranje i lizing.

Odbor za ljudske resurse

Misija odbora je da radi na predlozima za otklanjanje prepreka sa kojima se suočavaju investitori u oblasti ljudskih resursa i radnopravnoj regulativi, daje sugestije za unapređenje kvaliteta ljudskih resursa u zemlji proširujući svoj portfolio od upravljanja do obrazovnih aspekata HR politika.

Odbor za infrastrukturu i građevinarstvo

Aktivnosti odbora su usmerne ka unapređenju i modernizaciji okvira za razvoj infrastrukture i građevinarstva, energetike i saobraćaja. To uključuje zalaganje za implementaciju strategija, razvoj i kreiranje novih predloga sa ciljem modernizacije regulatornog okvira.

Pravni odbor

Pravni odbor se fokusira na analizu opšteg pravnog okvira u Srbiji. Cilj ovog međusektorskog odbora je zalaganje za unapređenje sveukupnog pravnog okvira putem pažljivog monitoringa rada srpskih vlasti, kao i generisanje predloga za njegovo dalje unapređenje.

Odbor za farmaceutsku industriju

Cilj ovog sektorskog odbora je promovisanje potrebnih reformi zdravstvenog sektora, modela zdravstvenog osiguranja i zalaganje za punu harmonizaciju zakonodavstva sa EU, kao i uklanjanje zakonodavnih prepreka.

Poreski odbor

Poreski odbor, koji okuplja članove iz gotovo svih oblasti privrede, značajno doprinosi unapređenju poreskog sistema sa ciljem njegovog daljeg usklađivanja sa međunarodnom praksom i smernicama OECD-a, kao i poboljšanju doslednosti u primeni i radu Poreske uprave.

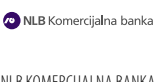
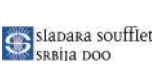
Odbor za telekomunikacije i digitalnu ekonomiju

Cilj ovog odbora je da se zalaže za unapređenje investicione klime u sektoru telekomunikacija, za uklanjanje zakonskih i drugih barijera za dalji razvoj e-trgovine i digitalnih usluga, kao i za promociju novih poslovnih modela.

Odbor za turizam i ugostiteljstvo

Ključni fokus odbora za turizam i ugostiteljstvo je na poboljšanju regulatornog okvira, ali i upravljanja turizmom i unapređenje međusektorskog vladinog pristupa, uključujući inovativna rešenja i efektivnu koordinaciju svih ciljeva radi ostvarivanja zajedničke vizije unapređene konkurentnosti destinacije.

 A1 SRBIJA D.O.O.	 A1 TOWERS INFRASTRUCTURE D.O.O. BEOGRAD – NOVI BEOGRAD	 ACB D.O.O. BEOGRAD – DRUŠTVO ZA POSREDOVANJE U OSIGURANJU	 ADDIKO BANK A.D. BEOGRAD	 ADECCO OUTSOURCING D.O.O.	 AIRPORT CITY BELGRADE
 ALMA QUATTRO D.O.O. BEOGRAD	 ARDAGH METAL PACKAGING SERBIA D.O.O.	 BALL CORPORATION, BEVERAGE PACKAGING EMEA, BEOGRAD	 BANCA INTESA A.D. BEOGRAD	 BARRY CALLEBAUT SOUTH EAST EUROPE D.O.O.	 BAYER D.O.O. BEOGRAD
 BDK ADVOKATI	 BELAGA MANAGEMENT COMPANY D.O.O.	 BELGRADE AIRPORT D.O.O.	 BOJOVIĆ DRAŠKOVIĆ POPOVIĆ & PARTNERS A.O.D. BEOGRAD	 BPI D.O.O. SOMBOR	 BRITISH AMERICAN TOBACCO SOUTH- EAST EUROPE D.O.O. BEOGRAD
 BRITISH-SERBIAN CHAMBER OF COMMERCE	 CARLSBERG SRBIJA D.O.O.	 CETIN D.O.O. BEOGRAD – NOVI BEOGRAD	 CTP INVEST	 CWPR SERVICES D.O.O. / CWP GLOBAL	 DAD DRÄXLMAIER AUTOMOTIVE D.O.O.
 DATALAB SR D.O.O.	 DDOR NOVI SAD A.D.O.	 DELHAIZE SERBIA	 DELOITTE ADVISORY D.O.O.	 DELTA HOLDING DOO	 DEUTSCH-SERBISCHE WIRTSCHAFTS- KAMMER (AHK SERBIEN)
 EKO SERBIA A.D.	 ERNST & YOUNG D.O.O. BEOGRAD	 ERSTE BANK A.D. NOVI SAD	 EURO LITHIUM BALKAN D.O.O. VALJEVO	 EUROBANK DIREKTNA A.D. BEOGRAD	 EUROPEAN INVESTMENT BANK
 EVROPSKA BANKA ZA OBNOVU I RAZVOJ	 EXLRT D.O.O.	 FCA SRBIJA D.O.O. KRAGUJEVAC	 FERRING PHARMACEUTICALS D.O.O. BEOGRAD-STARI GRAD	 FRESENIUS MEDICAL CARE SRBIJA D.O.O.	 FRIKOM D.O.O.
 G4S SECURE SOLUTIONS D.O.O.	 GEBRÜDER WEISS D.O.O. DOBANOVCI	 GENERALI OSIGURANJE SRBIJA A.D.O.	 GRAND CASINO D.O.O. BEOGRAD	 GRUNDFOS SRBIJA D.O.O.	 HAD BMP A.D. BEOGRAD (HYATT REGENCY BEOGRAD)
 HEMOFARM A.D.	 HUAWEI TECHNOLOGIES D.O.O.	 IKEA SRBIJA D.O.O.	 INOS BALKAN D.O.O.	 INTESA LEASING D.O.O. BEOGRAD	 JELEN DO D.O.O. (CARMEUSE SERBIA)
 JTI INTERNATIONAL A.D. SENTA	 K&F ADVOKATI	 KARANOVIĆ & PARTNERS O.A.D.	 KENTKART SOUTHEAST EUROPE D.O.O.	 KLEEMANN LIFTOVI D.O.O.	 KNAUF INSULATION D.O.O.

 KONCERN BAMBI A.D.	 KONSTRUKTOR KONSALTING	 KPMG D.O.O. BEOGRAD	 LAFARGE BFC D.O.O.	 WOLF THEISS LAW OFFICE MIROSLAV STOJANOVIC COOPERATING LAW OFFICE OF LAW OFFICE MIROSLAV STOJANOVIC IN COOPERATION WITH WOLF THEISS	 LEITNERLEITNER CONSULTING D.O.O. BEOGRAD
 LUKOIL SRBIJA A.D. BEOGRAD	 MARSH D.O.O. ZA POSREDOVANJE U OSIGURANJU BEOGRAD	 MERCK D.O.O.	 MESSER TEHNOGAS A.D.	 METROPOL PALACE HOTEL BELGRADE METROPOL PALACE D.O.O.	 MINI PANI D.O.O.
 MK GROUP MK GROUP	 MOBI BANKA A.D. BEOGRAD	 MORAVACEM D.O.O.	 MS RAJICEVA D.O.O. (MAMA SHELTER)	 NESTLÉ ADRIATIC S D.O.O.	 NIS A.D. NOVI SAD (NAFTNA INDUSTRIJA SRBIJE)
 NLB KOMERCIJALNA BANKA AD BEOGRAD	 NOKIA SOLUTIONS AND NETWORKS SRBIJA D.O.O. BEOGRAD	 SERBIA PRIME SITE ONE OGRANAK SERBIA PRIME SITE ONE AG BEOGRAD	 OTP BANKA SRBIJA A.D. NOVI SAD	 OTP LEASING SRBIJA	 PEPSICO
 PERNOD RICARD SRBIJA D.O.O.	 PETRIKIĆ & PARTNERI A.O.O. IN COOPERATION WITH CMS REICH-ROHRWIG HAINZ	 PHILIP MORRIS SERVICES D.O.O. BEOGRAD	 PHOENIX GRUPA SRBIJA	 PRICEWATERHOUSECOOPERS D.O.O.	 PRIGAN D.O.O. BEOGRAD
 PROCREDIT BANK	 PROMONT GROUP DOO NOVI SAD	 RAIFFEISEN BANKA A.D. BEOGRAD	 RAIFFEISEN LEASING D.O.O.	 RAUCH SRBIJA D.O.O.	 RIO TINTO RIO SAVA EXPLORATION D.O.O.
 ROCHE D.O.O.	 SAVA NEZIVOTNO OSIGURANJE A.D.O. BEOGRAD	 SGS BEOGRAD D.O.O.	 SIEMENS D.O.O. BEOGRAD	 SLADARA SOUFFLET SRBIJA D.O.O.	 SOG IN COOPERATION WITH KINSTELLAR
 STEEL IMPEX LLC	 STMG CONSULTANCY D.O.O. BEOGRAD	 STRAUSS ADRIATIC D.O.O.	 TELEKOM SRBIJA A.D. BEOGRAD	 TETRA PAK PRODUCTION D.O.O. BEOGRAD	 THE COCA-COLA COMPANY (BARLAN S&M D.O.O.)
 THE INTERNATIONAL SCHOOL OF BELGRADE	 TIGAR TYRES D.O.O. PIROT PREDUZEĆE ZA PROIZVODNJU GUMA	 TITAN CEMENTARA KOSJERIC	 TOYO TIRE SRBIJA D.O.O. INDIJA	 TRACE GROUP HOLD PLC OGRANAK BEOGRAD	 UNICREDIT BANK SRBIJA JSC
 UNIFIEDPOST SOLUTIONS D.O.O.	 VP LAW FIRM	 WEST PHARMACEUTICAL SERVICES BEOGRAD D.O.O.	 WIENER STÄDTISCHE OSIGURANJE A.D.O. BEOGRAD	 YAZAKI SRBIJA	 ŽIVKOVIĆ SAMARDŽIĆ ZIVKOVIC SAMARDZIC A.D.O. BEOGRAD

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Dawid Sold	G4S Secure Solutions	Member
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Goran Pekez	JT International	Member
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	Vice President	Dušica Jovičić	G4S Secure Solutions
Infrastructure & Real Estate Committee	President	Mario Kijanović	SOG in cooperation with Kinstellar
	Vice President	Tatjana Isakov	NIS a.d. Novi Sad (Naftna industrija Srbije)
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Renata Pindžo	Communication Director
Jelena Lazarević	Regulatory Director
Tanja Jovanović	Regulatory Officer
Koviljka Nikolić	Office Manager
Tamara Kapor	Regulatory Associate



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