Civil Society Participation in the Revision of the Open Government Partnership Action Plan:

Towards Strengthening Accountability and Efficiency of Public Administration

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Table of Abbreviations

Abbreviation	Full Name
AP	Action Plan
RS	Republic of Serbia
CSO	Civil Society Organizations
IRM	Independent Reporting Mechanism
KITEU	Office for Information Technologies and e-Government
MPALSG	Ministry of Public Administration and Local Self-Government
MHMRSD	Ministry for Human and Minority Rights and Social Dialogue
RSPP	Republic Secretariat for Public Policies
GS	General Secretariat of the Government of the Republic of Serbia
MLEVSA	Ministry of Labour, Employment, Veterans and Social Affairs
EPA	Environmental Protection Agency
MIT	Ministry of Information and Telecommunications
NA	National Assembly of the Republic of Serbia
UIS	Unified Information System
OSS	One-Stop Shop
PwD	Persons with Disabilities
OGP	Open Government Partnership
CI	Civic Initiatives
WG	Working Group
SCTM	Standing Conference of Towns and Municipalities
AEPA	AEPA Lawyers Association

Key Findings

A significant number of commitments in the Action Plan were narrowed already in the early stages of its development, which from the outset diminished their transformative potential. During the co-creation process, initial commitment proposals were reduced in scope or simplified to more technical activities, thereby missing the opportunity to launch more ambitious reforms through the Action Plan that could have had a broader systemic impact in the areas of open government.

The analysis of implementation shows that the realisation of a large number of commitments is significantly delayed, and that a relatively limited number of activities have been carried out in the period so far. To the greatest extent, commitments of a technical nature have been realised, primarily related to the consolidation and publication of already available data. In contrast, **activities that involve normative changes, development of new policies, or other more complex reforms, i.e., those requiring clear political support, have been narrowed compared to the original ideas and are significantly delayed.**

A large number of activities have been practically postponed to end of 2027, increasing the risk that the envisaged commitments will not be realised within the planned timeframe. In this context, justifications related to political processes, such as the formation of a new government, cannot be considered fully valid, given that in this Action Plan cycle a government of the same political majority and existing parliamentary composition was formed, without significant changes in the structure of institutions and the administrative apparatus directly responsible for implementing activities.

An additional challenge is the lack of regular communication between the competent implementation institutions and the members of the working group for Action Plan implementation from the civil society sector. Institutions responsible for the realization of individual commitments do not systematically inform the Working Group about the course of implementation nor sufficiently involve the civil society organisations that are part of it. Thus, the cooperation and co-creation process, which represents one of the fundamental values of the OGP initiative, is in practice reduced almost exclusively to the Action Plan development phase, while in the implementation phase this cooperation is significantly limited, despite the expertise and willingness of civil society organisations to contribute to the realisation of activities.

Finally, **the content of certain commitments indicates a lack of a more ambitious approach to reforms.** A significant number of activities amount to the preparation of analyses, assessments, and mapping of the existing situation, **without clearly defined next steps that would lead to concrete measures and improvement of practice in the given areas.** Without additional activities and clearly defined reform steps, there is a risk that the

results of the Action Plan will remain limited to analytical insights, without a real impact on public policies and institutional practice.

Based on these findings, this advocacy document, developed in cooperation with a broader group of organizations, contains 11 sets of recommendations for improving the existing commitments of the Action Plan, with a special focus on strengthening civil sector participation in the activity implementation process, as well as on defining additional measures and steps that would give existing commitments a more ambitious reform potential and enable the achievement of concrete results. **The document also contains proposals for five new commitments that could be included in the existing Action Plan.**

This version of the document has been supplemented with **the results of advocacy activities carried out by civil society organizations during the Action Plan revision process, as well as with conclusions and recommendations for the Open Government Partnership (OGP) International Mechanism in relation to the Action Plan revision process.**

Although the introduction of a four-year Action Plan cycle represents a novelty within the OGP initiative, the longer implementation period should not be understood as room for postponing reforms. On the contrary, the formally assumed commitment of the Republic of Serbia to participate in the OGP initiative implies continuous work on improving transparency, participation, and accountability of institutions throughout the entire period of Action Plan implementation.

Introduction

The Government of the Republic of Serbia adopted in December 2023 the Action Plan (AP) for implementing the OGP initiative in the RS for the period 2023–2027. This is the fifth AP that Serbia is implementing since joining the international OGP initiative. The goal of membership and implementation of related APs is to strengthen public administration capacities in participating countries in accordance with OGP principles: transparency, accountability, open data, and citizen participation in public policy making. The significance of this action plan compared to all others adopted in Serbia is reflected in several important differences. First, the AP is adopted through a co-creation process involving government representatives and state and local authorities together with civil society representatives within the Special Inter-Ministerial Working Group (hereinafter the working group). Second, the entire process, from co-creation, adoption, and AP implementation, is monitored externally by the OGP through a local representative, the Independent Reporting Mechanism (IRM). Third, in the case of lack of results, implementation, or non-compliance with OGP principles, the country can be called to account, and in extreme cases even excluded from the initiative – which is not uncommon.

The Republic of Serbia has been an active OGP member for over a decade, more precisely for a full 14 years. During those years and the implementation of action plans, results have generally been weak, and occasionally good or excellent in the case of individual commitments. It has not been uncommon for commitments not to be implemented at all, and this was sometimes the case even with commitments recognised as ambitious and transformative. The conclusion is that Serbia has not utilised all the opportunities and potential that the OGP offers to make transformative changes in public administration functioning. Therefore, the goal of this advocacy document is to codify the efforts of an informal group of civil society organisations[1] that wish to contribute to a higher quality and more inclusive revision of the existing AP.

The revision process is envisaged at the level of the international OGP organisation, according to a special methodology for all APs lasting four years[2], which is the case with the process in our country. This methodology involves evaluating what has been done so far, organising a new round of consultations for all interested parties, as well as amending existing and introducing new commitments into the AP, within clearly defined deadlines. We see the revision process as an opportunity for the civil sector to contribute to improving the

[1] List of informal group of organizations that participated in the preparation of this document and gave their support is at the end of this document.

[2] Methodology for the revision process, i.e., amendments to Open Government Partnership action plans, for action plans lasting 4 years: AP Refresh Process, available here: https://www.opengovpartnership.org/wp-content/uploads/2024/07/Four-Year-Action-Plan-Memorandum.pdf

implementation of the existing Action Plan, as well as to its substantive strengthening and raising the level of ambition, given the delays in implementation and the tendency to soften certain assumed commitments.

This document contains an assessment of the implementation of commitments to date from the perspective of civil society organisations, concrete recommendations for improving existing commitments in the current AP, proposals for new activities and commitments, results of advocacy activities carried out by civil society organizations during the Action Plan revision process, conclusions and recommendations for the Open Government Partnership (OGP) International Mechanism.

The informal group of organisations that participated in the creation of this document remains open to constructive comments, suggestions, and cooperation with all relevant actors, in order to improve the quality of the reform process.

Methodology

This document consists of two interconnected parts. The first part covers an overview of the implementation of commitments from the current Action Plan to date, from the perspective of civil society organisations, while the second part contains proposals and recommendations for improving existing commitments in the further course of implementation, as well as proposals for new commitments that should be included in the revision process.

1. Analysis of Action Plan Implementation to Date

In assessing the degree of implementation of each commitment, this analysis relies on the methodology of the Independent Reporting Mechanism (IRM) in the part relating to the level of fulfilment.[3] This methodology establishes a five-level fulfilment scale:

- *No evidence available;*
- *Not started;*
- *Limited;*
- *Substantial;*
- *Complete.*

When the implementation of a commitment is assessed as *no evidence available*, this means that primarily no primary sources such as self-assessment reports or meeting minutes are available, nor were institutional representatives available for comment and/or interview.[4] In the case that the implementation of commitments *has not started*, such assessment is based on data indicating that no activity from the observed commitment has been implemented either partially or fully. When the fulfilment level is *limited*, this means that based on available data it has been established that at least one activity from the observed commitment has been fulfilled, at least to a certain extent. The fulfilment level of a commitment *substantially* means that more than half of the activities within the observed commitment have been fully realised. Finally, a commitment assessed as *completed* implies the implementation of all activities envisaged by the AP.

[3] See more at: Independent Reporting Mechanism, "Results Report for Serbia for the period 2020-2022," Open Government Partnership (OGP), available here: https://www.opengovpartnership.org/wp-content/uploads/2023/06/Serbia_Results-Report_2020-2022_SR.pdf, pp. 11-12.
[4] For more detailed methodological explanations see: Open Government Partnership, "OGP National Handbook: A Practical Roadmap for National Stakeholders", August 2025, pp. 53-57, available at: https://www.opengovpartnership.org/wp-content/uploads/2025/04/OGP-National-Handbook-April-2025.pdf

As primary sources for categorizing the fulfilment of each commitment, publicly available documents of relevant institutions were used, documents from the OGP process (meetings and minutes of the Special Inter-Ministerial Working Group, self-assessment reports), findings from the civil society workshop on AP revision[5], as well as various secondary literature (academic and professional papers, newspaper articles, and civil society reports).

2. Development of Recommendations and Proposals for New Commitments

The second part of the document, relating to the improvement of existing commitments and the definition of new ones, was developed through a consultative and participatory process with civil society organisations, including working group members, as well as the broader community of interested stakeholders.

For this purpose, Partners Serbia organised a two-day workshop for CSOs, activists, and other interested stakeholders, with the aim of evaluating existing commitments from the current OGP Action Plan through joint work and discussion, identifying key challenges in their implementation, as well as defining priority areas and activities that should be included in the revision process.

The workshop was held on January 15 and 16, 2026, in Belgrade, with the support of the Belgrade Open School and the Delegation of the European Union in Serbia.[6] 21 participants attended the workshop.

After the workshop, an informal group of civil society organisations and activists was formed[7] interested in the AP OGP revision process. This group jointly prepared the proposals and recommendations presented in this advocacy document. The work of the informal group took place through continuous email communication, individual consultative meetings, as well as joint online meetings via the Zoom platform.

In this way, the participation of a broader group of organisations with diverse expertise was ensured, including good governance, development and improvement of local self-government units, transparency and anti-corruption, ecology and environmental protection, media rights, public finance, citizen participation in decision-making processes, etc., whereby proposals and recommendations were further strengthened through an interdisciplinary approach and exchange of practical experiences. Such a process enabled the document to reflect the needs and priorities of different segments of civil society, but

[5] More information about the workshop is available in the text below.
[6] The invitation for the workshop was public and open to all interested parties "Civil Society Participation in the Revision of the OGP Action Plan," Partners Serbia, available at: https://www.partners-serbia.org/post?id=692
[7] The list of organizations that make up the informal group is at the end of the document as Annex 1.

also to offer realistic, applicable, and substantively ambitious proposals for improving the Action Plan.

Overview of Action Plan Commitment Implementation

Slightly more than two years after the adoption and implementation of the Action Plan (AP), in accordance with the Open Government Partnership (OGP) methodology, a revision of the AP is mandatory. The halfway point of the implementation cycle represents an excellent opportunity to review the status and implementation of adopted commitments, as a basis for a quality AP revision process.

Summary Overview of AP Implementation

Out of a total of ten commitments (and one additional recommendation), the AP fulfillment result is mixed. The implementation of five commitments is completed (commitments 1, 3, 7, 8, and 9), while four more commitments (commitments 5, 6, 10), including the non-binding recommendation, record a limited level of fulfillment. Lastly, the implementation of two commitments (commitments 2 and 4) has not started. What is positive is that two commitments recognized by the IRM as promising have been completed in terms of the realization of all activities (commitments 1 and 8). It is particularly important to highlight that Commitment 8 originally emerged as part of the OGP AP and was not planned within other APs and Government programs. In the continuation of this section, each commitment is analyzed in detail, with justifications for the fulfillment level assessments shown in Table 1. In the second part of the analysis, concrete proposals for the revision of commitments, especially those recording a limited level of fulfillment or that have not started, are presented and elaborated. In addition to proposals for the revision of existing commitments, this paper also offers proposals for the adoption of new commitments within the upcoming AP revision, based on the joint work of the informal group of civil society organizations.[8]

Table 1 Summary Overview of the Degree of Commitment Fulfillment from the AP

Commitment No.	Commitment Name	Responsible Institution	Fulfillment Level
1	Electronic People's Initiative	KITEU	Completed

[8] Workshop "Civil Society Participation in the Revision of the OGP Action Plan," Partners Serbia, January 2026, available here: https://www.partners-serbia.org/post?id=692

2	Towards Better Citizens' Participation in the Drafting of Regulations and Public Policy Documents	MHMRSD	Not Started
3	Improving the Transparency of Monitoring Submitted Initiatives from Citizens and Businesses	RSPP	Completed
4	Achieving Greater Transparency in Respect of Spending of Budget Funds Through the Improvement of the Competitive Procedure for Awarding Funds to Civil Society Organisations	MHMRSD	Not Started
5	Proactive Government - Information on Click	MPALSG	Limited
6	Improving the Transparency of the Work of the Government of the Republic of Serbia	GS	Limited
7	Open Government for a Better Quality of Life for Persons with Disabilities	MLEVSA	Completed
8	Open "Green" Data for More Accessible Information About the State of the Environment in the Republic of Serbia	EPA	Completed
9	Establishment of a Unified Information System for Monitoring Project Co-financing in the Field of Public Information	MIT	Completed
10	Public Services Tailored to Citizens	MDULS	Limited
/	Modernisation and Improvement of Accessibility of Content, Information, and Data on the NA Website	NA	Limited

Overview of Individual Commitment Implementation

Assessment of Commitment 1 Fulfillment:

„Electronic People's Initiative"

The Electronic People's Initiative is an obligation aimed at improving citizen participation in decision-making through the digitalization of the process of submitting and supporting people's initiatives. It is envisioned that, following the development of technical specifications, a dedicated service will be established on the eGovernment Portal to enable electronic signing of people's initiatives. This simplifies the procedure, reduces administrative costs, and increases the accessibility of this mechanism to a wider range of citizens. The expected outcome is greater transparency and efficiency in the practical use of the people's initiative instrument.

Regarding the implementation of the electronic citizens' initiative, it can be assessed as **completed**. Office for Information Technologies and e-Government (KITEU) i Ministry of Public Administration and Local Self-Government (MPALSG) as the institutions responsible for implementation, assessed this obligation as fully implemented in their self-assessment

report.[9] The preparation of technical specifications and the establishment of the electronic initiative on the eGovernment portal, as formal AP commitments, have been fully implemented — which was also the conclusion of the civil society workshop.[10] The electronic initiative is available to all citizens and is functionally operational. In December 2024, civil society representatives submitted official objections to the Working Group regarding the functionality of the service. After a working group meeting in a smaller composition including civil society representatives, MPALSG, KITEU, and RSPP, it was established that in addition to the "ConsentID" security protocol, citizens also need an electronic signature to electronically sign a citizens' initiative. However, this does not change the fact that the service is functional and the commitment has been fulfilled.

Although this commitment has been assessed as completed, what remains an open question is the small number of users and generally limited citizen interest in using this service. Therefore, the recommendation of civil society is that promotional activities for the electronic citizens' initiative commitment be added in the AP revision, and that the complete procedure for launching a citizens' initiative be digitalised (more on this in the next chapter of the document).

Assessment of Commitment 2 Fulfilment:

"Towards Better Citizens' Participation in the Drafting of Regulations and Public Policy Documents"

This commitment aims, in a broader sense, to improve the quality of citizen participation in the processes of drafting regulations and public policy documents. The commitment seeks to examine the possibilities and further directions for improving the quality of public participation in drafting regulations and public policy documents. This goal should be achieved through a comprehensive assessment of the existing situation and its causes, as well as comparative practices, followed by the consideration and definition of further steps in accordance with the accepted findings of the analysis conducted by the competent authorities. Although this commitment has an ambitious title, it actually consists of two activities:

1. Preparation of a comprehensive comparative analysis, with recommendations for improving public participation in the drafting of regulations and public policy documents in the Republic of Serbia
2. Consideration of analysis findings by competent state administration authorities

[9] Draft Report – Self-Assessment on the implementation of the Action Plan for the Open Government Partnership initiative in the Republic of Serbia for the period 2023-2027, for the period December 2023 – December 2025, December 2025, pp. 3-5, available at: https://ekonsultacije.gov.rs/ogpPage/1.

[10] Workshop "Civil Society Participation in the Revision of the OGP Action Plan," Partners Serbia, available at: https://www.partners-serbia.org/post?id=692

In the draft self-assessment report, Ministry for Human and Minority Rights and Social Dialogue (MHMRSD), records limited progress in implementing this commitment. However, such an assessment is highly imprecise, given that Activity 1 – the preparation of a comprehensive comparative analysis – was not carried out at all and was abandoned. Accordingly, Activity 2, which involves reviewing the findings of the analysis, cannot be assessed as "limited progress with significant delay" without Activity 1 having been completed first.

These activities, even if fulfilled within the 4-year Action Plan implementation period, do not actually lead to higher quality citizen participation in the drafting of regulations and public policy documents, but rather establish, at most, the initial foundation.

Instead of preparing the analysis, the Draft Self-Assessment Report on AP implementation states that the RSPP formed a Working Group in November 2024 to prepare amendments to the legal framework for consultations and public debate (activity 2), including in its composition representatives of competent state administration authorities and CSO representatives selected through a public call conducted in cooperation between the RSPP and MHRSD[11]. This information is correct, the working group was formed, and civil society organisations were included in its composition; however, this working group has not so far worked on what is stated in the report as "formulating recommendations for improving transparency in the process of adopting regulations and public policy documents." The only regulation that this working group seriously addressed, according to the testimonies of working group members from civil society organisations, is the Government Rules of Procedure, the amendments to which, in part, undermine the achieved level of standards regarding the organizationof public debates. The civil society members of the working group opposed these amendments to the articles on public debate, but their positions were not taken into account.

It is important to emphasise here the contradictory nature of the policies of the Government of Serbia, which through this Action Plan advocates for improving procedures for citizen participation in decision-making processes, while at the same time the Government Rules of Procedure were amended in December 2025 to the detriment of citizen participation in decision-making processes.[12]

[11] Public call for civil society organizations for membership in the Working Group for the preparation of amendments to the legal framework for consultations and public debate: https://minljmpdd.gov.rs/javni-poziv-organizacijama-civilnog-drustva-za-clanstvo-u-radnoj-grupi-za-pripremu-izmene-pravnog-okvira-konsultacija-i-javne-rasprave/

[12] The Reform Agenda of the Republic of Serbia 2024–2027 envisages the obligation for the Government of Serbia to amend the Government Rules of Procedure by December 31, 2025, so that the decision on conducting public debate, the public debate program, and the deadline for draft laws are adopted by the Government, instead of the competent government committee. The Decision on amending the Rules of Procedure was adopted on November 28 and introduced this change. However, the same amendment also introduced additional provisions regarding the obligation to conduct public debates for draft laws, by-laws, and public policy documents. Specifically, Article 41a was introduced, allowing the public debate to be omitted if consultations are assessed as “successfully conducted,” although practice shows that

Although a working group was formed to work on formulating recommendations for improving public participation in the process of adopting regulations, this obligation has remained at the level of analytical work. The obligation does not commit the responsible institution to accepting the recommendations, or specifically – to amending any of the regulations in this area. It remains unclear what the final "product" of this obligation will be, and how it can even be measured whether the obligation has been implemented.

Regarding such definition of commitments, civil society organisations have repeatedly emphasised that action plans should contain commitments that lead to concrete changes and improvements. It has also been repeatedly pointed out that numerous reports by independent institutions, international organizations, academia, and civil society already map problems and challenges in the application of public policies, here specifically the challenges of citizen participation in decision-making processes, and that it is not necessary to conduct additional analyses, but that based on existing knowledge, concrete activities/commitments for the action plan can be defined that would lead to the desired goal (for example, amendments to regulations governing public participation in decision-making processes).

The position of the informal group of civil society organisations is that this commitment needs to be redefined during the Action Plan revision process, in a way that will ensure substantive improvement of the normative framework for citizen participation in decision-making processes. Instead of maintaining the existing approach, it is proposed that the focus of the commitment be on amendments to regulations governing public debates, consultations, and participation of the interested public in the early stages of drafting laws and other public policies. Instead of the planned activity 1 – preparation of a comprehensive comparative analysis, the MHMRSD should rely on existing analyses of international organisations and civil society, and based on them consider and create further activities within Commitment 2. More on this proposal is available in the next chapter of the document.

Assessment of Commitment 3 Fulfilment:

„Improving the Transparency of Monitoring Submitted Initiatives from Citizens and Businesses"

This commitment aims to enable a clear, accessible, and transparent insight into the status of initiatives submitted by citizens and business entities. The improvement of existing mechanisms or the development of a solution enabling the tracking of all phases of competent authorities' handling of submitted initiatives was envisaged. In this way, institutional accountability is increased and the space for informal or non-transparent handling is reduced. The ultimate effect is strengthening public trust in institutional channels of communication and participation.

consultations are often not sufficiently transparent, inclusive, or systematically conducted. Government Rules of Procedure: https://www.paragraf.rs/propisi/poslovnik-vlade-republike-srbije.html

Implementation of Commitment 3 can be assessed as **completed**. Within this commitment, two activities were to be implemented: Activity 1 – establishing an overview of submitted initiatives; and Activity 2 – publishing the overview of submitted initiatives. The overview of business and citizen initiatives was published in December 2025 on the Open Data Portal.[13] The publication of the overview of initiatives should not be the end of this commitment, but the beginning of further work on improving state administration transparency based on received initiatives.

Assessment of Commitment 4 Fulfilment:

„Achieving Greater Transparency in Respect of Spending of Budget Funds Through the Improvement of the Competitive Procedure for Awarding Funds to Civil Society Organisations"

This commitment aims to increase transparency and accountability in the distribution of budget funds intended for civil society organisations. The improvement of the grant award procedure through clearer criteria, more accessible information, and more uniform application of rules by competent authorities was envisaged. This reduces the space for arbitrariness and strengthens trust in the fund allocation process. The ultimate effect is more efficient and fairer use of public funds with greater public oversight.

Implementation of Commitment 4 has **not started**. This commitment was planned to be implemented through two activities:

1. preparation of an *ex post* analysis of previous applications of the relevant regulation, and;
2. acting in accordance with the analysis findings.

However, due to a lack of donor funding, the implementation of the activities envisioned by this obligation has not taken place so far. Although the Ministry for Human and Minority Rights and Social Dialogue (MHMRSD) has in the meantime secured funds for the implementation of Activity 1 and plans its realization during 2026, the informal group of civil society organizations proposes that further work on this activity take place with the active participation of interested CSOs, particularly in the preparation of the ex post analysis and formulation of proposals for improving regulations in the area of grant financing.

Such an approach would contribute to realising the principle of co-creation in the development and implementation of the Action Plan, which has been insufficiently represented in practice so far. Following the adoption of the Action Plan, civil society organisations have very limited space for involvement in its implementation through expert support, despite their expressed willingness to contribute, their possession of relevant knowledge and capacities, as well as the fact that such a contribution would not require additional budgetary expenditures.

[13] Ibid, pp. 7-8.

In this specific case, the organizationCivic Initiatives already has a prepared draft regulation aimed at improving the transparency of the competitive procedure for allocating funds to civil society organisations. These circumstances further confirm that the initial step of each obligation within the Action Plan does not necessarily have to be the preparation of a new mapping analysis, especially when relevant findings, proposals, and elaborated normative models already exist that can serve as a basis for further improvement of regulations. More information about this proposal is available in the following chapter.

Assessment of Commitment 5 Fulfilment:

„Proactive Government - Information on Click"

This commitment is aimed at harmonising and improving the content of public authority websites, through a clear definition of categories of information that must be mandatorily available to the public. It was envisaged that standardisation would be achieved through amendments to the Decree on Detailed Conditions for the Development and Maintenance of Public Authority Websites, whereby the normative solution would precisely determine the minimum mandatory content.

The basis for such amendments should be a prior comprehensive mapping of information that authorities, in accordance with applicable regulations, are obliged to publish, as well as an analysis of relevant international and comparative standards regarding transparency and accessibility of data on institutional websites. In this way, it would be ensured that the domestic framework is aligned not only with existing legislation but also with good practices in the area of digital transparency.

Implementation of Commitment 5 is assessed with **limited progress** in fulfilment. This commitment was planned to be implemented through three activities:

1. mapping content on public authority websites;
2. forming a working group for amending the decree; and
3. adoption of amendments and supplements to the decree.

The first activity has been partially implemented; initial mapping of content and all types of information that authorities are obliged to publish on websites was prepared in accordance with applicable regulations on a sample of 52 laws and 110 by-laws in force, [14] however, the part of the activity related to the review of comparative practice and other relevant international standards remains to be fulfilled.[15] The remaining two activities within this commitment, forming the working group and amending the decree, have not

[14] Ibid, pp. 12.

[15] Action Plan for the implementation of the Open Government Partnership initiative in the Republic of Serbia for the period 2023-2027, pp. 33-38, available at: https://ekonsultacije.gov.rs/ogpPage/1

started.[16] The joint position of the informal group of civil society organisations is that the civil sector should be included in the realisation of activity 1 and its implementation should be significantly accelerated. In the context of activities 2 and 3, it is necessary to include civil society organisations in the working group for amending the decree and to enable the participation of the widest possible circle of interested parties through organising public consultations and public debate.

Assessment of Commitment 6 Fulfilment:

"Improving the Transparency of the Work of the Government of the Republic of Serbia"

The goal of this commitment is to improve the transparency and accessibility of documents and data related to the work of the Government of Serbia. During the first two years of Action Plan implementation, this commitment envisaged the preparation and review of findings from a comprehensive comparative analysis of various aspects of government work transparency in the region and selected EU member states, with a special focus on the manner and scope of publishing acts and documents arising within the decision-making process. The results of such an analysis were intended to serve as a basis for possibly defining further activities aimed at improving the transparency of the Government of the Republic of Serbia, which would be specified within the mandatory Action Plan revision.

The commitment includes the following activities:

1. Preparation of a comparative analysis of standards and mechanisms for ensuring transparency of government work, with recommendations for improvement

2. Review of the conducted analysis findings and definition of concrete activities, in accordance with accepted recommendations

The degree of fulfilment of Commitment 6 can be considered **limited with significant delay, insufficient communication of work done so far with working group members from the CSO sector, and contradictions**.

The comparative analysis has, according to claims by the representative of the General Secretariat of the Government, been completed and presented during 2025 to the stakeholders and partners involved in the realisation of this commitment. This information was obtained at the fifth meeting of the Inter-Ministerial Working Group for the development and monitoring of the AP, held on December 5, 2025. This is also confirmed by the Draft Minutes from this meeting[17], as well as the Draft Self-Assessment Report on AP

[16] Draft Self-Assessment Report on the Implementation of the Action Plan for the Open Government Partnership Initiative in the Republic of Serbia for the Period 2023–2027, Covering the Period December 2023 – December 2025, December 2025, p. 12, available at: https://ekonsultacije.gov.rs/ogpPage/1.

[17] The Draft Minutes is not a publicly available document. The document is available to members of the working group for the development and implementation of the AP OGP, including civil society organizations involved in the preparation of this document.

implementation[18]. However, the same minutes further state that "*A broader presentation of the findings did not take place due to previously explained circumstances, including institutional changes, but the intention to present the analysis results in a broader composition still exists, once the content of the Analysis in terms of recommendations is defined."*. This statement calls into question whether the activity was actually carried out or not, since the activity title indicates that the analysis should include recommendations for improvement.

Working group representatives from CSO ranks who attended the meeting reported that the representative of the General Secretariat of the Government first stated that the analysis in question was presented to CSOs from the AP OGP working group, after which civil society representatives included in the working group denied this information (these statements are not found in the Draft Minutes from the working group meeting).

We therefore point out here that the analysis was not presented to civil society organisations included in the AP OGP working group, nor to Partners Serbia who are the proponents of the commitment, and that it remains unclear at what stage of implementation activity 1 is.

For activity 1 to be considered fully completed, there must be evidence that the analysis has been prepared. As long as the analysis is not publicly available or at least delivered to OGP working group members, activity 1 cannot be considered completed. In this regard, the organization Partners Serbia sent questions and comments on the Draft Self-Assessment Report[19].

Activity 2 of this commitment is also delayed, as stated in the Draft Self-Assessment Report. This means that the implementation of activity 2 is being shifted to the other two years of AP implementation (2026 and 2027), instead of concrete activities being carried out in these two years towards improving proactive government transparency based on the analysis results and their review.

It is important to recall that the commitment, in its original form as proposed by the organisation Partners Serbia, had a significantly more ambitious goal. The initial proposal involved directly proceeding to concrete measures for improving proactive transparency of government work, through a series of clearly defined steps, including: regular publication of annual, quarterly, and other work plans and reports on their realization; publication of the schedule and topics of government sessions; providing live broadcasts or publishing session

[18] Ministry of Public Administration and Local Self-Government. (December 2025) Draft Self-Assessment Report on the implementation of the Action Plan for the Open Government Partnership (for the period December 2023 – December 2025), available at: https://mduls.gov.rs/wp-content/uploads/Nacrt-izve%C5%A1taja-o-sprovo%C4%91enju-AP-POU-2023-2027_za-period-2023-2025.docx
[19] Ibid.

recordings; publishing information on the manner of decision-making at sessions, as well as other data relevant to understanding the decision-making process.

In the harmonisation process, this commitment was, like most others within the Action Plan, significantly narrowed and reduced primarily to the preparation of an additional analysis, i.e., a re-mapping of the existing situation. Such an approach is particularly problematic given that relevant reports from international institutions already exist – primarily the European Commission and GRECO – as well as numerous analyses and recommendations from civil society organisations that clearly indicate which data sets should be the subject of proactive publication by the Government.

In this sense, the question arises of the justification for further postponing concrete normative and institutional steps through additional analyses, instead of moving to the phase of implementing already recognised transparency standards.

Recommendations for further activities include: presenting the comparative analysis to working group members, and formulating concrete measures for improving proactive transparency of government work that should be fulfilled by the end of this AP implementation.

Assessment of Commitment 7 Fulfilment:

„Open Government for a Better Quality of Life for Persons with Disabilities"

This commitment aimed to create a Support Map for Persons with Disabilities (PwD) based on the visualisation of machine-readable data relevant to the daily life of PwD. Commitment 7 includes the most activities in this AP – 8. The activities involve collecting, standardizing, and publishing data from seven different sources and/or types of data (social work centers, social enterprises, enterprises for professional rehabilitation and employment of PwD, active associations and federations with goals in the field of PwD, contact persons for exercising the right to VAT refund, training providers for PwD, National Employment Service), and their publication on a special platform – the Support Map.

Commitment 7 is formally **completed**, but with a reservation regarding one activity. The Support Map was created during 2025, and data within all seven categories was collected, standardised, and published on this platform.[20] However, data for some categories is not complete; for example, data on contact persons for exercising the right to VAT refund for importing motor vehicles for PwD is available only for 17 local self-government units (out of a total of 174). For clarification, additional information is needed on whether information is available for all LSGUs. Additionally, a significant challenge will be regular portal updates

[20] See more at: Support Map for Persons with Disabilities, https://app.powerbi.com/view?r=eyJrIjoiMmI5MTgzNDktODdjYy00ZmRiLWI4MDAtZjlhM2Y1OGE1NjJkIiwidCI6ImU5ODY5ZDllLTVmMTYtNDE1Ni04OWIwLWQ1MTYzMGZmNzAwMCIsImMiOjl9

in the future; therefore, it is necessary that the responsible institution for the realization of this commitment, which is the Ministry of Labour, Employment, Veterans and Social Affairs, dedicate additional capacities to this task even after the completion of the implementation of this obligation and the AP, bearing in mind the importance of this Roadmap for the OGP.

Assessment of Commitment 8 Fulfilment:

"Open 'Green' Data for More Accessible Information About the State of the Environment in the Republic of Serbia"

This commitment aimed to improve the availability and quality of information on the state of the environment through the development and publication of open "green" data. The improvement of the system for collecting, processing, and publicly publishing data relevant to environmental protection was envisaged. This enables citizens, civil society, and the professional public easier access to reliable information. The ultimate effect is strengthening transparency, public oversight, and informed participation in environmental protection issues.

Implementation of Commitment 8 is **completed**. This commitment consisted of four activities: 1) data mapping; 2) data preparation and standardisation; 3) publishing data on the Open Data Portal and the Environmental Protection Agency (EPA) portal; and 4) visualisation of published data on the EPA website. Data envisaged by activity 1 and this commitment were collected and published on the two designated portals and the EPA website.[21] Currently, data on allergenic pollen concentrations is available on the portal.[22]

It should be noted that all activities from this commitment were implemented even before the planned deadline, thereby opening "green" data to citizens for review in one place in a visually appealing way. Additionally, Commitment 8 was recognised by the Independent Reporting Mechanism (IRM) as a promising commitment, i.e., a commitment with transformative potential.[23] Therefore, its early implementation is significant in the context of improving citizen awareness about the state of the environment. A proposal for supplementing this activity through the AP revision process is available in the next chapter of the document.

Assessment of Commitment 9 Fulfilment:

„Establishment of a Unified Information System for Monitoring Project Co-financing in the Field of Public Information"

[21] See more at: https://data.sepa.gov.rs/ i https://data.gov.rs/

[22] Draft Self-Assessment Report on the Implementation of the Action Plan for the Open Government Partnership Initiative in the Republic of Serbia for the Period 2023–2027, Covering the Period December 2023 – December 2025, December 2025, pp. 20-21, available at: https://ekonsultacije.gov.rs/ogpPage/1

[23] Independent Reporting Mechanism (IRM), "Action Plan Review: Serbia 2023-2027," Open Government Partnership (OGP), p. 4, available at: https://www.opengovpartnership.org/wp-content/uploads/2024/09/Serbia_Action-Plan-Review_2023-2027_SR.pdf

This commitment aims to establish a unified and transparent system for monitoring project co-financing in the field of public information. The development of an information system enabling consolidated tracking of data on tenders, allocated funds, and project realisation was envisaged. This would increase the availability of information and facilitate public oversight of fund spending. The ultimate effect is strengthening institutional accountability and public trust in the media content co-financing process.

Implementation of Commitment 9 can be assessed as **formally completed, but with a certain reservation regarding the content and functionality of the platform.** Three activities envisaged within this commitment: 1) preparation and adoption of a by-law; 2) formation and technical development of the unified information system; and 3) commencement of the information system operation, were realised within the planned deadline.[24] The Unified Information System (UIS) was launched in 2025, and it hosts calls for co-financing projects in the field of public information. However, representatives of media organisations have pointed out on multiple occasions the non-functionality of the portal, and journalists' associations have repeatedly called on the responsible ministry – the Ministry of Information and Telecommunications – to improve the type of content and searchability of the portal.

Media and journalist associations (ANEM, UNS, NUNS, Lokal Pres, and Association of Media) sent an official letter to the Ministry of Information and Telecommunications in August 2025 with proposals for changes to the project co-financing process for media content, in which, among other things, it was demanded that a media project database be established within the UIS portal, which would be searchable by publishers and media at the republic, provincial, and local levels for easier accessibility and greater transparency of the process at all levels of government and insight into the database of all supported projects through project co-financing.[25] This is of exceptional importance as it would provide a clear picture of how much money on an annual level from multiple tenders has been allocated to the same media outlet, in order to remove suspicions of corruption and media favouritism.

More information about proposals for improving the UIS platform is available in the next chapter.

Assessment of Commitment 10 Fulfilment:
„Public Services Tailored to Citizens“

[24] Draft Self-Assessment Report on the Implementation of the Action Plan for the Open Government Partnership Initiative in the Republic of Serbia for the Period 2023–2027, Covering the Period December 2023 – December 2025, December 2025, p. 22, available at: https://ekonsultacije.gov.rs/ogpPage/1
[25] ANEM, “ANEM project co-financing database searchable by organizations that received funds in tenders,” available at: https://anem.org.rs/sr/strane/anem-baza-projektnog-sufinansiranja-pretraziva-po-organizacijama-koje-su-dobile-sredstva-na-konkursima

This commitment envisages the establishment of a system for measuring user satisfaction with services provided within existing one-stop shops (OSS), formed at local self-government units. Its realisation implies that users in each of the open OSSs have access to appropriate IT devices (such as tablets), through which they could electronically rate the quality of services provided or file a complaint.

Entered ratings and complaints would be forwarded in real time to the competent mechanism, i.e., a center established within the Ministry of Public Administration and Local Self-Government (MPALSG), which would be responsible for data processing, coordination of competent authorities' actions on received complaints, as well as providing feedback to users.

The commitment includes 3 activities:

1. Preparation of technical specifications and methodology for measuring user satisfaction within existing OSSs, including the method of data collection and processing, handling complaints, and reporting on results.
2. Ensuring technical conditions for implementing the measurement system, through procurement and installation of appropriate software and IT equipment.
3. Capacity building and establishment of a mechanism (contact center) within MDULS for receiving and processing data, coordinating competent authorities, and regular reporting.

This commitment records **limited progress** in implementation. Of the three planned activities, two were due for realisation by the end of 2025, of which one has been implemented. A technical specification with a methodology for measuring user satisfaction with services provided at One-Stop Shops was developed, which constitutes Activity 1.[26] The remaining two activities have not yet been realised. Activity 2 was planned for Q4 2024, and Activity 3 for Q1 2026, so it can be said that the implementation of Activity 2 is significantly delayed, and it is certain that there will also be a delay in the implementation of Activity 3.

Assessment of Recommendation Fulfilment:

"Modernisation and Improvement of Accessibility of Content, Information, and Data on the Website of the National Assembly of the Republic of Serbia"

This recommendation aims to improve the transparency and accessibility of the work of the National Assembly (NA) through the modernization of its website. The improvement of the structure, clarity, and accessibility of content, information, and data was envisaged, with special attention to user experience and digital accessibility standards. This facilitates

[26] Draft Self-Assessment Report on the Implementation of the Action Plan for the Open Government Partnership Initiative in the Republic of Serbia for the Period 2023–2027, Covering the Period December 2023 – December 2025, December 2025, pp. 22-23, available at: https://ekonsultacije.gov.rs/ogpPage/1

citizens' and the interested public's monitoring of the legislative process and the work of members of parliament. The ultimate effect is greater parliamentary openness and strengthening of democratic control and public trust.

The commitment includes the following activities:

1. Decision on amendments and supplements to the Decision on the establishment of the Editorial Board of the National Assembly website

2. Analysis of the needs of all interested parties regarding the type of content, information, and data that will be placed by priority in certain sections/segments of the National Assembly website

3. Successive realisation of the redesign of the National Assembly website

This recommendation, like commitment 6 relating to improving proactive government transparency, was narrowed through the consultation process with the National Assembly, so that first an analysis of the needs of all interested parties regarding the type of content, information, and data that will be placed by priority in certain sections/segments of the National Assembly website is prepared, and only then in a subsequent step the National Assembly website is redesigned.

Regarding the recommendation, the level of fulfilment is **limited** with the note that not all information affecting the assessment of commitment implementation is available. Of the three envisaged activities, the first and simplest has been fully realised – the adoption of the Decision on amendments and supplements to the Decision on the establishment of the Editorial Board of the NA website, which is a necessary prerequisite for comprehensive changes and modernisation of the NA website. This assessment is based on the Draft Self-Assessment Report[27] in which this is stated; however, it is not possible to verify this information, as the Decision is not available on the website of the National Assembly, nor has it been published in any other way. The analysis of the content needs, information, and data to be featured on the National Assembly's website has been started but has not been completed, although the deadline was the second quarter of 2025. Finally, the redesign and modernisation of the website is an activity that has not been started.[28]

It is particularly important to note that in the process of preparing the needs analysis of interested parties, which should include identifying types of information and

[27] Ministry of Public Administration and Local Self-Government. (December 2025) Draft Self-Assessment Report on the implementation of the Action Plan for the Open Government Partnership (for the period December 2023 – December 2025) https://mduls.gov.rs/wp-content/uploads/Nacrt-izve%C5%A1taja-o-sprovo%C4%91enju-AP-POU-2023-2027_za-period-2023-2025.docx

[28] Draft Self-Assessment Report on the Implementation of the Action Plan for the Open Government Partnership Initiative in the Republic of Serbia for the Period 2023–2027, Covering the Period December 2023 – December 2025, December 2025, p. 26, available at: https://ekonsultacije.gov.rs/ogpPage/1

functionalities of significance for users of the redesigned website, **civil sector representatives have not been included so far**. **This is particularly problematic given that the initiative for improving proactive transparency of the National Assembly** originated precisely from civil society organisations. For the envisaged needs analysis to be comprehensive and relevant, it must also include the civil sector as one of the key interested parties, alongside citizens, media, and the professional public.

The AP OGP implementation process rests on the principle of co-creation between institutions and civil society. **The lack of timely and meaningful inclusion of CSOs in this phase represents yet another example of the gap between formally assumed commitments and their application in practice.** The inclusion of the civil sector should not be a subsequent or symbolic activity, but an integral part of the planning and implementation process, especially when it comes to commitments that arose from joint initiatives and advocacy efforts of civil society organisations.

It is certain that the implementation of the remaining obligations will be carried over into the second half of the Action Plan's implementation period, but it is important that the Working Group and CSOs within the working group be involved in the remaining two activities in order to maximise the benefit for citizens from the redesign and modernisation of the National Assembly's website. This is a unique opportunity to achieve a long-term improvement of the website of Serbia's highest representative body.

Proposals for the Revision of Existing and Introduction of New Commitments

An informal group of civil society organizations (CSOs), established at the initiative of Partners Serbia with the aim of improving the Open Government Partnership (OGP) Action Plan through a more meaningful and inclusive revision process, has jointly developed recommendations for improving and supplementing existing commitments, as well as proposals for introducing entirely new commitments.

The group has developed **11 concrete proposals for amendments and improvements to existing commitments**, as well as **5 proposals for new commitments**.

Throughout the revision process of the Action Plan, the group of organisations advocated for the inclusion of the proposed amendments and new commitments.

The following section presents the proposed recommendations and amendments in detail **and the outcomes of the revision process.**

Commitment 1: "Electronic People's Initiative"

Although this commitment has already been implemented, considering that the electronic people's initiative was recognised as a promising commitment, its further development and improvement within the remaining period of the Action Plan would be justified.

Based on the shortcomings identified by CSOs during the implementation period — primarily the very limited number of users of this service on the eGovernment portal and the complexity of using the service — the following recommendations have been developed.

Recommendation 1

The informal group of organisations proposes the organization of a comprehensive public awareness campaign on the electronic service and the procedure for using it, involving all relevant institutions.

The objective of such a campaign would be to ensure that as many citizens as possible become familiar with the possibilities offered by the electronic people's initiative and understand how to use this digital service, ultimately increasing the number of users of this service available through the eGovernment portal.

Recommendation 2

Improving the e-service by enabling the complete digitalisation of the initiative-launching procedure.

This proposal was developed by the organisations *I Ja Se Pitam* and the National Coalition for Decentralisation.

The proposed activities would naturally build upon the already established electronic people's initiative service.

Currently, the applicable Regulation on the Electronic People's Initiative ("Official Gazette of the Republic of Serbia", No. 85/2023) regulates only the phase of electronic signature collection, but not the phase of initiating the initiative itself — namely, establishing the initiative committee, submitting the proposal to the competent assembly, and verifying the proposal.

As a result, the initiative committee is still required to physically convene, sign the proposal in written form, and submit it personally to the competent authority, despite the fact that Article 59 of the Law on Referendum and People's Initiative explicitly allows proposals to be submitted electronically.

It is therefore proposed that the Regulation be amended to also include the possibility of initiating an initiative through the use of an electronic signature (eSignature) via the eGovernment portal.

Such an amendment would eliminate the existing legal gap, reduce administrative barriers for citizens, shorten the duration of procedures, and increase public participation in decision-making processes.

Outcome:

Both recommendations were **accepted** and introduced in the draft of the revised Action Plan.

Commitment 2: "Towards More Meaningful Citizen Participation in the Development of Regulations and Public Policy Documents"

The informal group of CSOs considers that this commitment should be redefined during the revision of the Action Plan in order to ensure a substantive improvement of the regulatory framework governing citizen participation in decision-making processes.

Although the commitment has an ambitious title, its current scope is primarily limited to preparing an additional analysis (which was later abandoned) and considering its findings, without a clear link to concrete regulatory or institutional changes.

Instead of preparing the analysis, the Draft Self-Assessment Report on the Implementation of the Action Plan states that, in November 2024, the Republic Secretariat for Public Policies (RSPP) established a Working Group for preparing amendments to the regulatory framework on consultations and public debates (as Activity 2 under this commitment). The Working Group included representatives of relevant public administration bodies and CSOs

selected through a public call organised in cooperation between the RSPP and the Ministry of Human and Minority Rights and Social Dialogue.

This information is accurate: the Working Group was established, and CSOs were included in its membership. However, according to CSOs participating in the Working Group, the body has so far not worked on the "formulation of recommendations for improving public participation in the process of adopting regulations and public policy documents", as stated in the report.

Furthermore, there is no publicly available official document confirming that the mandate of this Working Group is to develop recommendations for improving public participation in regulatory processes.

According to CSO representatives participating in the Working Group, the only regulation that the group has seriously addressed so far is the Rules of Procedure of the Government. The proposed amendments to this regulation would in fact undermine the existing level of standards related to organising public debates. CSO representatives opposed these amendments, but their positions were not taken into account.

An additional challenge concerns the measurement of the success of this commitment, given that no new measurable and verifiable activities have been defined.

Although the Working Group has been established, the development of recommendations has not taken place so far. Therefore, the commitment should be supplemented with an activity related to preparing recommendations for improving public participation in regulatory processes (which would replace Activity 1 and provide evidence of substantive work under this commitment).

Furthermore, the commitment does not oblige the competent institution to accept the recommendations or to undertake concrete amendments to relevant regulations. It therefore remains unclear what the final "output" of this commitment will be and how its implementation can be effectively assessed.

Recommendation 3: Redefinition of Commitment 2

The focus of the commitment should be shifted from further mapping of the existing situation towards concrete steps aimed at improving regulations governing public debates, consultations, and the participation of interested stakeholders in the early stages of drafting laws and other public policy documents.

The revised commitment should include new activities leading to the adoption of regulatory amendments by the end of the Action Plan implementation period.

As a first step, it is necessary to assess whether a change of the institution responsible for implementation is required (currently, implementation is assigned to the Ministry of Human and Minority Rights and Social Dialogue).

In this regard, the following is proposed:

1. **Introduce a new activity within the commitment focused on developing recommendations for improving public participation in regulatory processes**, prepared by the existing Working Group (or by a newly established Working Group with this specific mandate).
2. **Use existing analyses and recommendations of international organisations and civil society** as a basis for defining further steps towards improving the regulatory framework for public participation.
3. **Initiate amendments to relevant regulations governing public debates and consultations** in the process of drafting laws and public policies, with the aim of strengthening timely, meaningful, and inclusive participation of citizens and CSOs.
4. **Ensure the involvement of civil society from the earliest stage of drafting amendments**, in line with co-creation principles, which represent one of the core standards of the Open Government Partnership.
5. **Include the adoption and/or amendment of relevant regulations as the final activity under this commitment**, ensuring that the revised Action Plan clearly demonstrates that regulatory changes aimed at improving citizen participation are envisaged before the end of the implementation period.

This approach would transform Commitment 2 into a commitment focused on concrete and measurable reform steps, rather than further delaying reforms through the work of a Working Group without a clearly defined objective and mandate. It would also ensure genuine progress in improving public participation in decision-making processes.

Outcome:

The recommendations were **accepted.** In the draft of the revised Action Plan, new activities are introduced, including the adoption and/or amendment of relevant regulations as the final activity under this commitment.

Commitment 3: "Improving Transparency in Monitoring Submitted Initiatives by Businesses and Citizens"

Commitment 3 has been completed. In relation to this commitment, additional activities are proposed aimed at improving transparency and ensuring more effective follow-up on initiatives submitted by businesses and citizens.

It is necessary to supplement the existing table published on the Open Data Portal with an additional column containing information on the proposer of the initiative.

It has been identified that such information would be valuable for facilitating communication and cooperation among initiative submitters. This would contribute to stronger cooperation among relevant stakeholders and help prevent duplication of initiatives addressing the same issues.

Recommendation 4

The Union of Employers of Serbia proposes a new activity building upon the existing Commitment 3.

The proposal is that business initiatives submitted under Commitment 3 should also be considered by the Social and Economic Council. In this way, selected initiatives submitted by businesses and citizens could be directly presented to the Prime Minister and relevant ministers, ensuring that initiatives with the greatest potential impact are discussed within an appropriate forum and receive support at the highest level of decision-making.

The Union of Employers of Serbia proposes that initiatives submitted by businesses and citizens relating to issues within the scope of the Law on the Social and Economic Council of the Republic of Serbia should also be reviewed by this body.

The Social and Economic Council is an advisory body that considers matters within its mandate and submits its positions and recommendations to the Government of the Republic of Serbia.

The Social and Economic Council of the Republic of Serbia consists of six representatives of the Government (the Prime Minister, the Minister Responsible for Labour, Employment, Veteran and Social Affairs, the Minister of Finance, the Minister of Economy, the Minister of Education, and the Minister of Health), six representatives of representative trade unions, and six representatives of representative employers' associations operating in Serbia.

Given that representatives of public authorities involved in drafting regulations or amendments to regulations often participate in the Council's work, it is particularly important that initiatives related to the Council's areas of competence are also considered within this body.

Article 9 of the Law on the Social and Economic Council of the Republic of Serbia stipulates that the Council considers issues related to the development and improvement of collective bargaining, the impact of economic policies and their implementation measures on social development and stability, employment policies, wage and price policies, competitiveness and productivity, privatisation and other structural adjustment issues, labour and environmental protection, education and vocational training, health and social protection and security, demographic trends, as well as other issues in accordance with the Council's acts.

Furthermore, Article 11 of the Law provides that the Social and Economic Council may establish permanent and temporary working bodies to consider specific areas and may include representatives of non-governmental organisations and experts in their work without voting rights.

Currently, the Council has permanent working bodies dealing with legislation, economic affairs, occupational safety and health, collective bargaining, and peaceful resolution of labour disputes.

In this regard, it would be beneficial for initiative submitters to be invited to meetings of the relevant permanent working body so that submitted initiatives could be considered directly.

Using the mechanisms provided under the Law on the Social and Economic Council would contribute to greater transparency in handling submitted initiatives and create an additional platform for advocacy and public policy development based on the needs of businesses and citizens.

Outcome:

Recommendation 4 has been **accepted**. The draft Action Plan incorporates an activity related to the development of a Memorandum of Cooperation between relevant institutions, which will establish mechanisms for the exchange of information with the Council.

Commitment 4: "Towards More Transparent Budget Spending through Improving the Process of Grant Allocation to Civil Society Organisations"

Considering the importance of public calls for allocating funds to CSOs and the lack of progress in implementing this commitment, the informal group of CSOs proposes that further work on this activity be carried out with the active participation of interested civil society organisations, particularly in preparing the ex-post analysis and formulating proposals for improving regulations governing public funding mechanisms.

Such an approach would contribute to applying the principle of co-creation in the development and implementation of the Action Plan, which has so far been insufficiently represented in practice.

In this specific case, the organization Civic Initiatives has already prepared a draft regulation aimed at improving the transparency of procedures for allocating public funds to civil society organisations.

Recommendation 5: Redefinition of Commitment 4

1. **Include civil society in the preparation of the ex-post analysis** through the submission of written comments, considering that the regulation concerns CSO financing and that organisations' practical experience with its implementation and challenges is essential for accurately assessing the existing situation.
2. **Include civil society representatives in the working group responsible for amending the regulation** and consider the draft model regulation developed by Civic Initiatives.
3. **Organise early public consultations and a public debate** to enable a broad range of stakeholders to contribute to the drafting process.
4. Regarding the substance of the regulation, it should meet at least the following **minimum standards** in order for the objective of this commitment to be considered achieved:

a. Public authorities must plan public calls for funding in advance through annual plans and public calendars of calls, with clearly defined areas, indicative budgets, and deadlines;

b. Selection criteria must be defined in advance, measurable, and publicly available, with transparent scoring and ranking procedures;

c. Decisions on project selection should be made by a commission composed primarily of independent experts and civil society representatives, with clear conflict-of-interest prevention rules and mandatory publication of commission members' names;

d. The competent authority must publicly disclose key information regarding the call, including ranking lists with scores by criteria, explanations of decisions, minutes of the commission meetings, and final funding allocation decisions;

e. Organisations must have the right to access documentation, submit complaints, and seek judicial protection against funding decisions;

f. The regulation must clearly define the content of funding agreements, payment schedules, eligible costs, and obligations of beneficiaries;

g. Implementation monitoring must include narrative and financial reporting, monitoring, and potential evaluation, while ensuring proportionality to project value and avoiding unnecessary administrative burdens;

h. Public authorities must publish annual reports on allocated funds and the results of funded programmes, enabling the public to understand how budget resources are used;

i. The regulation must establish accountability mechanisms and sanctions for public authorities that fail to conduct procedures properly or fail to publish required information, ensuring effective implementation.

Outcome:

The recommendations of the civil society sector were **not accepted**. The activities originally envisaged in the Action Plan have only been rescheduled to the end of the implementation period.

Commitment 5: "Proactive Administration – Information at the Click"

Considering delays in implementing activities under this commitment- particularly the fact that Activity 1 (preparation of a document mapping the content and types of information that public authorities are required to publish on their websites under existing regulations) is still ongoing, the remaining activities have consequently not yet started: (2) establishing a working group for amending the relevant regulation and (3) adopting amendments to the regulation.

The common position of the informal group of CSOs is that it is necessary to ensure the involvement of civil society in implementing Activity 1.

Civil society organisations possess relevant expertise in transparency, open data, and digital governance and can contribute to improving and supplementing the document being prepared.

At the same time, civil society representatives should be formally included in Activity 2, namely in the working group responsible for preparing amendments to the regulation, in order to make the development of regulatory solutions more efficient and of higher quality.

Additionally, Activity 3 should include mandatory public consultations and a public debate on the draft amendments to the regulation, enabling a wider range of stakeholders and experts to participate.

Such an approach would increase transparency of the process, improve the quality of proposed solutions, and ensure consistent application of participatory governance and co-creation principles, which are fundamental elements of the OGP process.

Recommendation 6

1. Ensure the formal and timely involvement of civil society organisations in implementing Activity 1 through a consultation process and the possibility to submit comments and proposals regarding the document being developed.
2. Include civil society representatives in the working group responsible for preparing amendments to the regulation (Activity 2), through an open and transparent selection process.
3. Ensure mandatory public consultations and a public debate on the draft amendments to the regulation (Activity 3), including publication of all relevant materials and reports on the consultation process.

Outcome:

The recommendations from civil society have **not been formally rejected**; however, the new draft Action Plan does not include any new wording indicating that these recommendations aimed at improving the obligation will be accepted. The only change reflected in the draft is the postponement of the implementation deadline to the end of 2027.

Commitment 6: "Improving Transparency of the Government of the Republic of Serbia"

Given the significant delays in implementation, as well as the fact that this commitment was substantially narrowed during the drafting of the Action Plan to include only the preparation of a comparative analysis of standards and mechanisms for ensuring transparency of government work, followed by consideration of its findings and definition of concrete activities, the original ambition of this commitment was considerably broader than its current scope.

Partners Serbia, in cooperation with members of the informal CSO group, has developed a proposal for redefining Commitment 6 in a way that leads to concrete and measurable results in improving proactive transparency of government operations.

Recommendation 7: Redefinition of Commitment 6

1. Present the findings of the comparative analysis to the public through a dedicated public event and ensure its publication in order to enable broader discussion on its conclusions and potential application.
2. Rely on existing reports and recommendations from international organisations (including the European Commission, GRECO, and other relevant bodies), as well as civil society analyses, as complementary inputs in mapping measures to improve proactive transparency of government work.
3. Define concrete, measurable, and time-bound measures to improve proactive transparency of government operations, to be implemented by the end of the current Action Plan period, in cooperation with CSOs and members of the OGP Working Group.
4. In terms of content, the following measures should be introduced as the basis for improving proactive transparency of the Government:

- Regular publication of key documents and information, including annual and quarterly work plans and implementation reports; agendas and topics of government sessions; information on decision-making processes; and other documents enabling public understanding of government decisions.
- Consideration of live streaming or publication of recordings of government sessions, with clearly defined exceptions where justified by the protection of other legitimate interests.
- Introduction of regular reporting on the implementation of transparency measures, with publicly available performance indicators.

This approach would shift Commitment 6 from an analytical phase to a phase of concrete and measurable actions, ensuring that the revision process results in tangible improvements in government transparency rather than further delays of already identified reforms.

Outcome:

The recommendations from civil society have **not** been **accepted**. A comparative analysis of standards and mechanisms for ensuring transparency of government work was produced, but it was shared exclusively with members of the working group. We advocated for the full publication of this document. The refusal to publish the analysis further illustrates a lack of political will to advance reforms in this area. The analysis clearly indicates that there is substantial room for improving proactive transparency in government practice. This represents a missed opportunity to incorporate these findings into activities for the

improvement of proactive transparency within the Action Plan. The only change reflected in the draft of the Action Plan is the postponement of the implementation deadline to the end of 2027.

Commitment 7: "Open Government for Improving the Quality of Life of Persons with Disabilities"

This commitment aimed to develop a Support Map for persons with disabilities, based on the visualisation of machine-readable data relevant to their daily lives. The implementation of this commitment has been completed.

Recommendation 8

Additional efforts should be invested in the promotion of the platform.

Beyond promotion, it is necessary to establish mechanisms for the regular updating of available data, with clearly defined timelines, such as annual or quarterly updates of the information provided.

Outcome:

This recommendation has **neither been accepted nor rejected**. The revised draft Action Plan indicates that further improvements of the commitment are planned through the addition of activities aimed at opening and visualising new datasets in this area.

Commitment 8: "Open Green Data for Improved Access to Environmental Information in the Republic of Serbia"

The organization Team 42 proposes a new activity under Commitment 8, considering that this commitment has been successfully implemented. The proposal is also supported by a broader informal group of organisations involved in the preparation of this document.

Recommendation 9

The proposed new activity foresees the opening and visualisation of additional datasets in the fields of air quality management, water management, and waste management. This includes, for example, data on stationary point sources of pollution, wastewater quality, landfill sites, and municipal waste collection, among others.

Relevant institutions, businesses, and other entities are already obliged under existing regulations to submit these data to the Environmental Protection Agency (EPA).

Opening and visualising these datasets would significantly improve public access to environmental information and enhance compliance with EU standards. It would also create preconditions for meaningful reuse of environmental data.

Responsible institution: Environmental Protection Agency (EPA)

The commitment consists of three interconnected components:

First, regular updating and publication of data in machine-readable formats on the national Open Data Portal, the EPA website, and other relevant platforms, in line with EU policies and regulations, particularly the Open Data Directive (2019/1024/EU) and the EU regulation on High-Value Datasets.

Second, opening new datasets in the areas of air, water, and waste management. Although the EPA already collects and publishes extensive reports, data is often fragmented, published in non-machine-readable formats such as PDF, and difficult to search and analyse. Sectoral legislation (Air Protection Law, Water Law, and Waste Management Law) already provides a basis for systematic publication of these datasets in open formats.

Third, adequate visualisation and presentation of standardised datasets to make complex environmental information understandable and usable for both experts and the general public, thereby enabling reuse for research, analysis, and advocacy purposes.

Outcome:

The proposals of the civil society sector have been **partially accepted**. The revised draft Action Plan indicates that this commitment will be expanded through the publication of new datasets on water quality in watercourses, reservoirs, and groundwater quality, as well as data on air quality from monitoring stations for the past 30 days.

Commitment 9: "Establishment of a Unified Information System for Monitoring Project Co-Financing in the Field of Public Information"

This commitment was formally implemented in 2025 by the Ministry of Information and Telecommunications (MIT). However, users of the portal, particularly media professionals, have identified certain shortcomings and usability issues.

Based on their experience, several media associations (ANEM, UNS, NUNS, Local Press, and the Media Association) have developed proposals for improving the Unified Information System (UIS):

Recommendation 10: Improvements to the UIS Portal

- Introduce an obligation for the Ministry of Information and Telecommunications to collect feedback on the functioning of the UIS as a prerequisite for addressing technical deficiencies prior to and during the next funding cycle.
- Ensure that all documentation published on the UIS is machine-readable.
- Establish a searchable database of media projects, enabling searches by publishers and media outlets at national, provincial, and local levels. The database should include information on awarded funding amounts and lists of projects per applicant.
- Establish a searchable database of commission members at all levels of government, including their biographies and scoring results from selection procedures, thereby further enhancing transparency of the project co-financing process.

Outcome:

These recommendations were **rejected**. The representative of the Ministry stated that they are not prepared to work on these proposals, and that their priority is for media organisations currently boycotting participation in the Ministry's working groups on improving media regulation to become members of these working groups. This was indirectly presented as a condition, suggesting that the Ministry's willingness to address issues important to independent media in Serbia depends on the termination of the boycott.[29]

Recommendation: Modernisation and improvement of the accessibility of content, information and data on the website of the National Assembly of the Republic of Serbia

Recommendation 11

Civil society should be included in the preparation of the Analysis of the needs of all stakeholders concerning the type of content, information and data that will be located in certain segments of the National Assembly website, according to the priorities (Act. 2 of this Recommendation). Since civil society representatives have not been included in the needs assessment process to date, their involvement is necessary to ensure that the analysis is

[29] The boycott emerged in the context of widespread protests taking place in Serbia for nearly two years, during which independent media reporting on the protests have been subjected to both psychological and physical harassment and pressure, as well as due to the increasing involvement of government aligned media associations and organizations, which, despite lacking genuine independence and representativeness, are being legitimized by the authorities and included in policy-making processes concerning the media sector.

comprehensive and relevant. This can be achieved through written submissions, focus groups, and other participatory mechanisms.

Outcome:

The recommendation to formally include civil society at least through the submission of written proposals has **not** been **accepted**. The draft revised Action Plan indicates only that the implementation deadline has been extended to the end of 2027.

New Commitment 1: "Improving the Legal Framework for Civic Initiative and Local Referendum"

The proposal was developed by the organization Center for Policy Research Argument.

The existing legal framework governing civic initiatives and local referenda stipulates that, even after citizens collect the legally required number of signatures, the final decision on whether to call a referendum rests with the municipal or city assembly. In practice, this procedure allows the representative body, typically guided by a political majority, to reject initiatives supported by a significant number of citizens. This effectively neutralises the substantive right of citizens to participate directly in decision-making processes.

Such a regulatory design undermines public trust in institutions, discourages civic participation, and calls into question the effectiveness of civic initiatives as a tool of direct democracy.

The proposed amendment seeks to revise the normative and procedural framework to ensure that, in cases where a civic initiative for calling a local referendum meets all legally prescribed conditions (number and validity of signatures, subject matter of the initiative, and deadlines), the decision to call the referendum is no longer subject to political discretion by the municipal or city assembly.

The obligation would introduce a mechanism of automatic or binding calling of referenda, while retaining only formal-legal review (verification of legality and fulfilment of procedural requirements), without any substantive decision-making authority on behalf of citizens.

Outcome:

The proposal was **rejected** on the grounds that the legal framework already exists.

New Commitment 2: "No More Silence: A Transparent and Participatory System for Monitoring Institutional Responses to Violence Against Women"

The proposal was developed by the Association of Lawyers AEPA.

AEPA proposes a commitment focused on gender equality and the establishment of a transparent and comprehensive system for collecting data on violence against women and improving the protection of women in Serbia.

Data on violence against women and the actions of competent institutions in the Republic of Serbia are currently maintained across multiple separate systems and institutions, without a unified methodology, standardised indicators, or public availability in aggregated and anonymised form. There is no comprehensive national overview that would enable systematic monitoring of how institutions handle reported cases, nor insight into the effectiveness and consistency of protection measures.

A key element of the proposed commitment is the systematic collection, consolidation, and public dissemination of aggregated and anonymised data on institutional responses, based on a unified methodology and standardised indicators. This would establish a reliable and comparable evidence base for monitoring system performance, identifying patterns and structural inconsistencies, and assessing the effectiveness of applied measures. In this way, public policy in this area would shift from a reactive to a proactive, evidence-based approach.

Although Serbia has established a normative and institutional framework for preventing and protecting against violence against women, there is a lack of transparent, regular, and comparable public reporting on how this framework is implemented in practice, where gaps occur, and what the actual outcomes of institutional responses are. This limits public oversight, hinders the identification of systemic weaknesses, and reduces institutional accountability.

At the same time, user research and civil society experience indicate a strong need among women who have experienced violence for clear, reliable, and accessible information on their rights, procedures, and institutional responsibilities, as well as for educational and supportive content. The absence of a unified, accessible, and verified information source contributes to distrust in the system, delays in reporting violence, and difficulties in accessing legally guaranteed protection.

The lack of an integrated, transparent, and participatory system linking institutional performance data, public insight into the work of competent authorities, and user perspectives represents a significant obstacle to evidence-based policymaking and to strengthening public trust in the system for protection against violence against women.

The proposal is elaborated in detail and consists of the following activities: (1) establishment of an intersectoral working group; (2) development of methodology, indicators, and data exchange protocols; (3) development and launch of a national public platform; and (4) quarterly and annual reporting.

Outcome:

The proposal submitted by the AEPA organization was **rejected** on the grounds that work on a platform addressing these issues has already been initiated in the meantime. The "Isključi nasilje" platform has been launched and currently includes a section containing some statistical data related to this field, although not comprehensively covering all relevant data in this area.

New Commitment 3: "Establishing the SOVA Platform – A National Platform for Transparent Monitoring of Environmental Noise Levels"

The proposal was developed by the Association of Lawyers AEPA.

This commitment envisages the establishment of a national platform for transparent monitoring of environmental noise levels (hereinafter: SOVA Platform – acronym for System for Observation and Valuation of Ambient noise). The platform would integrate a public e-portal with an interactive noise map, a central environmental noise database, and a mobile application enabling citizens to report noise incidents.

The objective of the SOVA Platform is to ensure a unified, standardised, and easily accessible overview of environmental noise levels, as well as to improve communication between citizens and competent institutions, in line with the principles of transparency, public participation, and accountability of public authorities.

The platform would enable integration of existing noise-related data from various institutional sources, including measurement data, strategic noise maps, noise zoning data, and aggregated citizen reports. It would provide data visualisation through an interactive geospatial map and ensure publication in standardised and machine-readable formats, in accordance with applicable regulations.

Within the SOVA Platform, a central database on environmental noise would be established, enabling standardised data collection, processing, and exchange between institutions, as well as public access to aggregated and anonymised data, in compliance with personal data protection and business confidentiality regulations.

This commitment contributes to increased transparency and strengthened public participation, which are core values of the Open Government Partnership (OGP) initiative.

At the same time, it enhances public accountability by increasing the availability of data on environmental noise levels and mitigation measures. Public access to such data would enable

citizens, civil society organisations, and the media to monitor policy implementation and identify areas requiring improvement.

The proposed commitment is aligned with contemporary European approaches in environmental protection, data governance, and transparency, and contributes to further strengthening the environmental noise management system in the Republic of Serbia.

Outcome:

This proposal was **rejected** on the grounds that it is necessary to first amend the legal framework and the way local institutions report on noise and other relevant data in order for this initiative to be implemented. Considering that the organization AEPA has been advocating for the opening and systematisation of noise-related data for years, it is clear that there is no institutional willingness to work on this issue.

New Commitment 4: "Single Portal for Business Calls and Support Programs"

The proposal was developed by the Union of Employers of Serbia.

This commitment involves the development of a centralised portal for business-related calls, providing consolidated information on all public calls, competitions, and support programs intended for business entities. The initiative would consolidate information currently dispersed across the websites of various ministries, state institutions, local self-governments, development agencies, and other public bodies.

The portal would include both financial and non-financial support measures, ranging from mentorship programs and business plan development support to tax incentives and other fiscal benefits. It would also cover subsidies for equipment procurement, machinery, agriculture, science, tourism, innovation and innovative activities, women's entrepreneurship, social entrepreneurship, sustainable economic development, renewable and hybrid energy, as well as employment incentives, among others.

In addition to information on available support programs, the centralised portal would provide comprehensive data on eligibility criteria, application deadlines, required documentation, and results of implemented calls.

It would also include advanced search and filtering functionalities by sector, type of support, territorial jurisdiction, or target user group, as well as automated notifications about new calls.

Furthermore, a dedicated section within the portal would provide information on calls, support programs, and cooperation opportunities intended for professional associations and

business-related organisations. This would further enhance connectivity between the private sector, public institutions, professional associations, and citizens.

To ensure long-term benefits from the use of data available on the portal/register, it is proposed that the competent ministry, in coordination with line ministries, public institutions, national funds, and local self-governments, regularly updates the register to ensure real-time accuracy and completeness of information for investors, stakeholders, and the general public.

This would significantly facilitate access to information on available incentives for business entities, particularly small and medium-sized enterprises and entrepreneurs, which constitute the backbone of the national economy.

Outcome:

The proposal was **not accepted**. It was noted that a business information platform already exists within the relevant ministry. However, this portal is not sufficiently informative, as information of the type envisaged in the proposal is currently dispersed across the websites of multiple institutions (both on the national and local level). The relevant ministry indicated that it plans to address this issue in the future, but did not agree to undertake any specific commitment within the framework of this Action Plan.

New Commitment 5: "Revision and Enhancement of the Media Register"

The proposal was developed by the Balkan Investigative Reporting Network Serbia (BIRN).

The objective of this commitment is to consolidate national media registers into a single unified register/portal and align them with the new standards introduced by the European Media Freedom Act (EMFA), thereby improving transparency and accessibility of media-related information.

The Croatian media register was proposed to serve as a reference model: https://vsif.aem.hr/

The commitment would include:

1. Analysis of EMFA standards,
2. Alignment of secondary legislation with new functional requirements, and
3. Development of a centralised media register portal or technical upgrade of the existing system, if feasible.

Currently, Serbia maintains three separate databases managed by state authorities: the Media Register and Register of Media Content Producers maintained by the Business Registers Agency (Articles 45–52 of the Law on Public Information and Media), and the Register of Media Services maintained by the Regulatory Authority for Electronic Media (Article 7, paragraph 8 of the Law on Electronic Media).

These registers already contain some of the information required under EMFA (e.g., ownership structure, editors, and individuals holding more than 5% of shares). However, they lack systematically organised data on ultimate beneficial ownership as defined under Directive (EU) 2015/849, structured information on state advertising expenditures, and total revenues received from public entities or third countries, as required by EMFA.

Another key challenge is the irregular updating of data. For example, financial contributions from public procurement or advertising contracts are not consistently reported by public authorities, and therefore, are not systematically recorded by the registrar.

Finally, data accessibility and interoperability remain limited. The Media Register of the Business Registers Agency, for instance, allows searches only by media name or registration number, while search functionality by ownership is not available, and the existing registers are not interconnected.

Outcome:

The proposal was **not accepted.** As in the case of the rejection of Recommendation 10 in this document, the Ministry of Information and Telecommunications stated that it will work on aligning with the EMFA, but that it is not prepared to proceed with this proposal. As in the previous example, it was also implicitly suggested that the Ministry will not engage further with media stakeholders unless independent media end their boycott and agree to participate in working groups led by the Ministry.

Conclusions: Participation in the OGP Action Plan Revision Process

Following CSOs' engagement in the revision process of the Open Government Partnership (OGP) Action Plan of the Republic of Serbia (2023–2027), we present the following conclusions based on the collective experience of a group of civil society organisations participating in both the monitoring and the revision process of the Action Plan.

The current Action Plan cycle represents Serbia's first four-year OGP Action Plan. While the extended implementation period was intended to provide additional space for more ambitious and structural reforms, in practice it has largely resulted in the postponement of implementation rather than its acceleration. A significant number of commitments have not progressed within the first half of the cycle and have instead been deferred toward the end of the implementation period, without sufficient corrective measures to address underlying implementation barriers.

Our analysis indicates a clear pattern in implementation dynamics. Commitments of a technical nature- particularly those related to the publication of existing information or the consolidation of available datasets have generally advanced more successfully. **In contrast, commitments requiring political will, regulatory amendments, or institutional change have been systematically delayed, narrowed in scope, and deprioritised.** This suggests that the main constraint is not technical feasibility, but rather the level of political commitment to open government reforms.

As a result, several potentially transformative commitments have not been implemented within the expected timeframe, despite their relevance for strengthening transparency, accountability, and citizen participation.

An additional structural weakness concerns the limited application of the co-creation principle during the implementation phase. Although civil society representatives formally participate in the OGP Working Group, communication between institutions and civil society remains irregular and largely unstructured. Civil society is not systematically informed about progress, delays, or implementation challenges. Consequently, co-creation is effectively concentrated in the design phase of the Action Plan, while its implementation phase lacks meaningful participatory oversight.

The revision process was expected to address these shortcomings and strengthen both the ambition and effectiveness of the Action Plan. However, its outcomes indicate only limited progress in this regard. Out of 16 recommendations submitted by civil society, only four

were accepted, while the majority were rejected. In several cases, rejections were justified by reference to existing or parallel activities outside the Action Plan framework.

Although certain improvements were introduced, particularly in areas related to citizen participation, digital services, and environmental data transparency, **the revision did not substantially enhance the overall ambition or implementation capacity of the Action Plan.** Most delayed commitments were simply extended until 2027, without introducing stronger corrective mechanisms or addressing the systemic causes of delay.

As a result, **the revision process has largely functioned as an administrative extension mechanism rather than a substantive opportunity to strengthen reform commitments. Instead of recalibrating ambition, improving implementation feasibility, or introducing new transformative measures, the revised Action Plan has largely preserved its original structure with limited qualitative improvement.**

We acknowledge the efforts of the Ministry of Public Administration and Local Self-Government, which coordinates the OGP process in Serbia, and its openness to dialogue and cooperation throughout the process. However, the key constraints identified in this analysis appear to stem less from coordination issues and more from insufficient political prioritisation of OGP commitments by implementing institutions.

Overall, the revision process did not result in a substantial strengthening of the Action Plan in terms of ambition, scope, or implementation mechanisms.

In light of these findings, we consider it important for relevant OGP mechanisms to further reflect on several systemic issues, including the suitability of four-year Action Plans in contexts with limited political commitment, the need to strengthen accountability during implementation phases, and the design of revision processes that go beyond deadline extensions and instead ensure substantive improvement of Action Plans. Equally important is the need to strengthen meaningful co-creation throughout the entire implementation cycle, not only during the development phase.

Finally, based on the experience of the current cycle, we believe that the eligibility of Serbia for four-year OGP Action Plans should be reconsidered. In contexts where extended implementation periods contribute more to postponement than to progress, shorter Action Plan cycles combined with stronger monitoring and accountability mechanisms may provide a more effective framework for achieving meaningful reform outcomes.

Annex 1: List of organizations that participated in the preparation of this document and/or supported the findings and recommendations

1. Association of Lawyers AEPA (Asocijacija pravnika AEPA)
2. Association of Judicial Assistants (Asocijacija sudijskih pomoćnika)
3. Balkan Investigative Reporting Network Serbia (Balkanska istraživačka mreža Srbije)
4. Belgrade Open School (Beogradska otvorena škola)
5. Civic Initiatives (Građanske inicijative)
6. Center for Policy Research Argument (Centar za istraživanje u politici Argument)
7. Center for Growth and Development (Centar za rast i razvoj)
8. CHRIS Network of Human Rights Committees (CHRIS Mreža odbora za ljudska prava)
9. Foundation Center for Democracy (Fondacija Centar za demokratiju – FCD)
10. Initiative "And I Ask Myself" (Inicijativa I Ja se Pitam)
11. Youth Initiative for Human Rights (Inicijativa mladih za ljudska prava)
12. Institute for Corruption Research – KAREJA (Institut za istraživanje korupcije – KAREJA)
13. Human Resources Chamber of Serbia (Kadrovska komora Srbije)
14. National Youth Council of Serbia (Krovna organizacija mladih Srbije – KOMS)
15. Media & Reform Center Niš (Media & Reform Center Niš)
16. National Coalition for Decentralization (Nacionalna koalicija za decentralizaciju)
17. Independent Journalists' Association of Serbia (Nezavisno udruženje novinara Srbije)
18. Human Rights Committee Niš (Odbor za ljudska prava Niš)
19. Youth Center EUNI (Omladinski centar EUNI)
20. Partners for Democratic Change Serbia (Partneri za demokratske promene Srbija)
21. Legal Academy of Serbia (Pravnička akademija Srbije)
22. Friends of Brodarevo (Prijatelji Brodareva)
23. Team 42 (Tim 42)
24. Association Beyond (Udruženje Beyond)

25. Association for Promotion and Environmental Marketing of Natural Values “Ekomar” (Udruženje za promociju i ekološki marketing prirodnih vrednosti Ekomar)
26. Union of Employers of Serbia (Unija poslodavaca Srbije)