

Report on Public Consultations
on the Draft Rulebook on the Detailed Content and Guidelines for Determining the National Objectives of the Integrated National Energy and Climate Plan, the Method for its Preparation and Reporting on its Implementation

Pursuant to Article 8b of the Energy Law (“Official Gazette of the Republic of Serbia”, Nos. 145/14, 95/18 – other law, 40/21, 35/23 – other law, 62/23, 94/24 and 109/25 – other law), in 2022, the Ministry of Mining and Energy adopted the Rulebook on the Detailed Content and Guidelines for Determining the National Objectives of the Integrated National Energy and Climate Plan, the Method for its Preparation and Reporting on its Implementation (“Official Gazette of the Republic of Serbia”, No. 49/2022) (hereinafter: the Rulebook).

In December 2024, adapted EU Regulation 2022/2299 was adopted, defining the areas and types of data to be reported on the implementation of the Integrated National Energy and Climate Plan of the Republic of Serbia. In addition, the European Environment Agency established the Reportnet platform, while the European Commission established the Policy Reporting Platform, which are used for reporting on the implementation of the Integrated National Energy and Climate Plan of the Republic of Serbia.

In view of the above, it was necessary to amend the Rulebook in accordance with the new reporting obligations.

The Draft new Rulebook was prepared within the framework of the project “Improved Monitoring, Reporting and Updating of Integrated National Energy and Climate Plans in accordance with the Energy Law and Obligations under the Energy Community Treaty” (SEA-2023-31187), financed by the European Union. The project provides technical assistance to the Ministry of Mining and Energy and other relevant ministries in the development, monitoring and updating of Serbia’s Integrated National Energy and Climate Plan in accordance with the new obligations.

The implementation of the project commenced in May 2025 and will last for 30 months.

For the purpose of preparing the Draft Rulebook, a Working Group was established comprising representatives of the Ministry of Mining and Energy, the Ministry of Environmental Protection, the Ministry of Economy, the Ministry of Science, Technological Development and Innovation, and the Ministry of Construction, Transport and Infrastructure.

The Draft new Rulebook transposes the adopted and adapted EU Regulation 2022/2299 and establishes a national reporting system defining the roles and responsibilities of:

- the National Reporting Coordinator – the Ministry of Mining and Energy – responsible for the process of preparing, monitoring and reporting on the Integrated National Energy and Climate Plan;
- Lead and Supporting Reporters, appointed by the Ministry by decision from among its employees, responsible for completing one or more reporting templates related to reporting on progress in the implementation of the Integrated National Energy and Climate Plan;
- ministries and other state authorities, public enterprises, energy entities, local self-government authorities and, where necessary, other entities, responsible for providing data and information within their respective areas of competence.

The Rulebook provides for:

- deadlines for the submission of data and information;
- verification of data for reporting on progress in the implementation of the Integrated National Energy and Climate Plan;
- reporting format;

- content of reporting on progress in the implementation of the Integrated National Energy and Climate Plan.

Pursuant to Article 8a, paragraph 5 of the Energy Law (“Official Gazette of the Republic of Serbia”, Nos. 145/14, 95/18 – other law, 40/21, 35/23 – other law, 62/23, 94/24 and 109/25 – other law) and Article 15, paragraph 1 of the Law on State Administration (“Official Gazette of the Republic of Serbia”, Nos. 79/2005, 101/2007, 95/2010, 99/2014, 30/2018 – other law and 47/2018), the Ministry of Mining and Energy conducted public consultations on the Draft Rulebook from 22 April to 11 May 2026.

By publishing a Public Call on the Ministry’s website Public Consultations – Ministry of Mining and Energy <https://www.mre.gov.rs/tekst/95/javne-rasprave.php> , as well as on the eConsultations Portal <https://ekonsultacije.gov.rs/>, the Ministry of Mining and Energy invited representatives of all public authorities in the Republic of Serbia, interested citizens, companies, civil society organisations, representatives of the academic community and other interested stakeholders to participate in the consultation process on the Draft Rulebook.

In addition, the Ministry of Mining and Energy submitted the Draft Rulebook for comments to the European Environment Agency and the Energy Community Secretariat, which coordinate the process of reporting on the implementation of the Integrated National Energy and Climate Plan.

Suggestions and comments were received from the Energy Community Secretariat, the European Environment Agency, and the Centre for Ecology and Sustainable Development (CEKOR).

An overview of the comments received and the corresponding responses is provided below.

Energy Community Secretariat			
Коментар, питање, мишљење Comment, question, opinion		Образложење коментара Explanation of the comments	Одговор Reply
1.	Article 15 of the Rulebook (Updating the NECP) appears to conflate the provisions of the Governance Regulation concerning: a) the updating of the NECP (which is to be carried out for the first time in 2033 and subsequently every 10 years if the Contracting Party determines that this is justified, in accordance with Article 14); and b) the preparation and submission of a new NECP (the draft to be submitted to the Energy Community Secretariat by January 2028 and the final NECP by January 2029, in accordance with Article 3). It is important that both provisions are included and clearly		The comment is accepted. The text has been amended accordingly.

	distinguished, since an updated NECP covers the same time period and the same targets, whereas a new NECP covers a different period and sets different targets. Furthermore, the possibility of not submitting an amended NECP where there is no justified need to do so applies only to an update (2033), and not to a new NECP (2028/2029).		
2.	The Draft new Rulebook retains provisions on targets covering the period 2024–2030, which constitutes a technically correct transposition of the Governance Regulation and Implementing Regulation 2022/2299. However, in practice, defining this time period for NECPs will have limited practical value, as there will be no updated or new NECP using this timeframe. The next NECP to be submitted will have to cover the period 2030–2040. On the other hand, for NECP Progress Reports (NECPRs), defining the period 2024–2030 remains relevant, as the 2027 and 2029 reports will monitor progress towards achieving the 2030 targets.		The comment is accepted. The wording “2024–2030” will be replaced with “by 2030” in order to provide greater clarity and consistency with future planning cycles, while retaining its relevance for reporting on progress (NECPR).
3.	In the meantime, ReportENER has been renamed the “ Policy Reporting Platform ”, and it is managed by the European Commission, rather than by the Energy Community Secretariat.		Corrected.
European Environment Agency			
Коментар, питање, мишљење Comment, question, opinion		Образложење коментара	Одговор Reply

		Explanation of the comments	
1.	Article 17 of the Rulebook provides for reporting only through the NECP Progress Report (NECPR) and covers most of the relevant reporting obligations. However, I would like to draw attention to several reporting obligations which do not appear to be covered by this Rulebook. These are the Greenhouse Gas (GHG) Inventory and Greenhouse Gas (GHG) Projections.	Article 17(3) of the adapted Governance Regulation links the Projections (further elaborated in Article 18) and the GHG Inventories (further elaborated in Article 26) with reporting under the NECPR. The Ministry of Mining and Energy has an appointed Lead Reporter for Projections, while the GHG Inventory falls under the competence of the Serbian Environmental Protection Agency. If I have overlooked these provisions, I apologise. In addition, for completeness, I would like to point out that there are four reporting obligations to the European Environment Agency (EEA) that do not fall within the scope of NECPR reporting, but for which Serbia still has reporting obligations under the adapted Governance Regulation. These four obligations are: – approximate GHG inventories, Article 26(2), Implementing Regulation 2020/1208, Annex VI; – national planning and strategies for adaptation to climate change, Article 19(1), Implementing Regulation 2020/1208, Annex I; – use of revenues from carbon pricing mechanisms, Article 19(2), Implementing Regulation 2020/1208, Annex II; – support to	Наведено није предмет Правилника. Правилником се не транспонује у потпуности адаптирана Уредба о управљању већ само део који се односи на Инетгрисани национални енергетски и климатски план и с тим вези обавезе извештавања.

		developing countries, Article 19(3), Implementing Regulation 2020/1208, Annexes III and IV. These four obligations, as far as I can see, are not covered by the Rulebook.	
2.	Article 25 seems to focus on PaMs reporting. While both the GHG Inventory and GHG projections have important links to PaMs (so I'd say that the addition can stay), for the completeness of NECPR reporting, the production and submission of these two components is essential.		Corrected
Centre for Ecology and Sustainable Development (CEKOR)			
Коментар, питање, мишљење Comment, question, opinion		Образложење коментара Explanation of the comments	Одговор Reply
1.	Insufficient legal precision. A large number of formulations such as “if relevant”, “if applicable” and “to the extent possible” are used.	This leaves too much discretion to the administration, creating a risk of inconsistent application and lack of effective control.	Not accepted. The Draft new Rulebook transposes adopted and adapted EU Regulation 2022/2299, which provides definitions in Article 1. (1) “mandatory if applicable” means the following categories of information that Member States are required to provide: (a) information relating to national objectives, targets and contributions or national policies and measures, only if they have been established or adopted by the Member States; (b) information on how Member States are following up on a recommendation issued in accordance with Article 32(1) or (2) of Regulation (EU) 2018/1999, only if the Commission has issued such a recommendation. (2) “mandatory if available” means a category of information that Member States are required to provide only if such information is available at the time of submission of the biennial progress report.
2.	Excessive centralisation in the Ministry: conflict of roles (control +		The Ministry has the role of coordinator in the reporting process, taking into account that it is also the coordinator of

	implementation).		the process of preparing the document. Article 11 identifies the institutions participating in the preparation of the document, while Article 12 defines the role of the Ministry of Mining and Energy. Articles 17 and 18 define the role and responsibilities of the Ministry as the coordinator of the reporting process. It should also be taken into account that the majority of targets, policies and measures in the field of energy and climate fall within the competence of the Ministry of Mining and Energy.
3.	Undefined responsibility of “Lead Reporters”: no personal/institutional accountability.		Defined in Articles 11 and 19.
4.	Lack of data standards.	There are no specific standards (IPCC? Eurostat? EEA?)	Data standards and methodologies are not subject to this Rulebook. The data used must be official and provided in accordance with national legislation governing official statistics, as well as with relevant methodologies and guidelines, where applicable.
5.	Energy poverty – insufficiently operationalised.	There is no defined indicator, threshold or methodology.	Indicators, thresholds, methodology, as well as measures and policies for reducing energy poverty will be defined in the Action Plan for the Reduction of Energy Poverty.
6.	How is the quality of data provided by local self-governments ensured?		All data used for the preparation of the document and for the reporting process must be official and verifiable, regardless of whether they are collected at the national or local level.
7.	How is the NECP linked to the budgetary process?		The NECP is linked to the budgetary process through the identification of the financial resources and sources of funding required for the implementation of the defined measures and policies. The required funding is aligned with the applicable Law on the Budget of the Republic of Serbia and is verified in consultation with the Ministry of Finance during the process of adopting the NECP.