



Anti-Illicit Trade & Food Committee 2-YEAR PROGRAM (2026-2028)

1. Priority (topic) **Consistent Implementation of the National Program for Fighting the Grey Economy**

Combating illicit trade should remain a top priority on the agenda of the Government. Ensuring consistent and effective implementation of the Law on Inspection Supervision, harmonization of sectoral legislation in line with Article 69, full implementation of the Law on Official Controls, and strengthening efficiency of judicial procedures related to illicit trade are essential.

Special attention should be given to addressing illicit trade in the most vulnerable sectors, particularly excise goods and food, while mitigating the impact of current global crisis and disruptions in global supply chains.

Goal: The objective is to create a level playing field for all market participants, strengthen legal certainty, and support free movement of goods through a more reliable and predictable regulatory framework.

Support from FIC members to the Government's systematic approach in combating grey economy and illicit trade remains essential through coordinated enforcement efforts, open dialogue with stakeholders, contribution to development of effective legislation, and support in strengthening enforcement bodies.

Proposed activity: Advocate for consistent implementation of the Law on Inspection Supervision across all inspection bodies and support full and effective application of the Law on Official Controls, aligned with EU practices.

Promote harmonization of sectoral laws with the overarching inspection framework and engage in continuous dialogue with authorities to strengthen enforcement practices.

2. Priority (topic) **Trade facilitation with Simplified Import and Export Procedures and Standardized Import Permits**

Advocate for more efficient import and export procedures, aligned with the full implementation of the Law on Inspection Supervision, to ensure greater transparency, consistency, and efficiency in cross-border trade operations.

Goal: The objective is also to establish a transparent, predictable, and efficient system for issuing import permits, while reducing cost pressures on the FMCG industry through the removal of levies and customs duties on key raw materials.

In the context of the current global situation and Government efforts to strengthen regional trade through initiatives such as Open Balkan, it is important to address challenges stemming from both the domestic institutional framework and regional non-customs barriers that continue to complicate import and export procedures.

Proposed activity:

Priority should be given to resolving operational and technical issues within Serbian authorities, including inconsistent practices among customs officials across different border posts, uneven procedures in the issuance of certificates of origin, particularly regarding the recognition of production inputs, and continued reliance on paper-based documentation due to the lack of electronic interoperability between institutions.

Initiate and lead structured dialogue with relevant ministries and institutions, propose standardized procedures and timelines for import approvals, and advocate for policy changes related to removal of levies and customs duties on key raw materials.

3. Priority (topic)

Establishment of a Risk-Based Food Safety Inspection System

Implementing a modern, risk-based inspection framework that ensures consistent, transparent, and non-discriminatory application of food safety controls.

This includes addressing delays and inefficiencies in issuing import permits and veterinary-sanitary approvals, which affect supply chain reliability and create unnecessary administrative burden.

Goal:

The objective is to reduce complexity, eliminate disparities between domestic producers and importers, improve overall inspection efficiency, and strengthen trust in the food safety system.

Advocate for the adoption of a risk-based inspection model aligned with EU best practices and promote the use of centralized information systems with consolidated operator data and compliance track records.

Proposed activity:

Advocate for more efficient, transparent, and timely issuance of import permits and veterinary-sanitary approvals.

Engage with authorities to improve coordination between inspection services and permitting processes.

Strengthen public-private cooperation in designing and implementing risk-based approaches.

4. Priority (topic)

Alignment of Serbian Food Regulations with EU Standards

The objective is to achieve full alignment of Serbian legislation with EU, industry, and international standards, followed by consistent, transparent, and predictable implementation.

A further objective is to establish clear and reliable contact points within Ministries to address potential differences in interpretation and application of regulations. This approach will reduce ambiguity, improve regulatory efficiency, and support smoother implementation across stakeholders.

Goal:

It is also important to ensure timely, practical, and industry-aligned implementation of the EU Packaging and Packaging Waste Regulation (PPWR), balancing sustainability targets with operational feasibility.

Maintain continuous and structured dialogue with relevant authorities and industry representatives.

Proposed activity:

Support clarification and harmonization of regulatory interpretation across Ministries and advocate for consistent enforcement practices among inspection bodies.

Promote the establishment of official contact points within competent authorities.

Coordinate industry input and positions within FIC, engage with policymakers on transposition and implementation plans, and support development of clear guidelines and realistic transition timelines for companies.

5. Priority (topic)

Removal of VAT on food donations

Goal:

The goal is to enable increased food donations by eliminating VAT on donated food, thereby reducing food waste and supporting vulnerable communities.

Proposed activity:

Advocating for amendments to relevant tax regulations; building partnerships with government institutions and humanitarian organizations; promoting best practices and data-driven arguments to support policy change.

6. Priority (topic)

Wide visibility of the Committee - important factor in public discussions on AIT and Food issues

Goal:

Promote efficient cooperation with key Government stakeholders, while raising awareness of the importance of anti-illicit trade (AIT) and food-related issues through both national and regional approaches.

Proposed activity:

It is important to ensure the continuation of the already established dialogue and cooperation with Government institutions on anti-illicit trade (AIT) and food-related

issues, while maintaining an open and constructive engagement with all relevant stakeholders.

Joint and coordinated actions with inspection bodies, the Prosecutor's Office, and the judiciary should be further strengthened to reduce procedural complexity, address inconsistencies in the application of regulations, and improve overall efficiency and effectiveness of enforcement outcomes.

In parallel, initiatives should be undertaken to sustain both public and Government focus on the importance of ongoing anti-illicit trade efforts.

This includes organizing regular (biannual) meetings with inspection authorities and the police, with the aim of presenting enforcement results and sharing supportive proposals and recommendations from AIT and Food Committee members.
