



СТАЛНА МИСИЈА РЕПУБЛИКЕ СРБИЈЕ
ПРИ САВЕТУ ЕВРОПЕ
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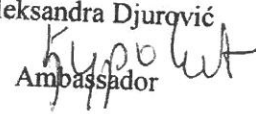
Strasbourg, 25 January 2018

Dear Ms. President,

With reference to your letter dated 12 January 2018, please find attached the comments of the Ministry of Public Administration and Local Self-Government of the Republic of Serbia, the Office for co-operation with civil society of the Serbian Government, as well as comments of the Commissioner for Information of Public Importance and Personal Data Protection on the Report on the fact-finding visit of the Conference of INGOs of the Council of Europe to Serbia.

We would kindly ask if the comments could be published on your website.

Please accept, Ms. President, the assurances of my highest consideration.

Aleksandra Djurović

Ambassador

Ms. Anna Rurka
President
Conference of INGOs of
the Council of Europe
Strasbourg

**Comments related to the Report of the International NGO Conference (INGO)
on the visit to Serbia, 13-15 November 2017, within the area of responsibility of the
Ministry of State Administration and Local Self-Government**

Generally, the comments indicate that the Report is politically biased and aimed at finding negative exceptions in order to create views on every area of the Report. Negative exceptions are portrayed as dominant, blurring the standard procedure.

The majority cases or positive practices are rarely indicated and are used solely for the purpose of making an objective assessment of the situation in certain areas that are dealt with in the Report.

The Report contains criticism of the political system and assessment of the state of democracy in Serbia, raising the justified question concerning the mandate of the Conference (INGO) for such an approach, as well as analytical foundations of the general remarks contained in the Report.

In the segment of the Report pertaining to the legal framework and participation of the non-governmental organizations in the processes of policy decision-making, based on the meeting with the officials of the Ministry of State Administration and Local Self-Government, does not reflect the activities of this Ministry regarding legal framework modification, that were presented to the Conference representatives.

Local self-government system

The Ministry of State Administration and Local Self-Government prepared Draft amendments to the Law on State Administration and Draft amendments to the Law on Local Self-Government, introducing essential changes to the legal framework for public participation in decision-making on the republic and local levels.

Locally, in addition to the existing obligations to carry out public discussion procedures aimed at drawing up major local enactments (Statute, Spatial plans, decisions on basic revenues of local self-government units, etc.), it is stipulated that there is an obligation to carry out public discussion aimed at adopting decisions concerning the budget of local self-government units in the segment of local investment planning. As an apparent lack of public participation on the local level, the Report gives an example of adopting a decision on the budget of the City of Belgrade for 2018, although it was clear to the Conference representatives that the amendments to the Law on Local Self-Government have not as yet been adopted, and thus do not constitute a binding model of decision-making. Irrespective of the amendments to the said Law, the highest representatives of the City of Belgrade have explained their intention to carry out, in the course of 2018, a consultative process with the citizens of the City of Belgrade in preparation of the 2019 budget.

In addition to the above modifications and amendments to the Law on local self-government, provisions have been made according to which a minimum of 100 citizens may propose organization of a public hearing or debate also on any other document for whose preparation citizen participation is considered important. It is also envisaged that organs of local self-government units are obliged to publicize on the website of the local self-government units the beginning of the work on preparing important enactments of local self-government units. The Draft law also provides for “public hearings” to be organized by working bodies or the expert commission of the local self-government unit assembly, in the process of preparing the decisions of the local self-government assembly.

The presentation of the legal framework for the citizen (NGO) participation in decision-making has omitted the Law on referendum and national initiative whose active implementation is in progress, both in terms of initiating themes for local assemblies, and of drafting the Law on the National Assembly of the Republic of Serbia.

Human and minority rights and freedoms

The draft Law amending the Law on national councils of national minorities has been drawn up, and the process of public consultations concerning this draft is underway, and representatives of national councils and civil society organizations took a very active part in the process of its preparation. An announcement has been made to the Conference representatives regarding the holding of public consultations on the said draft Law.

We would like to note that the Ministry of State Administration and Local Self-Government has held the above-mentioned consultations on:

- 29 November 2017, Novi Sad
- 4 December 2017, Novi Pazar
- 5 December 2017, Bujanovac
- 7 December 2017, Petrovac na Mlavi
- 15 December 2017, Subotica
- 18 December 2017, Belgrade.

(A public invitation was sent to all national councils, civil sector and expert public.).

Conference representatives were informed that public consultations would be held to the effect of preparing the Draft law amending the Law on Ombudsman. *Note* – the Ministry of State Administration and Local Self-Government launched public consultations *online*, on 6 December 2017.

The Ministry of State Administration and Local Self-Government – Special working group for drafting the Law amending the Law on free access to information of public importance was set up on 3 November 2016. Members of the working group are representatives from the Ministry of State Administration and Local Self-Government, Administrative Inspectorate, Ministry of

Justice, Secretariat of Legislation of RS, Secretariat of Public Policies of RS, National Assembly, Ministry of Finance.

General comments (Report, page 9)

NOTE – the Government of the Republic of Serbia adopted, in 2017, two strategic documents related to combating terrorism – the National Strategy for the Prevention of the Fight against Terrorism and the Action Plan for Implementing the Strategy for the Prevention of the Fight against Terrorism.

Funding civil society organizations

Regarding the funding of civil society organizations, the Conference representatives were informed of the following:

In 2017, in accordance with the commitments undertaken on the basis of strategic documents (Action Plan for the implementation of the National Strategy for the fight against corruption in the Republic of Serbia for 2013-2018 and the Action Plan for implementing the initiative *Partnership for Open Administration*), work on Regulation amendment was initiated.

Under the Ministry Decision of 14 March 2017, a Special Working Group was established to prepare Draft regulation on amendments. The amendments are aimed at improving the framework related to the criteria, conditions, scope, manner and the procedure of allocating funds and imposing obligations on all beneficiaries to submit, when applying for funding from public sources, a statement confirming that there is no conflict of interest and an internal legal act on anti-corruption policy.

It was particularly underlined that representatives of civil society organizations participated in the preparation of this Regulation, firstly in the public consultation process. Namely, the Draft regulation was published, from 1-15 September 2017, on the site of the Ministry of State Administration and Local Self-Government and the site of the Office for Cooperation with Civil Society, and was forwarded to all local self-government units through the network of the Commissioner of the Standing Conference of Towns and Municipalities. Principled and specific remarks, proposals and suggestions were submitted by eight associations and anti-corruption agencies, including the Anti-Corruption Agency, the Standing Conference of Towns and Municipalities and by local-self-government units.

Note:

- After the comments were received, the Ministry held separate meetings with the representatives of: the Office for Cooperation with Civil Society, Standing Conference of Towns and Municipalities, associations (Transparency Serbia, Civic Initiative), Anti-Corruption Agency and local self-government units (City Administration of Belgrade, City Administration of Kragujevac, Municipal Administration of Knjazevac).
- A Special Working Group held six meetings and prepared a Draft Regulation concerning the funds for encouraging programmes or the assets necessary for financing the programmes of public interest implemented by associations. Compilation of opinions of relevant authorities concerning the Draft regulation is underway, which will subsequently be submitted to the Government of the Republic of Serbia for adoption in the first quarter of 2018.
- On 14 December 2017, the Ministry, together with the Office for Cooperation with Civil Society and the Civic Initiative association, organized in Belgrade, in the House of Human Rights and Democracy, the final consultative meeting with representatives of civil society organizations devoted to the drawing up of the Draft regulation (80 participants), whereupon the civil sector was given another opportunity to forward its comments on the presented text.

SPECIAL NOTE: From September to the end of December 2017, comments were submitted by a total of eleven associations. Given the importance of the area addressed by the Regulation, the number of associations entered in the Register and frequent objections to the lack of transparency on the funding procedure, it is important to note that associations did not participate in a larger number, although they were provided with an opportunity to do so in different phases of the Regulation preparation.

State Administration

- In 2017, a new round for preparation of the next Action Plan for the Implementation of the Public Administration Reform Strategy for the 2018-2020 period, was initiated.

In April 2017, the Office for Cooperation with Civil Society announced a public call to non-governmental organizations interested in taking part in the Special Working Group for the preparation of the new Action Plan.

In September, when the decision was adopted to establish a Special Working Group to draft Actin Plan for the implementation of the Public Administration Reform Strategy for the 2018-2020 period, 12 civil society organizations became SWG members on a footing of equality. Of the twelve non-governmental organization members, some of which represent network organizations, four have seats outside Belgrade (Subotica, Nis, Leskovac, Prijepolje). In addition to the twelve members, representatives of the Standing Conference of Towns and Municipalities also became members of the Special Working Group providing a link to local self-governments.

- The Law amending the Law on the State Administration has been prepared which will, among other things, enable the interested public sector stakeholders and civil society organizations to take part in drafting legislation, regulations and other acts as well as strategies, Action Plans and other plan-related documents. This law was passed in September by the Committee on Legal Systems and State Bodies. The Government is now expected to draft the Law so that it can be submitted to the National Assembly for further procedure.

According to the proposed amendment in respect of Article 77 of the Law, including the public in the process of drafting laws and other legal acts, implies the following basic forms:

1. Universal obligation to include the public in drafting acts from the competencies of ministries and special organizations;
2. Universal obligation of informing the public about the pending preparations of draft laws;
3. Publishing documents regarding the Starting positions in certain cases;
4. Universal obligation of conducting consultations with the interested public in the working phase of the draft law preparation, in line with its content and effects; the same obligation in certain cases applies to by-laws;
5. The obligation to conduct public debate regarding the amendments to the law that essentially change legal regime in a certain area or those regulating issues of particular interest to the public (regulated more specifically in the Government Rules of Procedure);
6. Similar application of these forms to include the public in the process of preparation of public policy documents.

Professional training

Over the past period, major legislation activities of the Ministry related to the preparation of regulations in the field of professional training, such as the Law on the National Academy for Public Administration, the Law Amending the Law on Civil Servants and the Law Amending the Law on Employees in the Autonomous Provinces and Local Self-Government Units, adopted in late 2017.

Representatives and organizations of civil society took part in the preparation of these laws, both in the consultation process which had been initiated immediately after the first working draft laws were prepared (by posting them on the website of the Ministry and a call that they submit their proposals and suggestions to improve the text of these laws which resulted in the cooperation with the relevant civil society organizations, such as the Standing Conference of Towns and Municipalities - SKGO, National Alliance for Local Economic Development – NALED, the Belgrade Fund for Political Excellence, etc.) and in the very preparation of the draft law and public debate which, among other things, held four roundtables (one each in Nis and Novi Sad and two in Belgrade) with a total of 362 participants including many representatives of civil society organizations.

The cooperation with civil society representatives and organizations has been assessed by the organizations themselves as a positive practical example which enabled civil society organizations not only to offer comments on draft laws but to directly take part in formulating solutions adopted when passing these laws.

Proactive transparency

It is not stated in the report that the Ministry of State Administration and Local Self-Government (inter alia, on the basis of the above mentioned analysis of the Belgrade Open School at local level) started development of the legal framework (Amendments to the Law on Free Access to Information of Public Importance), which regulates, among other things, the establishment of a unique application to enter data in the public administration Factsheet which will enable re-formatting the Factsheet in order to make its data available (the Factsheet in open data format) and thus essentially promote proactive transparency and expand the number of bodies which will be legally obliged to publish their Factsheets.

It was not mentioned either that the Commissioner for Information of Public Importance and Personal Data Protection, has already prepared a Model (electronic platform) for the Factsheet, as one of the activities related to the Project: “Capacity-building of the Commissioner for Information of Public Importance and Personal Data Protection to ensure his effective and proper exercise of legal authority and free access to information and the right to data protection in line with European standards.”

The Ministry of State Administration and Local Self-Government, in partnership with and support of UNDP, initiated a process of support to several local self-government units (Novi Sad, Nis, Leskovac, Vranje, Novi Pazar, Zrenjanin, Pancevo, Becej, Sabac, Uzice, Loznica) so that these self-government units may benefit from the support of consultants in the field of information technologies and advisory assistance to use a new electronic application to enter Factsheet including data preparation and processing. At the same time, interested civil society organizations from selected self-government units attended training sessions for open data and development of concrete applications on the basis of data provided by self-government units which could improve the quality of life of their fellow citizens, providing more efficient services and facilitating communication with citizens.

Within this process in July 2017, an interactive workshop was held in Belgrade and representatives from selected local self-government units could get acquainted with a new application to enter Factsheet applications as well as with benefits of open data for local development. Entering data in electronic Factsheet by selected municipalities is currently underway.



**Republic of Serbia
GOVERNMENT**



Office for Cooperation
with Civil Society

**COMMENTS OF THE OFFICE FOR COOPERATION WITH CIVIL SOCIETY OF
THE GOVERNMENT OF THE REPUBLIC OF SERBIA ON THE REPORT OF THE
CONFERENCE OF INGOs OF THE COUNCIL OF EUROPE ON THE FACT FINDING
VISIT TO SERBIA IN NOVEMBER 2017**

Taking into consideration the mandate and scope of the work of the Office for Cooperation with Civil Society as government body established for improving system inclusion of civil society organizations into a permanent dialogue with government institutions, Office would like to emphasize several issues regarding the Report of the Conference of INGOs of the Council of Europe on the Fact finding visit to Serbia in November 2017.

General Comments

Establishment of the Office for Cooperation with Civil Society generally aims at achieving better cooperation and creating new mechanisms for improvement of the legal, financial and institutional framework for cooperation between public and civil sector.

- One of the Government priorities in the previous period was certainly enabling the greater inclusion of CSOs in the decision-making process at all three levels of government, and accordingly to that, numerous amendments to the certain legislation are currently in progress, which should further underline the obligation of public authorities to cooperate with CSOs, but as well to define clear and transparent mechanisms and criteria for establishing that cooperation.
- What is even more important is that civil society organizations are recognized as partners with expertise, enough experience and commitment to be part of the processes of creating and implementing public policies.

Consultation with civil sector

- In the period August 2016 – January 2018 the Office published **34 public calls** for participation in public consultations and consultative meetings – public calls for participation in the formal process of public consultation or for participation in wider debates, consultations and consultative meetings. The majority of published calls were sent to the Office by the line ministries with the request for providing support in conducting public consultations. Some of the most important are – consultative process regarding potential changes in the segment of *the Constitution of the Republic of Serbia* related to the judiciary¹, consultative process regarding proposals for amending the *Regulation on Funds for Programme Promotion or the Lacking Funds for Programmes in Public Interest Implemented by Associations* (“Official Gazette of the RS”, No. 8/2012, 94/2013, 93/2015), formal public consultations regarding the Draft Laws amending *the Law on Public Administration*², the *Law on Civil Servants* and the *Law on Employees in the Autonomous Provinces and Local Self-Governments*, as well as regarding the *Law on National Academy for Professional Training in Public Administration* etc. Additionally, the Office published **7 public calls** for submitting comments on the reports about implementation of certain policies and documents, such as the *Action Plan for the implementation of Open Government Partnership (OGP) initiative in the Republic of Serbia* or the *Action Plan for Minority Rights*.
- Among the best examples of civil society inclusion in the process of public consultations are the processes of preparing the *National Action Plan for the implementation of Resolution 1325 of the UN Security Council – Women, Peace, Security 2016-2020* (hereinafter: NAP 1325) and the *Action Plan for the implementation of Open Government Partnership (OGP) initiative in the Republic of Serbia for the period 2016-2017*. Both processes included on-line consultations prior to drafting documents and after drafting documents, as well as the meetings with civil society and wider public organized at the local level. Likewise, within both processes the reports on the status of comments and suggestions of interested public were prepared, including argumentation about why certain comments and suggestions were not adopted. In this way, participants of public consultations obtained feedback on submitted proposals. Reports on conducted public consultations were published on the web sites of the line ministries (Ministry of Defence for NAP 1325 and Ministry of Public Administration and Local Self-government for OGP) and the Office, which was involved in organizing and conducting both processes.

¹ More information is available in the Report on Implementing Action Plan for Chapter 23.

² More information about public debate regarding the Draft Law amending the Law on Public Administration is available in the Report on Implementing Action Plan for Chapter 23.

- In the previous year and a half, the Office also published **4 public calls** for including representatives of civil society and wider public into various working and advisory bodies established by the public administration. The Office insists on ensuring transparency of these processes and on establishing clear criteria for selection, based on adequate qualifications. One of these calls was aimed at selecting civil society representatives in the *Special Working Group for preparing Draft Action Plan for Implementation of the Strategy of Public Administration Reform for the period 2018-2020*. Besides publishing the call, the Office also gathered applications and participated in the Commission for selecting civil society representatives. Representatives of all 12 CSO from different parts of Serbia that submitted applications were selected for membership in this Special Working Group. Inclusion of all interested CSOs in the Special Working Group stands for an excellent example of partnership between the state and civil sector in the process of creating documents.
- Office also conducted all activities mentioned above regarding publishing call for establishing partnership between Office of Drug Control and CSOs in the field of fight against drug abuse. In January 2018, Office of Drug Control signed Memorandum of Cooperation as the highest form of cooperation between two sectors with 11 CSOs. The Memorandum was signed with all the organizations that have fulfilled the formal condition instead of only 5 CSOs as planned in public call.
- In cooperation with the Ministry of Finance, the Office published the public call for interested CSOs for participation in the first **meeting within dialogue about the public financial management**. The meeting was organized in June 2017 in order to discuss advancements within the reform of the public financial management. Also, CSOs were invited to submit their opinions and proposals by e-mail. Likewise, civil society is included in the process of formulating the *Programme for Economic Reforms*. The Ministry of Finance and several CSOs gathered within the National Convention for the EU have signed the Platform for following and monitoring implementation of the Programme for Economic Reforms 2018-2020.
- Together with the Ministry of Public Administration and Local Self-government, the Office is working on including civil society in the process of amending the *Decree on Incitement funds for programs or shortage of funds for financing programs of public interest realised by associations* ("Official Gazette of the RS", No. 8/12), as one of the most important documents for civil society activities. During the on-line consultative process carried out in September 2017 nine civil society organizations from different parts of Serbia submitted their suggestions. The process of amending this Decree is significant for improving transparent allocation of budgetary sources to civil society, especially in the

field of establishing better monitoring and evaluation system and ensuring possibility to involve representatives of civil society in Evaluation Comities and other evaluation body.

- According to the provisions of the Action Plan for the implementation of Open Government Partnership (OGP) initiative in the Republic of Serbia for the period 2016-2017, the Office conducted two **trainings** for local self-government employees in Nis (June 2017) and in Novi Sad (July 2017), with total of 39 participants. Office also organized 4 trainings for CSOs in Sabac, Krusevac and Nis (October 2017) and Belgrade (November 2017) with 69 participants from 55 organisations. These trainings are aimed to contribute to raising capacities for cooperation of both sectors – civil and public.
- Through consultations with the Office and the Ministry of Public Administration and Local Self-government, Standing conference of Towns and Municipalities prepared **models of By-law on organization and systematization of work places** in city and municipal government, professional services and special organizations, as a part of its activities of support to cities and municipalities for implementing the Law on employed in autonomous provinces and local self-government units. This By-law proposes a working place „Cooperation with civil society organizations“, described in detail according to suggestions and comments of the Office.
- Office continued with the practice of conducting a **research** on cooperation between public administration and CSOs. Based on a structured questionnaire, the Office gathered data from public administration bodies, provincial and independent bodies especially regarding public debates with CSOs and inclusion of CSOs in working groups for the creation of policies. Office prepared research on the data for 2015 and currently is finishing research for the data for 2016. Analysis of data for 2015 suggests advancement in implementing the *Guidelines for Inclusion of CSOs in the Regulation Adoption Process* (adopted by the Government in 2014). In 2014, 79% of laws were adopted within the urgent procedure³, while in 2015 this percentage decreased to 46,9 %. Full research report for 2015 and the report for 2016 is expected to be published by the end of February 2018.
- Regarding resources for cooperating with civil society, data for 2016 show that portion of public administration bodies that have a cooperation unit of focal point for cooperation with civil society increased from 28% in 2014 to 40% in 2015.
- It is important to emphasize that in the reporting period the Serbian Government worked on improving legislation in order to ensure the obligation to involve public and CSOs from the beginning of the law drafting process and to conduct wide and inclusive consultations.

³ Research Reports for 2014 on CSO-Gov cooperation on national, provincial and local level are available on the Office's website.

Main activities include preparing the amendments to the *Law on Public Administration* and formulating the *Law on Planning System*. The Office was actively involved in these activities and submitted Opinions for both documents. Office will be actively engaged in creating By-laws to the Law on Public Administration that will further regulate the process of consultations in drafting legal acts.

- Furthermore, the Office provided support to the Ministry of Public Administration and Local Self-Government in the process of conducting public consultations regarding the Draft Laws amending the *Law on Public Administration*⁴, the *Law on Civil Servants* and the *Law on Employees in the Autonomous Provinces and Local Self-Governments*, as well as regarding new *Law on National Academy for Professional Training in Public Administration*. Civil society from different parts of Serbia was involved in these public consultations, while reports on conducted consultations were published on the web sites of the Ministry and the Office. On the other hand, CSOs also were involved in the public consultations regarding the Law on Planning System and the report about conducted public consultations is available on the website of the Public Policy Secretariat.
- It is also important to emphasize that draft National Strategy for Creating an Enabling Environment for Civil Society Development was addressed in January 2018 to the Government for the final adoption. Even though the Strategy hasn't been adopted yet, Office continuously conducted activities envisaged by the Action plan of the Strategy in the previously period.

CSOs funding

- The INGO report refers to critical issues in the field of financing the CSOs from budgetary sources that have been emphasized in Draft Strategy for Creating an Enabling Environment for Civil Society Development in the Republic of Serbia for period of 2018-2020. Despite of identified issues listed in the report, Annual summary report on spending of funds planned and disbursed to associations and other civil society organizations from the budget of the Republic of Serbia in 2016 drafted by the Office for Cooperation with Civil Society notice significant progress in introducing transparent procedure of financing by the institutions from all level of the Government. According to the Annual summary report on spending of funds planned and disbursed to associations and other civil society organizations from the budget of the Republic of Serbia in 2016 great majority - 95% of the institutions made allocations on the basis of open calls and 28% based on legislation (multiple answers were allowed). When disaggregating data on approval mode by level of

⁴ More information about public consultations regarding the Draft Law amending the Law on Public Administration is available in the Report on Implementing Action Plan for Chapter 23.

government, it is noted that approvals outside of a public competition are prevailing at Republican level. The reason is that these allocations are mostly based on the legal and regulatory framework. At local level, open calls are prevailing. According the data form the Annual Report evaluation criteria for the approval of funding have been defined for almost over 87% of projects. This share is slightly lower at Republican level, mostly because of financing political parties, sports organizations which does not require evaluation criteria.

- Currently Ministry for public administration and local self-government in cooperation with the Office for Cooperation with Civil Society is preparing amendments on Decree on the funds for programme support or for covering the missing amount for financing programmes of public interest implemented by associations - by-law which regulates process of transparent funding. Amendments to the Decree have an aim:
 - to increase the transparency of planning and disbursement processes
 - to provide a more detailed definition of mandatory requirements within open calls, including the requirement to determine the conditions and criteria for evaluating applications, with a clear evaluation matrix system,
 - to increase participation of civil society in awarding and evaluation process: in the draft Decree explicitly state the possibility of experts participating in evaluation committees and specify the possibility to engage experts (including those from CSOs) in preparing the analysis on the success and quality of achieved results, i.e. in the evaluation process
 - to avoid conflict of interest of the members of the evaluation committee.

- The Office has developed and published Methodology for planning, monitoring the implementation and evaluation of programs and projects financed from the budget and Manual for its implementation in order to help public administration to understand and improve methods and practice of monitoring and of awarded projects and evaluation of achieved results. Currently The Office conduct trainings for representatives of national institutions and local self- governments as on the theme focused on transparent financing, strategic planning and monitoring of awarded projects to civil society organisations.

- Regarding Moneyval Committee and its recommendation it is also important to say that Office for Cooperation with Civil Society started cooperation with Administration for the Prevention of Money Laundering in December 2017 and organized first of many planned meetings in cooperation with National Convent on potential risks of financing of terrorism in non-profit sector.

Access to Justice and Independence of Judiciary

- Regarding consultative process on changes of the Constitution of the Republic of Serbia related to the judiciary, The Office for Cooperation with Civil Society, in cooperation with the Ministry of Justice, published in May 2017 public call for civil society organizations for delivering suggestions for identifying Constitutional provisions related to the judiciary that have to be changed, as well as on collecting concrete and clearly explained proposals for changes. The public call was open until June 30, 2017. The aim was to organize wide consultative process on changes of the most important legal act and to include all relevant stakeholders. Within the first call for submitting proposals and suggestions, during May and June 2017, 14 proposals were submitted by 16 civil society organizations and networks of organizations. In order to ensure transparency and inclusiveness of the process, all gathered proposals and suggestions are published on the web pages of the Office and the Ministry. Furthermore, CSOs are invited to send continuously their additional comments and proposals. After that 6 round tables with CSOs were organized across Serbia. This consultation process resulted with publishing the first draft on changes of the Constitution of the Republic of Serbia related to the judiciary in January 2018 and opened new phase of consultative process that will include public debate and new series of round table in different areas of Serbia.

Comments of the Commissioner for Information of Public Importance and Personal Data Protection on the Report on the fact-finding visit of the Conference of INGOs of the Council of Europe to Serbia.

Page 14, last paragraph

The number of cases in which the Commissioner requested from the Government to enforce the implementation of his decisions was 43.

Page 15, 4th paragraph

It is written that the Commissioner is currently preparing the Model Law on Personal Data Protection. Please note that the Commissioner prepared the Model Law on Personal Data Protection in March 2017, in accordance with the General Data Protection Regulation. After the public consultations, the agreed text of the Model was submitted to the Government and the Ministry of Justice for consideration.

