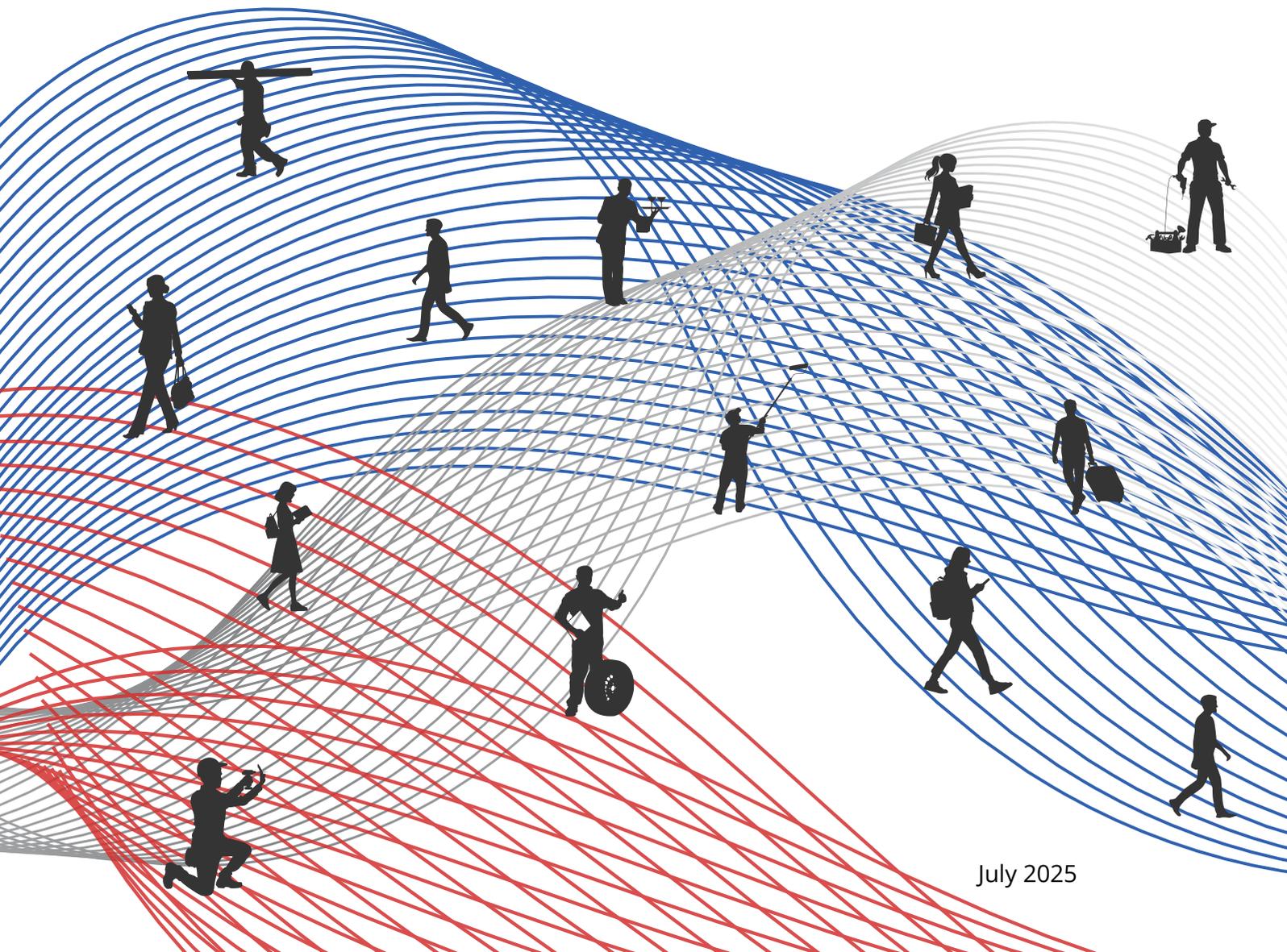


Facilitating Regional Labor Mobility in Serbia: Between Berlin Process and Open Balkans



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Executive Summary

This report analyses Serbia's evolving legal and institutional approach with regard to regional labour mobility with its Western Balkans partners, with a focus on its dual engagement in **Open Balkan Initiative (OBI) and the Common Regional Market (CRM) under the Berlin Process**.

While both frameworks seek to reduce barriers to the free movement of workers, they are not harmonised but rather marked by overlapping mandates, administrative duplication, and uneven access for citizens of different Western Balkans 6 (WB6) economies. Such dual-track structure risks undermining the region's cohesion and Serbia's alignment with the European Union (EU) acquis, particularly under Chapter 2 on the free movement of workers.

Serbia has made notable advancement in recent years, including the ratification of multiple regional mobility agreements, legislative reforms to simplify foreign workers' access to the labour market, and the digitalisation of administrative procedures. These actions reflect Serbia's ambition to serve as a regional hub for mobility and a frontrunner in aligning national systems with European standards. Yet despite this progress, the practical implementation of regional agreements remains inconsistent. Notably, the uptake of the Open Balkan ID has been minimal, awareness among citizens and employers remains limited, and critical features such as social security coordination and equal treatment safeguards are either missing or underdeveloped.

The report finds that while CRM agreements are more comprehensive and EU-aligned, OBI has been used as a political fast track – offering quicker adoption of mobility tools but without sufficient institutional safeguards or inclusive regional participation. This has created a two-tier mobility regime, where nationals of Albania and North Macedonia are able to enjoy preferential access to the Serbian labour market, while citizens of Bosnia and Herzegovina, Montenegro, and Kosovo must follow traditional, more burdensome procedures. This asymmetry can be seen as a threat to the credibility of regional integration and Serbia's broader EU approximation goals.

Drawing on a detailed legal and policy analysis, the report concludes that Serbia's current approach, although legally ambitious, lacks coherence and full inclusiveness. In order to address this, the report recommends that the regional labour mobility framework should be consolidated in a single and all-inclusive system, open to all six Western Balkan economies and aligned with EU norms. Such framework should include a multilateral treaty not only on mutual access to labour markets across the region, but also aligned with the EU norms, and with stronger institutional coordination, social and other benefits portability, unified digital platforms, and robust safeguards for labour rights. In such framework, Serbia would be able not only to reinforce its role as a regional anchor, but it could also advance its EU accession by demonstrating that it can translate regional cooperation into effective, rights-based, and enforceable mobility governance.

Introduction

Free movement of people (especially workers) is a cornerstone of European integration and one of key drivers of economic growth. In Western Balkans, efforts to facilitate cross-border labour mobility have intensified through regional initiatives. Serbia is at the nexus of these efforts, participating both in Open Balkan Initiative (OBI) and Common Regional Market (CRM), the latter championed by the Berlin Process. With CRM having a wider scope of regional integration and approximation to the EU Single Market, both initiatives share the goal of reducing administrative barriers and facilitating free flow of human capital, yet varying in scope, outcomes and perception.

Open Balkan Initiative (OBI), launched in 2019 among Serbia, Albania and North Macedonia, (originally labelled “Mini-Schengen”) is a political initiative envisaged as an economic zone of three member states, with the goal to improve trade, enable free flow of people and improve EU integration prospects. With respect to people, the OBI produced agreements in July and December 2021 that directly impact labour mobility. Most notably, the Agreement on Free Access to the Labour Market in the Western Balkans¹ (signed 21 December 2021 in Tirana) pledges to create a single labour market among the three countries. Complementary to this, an Agreement on Interconnecting Electronic Identification Schemes was signed the same day to mutually recognise national e-IDs and support the new labour mobility system.

In parallel, Western Balkan Six (WB6) adopted in 2020 a Common Regional Market (CRM) Agenda, under the Berlin Process, replicating four freedoms of the EU Single Market: free flow of goods, services, capital and people. Unlike OBI, CRM builds on earlier regional integration efforts (like the 2017 Multi-Annual Action Plan for a Regional Economic Area, also under the Berlin Process) and has strong support from the EU. Under the CRM’s mobility agenda, three major agreements were concluded by WB6 leaders at the Berlin Process Summit on 3 November 2022. These entail freedom of movement with identity cards, mutual recognition of higher education qualifications, and mutual recognition of professional qualifications (initially for doctors of medicine, dentists and architects, and later for nurses, veterinary surgeons, pharmacists, and midwives). Unlike OBI, which involves only three stakeholders, the CRM involves all WB6 and is acknowledged as an important factor in an EU-integration process and ultimately included in the EU’s Growth Plan for the Western Balkans. In free flow of people, CRM measures aim to gradually approximate EU free movement standards in the region, albeit in a stepwise fashion and with more complex institutional oversight.

Although Central European Free Trade Agreement (CEFTA) primarily governs trade, it has also contributed to mobility of people. Additional Protocol 6 on Trade in Services² (in force since 2021) facilitates the temporary movement of professionals as service providers across the region. Through CEFTA, the region has also implemented trade-facilitation tools like “Green Lanes” (expedited border crossings, including for essential workers) and mutual recognition of Authorised Economic Operator (AEO) certificates,

¹ [Government of the Republic of Serbia](#) (2021, December 21). Several agreements signed at “Open Balkans” Summit in Tirana.

² CEFTA Secretariat. (2019, December 18). [13th Joint Committee Meeting: Ministerial conclusions](#).

which simplify customs procedures for certified firms. Moreover, some of the professional qualifications agreements mentioned above were negotiated in the context of CEFTA, treating recognition as a measure to improve trade in services and providing sector-specific mobility improvements that complement the broader initiatives.

While both initiatives share some overlapping goals, legal fragmentation and political divergence present major challenges. Serbia, as a signatory of all three frameworks, has had to navigate multiple implementation pathways, different institutional demands, and at times, competing narratives about regional leadership and EU alignment. Operating both under the national Single Permit System and Open Balkan ID System, Serbia has different pathways for OBI citizens (less demanding, less complexed and fee-free) and third country nationals (different portal, detailed documentation, longer waiting period, fees and labour market tests involved), creating two parallel legal and procedural tracks for accessing Serbia's labour market. While institutional setup in labour market access similarly involves Ministry of interior and National Employment Service for labour market access, regional agreements for recognition of qualifications (although with nearly identical goals) request regional institutional coordination under CRM, while OBI leaves it solely to national agencies without regional coordination mechanism, resulting in different institutional reporting lines, timelines and governance expectations. While the EU sees CRM as a regional integration model based on EU standards, Serbia promotes projects its own regional leadership by pushing OBI as a success story, even when it bypasses EU procedures and institutional standards.

Furthermore, while the OBI intends rapid deployment of digital mobility solutions, its legal structure lacks external monitoring and has raised questions about data protection and procedural fairness, in addition to the question of regional inclusiveness. Conversely, CRM agreements are technically robust and EU-aligned but rely heavily on regional consensus and slower legislative procedures. Such multiplicity has resulted in a dual-track regional integration reality: one that is (or was intended to be) fast-moving and politically agile (OBI), and another that is slow but more inclusive and more compatible with EU norms (CRM/CEFTA).

For Serbia, coexistence of these tracks offers opportunities for experimentation and administrative innovation, but also shows significant risks of duplication, institutional confusion, and unequal access for citizens from non-OBI stakeholders. As a key player in all of these frameworks, Serbia has ratified a good number of regional mobility agreements and introduced new procedures and digital tools, such as the Open Balkan ID, aimed at operationalizing cross-border labour access. Yet, despite the political momentum and diplomatic commitments, practical implementation remains uneven. Discrepancies persist between legal provisions and administrative practices, between formal institutional mandates and actual inter-agency coordination, and between the intended simplification of procedures and the complexity still faced by citizens, employers, and authorities on the ground.

Methodology and Scope

This report is based on a multi-layered legal and policy analysis supported by document review and institutional research. It examines regional agreements against Serbia's laws, bylaws, protocols, and government decrees relevant to transposing and implementing labour mobility agreements. Special attention is given to Serbia's institutional architecture for managing mobility services, the adoption of digital administrative procedures, and alignment with relevant chapters of the EU *acquis communautaire* (notably Chapter 2: Free Movement of Workers). Conducted research draws on official sources (e.g. legislation published via Official Gazettes, government and other relevant institutional information, policy papers), as well as interviews and correspondence with Serbian institutional representatives, where available.

The scope of the report is both legal and practical: it deliberates the evolution and current status of regional mobility frameworks in Serbia, their anchoring in national law, and their interaction with pre-existing norms on labour migration. The paper also addresses procedural timelines, institutional mandates, service digitalization, and operational bottlenecks from the perspective of both public authorities and foreign workers. Ultimately, this report aims to be accessible and actionable for decision-makers, highlighting concrete areas for improvement and alignment with European standards.

Regional Frameworks for Labour Mobility

Open Balkan Initiative: Towards a Trilateral Labour Market?

Open Balkan Initiative (OBI), launched by Serbia, Albania, and North Macedonia, led to the establishment of a new regional, although trilateral, framework for mobility and integration. Through a mix of legally binding agreements and memoranda of understanding, three countries have committed to removing cross-border barriers in trade, labour, education, public administration, and culture. Serbia has adopted the necessary legislative adjustments and institutional reforms to fulfil its obligations under the agreements, particularly those related to mobility. Nonetheless, as of 2024, the actual utilisation of these mechanisms remains uneven, with several agreements still in early stages of implementation.

At the heart of the OBI agenda is the Agreement on Conditions for Free Access to the Labour Market in the Western Balkans, signed in December 2021 and ratified by Serbia in 2022. This agreement formally abolishes the requirement for Albanian and North Macedonian citizens to obtain traditional work and residence permits in Serbia, and vice versa, via Open Balkan ID that can be obtained through national e-government platforms. Serbia officially introduced this digital identification system in March 2024. Open Balkan ID serves as proof of eligibility under the Agreement and exempts its holders from applying or paying for separate permits in the host country, provided they meet basic legal conditions.³

³ ["Lost in Translation: Open Balkan ID Initiative Yet to Take Off,"](#) Balkan Insight, October 24, 2024.

In response to regional commitments, Serbia has amended its domestic legal framework. In amendments⁴ to the Law on Foreigners, Article 3 was expanded to introduce key definitions, including *“jedinstvena dozvola”* (single permit for residence and work) and *“jedinstveni veb portal”* (online platform), facilitating simplified digital procedures. These amendments allow Albanian and North Macedonian nationals who meet basic criteria (clean criminal record, valid ID, job offer or intention to seek work) can register via online platform and receive an ID number, after which they may legally reside and work in Serbia without being subject to standard quotas, permit fees, or labour market tests. Once registered via the online portal, eligible individuals may stay for up to two years (with possibility of renewal) without additional administrative burdens.⁵

A new chapter (Articles 46–46ž) was added, regulating conditions, issuance, and revocation of the single permit, including procedural rules, required documentation, validity (up to three years), and biometric features (Article 101a–b). Article 25 was amended to enable electronic application processing, and Article 13a introduced legal responsibilities for sponsors of foreign nationals. Parallel to this, amendments⁶ to the Law on Employment of Foreigners have classified labour dimension of this change. Article 2 introduced definitions for temporary employment, single permit, assessment, and consent, which enables foreign nationals to change employers or work for multiple employers without reapplying. Article 3 was revised to specify categories of foreigners who can work without a permit. A new Article 16a introduced the labour market test, designed to be completed within four days, with potential exemptions for deficit occupations. Articles 10 and 11 provided the legal basis for digital processing of employment-related assessments and permits. New sections (Articles 21–23) were added to define conditions for intra-corporate transferees, independent professionals, and self-employed persons.

More broadly, legal architecture of the Open Balkan Initiative includes a series of agreements signed between 2021 and 2022. In addition to the labour mobility agreement, Serbia has ratified the Agreement on Interconnection of Electronic Identification Schemes, which allows for recognition of national e-IDs across the three states. Citizens can use these digital credentials to access labour markets and public services in other Open Balkan countries.⁷ Another ratified document is the Agreement on the Recognition of Higher Education Qualifications in the Western Balkans, which facilitates academic and professional mobility.

Further agreements cover a wide spectrum of cooperation areas. These include memorandums on trade facilitation, disaster response, tourism and cultural collaboration, and a regulatory framework for uninterrupted supply of essential goods.

⁴ Law on Amendments to the Law on Foreigners. Official Gazette of the Republic of Serbia, No. 62/2023.

⁵ Law on the Ratification of the Agreement on Conditions for Free Access to the Labor Market in the Western Balkans, Official Gazette of the Republic of Serbia – International Agreements, No. 27/2021.

⁶ Law on Amendments to the Law on the Employment of Foreigners. Official Gazette of the Republic of Serbia, no. 62/2023.

⁷ Law on Ratification of the Agreement on the Interconnection of Electronic Identification Schemes for Citizens of the Western Balkans, Official Gazette of the Republic of Serbia – International Agreements, No. 27/2021.

Serbia has also adopted agreements on veterinary and phytosanitary cooperation, mutual recognition of Authorized Economic Operator (AEO) certificates, and cooperation between national accreditation bodies. While many of these agreements aim to standardize administrative procedures and reduce technical barriers to trade, others support regional integration through shared cultural or audiovisual programming. Notably, the Agreement on Veterinary, Food Safety, and Phytosanitary Cooperation and the Agreements on AEO Recognition with both Albania and North Macedonia have been ratified and entered into force. Implementation is led by the relevant Serbian ministries, such as the Ministry of Agriculture and the Ministry of Finance.⁸ Meanwhile, the Agreement on Cooperation Among Accreditation Bodies, signed in December 2021, has not yet been ratified.

However, despite legislative developments, the implementation of the Open Balkan labour mobility regime remains incomplete. The full promise of a “single labour market” under OBI requires more robust administrative coordination between Serbia, Albania, and North Macedonia – including the sharing of data (for verification of qualifications, criminal records, etc.), and mechanisms to prevent abuse (such as persons using OBI status to bypass immigration rules for non-OBI nationals). Furthermore, although Open Balkan ID system is functional, it is still considered as underutilized in Serbia, and findings of this report indicate that a number of Albanian and North Macedonian citizens continued to obtain standard work permits through the pre-existing channels.

In the period between 1 March 2024 and 28. November 2024⁹ total 285 requests have been made for free access to the labour market through electronic Open Balkan ID platform, out of which 282 requests were made by the Citizens of the Republic of North Macedonia, and only 3 requests from the citizens of the Republic of Albania. From the total number of requests, 195 have been submitted by men and 90 from women. All submitters of requests are of legal age and the purpose of application was access to the free labour market, with no segregated data on industry, education levels, and other parameters. On the other hand, data for the same period from the National Employment Service (NES) do not hold information on number of applications via Open Balkan Electronic ID platform, but they show that 13 citizens of Albania and 91 of North Macedonia have been granted work permits.¹⁰ Given notable discrepancies between these two sources, it can be assumed that there is a number of permits issued via traditional system of procedures.

⁸ Law on the Agreement on Cooperation in Veterinary, Phytosanitary, and Food Safety for Animal Feed in the Western Balkans, Official Gazette of the Republic of Serbia – International Agreements, No. 27/2021.

⁹ Ministry of Interior of the Republic of Serbia, Internal Statistical Overview on the Implementation of the Agreement on Free Access to the Labour Market, unpublished report, March 2025.

¹⁰ National Employment Service of the Republic of Serbia, Internal Statistical Overview of Issued Work Permits, unpublished report, March 2025. NB: National Employment Service of the Republic of Serbia is not in possession on statistical information via Open Balkan ID platform.

Table 1: National Employment Service of the Republic of Serbia, Internal Statistical Overview of Issued Work Permits for the Western Balkans Citizens

Year	Albania	Bosnia and Herzegovina	Montenegro	North Macedonia	Total
2018	48	332	219	493	1,092
2019	127	382	292	501	1,302
2020	164	287	266	433	1,150
2021	157	356	364	483	1,360
2022	148	353	325	498	1,324
2023	99	301	308	556	1,264
2024 (Jan-Nov)	13	69	64	91	237

Data from the Ministry of Interior shows the following work permits history for the region:

Table 2: Ministry of Interior of the Republic of Serbia, Internal Statistical Overview of Registered Western Balkans Citizens Employed in Serbia

Country	Year	Total Permits	Employment Permits	Other Reasons (family reunification, education, etc)
Albania	2018	137	38	99
	2019	185	102	83
	2020	211	128	83
	2021	255	173	82
	2022	209	127	82
	2023	179	94	85
	2024 (Jan-Nov)	146	56	90
Bosnia-Herzegovina	2018	608	242	366
	2019	608	302	306
	2020	609	247	362
	2021	651	282	369
	2022	643	260	383
	2023	686	281	405
	2024 (Jan-Nov)	662	212	450
Montenegro	2018	398	113	285
	2019	398	162	236

	2020	499	156	343
	2021	692	223	469
	2022	758	202	556
	2023	795	211	584
	2024 (Jan- Nov)	836	172	664
North Macedonia	2018	683	222	461
	2019	633	207	426
	2020	658	212	446
	2021	744	240	504
	2022	870	319	551
	2023	938	311	627
	2024 (Jan- Nov)	938	281	657

As it can be noted, data varies across institutions, where MOI records significantly higher numbers of temporary work and residence permit holders compared to NES data on issued work permits. The gap is consistent across all years and countries, suggesting that a significant portion of residence permits is issued for reasons other than employment, or that information may not be synchronised.

Furthermore, comparison with total of around 38,000 work permits issued to foreigners in 2024 (and approximately 50,000 in 2023) leads to the conclusion that representatives of OBI countries do not represent a significant share of foreign workforce in Serbia, especially taking into account that nationals from Russia and China take the largest share of more than 70% and with significantly growing trend of inflow of workers from Asian countries.¹¹

Table 3: National Employment Service of the Republic of Serbia, Internal Statistical Overview of Issued Work Permits to Foreign Citizens in Serbia

	2019	2020	2021	2022	2023	2024 (Jan- Nov)
Russian Federation	2,812	1,976	1,364	8,081	20,396	6,824
China	3,150	3,515	9,373	10,044	10,602	3,627
Turkey	771	1,489	4,597	5,676	5,070	1,179
India	256	412	1,268	2,973	5,010	1,529

¹¹ National Employment Service of the Republic of Serbia, Internal Statistical Overview of Issued Work Permits, unpublished report, March 2025. NB: National Employment Service of the Republic of Serbia is not in possession on statistical information via Open Balkan ID platform.

In regards to the surge of workers from countries other than Western Balkans and the EU, factors such as labour in Serbia in specific sectors (construction, transport, manual work, seasonal works, etc.), migration of Russian citizens caused by war in Ukraine, and inflow of investments from China investments have contributed to this.

Labor Mobility under the Berlin Process

Serbia also participates in a wider labour mobility framework under Common Regional Market (CRM), encompassing all WB6. CRM agreements achieved under the auspices of the Regional Cooperation Council (RCC) and the Central European Free Trade Agreement (CEFTA), as main facilitators of CRM, pursue a more institutionalized and EU-aligned approach to mobility, grounded in consensus and coordination among national institutions and supported by technical working groups at the regional level.

Berlin Process, launched in 2014, initially served as a political platform for accelerating regional cooperation among all WB6: Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, and Serbia. At the Trieste Summit in 2017, it introduced Multi-Annual Action Plan on the Regional Economic Area (MAP REA), aimed at improving regional trade, investment, and mobility. MAP REA was followed in 2020 by the CRM Action Plan 2021–2024, endorsed at the Sofia Summit, which sought to deepen economic integration through harmonized labour policies, digital transformation, and mobility reforms, focusing on four freedoms of the EU Single Market: free flow of goods, capital, services, and people¹². Adopted in 2024, CRM 2.0 (Action Plan 2025-2028) expanded these ambitions by incorporating lessons learned and prioritizing green transition and cross-border infrastructure, while maintaining labour mobility as one of the central pillars of cooperation.¹³

Several legally binding agreements under the Berlin Process have been ratified in Serbia, directly influencing the conditions for movement of workers and professionals across the whole region. The most impactful one is the Agreement on Freedom of Movement with Identity Cards, signed in November 2022, and ratified by Serbia in early 2023,¹⁴ allowing citizens of any WB6 to enter and stay in another WB6 country for up to 90 days using only a valid ID card, eliminating the requirement for passports. This measure is significant for cross-border travel, short-term employment, family visits and business activities, and reflects an effort to replicate some benefits of the EU's Schengen system. Ministry of Interior of Serbia is designated as the primary implementing institution.¹⁵

Another important milestone is 2022 Agreement on Mutual Recognition of Higher Education Qualifications in the Western Balkans 6, which simplifies recognition of university degrees issued in WB6 countries. Coordinated by RCC, this agreement aims to remove unnecessary administrative barriers to education and employment by ensuring that academic credentials of higher education are accepted across the region without lengthy verification procedures. Serbia ratified this agreement in 2023 and began

¹² Regional Cooperation Council (RCC), [Common Regional Market Action Plan 2021–2024](#).

¹³ Regional Cooperation Council (RCC), [Common Regional Market Action Plan 2025–2028](#).

¹⁴ Official Gazette of the Republic of Serbia – International Agreements, No. 3/2023.

¹⁵ Ministry of Interior of the Republic of Serbia, Implementation Guidelines for ID Travel under CRM, 2023.

adjusting its recognition practices accordingly. The implementation falls under the jurisdiction of the Ministry of Education, in coordination with the National Academic Recognition Information Centre (NARIC) and universities.¹⁶ This agreement mirrors principles of the EU's Bologna Process and the Diploma Supplement, aligning with Serbia's obligations under Chapter 26 of the EU acquis. The Ministry of Education, Science, and Technological Development, in collaboration with the National Academic Recognition Information Centre (NARIC), oversees its implementation.¹⁷

Third key instrument is Agreement on Mutual Recognition of Professional Qualifications, which has been operationalized in two separate sectoral agreements. The first, adopted by the region in 2022 and ratified by Serbia in 2023, covers doctors of medicine, dentists, and architects; the second, adopted in 2023 and ratified in 2024, extends to nurses, midwives, pharmacists, and veterinary surgeons.¹⁸ These agreements establish harmonized standards and frameworks to recognize licenses and professional credentials, easing the process for professionals moving across the region. In Serbia, this required coordination between the Ministry of Health, the Ministry of Education, and professional chambers. While these agreements do not automatically grant the right to work and foreign professionals must still register with relevant Serbian institutions, they eliminate redundant procedures such as requalification exams or extended internships.¹⁹

CRM mobility agreements are characterized by their alignment with EU law and practices. The negotiation process incorporated input from the European Commission and drew on EU directives concerning professional qualifications and freedom of movement.²⁰ This connection to the EU acquis means that implementation of these agreements not only enhances regional integration but also advances its readiness for eventual EU membership.

Other agreements under the CRM framework include the Agreement on Access to Higher Education and Admission to Study, adopted at the WB6 Summit in Berlin in October 2024, aiming to simplify student mobility and reduce administrative burdens for students enrolling in higher education institutions across the whole region. Although rather new and not yet ratified, this agreement complements the academic qualifications agreement and is viewed as a step toward deeper educational cooperation.²¹

CRM agreements are governed by specific regional working groups coordinated by RCC and CEFTA, which include national institutions that manage implementation domestically. These working groups are responsible for developing action plans,

¹⁶ Regional Cooperation Council, "[Agreement on the Mutual Recognition of Academic Qualifications](#)," November 2022.

¹⁷ Law on Ratification of the Agreement on the Recognition of Higher Education Qualifications in the Western Balkans, Official Gazette of the Republic of Serbia – International Agreements, No. 3/2023.

¹⁸ Official Gazette of the Republic of Serbia – International Agreements, No. 3/2023 and No. 8/2024.

¹⁹ Ministry of Education of the Republic of Serbia, Implementation Framework for Recognition of Professional Qualifications, internal policy document, 2023.

²⁰ European Commission, "[EU Support to the Common Regional Market](#)," March 2022.

²¹ RCC Press Release, "[WB6 Summit: New Agreements on Student Mobility and Digital Integration](#)," October 9, 2024.

addressing technical challenges, and ensuring monitoring through regular reporting cycles. In case of Serbia, Ministry of Interior manages ID-related agreements, while the Ministries of Education, along with governmental agencies, professional chambers and accreditation bodies, are responsible for implementing the professional and academic qualification agreements.²²

While implementation is ongoing, initial assessments suggest that awareness and administrative readiness vary across sectors. For instance, recognition procedures are still under development in some institutions, and further guidance may be required for employers and universities to fully understand the new rules. Nonetheless, the CRM framework remains widely accepted as a key vehicle for long-term mobility integration in the Western Balkans and a bridge toward the EU's internal market principles.

Synergies and Overlaps Between OBI and CRM Frameworks

Serbia's simultaneous participation in OBI and CRM means there are now two parallel regimes governing regional labour mobility – one limited to Serbia, Albania, North Macedonia (OBI), and another encompassing all WB6 (CRM). While the ultimate goal of both is similar (freer movement of people and skills), their scope and methodologies sometimes overlap and other times diverge, creating a complex tapestry of rules. Serbia's legal framework embodies both the “out-of-the-box” model of OBI and the “grounded-in-acquis” model of CRM, to borrow terms used in regional analyses²³.

This is namely because OBI agreements rely on ad-hoc and uneven institutional arrangements with limited regional outreach, while CRM has a structured governance and reliance on regional bodies (RCC and CEFTA) with clear alignment with EU procedural standards. Furthermore, OBI offers a rapid but non-inclusive pathway, while CRM offers a universal but incremental pathway built on the logic of gradual approximation to the EU through legally binding and acquis-aligned agreements that are to be implemented through a structured and consensus-based procedures and regional coordination across entire WB. Although Serbian authorities view OBI positively, its fragmented implementation approach carries a risk of creating confusion among employers and administrative officials due to uneven application of rules,.

Overlap in objectives: Both OBI and CRM agreements seek to facilitate mobility for work, and there is an overlap in areas like recognition of qualifications. As an illustration, in addition to the CRM's multilateral agreements on qualifications, the Open Balkan trio in June 2022 signed their own Memorandum of Understanding on Mutual Recognition of Academic Qualifications. Thus, Serbia has committed to recognize Albanian and North Macedonian degrees via the OBI memorandum²⁴ signed in Ohrid in 2022, along with a

²² CEFTA Secretariat, “Monitoring Framework and National Implementation Coordination,” CEFTA Updates, 2023.

²³ Cooperation and Development Institute, “[The Berlin Process and Open Balkans Initiative: On Free Movement of Citizens](#),” February 2025.

²⁴ Republic of Albania, Republic of North Macedonia, and Republic of Serbia, “[Agreement on Cooperation in the Western Balkans in the Field of Mutual Recognition of Diplomas and Scientific Grades](#),” Ohrid, June 8, 2022.

very similar goal with all WB6 via the CRM agreement²⁵ on the Recognition of Higher Education Qualifications signed in 2019, both aiming to facilitate automatic recognition of academic degrees across the Western Balkans using European Qualifications Levels-EQF (with CRM directly linked to Bologna Process in Art.2 and Lisbon Recognition Convention in Art. 4. On the other side, Ohrid Agreement makes a reference to these frameworks indirectly in the preamble).

Each agreement identified national institutions (ERIC/NARIC offices and Ministries of Education) as responsible for implementation, and similar deadlines (14-20 days in Ohrid Agreement and 2 weeks in CRM declaration), with a difference in commitment to regional coordination. So, while CRM Declaration relies on regional structures such as RCC and ERISEE, Ohrid Agreement relies on national implementation. In practice, these parallel tracks need to be harmonized so that regional degrees are recognized in Serbia under the same terms whether the requests come through OBI framework or via the general regional agreement.

Overlaps are also found between CEFTA Additional Protocol 5²⁶ on food safety and OBI 2021 Agreement on Agreement on Cooperation in the Areas of Veterinary, Food and Feed Security and Phytosanitary Areas²⁷. Both agreements aim to facilitate trade in agricultural and food products by harmonizing veterinary, food safety and phytosanitary inspection rules through mutual recognition of certificates, lab results and inspections (OBI Agreement Art.7 and AP5 Art.11), risk based controls (OBI Agreement Art.5-6 and AP5 Art.12), transparency and information exchange (OBI Agreement Art.9 and AP5 Art.16). While both have governance structures, AP5 cooperation is embedded in regional CEFTA structure and OBI Agreement is self-contained and inter-governmental.

Differences in coverage: The most notable discrepancy is in coverage. OBI currently excludes Bosnia and Herzegovina, Kosovo, and Montenegro, which are part of the CRM. This has led to a bipartite situation: nationals of Albania and North Macedonia enjoy near-equal status to Serbians when working in Serbia (no permits, etc.), whereas nationals of Montenegro or Bosnia must use the older route. This raises concerns about fairness and regional cohesion – could a Montenegrin worker be at a disadvantage compared to a North Macedonian in the Serbian job market? CRM process can ideally bridge this gap over time by bringing all WB6 to a similar level of labour market access, but until then, Serbia should ensure that OBI's benefits do not come at the expense of wider regional cooperation. Representatives of authorities in Serbia have generally messaged that OBI is “open” for others to join and is *complementary* to the Berlin Process, not a competing bloc, but the reality shows that Serbia maintains two sets of administrative workflows for regional workers.

Legal and institutional compatibility: Another overlap is institutional, with potential duplication risk in the monitoring and reporting efforts. Serbia participates in joint OBI

²⁵ Regional Cooperation Council, “[Declaration on Recognition of Higher Education Qualifications in the Western Balkans](#),” November 2019, Regional Cooperation Council.

²⁶ CEFTA Parties, “[Additional Protocol 5](#) to the Central European Free Trade Agreement on Trade Facilitation,” Brussels, December 18, 2019.

²⁷ Republic of Albania, Republic of North Macedonia, and Republic of Serbia, “[Agreement on Cooperation in the Areas of Veterinary, Food and Feed Safety, and Phytosanitary Matters in the Western Balkans](#),” Tirana, November 4, 2021.

bodies (like the Joint Committee established by the Open Balkan labour agreement to monitor its implementation) and also participates in CRM coordination structures under RCC and CEFTA. In this respect, synergies in data collection and policy feedback may overlap, and consequently implies a need to harmonize monitoring interfaces of both and strengthen cross-initiative coordination in order to prevent fragmentation.

Serbia's Legal Framework for Foreign Nationals' Access to the Labor Market

Serbia's legal system for employment of foreign nationals has undergone substantial reforms in recent years, having at the heart of this evolving framework four core laws that shape the rights, responsibilities, and procedures that govern the ability of third-country nationals to live and work in the Republic of Serbia. These are: Labor Law, Law on Employment of Foreigners, Law on Foreigners, and Law on Asylum and Temporary Protection. Together, they provide a cohesive legal infrastructure for labour migration governance, alignment with EU norms and regional labour mobility demands.

Labor Law of Serbia²⁸ applies to all employees working within the territory of Serbia, irrespective of their nationality. It sets out the fundamental terms and conditions of employment, such as working hours, contracts, dismissal protections, and guarantees of fair treatment. The law (Art.2) ensures that foreign nationals who are legally employed in Serbia enjoy the same core labour rights and protections as Serbian citizens. Nevertheless, enjoyment of these rights is contingent on compliance with applicable immigration and employment regulations—notably, securing a valid work permit or qualifying for an exemption under a relevant international or bilateral agreement.

Central to employment of third-country nationals is Law on Employment of Foreigners²⁹, which provides main legal basis for employment of foreign workers in Serbia (Art. 4) . It lays out the specific categories of work permits available, including those for employment, self-employment, family reunification, and special cases such as seasonal workers and intra-company transferees. Reforms of 2023 introduced a major innovation: the so-called "Single Permit", representing a unified residence and work permit that consolidates two previously separate application processes into one, where foreign nationals can submit a single application covering both the right to live and work in Serbia. This same reform also extended maximum duration of work permits from one to three years³⁰, creating greater predictability for both employers and foreign workers. In line with Serbia's digital transformation agenda, entire procedure has been digitized, with applications submitted through the national eGovernment platform.

Furthermore, amendments introduced stronger enforcement measures, including monetary penalties of up to 2 million RSD (approximately €17,000) for companies that fail to comply with legal obligations related to foreign employment. Some similarities are noted in the Single Permit system and the OBI ID number, such as relying on Ministry of

²⁸ Labor Law, Official Gazette RS, No. 24/2005, 61/2005, 54/2009, 32/2013, 75/2014, 13/2017, 113/2017, 95/2018.

²⁹ Law on Employment of Foreigners, Official Gazette RS, No. 128/2014, 113/2017, 50/2018, 31/2019, 62/2023.

³⁰ PwC Serbia, "[Changes to the Law on Employment of Foreigners](#)".

Interior and National Employment Service, Office for IT and eGovernment, although operating through separate platforms. Single Permit system is intended for all citizens of other countries, and involves a unified application for residence and work, typically processed within 30 days, with a fee of approximately 22,000 RSD (approximately 180EUR). OBI ID number system, on the other hand, is limited to citizens of Albania and North Macedonia, and offers a streamlined, instant and free-of-charge procedure that bypasses the labour market test and involves less amount of documentation.

Law on Foreigners³¹ complements the above two by establishing legal status of foreign nationals residing in Serbia. It governs entry procedures, visa issuance, and temporary and permanent residence rights. Amendments adopted in July 2023 modernized this legal framework and extended the validity of temporary residence permits from one to three years³² and reduced the threshold for acquiring permanent residence from five to three years of continuous legal stay. These changes, effective from August 2023, are part of Serbia's broader strategy to attract and retain foreign talent.

Additionally, revised Law on Foreigners provides for Single Permit to be issued as a biometric ID card, fully integrating work and residence rights into a single document. This system, operational since February 1, 2024, is supported by digital infrastructure that allows online submission, document uploads, and communication with authorities via the dedicated eGovernment portal for foreigners (<https://welcometos Serbia.gov.rs/home>). This reform brings Serbia's administrative practices closer to EU models and simplifies access for both applicants and employers. Another key innovation under 2023 reform package was expansion of eligible categories for temporary residence, with new provisions allowing issuance of residence permits to foreign investors, startup founders, highly skilled professionals, digital nomads, and persons of Serbian origin—even in cases where standard criteria may not be fully met.

Law on Asylum and Temporary Protection³³ serves a specific but essential role in labour mobility governance. It stipulates that asylum seekers may access the Serbian labour market if their application for protection remains unresolved for more than six months. This waiting period, previously nine months, was reduced in 2023 to align more closely with EU standards. Once recognized as a refugee or granted subsidiary protection, individuals are granted full access to employment on the same terms as Serbian nationals, thereby promoting their socioeconomic integration.

Key Bylaws and Supporting Regulations

To operationalize the above-mentioned legal framework, Serbia has adopted a series of implementing bylaws and decrees, many of which were updated as part of the legal reforms in 2023 and 2024. These sub-legal instruments fill critical gaps by offering procedural clarity, defining documentation requirements, and tailoring permit types to different categories of foreign workers.

³¹ Law on Foreigners, Official Gazette RS, No. 97/2008, 24/2018, 31/2019, 62/2023.

³² Ernst & Young, "[Legal Alert: Changes to the Serbian Law on Foreigners](#)".

³³ Law on Asylum and Temporary Protection, Official Gazette RS, No. 24/2018.

Decree on the Conditions and Procedure for Issuing Work Permits for Foreigners³⁴ elaborates application procedures, timelines, and eligibility rules for each type of work permit. Additional rulebooks specify different paths depending on the nature of employment. Rulebook on the Procedure for Issuing Work Permits³⁵ governs timelines and application processes and distinguishes between employment, self-employment, and special permit categories. Rulebook on Detailed Conditions for Employment Permits requires employers to justify hiring foreign workers, while the Rulebook on Temporary Assignments enables intra-company transfers. Other rulebooks regulate work for independent professionals, special categories (such as seasonal workers, researchers, and artists), and circumstances under which foreigners can work without a permit—such as nationals of Open Balkan Initiative countries.

A particularly important bylaw adopted in 2024 is the Rulebook on Issuing the Unified Permit for Temporary Residence and Work of a Foreigner³⁶, which brought to life the new Single Permit system. This rulebook mandates that all applications be submitted electronically through Serbia's eGovernment platform and sets out documentation, communication procedures, and integration of labour market testing by the NES. Alongside it, the Rulebook on the Approval of Temporary Residence³⁷ aligns residence procedures with the digital application system, consolidating steps for residence and work authorization into a single online process. Another bylaw, the Rulebook on Electronic Submission of Permanent Residence Requests³⁸, allows foreigners to apply for permanent residency via digital channels, in line with Serbia's overall push for e-governance.

Regulation on Criteria for Determining Categories of Foreigners Who May be Granted Temporary Residence Independently of Standard Requirements³⁹ defines strategic categories such as startup founders, highly skilled talent, and people of Serbian origin, and sets eligibility requirements for each.

Before the single permit reform, Decree on Conditions and Procedure for Issuing Work Permits to Foreigners (Official Gazette RS No. 37/2015) and related rulebooks governed work permit types (e.g. for employment, self-employment, intra-company transfers, seasonal work, etc.). Much of this has now been superseded by the unified framework of 2024. Old decree was amended and effectively replaced by the new rulebook on unified permits. Nonetheless, many concepts from earlier regulations (such as labour market tests, categories of work authorization, and employer obligations) have been carried into the new system.

³⁴ Decree on Work Permits, Official Gazette RS, No. 37/2015, 6/2024.

³⁵ Rulebook on the Unified Permit for Temporary Residence and Work, Official Gazette RS, No. 6/2024.

³⁶ Rulebook on Issuing the Unified Permit for Temporary Residence and Work of a Foreigner, Official Gazette RS No. 6/2024.

³⁷ Rulebook on the Approval of Temporary Residence, Official Gazette RS, No. 6/2024.

³⁸ Rulebook on Electronic Submission of Permanent Residence, Official Gazette RS, No. 6/2024.

³⁹ Regulation on Criteria for Granting Temporary Residence, Official Gazette RS, No. 13/2020, 69/2022.

Procedures regulating Foreign Nationals Work in Serbia

Foreign nationals intending to work in Serbia must ensure they enter the country with the appropriate visa. While citizens of many countries - including European Union member states- may enter Serbia without a visa for up to 90 days within six months, those who require a visa and intend to reside and work for an extended period must obtain a long-stay visa, commonly referred to as Visa D. This visa must be secured at a Serbian diplomatic-consular mission abroad, typically in the applicant's country of nationality or legal residence.

The application process involves submitting documentation that proves the purpose of stay - usually an employment contract or an invitation letter from a Serbian company or host - as well as evidence of sufficient financial means, place of residence (rental contract or similar) health insurance, and a valid travel document. Once issued, a Visa D is valid for a period ranging from 90 to 180 days, and it allows its holder to enter Serbia and apply for a temporary residence permit on arrival. Nationals from countries with a visa-free regime with Serbia are permitted to enter as tourists and subsequently apply for a residence permit within the country, although they are still required to meet all substantive conditions for legal residence and employment.⁴⁰

All foreign nationals planning to stay in Serbia for longer than 90 days are required to apply for a Temporary Residence Permit. The legal grounds for such residence can include employment, self-employment, education, family reunification, or ownership of property. Application is facilitated by the Ministry of Interior, and as of 2024, it can be submitted electronically via the "Welcome to Serbia" [portal](#), in addition to traditional submission at the local police station for foreigners.⁴¹ Applicants must provide a valid passport, documentation establishing the purpose of their stay, proof of accommodation in Serbia, health insurance coverage, and evidence of sufficient financial resources.

Amendments to the Law on Foreigners in 2023 extended the maximum duration of temporary residence permits to three years, an increase from the previous one-year limit.⁴² In practice, granted duration is typically aligned with the period stipulated in the applicant's employment contract or other documented basis for residence. Extensions are possible and, following legal changes in 2023, renewal application can be filed up to the last day of validity, replacing the earlier 30-day prior deadline. A change in the declared purpose of stay (for example, from studying to employment) requires a new residence application based on the new grounds.

Until 2024, foreign nationals with temporary residence in Serbia had to obtain a separate work permit issued by the National Employment Service (NES). Several categories of work permits existed, including standard employment permits linked to a

⁴⁰ Law on Foreigners, Official Gazette RS, No. 97/2008, 24/2018, 31/2019, 62/2023; see also: Ernst & Young, "[Legal Alert: Changes to the Serbian Law on Foreigners](#)".

⁴¹ Dedic Law Office, "[Temporary Residence in Serbia – Unified Permit for Residence and Work](#)," February 2024.

⁴² [Ministry of Interior](#), Republic of Serbia, Portal za strance, accessed April 2025.

specific job and employer, self-employment permits, and special permits for seasonal workers, intra-company transferees, and accompanying family members.⁴³ A labour market test was generally required, whereby the employer had to prove the unavailability of suitable domestic labour. However, a significant reform was introduced with the adoption of the unified or “Single Permit” system in 2024, where a single online application now covers temporary residence and work authorization.⁴⁴

The new system requires the applicant or employer to upload all supporting documents digitally through the e-portal. NES integrates labour market test directly into the application workflow and must respond within a shortened four-day period.⁴⁵ Once the Ministry of Interior, in coordination with NES, completes its assessment, a biometric residence and work permit card is issued. The law mandates a 15-day decision period from the moment of a complete submission (up to a legal 30 days deadline), significantly shortening the processing time compared to the previous system, which could stretch up to 60 days. Unified permit is valid for up to 36 months and may be renewed for additional three-year periods as long as the purpose persists.⁴⁶ A notable feature of the reform is that individuals may begin working immediately upon filing the single permit application, without having to wait for formal approval. Furthermore, family members (spouses and children) of foreign permit holders who are granted temporary residence for family reunification purposes are now automatically authorized to work in Serbia, without needing a separate permit.

Reforms also streamlined internal transitions within Serbia’s labour market. Foreign workers wishing to change employers or job positions no longer need to apply for an entirely new permit. Instead, they can request a modification to the existing single permit via NES, and if the labour market test for the new role is passed, the updated permit is issued.⁴⁷

After residing continuously in Serbia based on temporary residence for at least three years (reduced from five years as of 2023), a foreign national may apply for permanent residence.⁴⁸ This status grants an open-ended right to reside in Serbia and allows the individual to work without requiring a separate permit. Application submitted to the Ministry of Interior can also now be filed electronically and applicants must demonstrate uninterrupted legal residence over the previous three years, stable income, and accommodation in Serbia. Once granted, a Foreigner’s ID Card is issued, valid for five years, and renewable as a formality. While permanent residents enjoy equal labour market access as Serbian nationals, they do not hold political rights such as voting.⁴⁹

⁴³ “Employment of Foreigners in the Republic of Serbia,” National Employment Service (NES), last updated 2023. <https://www.minrzs.gov.rs/sites/default/files/2021-08/Employment%20Strategy%20of%20the%20RS%20%20%202021-2026.docx>

⁴⁴ PricewaterhouseCoopers (PwC) Serbia, [Tax & Legal Alert: Amendments to the Law on Foreigners](#), January 17, 2024.

⁴⁵ Dedic Law Office, [“Temporary Residence in Serbia – Unified Permit for Residence and Work,”](#) February 2024.

⁴⁶ PricewaterhouseCoopers (PwC) Serbia, [Tax & Legal Alert: Amendments to the Law on Foreigners](#), January 17, 2024.

⁴⁷ National Employment Service, [Changing Employer or Job Role for Foreigners](#).

⁴⁸ Law on Foreigners, Official Gazette RS, No. 97/2008, 24/2018, 31/2019, 62/2023

⁴⁹ Law on Foreigners, Official Gazette RS, No. 97/2008, 24/2018, 31/2019, 62/2023

Employers remain responsible for registering these employees with tax and health authorities in the same manner as they would for domestic workers.

Table 4: Key differences in traditional and OBI procedures for foreign workers

	Traditional Procedure	OBI Procedure
Legal Basis	Law on Foreigners, Law on Employment of Foreigners	OBI Agreement on Conditions for Free Access to the Labour Market
Target Group	All foreign citizens	OBI citizens (Albania, North Macedonia)
Entry Requirements	Visa D often required; must apply for temporary residence within 30 days.	No visa required for OBI nationals; entry with ID/passport.
Permit Type	Unified Single Permit (residence and work)	Unique ID number
Application Channel	eGovernment portal	OBI portal
Documentation	Comprehensive: passport/proof of identity, proof of purpose, job offer, clear criminal record, funds, insurance, etc.	Minimal: valid ID, Open Balkan number, basic personal data, job offer or intention to seek work, clear criminal record
Authorities Involved	Ministry of Foreign Affairs, Ministry of Interior, NES.	Single-window: Ministry of Interior and NES via e-portal.
Processing Time	15-30 days (sequential steps).	Near-instant (auto-generated ID number)
Eligibility Conditions	Job offer, residence permit, labour market test required.	Nationals of OBI states, valid ID, no job offer needed.
Scope and Validity	Residence & work tied to employer/purpose; up to 3 years, renewable.	2-years, renewable, access to Serbian labour market, all employers.
Charges and fees	Approximately 180 EUR (approx..22,000 RSD)	No fee
System Efficiency	Multi-step, present labour tests, fragmented process despite recent digital improvements.	One-step, no labour market test, streamlined via ePortal.
Quotas and Restrictions	None	None

If comparing Serbia's reformed Single Permit system with OBI ID number mechanism, the latter shows as more flexible for employment, although only for citizens of Albania and North Macedonia, who in theory do enjoy a competitive advantage and fewer legal and administrative procedures in comparison to other third-country nationals. OBI workers are not subject to permit quotas, fees, labour market tests or employment-based restrictions, which makes them more attractive in sectors that require flexibility and rapid employment (such as seasonal work).

However, workers following the Single Permit system, although conditioned by more formalities, have some other rights protected such as family members permits entailed in this traditional process, reflecting a more “human” policy approach. Such dual track system may cause the risk of fragmented regulatory landscape that could undermine its predictability and efficiency it initially aimed to achieve.

Institutional Ecosystem for Employment of Foreign Nationals in Serbia

Effective implementation of Serbia's labour migration framework hinges on a complex and interdependent institutional ecosystem. Multiple national and local institutions contribute to various stages of the foreign employment process, ranging from pre-entry visa issuance to final employment monitoring and labour law enforcement. Ministry of Interior leads on immigration and residency; National Employment Service manages labour market alignment; Ministry of Foreign Affairs handles visa entry; bodies like Tax Administration, Health Insurance Fund, municipalities and local police offices, and Labor Inspectorate handle ancillary but important facets of a foreigner's life and work in Serbia and their role is to ensure that foreign workers are properly registered, protected, and accounted for. Each institution plays a distinct but interconnected role, and such multi-agency approach requires strong coordination, especially following the introduction of Serbia's Single Permit system in 2024 that unified work and residence permits.

Ministry of Interior (MoI) is the lead authority for foreign nationals' residency, and issues unified work-residence permit through its Department for Foreigners and local police branches. MoI processes both temporary and permanent residence applications and manages the biometric data required to produce the new Foreigners' ID card. MoI also supervises border control and visa policies and enforces immigration rules. Every foreign national residing in Serbia must register their address with the local police department—a responsibility that falls within the remit of MoI. With the launch of the Single Permit, Ministry's role has expanded to cover the issuance of integrated ID cards that contain residency and work authorization in a single biometric chip.

Working closely with MoI is National Employment Service (NES), which manages labour market aspect of foreign employment. While NES previously issued work permits directly, under the new unified permit system it now provides expert opinions during the application process. Specifically, it conducts the labour market test to determine whether a domestic candidate could fulfil the job in question. Employers must submit a vacancy notice to the NES (Form PPZ) and request a labour market test, which is now done online and concurrently with the Single Permit application. If no qualified domestic jobseekers are identified, NES issues a favourable assessment, allowing the foreign

worker to be employed. NES also handles approvals for job changes during the permit's validity, ensuring regulatory oversight remains intact if a foreign employee changes roles or employers.

Ministry of Labor, Employment, Veteran and Social Affairs is responsible for employment policy, legislation, and alignment with EU labour standards. It drafts and implements Law on Employment of Foreigners and related bylaws, in close coordination with the Mol. It supervises NES and Labor Inspectorate and plays a key role in monitoring trends in foreign labour, ensuring that Serbia's legal framework protects workers' rights and serves the broader goals of economic development and labour market stability.

Ministry of Foreign Affairs (MFA) plays a critical role at the pre-entry stage. For nationals from countries that require a visa to enter Serbia for employment purposes, MFA is responsible for issuing long-stay visas (Visa D) through Serbia's embassies and consulates abroad. These diplomatic missions review supporting documents, such as employment contracts or invitations, and coordinate with domestic authorities to facilitate entry. Once a foreign worker enters the country, oversight shifts to domestic bodies, but MFA remains an important gateway for work-based immigration.

On the fiscal side, Tax Administration, operating under the Ministry of Finance, registers foreign workers for taxation purposes. It issues tax identification numbers and monitors employer compliance with payroll taxes and social contributions. Serbian employers are legally obliged to withhold income tax and make social security payments for their foreign employees, just as they would for local staff. Recent administrative reforms have simplified this process, introducing a unique personal identification number (EBS number) upon residence registration, which links individuals across government systems.

Healthcare access for foreign employees is managed by Health Insurance Fund (HIF). Once a foreign worker secures legal residence and an employment contract, the employer must register them in the national health insurance system. HIF then issues an insurance card granting access to Serbia's healthcare services. This ensures that foreign workers with valid status enjoy the same health protections and obligations as Serbian citizens. HIF coordinates with both the Mol and employers to ensure that eligible foreign employees are properly enrolled.

Local police stations and municipal authorities are the frontline service providers for many day-to-day immigration matters. While strategic oversight lies with Mol, local police offices process temporary residence requests, register foreigner addresses, collect biometric data, and issue residence cards. Some municipalities assist in integration efforts or support foreign investors with documentation. Though much of the process has been digitized, certain procedures, such as fingerprinting and card issuance, still require in-person visits. Local institutions therefore play a crucial role in ensuring the smooth implementation of national laws at the community level.

Finally, Labor Inspectorate is charged with enforcing employment law, including legality of foreign employment. Inspectors may visit workplaces to verify that foreign nationals are employed under lawful conditions and hold valid permits. If violations are found, such as undocumented employment or labour exploitation, Inspectorate has the

authority to impose sanctions. The 2023 legislative reforms increased penalties for such infractions, highlighting the state's zero-tolerance approach to illegal employment. In practice, the Inspectorate works in coordination with the MoI and NES to monitor compliance, prevent abuse, and ensure foreign workers benefit from full legal protection.

Implementation of Regional Mobility Frameworks

To operationalize the legal and policy frameworks arising from the OBI and CRM agenda, Serbia has activated a range of institutional actors at the national level.

Ministry of Labour, Employment, Veteran and Social Affairs plays a central role in shaping and managing Serbia's labour mobility policies. It oversees National Employment Service (NES), which provides frontline support to employers and OBI nationals. NES is responsible for offering guidance, processing ancillary documentation, and ensuring that citizens of Albania and North Macedonia can access the Serbian labour market under the OBI framework. In addition to this operational role, the Ministry chairs an inter-ministerial working group that coordinates Serbia's legal alignment with obligations under both OBI and CRM. This working group is also tasked with developing bylaws, such as administrative instructions for recognizing the Open Balkan ID as a valid employment document.

Ministry of Interior (MoI) is instrumental in the governance of entry and stay of foreign nationals and ensures that OBI nationals entering Serbia with an Open Balkan ID are not subjected to visa or residence permit requirements. Department for Foreigners has been updating internal registration procedures to ensure that Open Balkan citizens who register their address in Serbia (mandatory for anyone staying over 90 days) can do so without a standard work visa. For citizens of other CRM countries, MoI continues to manage temporary residence under updated procedures, including ID-based entry without a visa. Moreover, MoI issues residence ID cards and has had to decide whether and how to reflect the OBI status on such documents. Currently, Serbia provides digital confirmation of Open Balkan ID status rather than physical cards, to avoid conflation with the national ID system.

Serbia's Office for IT and e-Government has overseen the development of Serbia's digital infrastructure for foreigner registration, including the "Welcome to Serbia" portal (e-portal). As of February 1, 2024, portal enables complete online submission of residence and work permit applications. This functionality was particularly essential for the digital-first design of the OBI system. Office for IT and e-Government also manages back-end interoperability with systems in Albania and North Macedonia, allowing for verification of Open Balkan ID holders. In addition, this office addresses data protection, cybersecurity, and technical reliability challenges associated with increased digitalization of migration governance.⁵⁰

Although not directly tied to labour mobility, Customs Administration and Ministry of Finance contribute to the OBI through the implementation of mutual recognition

⁵⁰ [Government of Serbia](#), Office for IT and e-Government, "Welcome to Serbia" Portal, accessed March 2025.

agreements for Authorized Economic Operators (AEOs). These trade facilitation measures, while primarily focused on goods, also benefit labour mobility indirectly, especially for logistics and transport workers, by reducing border bottlenecks and ensuring more fluid cross-border movement.⁵¹

In the field of education, Ministry of Education, Science and Technological Development, working through Serbia's ENIC/NARIC centre, is responsible for the recognition of academic qualifications from the region. In order to implement CRM-related mobility agreements, the ministry issued a new rulebook in 2023 that mandates expedited recognition procedures for diplomas from WB6. This includes shortened deadlines, simplified documentation, and closer cooperation with higher education institutions and relevant professional associations.

Professional chambers and sectoral agencies have a role in regional mobility agreements. As an example, Serbian Chamber of Commerce is participating in CRM-let processes through a regional Chamber Investment Forum that cooperates with CEFTA and RCC, while in the OBI structure the Chamber of Commerce participates actively in promotion of OBI and in organization of OBI-related events such as trade fairs. In implementing recognition of professional qualifications, professional chambers are also expected to take their role in aligning their admission and licensing criteria with regional agreements, yet once the domestic legislation in Serbia is modified to accommodate regional agreements. For instance, the regional agreements for professional qualifications recognitions should be accompanied with automatic recognition of licenses (such as to have Serbian Medical Chamber accepting licenses from Albania or North Macedonia without requiring retesting).⁵²

Institutional coordination in Serbia is supported through both formal and ad hoc mechanisms. CRM agenda is managed through a national coordination body (sherpa) within the Prime Minister's Office, which gathers officials from relevant ministries to monitor implementation. In contrast, OBI is handled more bilaterally, with inter-ministerial coordination conducted primarily between Serbia, Albania, and North Macedonia.

Practical Coordination Challenges

While Serbia has established a comprehensive legal and institutional framework to support regional mobility agreements, several practical challenges have emerged during implementation. These challenges span administrative awareness, technical infrastructure, monitoring procedures, and complex existence of overlapping legal regimes.

One of the early issues was the inconsistent application of new rules by local officials. Despite having ratified and incorporated into national law the Agreement on Freedom of

⁵¹ Government of Serbia, "Mutual Recognition Agreements on AEOs under Open Balkan," Official Gazette of the Republic of Serbia – International Agreements, No. 27/2021.

⁵² In this particular part, it is important to note that the procedures and domestic legislation on automatic recognition of professional qualifications are yet to be reformed in order to accommodate regional agreements.

Movement with ID Cards under the Berlin Process, there were still instances where local-level authorities, including border officers, were reportedly unaware of the new rules, occasionally failing to recognize the right of entry based solely on a national identity card. To address such gaps, targeted training measures were introduced.⁵³ With the support of the Regional Cooperation Council (RCC), Serbia participated in broader regional efforts to build institutional capacity for the implementation of the Common Regional Market. As part of these efforts, training needs were assessed and education sessions were organized, particularly focusing on equipping parliamentary and administrative staff with the knowledge needed to apply CRM-related obligations effectively in practice.⁵⁴

Data verification and sharing remain critical technical hurdles. Open Balkan system is largely self-declaratory: applicants provide personal information and declare intent to work, which is validated through national e-ID systems. However, background verification, such as academic qualifications or criminal records, is not yet fully automated or harmonized. Serbian institutions, particularly the Office for IT and e-Government, are working toward cross-border data integration, but concerns over security and abuse persist as regional studies show that Serbia operates within a context of significant security vulnerabilities, limited transparency, and privacy risks⁵⁵.

Until verification mechanisms became mature, some Serbian authorities reportedly continue to request additional documentation from Open Balkan applicants, reflecting a cautious approach. Similarly, recognition of qualifications under CRM agreements relies on mutual institutional trust, which takes time to build. Proposals for an EU-supported regional data-sharing system have been tabled, particularly under the EU's Action Plan for the Western Balkans Digital Agenda that is currently in implementation (until the end of 2025) and entails timely development of cross-border eGovernment, eProcurement, and eHealth and other tools to improve interoperability of intra-regional services and free flow of data ⁵⁶, but until such tools are fully operational, Serbian authorities are relying on interim safeguards.

Monitoring and dispute resolution mechanisms are also under development. In cases where Open Balkan workers experience labour rights violations in Serbia, or when employers face legal ambiguities, a clear path for resolution is yet to be established. Bilateral governance structures of OBI and the RCC's coordination under CRM offer some avenues, but protocols for inter-governmental notification (e.g., in the event of deportation) are not yet standardized. CRM model envisions escalation of unresolved issues to ministerial level, but this is a slow and politically sensitive process. Serbia is

⁵³ Regional Cooperation Council, [Assessment Report on the Training Needs of Parliamentary Staff in the Western Balkans on Common Regional Market](#) (Sarajevo: RCC, June 21, 2024).

⁵⁴ Regional Cooperation Council. ["Building the Common Regional Market: An Executive Training for Western Balkans Change Makers"](#) Last modified December 2, 2024.

⁵⁵ BIRN, ["Battle for Balkan Cybersecurity: Threats and Implications of Biometrics and Digital Identity,"](#) June 30, 2023.

⁵⁶ European Commission, ["EU4Digital Western Balkans: Action Plan 2022-2024"](#), Brussels: Directorate-General for Neighbourhood and Enlargement Negotiations, 2022.

thus exploring its own national procedures for complaint handling and coordination across relevant ministries.⁵⁷

There is also the question of compatibility with EU law. Serbia's regional commitments must not contradict its Stabilisation and Association Agreement (SAA) or create legal inconsistencies in the context of eventual EU membership. For now, Serbia maintains parallel tracks: while Open Balkan and CRM nationals benefit from streamlined access, EU and EFTA citizens also enjoy simplified procedures under national legislation. Nonetheless, Serbian officials are mindful that preferential treatment for non-EU nationals, however regionally justified, may have to be reconsidered upon accession. This legal balancing act reflects the complexity of pursuing both regional cooperation and EU alignment simultaneously.

Several operational impacts have already been observed. Launch of the "Welcome to Serbia" e-portal significantly simplified procedures, especially for OBI applicants who can apply for permits and register online. Administrative fees for OBI nationals have been waived, making their application process less burdensome than that for EU or third-country nationals. Although the officials praise OB ID system's digital efficiency, uptake has been modest. Statistical data on low number of issued permits to OBI citizens imply limited use of the OB ID system⁵⁸ suggesting a lack of awareness among both potential beneficiaries and employers. In response, Serbian Chamber of Commerce (PKS) and other government institutions have started informational campaigns, including public presentations and online resources.⁵⁹

Administrative burdens have also been considerable. National Employment Service (NES) staff needed retraining to accommodate Open Balkan procedures, where inconsistencies appeared such as reports of local officials still requesting residence permits from OB ID holders. Ministry of Interior has issued clarifying circulars and may soon designate liaison officers to handle Open Balkan-specific cases. Simultaneously, Serbia's digital infrastructure has undergone upgrades to support real-time processing and verification across borders. Office for IT and e-Government remains central to this transition, although continued investment in cybersecurity and staff training is required.

Coexistence of multiple legal regimes has introduced new layers of complexity. For example, hiring a worker from Albania (an OBI country) involves a simpler, digital route, whereas hiring a Montenegrin (non-OBI, but part of CRM) requires the traditional application for residence and work permits. This duality might unintentionally create disparities in access and even influence employer preferences. Serbia maintains distinct legal provisions for each group, which must be carefully updated to prevent inconsistencies or loopholes.

Initial data suggest an asymmetrical flow of labour, primarily from Albania and North Macedonia into Serbia. While this benefits Serbia's labour market - particularly in construction, agriculture, and IT - it also places additional responsibilities on Serbian institutions to ensure proper integration and labour rights protection.

⁵⁷ Balkan Insight, "[Lost in Translation: Open Balkan ID Initiative Yet to Take Off](#)," October 24, 2024,

⁵⁸ Balkan Insight, "[Lost in Translation: Open Balkan ID Initiative Yet to Take Off](#)," October 24, 2024,

⁵⁹ [Serbian Chamber of Commerce](#), "Open Balkan." Serbian Chamber of Commerce and Industry. Accessed April, 2025.

Where Open Balkan Initiative Falls Short

Although Open Balkan Initiative (OBI) was launched with the promise of enabling free movement of people, goods, services, and capital among Serbia, Albania, and North Macedonia, its implementation in the domain of labour mobility reveals significant shortcomings. Despite Serbia's ratification of OBI Agreement on Free Access to the Labour Market and the subsequent rollout of Open Balkan ID, practical uptake has been exceedingly low, as per previously mentioned statistical data. Such modest figures highlight a considerable gap between political declarations and real-world impact, raising questions about the initiative's effectiveness and relevance for regional workers. Open Balkan Initiative, while conceptually promising and politically bold, has not delivered thus far on its core objective of facilitating meaningful and equitable labour mobility in the Western Balkans. Its technical, legal, and institutional deficiencies, compounded by limited scope and weak uptake, suggest that without a significant course correction, OBI represents a symbolic initiative, widely criticized as a political marketing tool, with little transformative impact on the region's labour markets.

One of the core challenges lies in the underdeveloped administrative infrastructure supporting OBI implementation. Although the concept of digital ID and a centralized e-portal system is in line with modern governance practices, its actual execution has been inconsistent and, at times, counterproductive. Early Serbian version of the platform lacked interfaces in Albanian and Macedonian languages of the two key partner countries, although it included links to Albania's and North Macedonia's e-ID platforms, which hindered accessibility for potential users. Furthermore, procedural steps remain unclear to both employers and workers, eroding trust in the system's reliability. As a result, notable number of users continue to rely on traditional channels for work permits, bypassing the OBI mechanism altogether.

In addition to technical shortcomings, limited public awareness continues to undermine the initiative's objectives. Many eligible citizens, as well as employers, remain either uninformed about OBI's potential benefits or are sceptical of its legal enforceability. This reflects a deeper problem in outreach and communication, as well as public trust, which has left much of the region's workforce either unaware of the initiative or unconvinced that it offers a viable pathway to employment across borders.

Moreover, although Serbia has bilateral agreements on social and health protection, there are no mechanisms to efficiently streamline portability of pensions, health insurance, or unemployment benefits into OBI. This omission leaves workers vulnerable and disincentivizes cross-border mobility, particularly for those considering long-term employment, and this may also be another reason why some are seeking old bilateral routes for employment.

Design of the initiative itself is another point of concern. By including only three of the six Western Balkan, OBI has inadvertently institutionalized a two-tier regional integration model. Citizens from Montenegro, Bosnia and Herzegovina, and Kosovo are excluded from its benefits, creating legal inconsistencies and undermining broader regional cohesion. This selective inclusion not only weakens trust among neighbours but also

reinforces political divisions that contradict the EU's vision of a united and integrated Western Balkans.

Finally, lack of external oversight and enforcement mechanisms distinguishes OBI from more robust frameworks like the Common Regional Market (CRM) agreements under the Berlin Process. Despite its own shortcomings, CRM enjoys technical support and political endorsement from the European Union and the Regional Cooperation Council (RCC), while OBI remains a trilateral political initiative without independent monitoring, formal dispute resolution procedures, or supranational accountability. Its governance structure is heavily dependent on the political will of its founding members, raising concerns about transparency, sustainability, and the ability to ensure compliance over time.

Moreover, OBI has been criticized as a political showcase of regional leaders rather than serious effort in regional integration, which served to fill the political vacuum amid EU enlargement fatigue⁶⁰. Instead of building durable, institutional frameworks, the initiative leaned heavily on high-profile summits and declarations, and several trade (wine) fairs, driven by the personal agendas of political leaders.

Alignment with EU Acquis and National Legal Adjustments

Critical aspect of Serbia's regional mobility framework is its compatibility with the *EU acquis communautaire*, especially in the context of Serbia's strategic ambition to join the European Union. In particular, Chapter 2 of the acquis, which pertains to the Free Movement of Workers, along with related chapters such as those on social security coordination, recognition of professional qualifications, and justice and home affairs, set the benchmarks that Serbia will eventually be required to meet. OBI and CRM agreements can be interpreted as preparatory steps toward achieving those standards, though they also reveal several areas that require further development to ensure full compliance. Serbia's participation in regional mobility frameworks such as OBI and CRM reflect a meaningful convergence with the norms and expectations of the European Union. Thus, while Serbia is advancing on the path of legal and procedural alignment, continued reforms and strategic planning will be crucial to ensure a smooth transition from regional integration to full EU membership.

In several domains, recent reforms have brought Serbia closer to EU standards. For instance, the mutual recognition agreements signed under both OBI and CRM closely mirror the EU's Directive 2005/36/EC on the recognition of professional qualifications, as well as the principles of the Bologna Process for academic recognition. These agreements have allowed Serbia to begin implementing EU-like practices at a regional level ahead of formal accession. Recognition of Western Balkans architects' doctors' and dentists' credentials in Serbia's processed using standards that approximate those employed within the EU. As noted in a 2022 statement by German Chancellor Olaf

⁶⁰ Balcani Caucaso, "[Open Balkan, a Failed Step in the Right Direction](#)," Osservatorio Balcani e Caucaso Transeuropa, August 20, 2024.

Scholz, such regional agreements "align you with European standards" and thus contribute to the accession process.⁶¹

Additionally, Serbia's removal of work permit requirements for OBI nationals, along with relaxed residence rules, brings its legal regime closer to the EU's Article 45 TFEU principle on the free movement of workers. While still limited in scope, this approach, until some extent, demonstrates a commitment to treating regional workers equitably, which is a fundamental assumption of EU law. Moreover, Serbia's efforts to digitize the application processes through its e-government portal, and the rollout of the Open Balkan ID, echo EU-level digital integration initiatives, such as the Digital Single Gateway.

Despite these advancements, significant gaps remain. One of the most pronounced ones is the lack of a comprehensive social security coordination mechanism. Until now, neither OBI nor CRM addressed regional portability of pensions, unemployment benefits, or health insurance, which are essential features of EU Regulation (EC) No. 883/2004 on social security coordination. Although Serbia has bilateral agreements on social security with neighbouring and EU countries, a multilateral regional framework is lacking. CRM Action Plan 2025-2028⁶² intends to work more on this matter in the future, along with RCC's ESAP initiative⁶³.

Furthermore, while OBI and CRM have simplified entry and work procedures, they do not necessarily provide comprehensive bundle of rights guaranteed under EU law. EU mobility includes also rights on non-discrimination and family reunification. Serbia's Law on Foreigners maintains a three-year residency requirement for permanent stay, which applies to OBI nationals and mirrors EU rules for long-term residents. However, additional rights such as language training and anti-discrimination mechanisms need reinforcement. Serbian labour legislation mandates equal treatment in wages and working conditions, but ensuring effective integration and protection for regional workers requires more robust policy interventions.

The complexity of Serbia's dual mobility regime, with distinct tracks for OBI and CRM, also presents challenges for institutional coherence and consistent legal application. The EU places a premium on the uniform application of laws across all member states, and Serbia will be expected to demonstrate that its institutions can implement recognition agreements with rigour and transparency. There is a risk that fast-tracking recognition processes for political expediency could lead to standards that fall short of EU expectations.

Legal enforceability presents another dimension of divergence. While EU law has direct effect and is enforceable through institutions like the European Court of Justice, regional agreements like OBI and CRM remain subject to the principles of regional consensus, which relies on intergovernmental cooperation rather than binding supranational

⁶¹ European Western Balkans. "[Scholz: Agreements within the Open Balkan Align the Region with European Standards.](#)" June 8, 2022..

⁶² Regional Cooperation Council. "[Common Regional Market Action Plan 2025-2028.](#)" Accessed March 28, 2025.

⁶³ Regional Cooperation Council. "[Employment and Social Affairs Platform – ESAP3.](#)" Accessed April 20, 2025.

enforcement⁶⁴. Although Serbia has embedded many of these agreements into its national legal framework through laws of ratification, true legal alignment with the EU acquis will only be realized once these commitments operate within the enforceable legal structures of the Union.

Policy Recommendations

Western Balkans region, including Serbia, stands at a crossroads. While the important steps have been taken toward enabling labour mobility, these efforts remain fragmented, uneven in implementation, and incomplete in scope. This framework must reflect European standards, ensure fairness across all WB6, and prepare for future integration into the EU Single Market.

This report proposes the following:

1. Consolidate Fragmented Regional Frameworks Under One Inclusive System

Parallel existence of OBI and CRM has produced legal overlaps, institutional duplication, and unequal access to labour mobility rights. To address this fragmentation, Serbia should initiate a process of consolidating all regional labour mobility initiatives into a unified framework, ideally anchored in the Berlin Process and CRM which has gained higher significance in the EU integration efforts with its inclusion in the EU Growth Plan for the Western Balkans. This would mean formally aligning OBI mechanisms, such as Open Balkan ID, permit waivers, and digital application tools, with CRM agreements, and phasing out standalone OBI instruments that contradict broader regional objectives.

The consolidated framework should be developed as a multilateral treaty on regional labour mobility, open to all Western Balkan Six and embedded in the CRM Agenda. It should establish a common legal foundation for mutual access to labour markets, recognition of qualifications, and protection of workers' rights, supported by EU institutions and implemented through coordinated regional structures. In this respect, the RCC stands as the representative and all-inclusive regional body that would be able to coordinate such framework through the CRM, subject to practiced political commitment of all WB6 leaders mandating clear roles and duties of relevant national institutions and EU's continued (financial and political) backing.

2. Harmonize Administrative Procedures and Ensure Equal Access

To support coherence across the region, Serbia should harmonize documentation requirements and recognition criteria across OBI and CRM pathways. An academic degree or professional license from a neighbouring country must be recognized under the same conditions regardless of the entry point. For CRM countries still subject to regular permit requirements, Serbia should consider unilaterally waiving labour market tests and streamlining application procedures, levelling the field with OBI nationals and reinforcing the principle of equal treatment.

⁶⁴ Cooperation and Development Institute, "[The Berlin Process and Open Balkans Initiative: On Free Movement of Citizens](#)," February 2025.

Additionally, Serbia should introduce a standardized regional worker certificate, even for OBI nationals who do not need formal permits, to serve as a recognized document for use in everyday life (e.g., accessing banking, renting housing).

3. Address Portability of Social Security and Workers' Rights

A cornerstone of real labour mobility is the portability of social benefits. Serbia should champion a new regional agreement on social security coordination, potentially under the Berlin Process, covering pensions, health insurance, and unemployment protection. In the meantime, it should review and, if necessary, update its bilateral agreements with Albania and North Macedonia to ensure they reflect the realities of increased mobility. Informational materials must be developed to help workers understand how to protect and transfer their entitlements across borders. Simultaneously, Serbia should strengthen labour inspection and anti-discrimination enforcement, ensuring that mobile workers receive equal pay and treatment. Monitoring mechanisms, surveys, and feedback loops should be institutionalized to detect any rights violations or systemic challenges.

4. Build Institutional Capacity and Ensure Uniform Implementation

Effective implementation requires investment in people and systems. Serbia should allocate dedicated resources for training local officials, inspectors, and administrators on regional mobility rules, cultural competence, and IT systems. EU support should be mobilized — through IPA, Twinning, or peer exchange — with a focus on countries that have transitioned through similar reforms (e.g., Croatia or Bulgaria). Cross-border training exercises and regional coordination forums should become regular practice.

5. Establish a High-Level National Coordination Mechanism

Serbia must strengthen its internal governance of labour mobility by creating a permanent Inter-Agency Task Force on Regional Labour Mobility, chaired at a high level (relevant Ministry or even Prime Minister's Office). This body should coordinate implementation of all regional mobility agreements, harmonize procedures across ministries (Labour, Interior, Education, Foreign Affairs, IT), and include local-level actors such as municipal offices and employment services. A dedicated "Western Balkans Mobility Desk" within NES would be beneficial in serving as the public interface for employers and workers navigating new mobility rules.

6. Finalize and Operationalize Pending Agreements

Serbia must complete ratification and implementation of all outstanding regional agreements, particularly the 2024 CRM agreement on access to higher education and mobility of students. Institutional readiness, including updated rules within universities and ministries, must accompany legal commitments. Annexes listing recognized

qualifications should be regularly updated to ensure legal certainty and predictability for mobile professionals and students alike.

7. Link Regional Progress with EU Accession Benchmarks

Serbia should ensure that its achievements in regional labour mobility are formally integrated into its EU accession process. The European Commission should be encouraged to monitor the implementation of regional mobility frameworks under Chapter 2 (Free Movement of Workers), as well as other relevant chapters, and reflect progress in enlargement reports. Moreover, Serbia should advocate for CRM and regional agreements to be recognized as preparatory instruments for integration into the EU Single Market. The long-term vision could include piloting facilitated access for regionally certified professionals to EU labour markets, which would be a move that would reinforce the strategic relevance of these efforts.

8. Create a Unified Regional Information Platform and Boost Public Awareness

Low awareness and poor communication have hampered the impact of existing mobility schemes. Serbia and its regional partners should launch a multi-language digital platform that consolidates information on rights, procedures, and implementation progress under both CRM and OBI. Such platform should include guides for employers and workers, real-time data dashboards, and links to national services. In parallel, targeted public outreach campaigns, in coordination with business chambers, universities, and municipalities, should raise visibility and build trust in regional mobility.

Conclusion: Regional Harmonisation is the only win-win scenario

Having overlapping labour mobility regimes in the Western Balkans, particularly Open Balkan Initiative (OBI) and Common Regional Market (CRM) under the Berlin Process, has resulted in a system that is innovative but fragmented. While these frameworks have achieved important breakthroughs, they have also introduced legal and procedural complexity. Citizens from the region are subject to different processes, creating perceptions of inequality and risking institutional inefficiencies. As implementation gaps and data discrepancies persist, it has become clear that parallel tracks cannot deliver long-term convergence or cohesive integration.

If the Western Balkans is to truly harness mobility as a tool for social stability, economic growth and modernization, and regional peacebuilding, the region must transition from experimentation to unification. This means creating a single, fully interoperable labour mobility system that is inclusive of all Western Balkan Six, grounded in enforceable commitments, and aligned with European Union standards, the latter not just in form but in function. Such system should integrate digital infrastructure, mutual recognition of qualifications, transparent dispute resolution, and coordination on social and health security, labour rights, and anti-discrimination protections. Only then will mobility be genuinely transformative.

Serbia is well positioned to catalyse this shift. As the largest market in the region, it can play a central role in harmonizing standards, piloting shared digital solutions, and pushing for legally binding commitments that include all WB6. Its dual participation in OBI and CRM gives it a unique vantage point and the institutional experience to bridge the two frameworks and guide their convergence. Leading this process would not only benefit Serbia's economy by addressing labour shortages and enhancing competitiveness but also elevate its credibility as a driver of regional cooperation and a serious candidate for EU accession.

A single Western Balkan labour market is not a utopian ambition. It is a pragmatic necessity in a region that must overcome historical divisions through shared opportunity and mutual trust. The administrative architecture, political momentum, and policy models already exist. What is needed now is the political will to unify, to simplify, and to move forward together: toward a common labour space that reflects the values of the European Union and meets the expectations of the citizens of the Western Balkans. The future does not lie in fragmented access, but in a coherent, regional system that enables free movement not only in theory, but in daily reality.

Annex 1: Open Balkans Mobility Agreements

Agreements	Laws and bylaws which ratified the agreements.	National Structures responsible for the implementation of the agreement	Regional OBI Structures
<p>Agreement on Conditions for Free Access to the Labour Market in the Western Balkans. December 2021</p>	<p>Law on the Ratification of the Agreement on Conditions for Free Access to the Labor Market in the Western Balkans (Official Gazette of the Republic of Serbia - International Agreements, No. 27/2021)</p>	<p>The Ministry of Labor, Employment, Veterans, and Social Affairs of Serbia</p>	<p>Joint Working Group, as per Agreement. Serbian members of the commission likely include officials from line ministry and other agencies involved in employment and migration policy. (Names of individual representatives have not been publicly disclosed; Serbia's participation is institution-based.)</p>
<p>Agreement on the Interconnection of Electronic Identification Schemes for Citizens of the Western Balkans, December 2021</p>	<p>Law on Ratification of the Agreement on the Interconnection of Electronic Identification Schemes for Citizens of the Western Balkans ("Official Gazette of the Republic of Serbia - International Agreements", No. 27/2021)</p>	<p>Office for IT and e-Government</p>	<p>Line institutions contact points, names not disclosed</p>

<p>First Protocol on the Implementation of the Agreement on Conditions for Free Access to the Labor Market in the Western Balkans, January 22, 2024.</p>	<p>Signed by the Ministry of Finance State Secretary, no publicly available info on government adoption, but the above Law indicates these protocols</p>	<p>Not disclosed</p>	<p>Joint Working Group, Line institutions contact points, names not disclosed</p>
<p>Protocol on Connecting the Electronic Identification Schemes of the Western Balkans Citizens, January 22, 2024</p>	<p>Signed by the Ministry of Finance State Secretary, no publicly available info on government adoption, but the above Law indicates these protocols</p>	<p>Ministry of Finance</p>	<p>Joint Working Group, Line institutions contact points, names not disclosed</p>
<p>Agreement on Mutual Recognition of Certificates of Authorized Economic Operators (AEOS) Between Albania and Serbia - December 2021' Agreement on Mutual Recognition of Certificates of Authorized Economic Operators (AEOS) Between Albania and North Macedonia - December 2021</p>	<p>Law on the Agreement between the Government of the Republic of Serbia and the Council of Ministers of the Republic of Albania on Mutual Recognition of Authorizations of Authorized Economic Operators for Security and Safety (AEOS) by the Parliament and published in the Official Gazette of the Republic of Serbia - International Agreements, No. 27/2021. The</p>	<p>Ministry of Finance, through the Customs Administration of Serbia</p>	<p>Line institutions contact points, names not disclosed</p>
<p>Agreement on mutual recognition of academic qualifications, June 2022.</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

Annex 2: CRM Mobility Agreements (under Berlin Process) on Free Movement of People:

Agreements:	Serbian/ North Macedonian laws/bylaws which ratified the agreements.	National Structures responsible	Commission's representatives at the Level of CRM agreements
Recognition of Higher Education Qualifications	Law on the Ratification of the Agreement on the Recognition of Higher Education Qualifications in the Western Balkans, Official Gazette of the Republic of Serbia – International Agreements, No. 3/2023.	Ministry of Education, Science, and Technological Development of the Republic of Serbia National Academic Recognition Information Centre (NARIC) also plays a role among with Higher education institutions	Joint Commission on the Recognition of Higher Education Qualifications inWB6 (Line institutions contact points), coordinated by RCC and ERI SEE .
Freedom of movement with ID cards	Law on the Ratification of the Agreement on Freedom of Movement with Identity Cards in the Western Balkans and published in Official Gazette – International Agreement No. 3/2023.	Ministry of Interior Affairs	Joint Commission (Line institutions contact points), coordinated by RCC
Agreement on the recognition of professional qualifications of doctors of medicine, doctors of dental medicine and architects, 3.11.2022	Law on the Ratification of the Agreement on the Recognition of Professional Qualifications for Doctors of Medicine, Doctors of Dental Medicine, and Architects, with Annex I, Annex II, and Annex III, and published in the Official Gazette - International Agreements No. 3/2023.	Ministry of Education, Science, and Technological Development of the Republic of Serbia National Academic Recognition Information Centre (NARIC) also plays a role among with Higher education institutions	Joint Working Group on Recognition of Professional Qualifications in WB6 (Line institutions contact points), coordinated by RCC

<p>Agreement on the recognition of professional qualifications of nurses, veterinary surgeons, pharmacists, and midwives.</p>	<p>Law on the Ratification of the Agreement on the Mutual Recognition of Professional Qualifications for Nurses, Veterinary Doctors, Pharmacists, and Midwives Agreement and published in Official Gazette – International Agreements No. 8/2024.</p>	<p>Ministry of Education, Science, and Technological Development of the Republic of Serbia National Academic Recognition Information Centre (NARIC) also plays a role among with Higher education institutions</p>	<p>Joint Working Group on Recognition of Professional Qualifications in WB6 (Line institutions contact points), coordinated by RCC</p>
<p>Agreement on Access to Higher Education and Admission to Higher Studies 2024</p>	<p>N/A</p>	<p>N/A</p>	<p>N/A (Joint Commission on Recognition of Higher Education Qualifications in WB6 will specify the list of higher education institutions in the Western Balkans)</p>

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