

CRTA:

Path to trust



CRTA'S PROPOSAL FOR THE AUDIT OF THE VOTERS' REGISTER

**Step Zero: Amendments to the Law
on the Unified Voters' Register**

September 2025

Independent Audit of the Voters' Register – A Prerequisite for Building Trust

CRTA's Draft Law on Amendments to the Law on the Voters' Register is the outcome of a broad consultative process in which both formal and informal political and social stakeholders were invited to provide comments and contributions, many of which were duly acknowledged and incorporated. In parallel, CRTA closely monitored all observations and recommendations issued by ODIHR on the drafts submitted by the ruling majority and sought to align the provisions of its own proposal both with those specific recommendations and with their broader underlying principles.

The solution proposed in CRTA's model is designed to lay a robust foundation for restoring public confidence in the Voters' Register through a process that is inclusive, transparent, and expert-led. Since 2012, ODIHR election observation reports have documented a growing concern over public trust in the register, culminating in repeated recommendations for a comprehensive and inclusive audit. This approach places trust at the heart of the process – a value which, from our perspective, must shape the very design of the audit. The most recent final reports (2022, 2023, 2024) recommend an audit “with the participation of relevant stakeholders, including political parties and civil society”, to be conducted by independent experts and in full compliance with data protection rules.

The report on the 2024 local elections once again highlights the persistent lack of confidence in the Voters' Register and, in two separate recommendations, reiterates the call for an inclusive audit. The 2025 local elections in Zaječar have confirmed that these concerns are well-founded: a sample check of the local register revealed numerous serious errors, coupled with a lack of appropriate institutional response. CRTA's proposed solution is intended to put ODIHR's recommendations fully into practice.

The success of the register audit depends above all on whether the Voters' Register Audit Commission, as a standing body, is vested with sufficient powers and resources and whether it operates independently of any particularistic influence, so as to conduct the audit in the public interest and build trust. Under CRTA's model, the nine-member expert Commission – three members nominated by the ruling majority, three by opposition MPs, and three by civil society organisations – gives direct effect to ODIHR's recommendation concerning inclusiveness, balance, and the participation of political actors and civil society in the audit. This composition guarantees visible balance among all stakeholders, thereby fostering trust. Equal representation from the outset prevents built-in dominance and reduces perceptions of political control over what must be an expert process – which, in turn, increases public acceptance of the Commission's findings.

Inter-group decision-making based on the dual-key principle is demanding but achievable and, we firmly believe, of fundamental importance to the entire process. The rule requiring at least six votes, including a minimum of two from each group, translates inclusiveness into practice at the very moment of decision-making. This ensures broad – almost consensual – agreement, removes any possibility for a single group to decide unilaterally, and at the same time reduces the risk of mere “rubber stamping”, as it requires two concurring votes from each grouping. By contrast, the model proposed by the ruling majority – with ten members distributed 5-3-2 (where a two-thirds majority is required for a decision, meaning only two or three votes from opposition and civil society members are needed) – builds in a structural advantage and risks creating the public perception that the body is politically driven, even when members act professionally and with integrity. Concerns that a larger number of civil society members might use their numbers to block the process are unfounded. The same argument could be made with regard to any of the three groups. In practice, however, it is particularly relevant to stress that only the ruling coalition consistently votes as a bloc and reliably achieves internal consensus – making it, in fact, the most likely candidate to block the process.

As the members are appointed as experts, parity enables them to “let the work speak for itself”. The requirement for at least two votes from within each group gives members the space to demonstrate impartiality, while preserving the possibility of dissenting opinions where justified – thereby strengthening transparency without obstructing the decision-making process.

Since 2012, ODIHR has recommended improving the accuracy and transparency of the Voters’ Register, and since 2022 has called for a comprehensive, independent audit – all with the aim of building public trust. The parity-based model translates these principles into a concrete institutional solution: a process led by experts, jointly owned by government, opposition, and civil society, and oriented towards trust as the key outcome.

Moreover, the proposal retains parliamentary oversight and ultimate control by the parliamentary majority through a precisely defined mechanism for dissolving the Commission in the event that its work is manifestly blocked – thus safeguarding democratic accountability while preserving operational independence and, ultimately, laying the groundwork for public confidence in the process.

It is important to note that CRTA, as the proponent of this solution, has since 2019 taken part in two government working groups and one parliamentary working group, consistently advocating for a comprehensive audit of the Voters’ Register. In just the past eighteen months, since CRTA formally presented its proposal, elections have been held in Belgrade as well as local elections in Zaječar and Kosjerić, during which the authorities took no substantive steps to improve the quality of the register, despite having formally initiated the process and publicly pledged to do so.

Explanation of the Amendments Incorporated into CRTA's Proposal Following Public Consultations

On December 19th, 2024, CRTA submitted its Draft Law on Amendments to the Law on the Voters' Register to the National Assembly's Working Group on the Improvement of the Electoral Process.¹

On February 4th, 2025, however, together with 27 civil society organisations, CRTA decided to suspend cooperation with the legislative and executive authorities in Serbia and withdrew from both formal and informal membership in government and ministerial working groups, as well as from other standing or ad hoc bodies in which it had previously participated.²

The decision to suspend cooperation was taken in response to the authorities' near-daily departures from basic democratic standards and the principles of the rule of law; the formal inclusion of civil society solely as a façade of democratic dialogue; the student-led struggle for institutional and public office-holder accountability; the climate of intimidation, arrests, and various forms of attacks on students; and the pressures, threats, and hate campaigns to which civil society organisations had been subjected.

CRTA pledged to citizens that it would not abandon its mission of returning institutions to the people of Serbia and would continue to keep the public regularly informed, making full use of all legal, administrative, and other mechanisms to protect human rights and the interests of citizens.

On July 16th, 2025, CRTA opened a public consultation and invited citizens to submit suggestions on the Draft Law from December.³

Continuing its work on improving the Law on the Voters' Register, and in line with international legal standards, on July 30th, 2025 CRTA launched a consultative process on its draft legislative proposal and organised a public discussion on the needs and possibilities for revising the register at the Miljenko Dereta Centre.⁴ The public discussion was attended by representatives of students, the academic community, citizens' assemblies, and political parties.⁵ A second public discussion was held at CRTA's premises on September 5th, 2025, where specific solutions arising from the comments and suggestions of all participants in the consultative process were considered.

On the basis of the proposals of all stakeholders and ODIHR's recommendations for improving this law from the previous period, CRTA introduced a number of amendments and additions in its Draft Law on Amendments to the Law on the Voters' Register.

¹ <https://crt.rs/predlog-za-izmene-i-dopune-zakona-o-jedinstvenom-birackom-spisku/>

² <https://crt.rs/obustava-saradnje-sa-zakonodavnom-i-izvrsnom-vlascu-u-srbiji/>

³ <https://crt.rs/javna-rasprava-crt-predlog-nacrt-zakona-o-jbs/>

⁴ <https://youtu.be/P5bK-NJ2Pws?si=0Zb1RI6NXZqaLEQT>

⁵ <https://link.crt.rs/ve>

1. Personal Data Protection

The provision regulating the protection of personal data in the Voters' Register has been expanded.

A new paragraph has been introduced stipulating that data from the register shall be processed exclusively for the purpose of exercising the right to vote, in accordance with this law and the law governing the protection of personal data.

The misuse of personal data is also expressly prohibited, and a legal standard has been introduced requiring all persons with access to such data to handle it with due care.

This provision has been supplemented in line with the recommendations of the organisation Partners Serbia from the public consultation, while the amendments reflect ODIHR's position with regard to Uglješa Mrdić's Draft Law of January 23rd, 2025 (its recommendation to expand the chapter on personal data protection and ensure compliance with data protection regulations). The amendments to this article also correspond, *inter alia*, to other international legal standards in the field of personal data protection.

2. Standing status of the Commission

Standing status is explicitly introduced in the definition of the Commission.

CRTA's previous Draft did not limit the Commission's term of office, which was positively noted by ODIHR. Nevertheless, in line with three ODIHR recommendations on Uglješa Mrdić's drafts of October 1st, 2024, December 26th, 2024, and April 23rd, 2025 – which highlighted that the possibility of establishing the Commission as a permanent body should be considered – this provision has been minimally amended to explicitly establish the Commission's standing status.

3. Status as Public Office Holders

It is stipulated that members and deputy members of the Commission shall have the status of public officials when performing duties within the Commission's remit.

This provides members and deputy members with legal protection (due to the existence of the criminal offence of Assault on a Public Official) while simultaneously increasing their duty to act lawfully and conscientiously.

Although ODIHR recommendations do not explicitly call for granting a special status to members and deputy members, this solution aligns with the logic of existing provisions in the Draft and the new amendments.

4. Standard of Integrity, Expertise, and Competence

It is prescribed that a member or deputy member of the Commission must possess appropriate professional integrity, expertise, and competence.

This legal standard has been included in the Draft in accordance with the recommendation of the association Birodi from the public consultation.

Similar qualifications are present in other laws in the Republic of Serbia, and moreover, this amendment aligns with the requirements for the appointment of members and deputy members and with their status as public officials.

5. Methods of Nominating Candidates

The amendments clarify the procedure for the simultaneous nomination of all members proposed by a single group, in cases where fewer than three parliamentary groups of the government or opposition exist in the National Assembly.

These amendments allow for a more efficient and fair procedure for the nomination and appointment of members and deputy members.

6. Procedure for Nominating Members and Deputy Members of the Commission

It is prescribed that nominations are made on the basis of a call issued to the nominators by the Speaker of the National Assembly within an appropriate timeframe, and that this call is published on the National Assembly's website. This establishes the start of the nomination process and ensures legal certainty for both nominators and candidates for membership and deputy membership of the Commission.

7. Procedure for Appointing Members and Deputy Members of the Commission

A new provision has been introduced stipulating that if the National Assembly is not in regular session, the Government may request that it convene an extraordinary session.

This ensures the timely appointment of members and deputy members in cases where the National Assembly cannot decide on the proposed list of candidates at its next ordinary session because it is not in session.

8. Limitation of Terms

The number of possible reappointments of Commission members is limited by providing that the same individuals may be appointed as members no more than twice.

This promotes the efficiency of the Commission's work (by ensuring a flow of expert personnel) and contributes to its independence.

9. Termination of Mandate by Operation of Law – Incompatibility of Functions

A rule is added stipulating the automatic termination of a member's or deputy member's mandate if circumstances arise that give rise to a conflict of interest. This amendment aligns the provision on the duration and termination of mandates with the provision regulating the composition of the Commission, which stipulates that a person who is a Member of Parliament or an official of the Ministry of the Interior or the Ministry of Public Administration and Local Self-Government may not be nominated or appointed as a member or deputy member of the Commission.).

10. Filling a Vacant Position of a Member or Deputy Member of the Commission

A provision has been introduced regulating the procedure for appointing a new member or deputy member in the event that a mandate ends by operation of law or by dismissal.

The purpose of this provision is to ensure the uninterrupted functioning of the Commission at full strength, with guarantees of equal and fair treatment in the selection of new members and deputy members.

11. Possibility of Dissolving the Commission

A provision is included allowing for the dissolution of the Commission in cases where its work is stalled (for instance, if it fails to adopt the Rules of Procedure, the Audit Methodology, or the Work Plan, if it does not deliver the annual audit reports, or if it fails to carry out activities set out in the Work Plan within the prescribed timeframe).

This provision ensures the Commission's functionality and continuity in overseeing the integrity of the Voters' Register, while encouraging members and deputy members to act responsibly and within their powers to avoid dissolution and loss of mandate.

This provision also indirectly reflects ODIHR's position on Uglješa Mrdić's Draft Law of January 23rd, 2025, which recommended measures to prevent deadlocks in decision-making.

12. Alternating Chairmanship of the Commission

Alongside the rules governing the first session of the Commission, the mandate and election of the Chair are regulated.

According to the amendments, the Chair of the Commission is elected for a six-month term, while until the submission of the first report to the National Assembly the Chair is elected for a three-month term from among members nominated by citizens' associations.

Chairmanship is to rotate alternately, so that upon expiry of the statutory terms, the Chair is each time elected from among members appointed on the proposal of a different group.

This solution was incorporated into the Draft following ODIHR's recommendation regarding Uglješa Mrdić's Draft of June 11th, 2025, to introduce and apply three-month rotation periods for the Commission, followed by a longer subsequent rotation period.

13. Expansion of the Commission's Competence to the Training of Civil Servants

The Commission's remit is expanded to include the training of officials responsible for maintaining sections of the Voters' Register in local government units, in cooperation with the Ministry of Public Administration and Local Self-Government and the Republic Electoral Commission.

ODIHR recommendations on drafts of this law (such as the recommendation on Uglješa Mrdić's Draft of October 1st, 2024 that additional powers be considered for the audit process, including staff assessment and training for voter registration) generally indicate the need for transparent operations, building public trust, and educating voters about their rights regarding the Voters' Register.

In line with such recommendations, and particularly with a view to strengthening public confidence in the management of the Voters' Register, the Commission's powers are extended to include the training of civil servants responsible for maintaining sections of the Register, in order to ensure more effective and consistent practice.

14. General and Special Acts Adopted by the Commission

The remit of the Commission is expanded by the addition of a provision stipulating that the Commission shall adopt its Rules of Procedure and its Work Plan. This article also prescribes that the Audit Methodology constitutes the instrument by which the Commission regulates the conduct of audits.

It is envisaged that, in performing its duties within its remit, the Commission shall adopt decisions, issue orders, provide opinions, and compile reports. In addition, the binding order for the provision of information, which the Commission issues to public authorities and organisations, is expressly defined. Where the responsible person fails to comply with such an order, the Commission shall initiate misdemeanour proceedings.

The aim of this provision is to clearly establish the instruments adopted by the Commission to regulate its internal functioning and the exercise of its powers. By prescribing the obligation to adopt the Rules of Procedure, Work Plan, and Audit Methodology, the institutional capacity for the performance of the entrusted duties is ensured, while the stipulation that the Commission shall adopt decisions, issue orders, provide opinions, and compile reports further clarifies the legal framework for its actions. The introduction of the binding order for the provision of information guarantees effective access to the necessary data, while the possibility of initiating misdemeanour proceedings serves as a safeguard for enforceability and effectiveness.

This section has been revised in line with ODIHR's position, compared with the version of the law drafted by Uglješa Mrdić on June 11th, 2025, which underscores the importance of the finality and enforceability of the Commission's recommendations.

15. Decision-Making at Sessions

It is specified that the Commission shall take decisions at its sessions.

This amendment clarifies that, in addition to the inaugural session, decisions and acts shall also be adopted at subsequent working sessions. The amendment also aligns with the new provisions specifying the concrete instruments to be adopted by the Commission.

16. Commission's Reports

The amendments to this provision stipulate that the Commission shall adopt a regular annual report on its work and an Audit Report (as an integral part of the annual report), and may also issue periodic reports containing recommendations for the competent authorities and organisations. All reports are to be published on the Commission's website.

This amendment ensures that the Commission reports regularly, efficiently, and transparently on all aspects of its work, while the introduction of periodic reports allows for timely responses and enhances the Commission's overall effectiveness.

17. Recommendations and Monitoring of Their Implementation

The Draft introduces a provision whereby the Commission shall issue recommendations containing measures for improving the state of the Voters' Register to the competent authorities and organisations, and shall monitor the implementation of those recommendations.

This amendment is based on three explicit ODIHR recommendations regarding the draft laws proposed by Uglješa Mrdić (two dated June 11th, 2025, and one dated July 28th, 2025).

To ensure that the authorities and organisations act in accordance with the Commission's recommendations, the penal provisions introduce misdemeanour liability for responsible persons who fail to ensure compliance with such recommendations.

18. Expansion of Public Access to the Work of the Commission

As part of measures to ensure public access to its work, the Commission is now required to maintain its own website, publish regular and periodic reports, and issue public statements at least once a month.

Furthermore, it is provided that citizens shall be able, via the Commission's website, to notify the Commission of any irregularities concerning the Voters' Register.

The introduction of the website is based on explicit ODIHR recommendations (on the drafts by Uglješa Mrdić dated June 11th, 2025, and July 28th, 2025), while the other aspects of public access have been specified in order to enhance the transparency of the Commission's work.

19. Remuneration for Work in the Commission

The amendment provides that the members and deputy members of the Commission are entitled to a monthly remuneration for their work in the amount of one and a half times the average salary.

This condition is introduced to secure the independence and impartiality of the members and deputy members of the Commission and is in line with the ODIHR recommendation (on the version of the law drafted by Uglješa Mrdić dated October 1st, 2024), which states that the provision prescribing pro bono work should be revised, since such an arrangement could discourage qualified and experienced independent experts from participating in the Commission.

20. Misdemeanour Liability

Penal provisions are added introducing misdemeanour liability for violations of the provisions on personal data protection and for non-compliance with the Commission's order for the provision of information.

By prescribing liability for non-compliance with obligations, the uninterrupted functioning of the Commission is ensured, the integrity of the process is safeguarded, and the prevention of irregularities in the work of the competent authorities and organisations is strengthened.

21. Deadlines for Taking Action

The transitional provisions are supplemented with deadlines for the undertaking of various actions: deadlines for the submission of proposals for the appointment of members and deputy members, deadlines for acting upon the Commission's conclusion in cases of non-compliance with its recommendations, deadlines for considering compliance with the conclusion, as well as deadlines for the adoption of the Commission's Rules of Procedure and Work Plan.

Draft Law on Amendments to the Law on the Unified Voters' Register

ODIHR Recommendation No. 4/2023: In order to address concerns regarding the accuracy of extracts from the Voters' Register and to strengthen public confidence, the relevant laws, regulations, and practices should be reviewed so as to enable access to data from the Voters' Register and facilitate the conduct of a meaningful audit of the Unified Voters' Register with the participation of relevant stakeholders, including political parties and civil society organisations, in compliance with data protection standards.

PROPONENT: CRTA

Amendments to the Law on the Unified Voters' Register

LAW

ON AMENDMENTS TO THE LAW ON THE UNIFIED VOTERS' REGISTER

Article 1.

In the Law on the Unified Voters' Register (Official Gazette of the Republic of Serbia, Nos. 104/09, 99/11 and 44/24), after Article 2 a new Article 2a shall be added, reading as follows:

“Body Competent for the Audit, Verification, and Control of the Accuracy and Updating of the Voters' Register

Article 2a

The audit, verification, and control of the accuracy and updating of the Voters' Register shall be carried out by the Commission for the Audit, Verification, and Control of the Accuracy and Updating of the Voters' Register, which is established by this Law and whose members shall be appointed by the National Assembly in accordance with this Law.”

Article 2

After Article 14, new Articles 14a and 14b shall be added, reading as follows:

“Presentation of the Voters' Register to Citizens

Article 14a

For the purpose of presenting the Voters' Register to citizens, the ministry responsible for administrative affairs shall, on its website and in a machine-readable format, provide access to data on voters (first name, one parent's name, and surname) organised by polling stations for the territory of each local self-government unit, as well as access to data on the number of voters per household, including address and apartment number.

After the closure of the Voters' Register, the ministry responsible for administrative affairs shall, in addition to the data referred to in paragraph 1 of this Article, provide on its website, in a machine-readable format, information on whether a

voter will vote in the upcoming elections according to their place of residence or place of stay in the country, or abroad.

Access to the data referred to in paragraphs 1 and 2 of this Article shall be granted upon prior entry of the individual's unique personal identification number and the ID card registration number, or passport number, of the person accessing the data on the website of the ministry responsible for administrative affairs.

The municipal or city administration shall publish, every seven days on its website, data on the total number of voters in its territory, the number of changes in the section of the Voters' Register for that local self-government unit which it updates as a delegated task, as well as the legal basis for such changes over the preceding seven days, and shall submit this data electronically to the ministry responsible for administrative affairs without delay.

The ministry responsible for administrative affairs shall publish the data referred to in paragraph 4 of this Article, organised by local self-government units, on its website every seven days.

Personal Data Protection

Article 14b

The data contained in the Voters' Register shall be processed solely for the purpose of exercising the right to vote, in accordance with this Law and the law governing the protection of personal data.

Personal data in the Voters' Register shall not be used for political advertising, commercial purposes, or otherwise misused.

All persons who, on any basis provided for in this Law, have access to personal data in the Voters' Register shall be obliged to handle such data with due care, in accordance with the law governing the protection of personal data, and solely for the purpose of exercising the powers conferred upon them by this Law.

Persons referred to in paragraph 1 of this Article shall, when accessing data from the Voters' Register, provide a written confidentiality statement, confirming that they are aware of their obligation to handle data from the Voters' Register in accordance with the law governing the protection of personal data and solely for the purpose of exercising the powers conferred upon them by this Law.

The Commission for the Audit, Verification, and Control of the Accuracy and Updating of the Voters' Register shall determine the format of the confidentiality statement."

Article 3.

After Chapter V, a new Chapter Va and new Articles 22a to 22n shall be added, reading as follows:

"Chapter Va

COMMISSION FOR THE AUDIT, VERIFICATION, AND CONTROL OF THE
ACCURACY AND UPDATING OF THE VOTERS' REGISTER

Position of the Commission

Article 22a

The Commission for the Audit, Verification, and Control of the Accuracy and Updating of the Voters' Register (hereinafter: the Commission) shall be a permanent, independent, and autonomous body exercising public powers for the purpose of: conducting audits and establishing the factual situation regarding the management, maintenance, and accuracy of the voters' register; controlling the accuracy of and procedure for updating the voters' register; and contributing to greater transparency and public confidence in the voters' register.

The Commission shall have the status of a legal entity.

The Commission shall be accountable to the National Assembly for its work.

Composition of the Commission

Article 22b

The Commission shall consist of nine members and nine deputy members, appointed by the National Assembly, upon the proposal of authorised nominators.

Six members of the Commission and their deputies shall be appointed upon the proposal of parliamentary groups in the National Assembly, whereas three members of the Commission and their deputies shall be appointed upon the proposal of associations which have been authorised by the Republic Electoral Commission to observe at least three electoral processes and which have published at least three reports on the findings of such electoral observation (hereinafter: civil society associations).

A person who is a Member of Parliament, or who is employed, elected, appointed, or nominated to a position within the ministry competent for administrative affairs or the ministry competent for internal affairs, may neither be proposed nor appointed as a member or deputy member of the Commission.

A member or deputy member of the Commission shall have the capacity of an official person in the performance of tasks within the competence of the Commission.

Requirements for Election to Membership of the Commission

Article 22c

A person elected as a member or deputy member of the Commission shall be one who possesses appropriate professional integrity, expertise, and skills.

Only a person who meets the following criteria may be proposed as a member or deputy member of the Commission:

1. is a citizen of the Republic of Serbia and has permanent residence on the territory of the Republic of Serbia;
2. holds a higher education degree in law, mathematics, demography, information sciences, economics, social sciences, or other related fields, and has at least five years of professional work experience.

Authorised Proposers

Article 22d

The three largest parliamentary groups in the National Assembly that voted in favour of the election of the Government shall each nominate one member and one deputy member of the Commission.

If, at the time of nominating members and deputy members of the Commission, only one parliamentary group that voted in favour of the election of the Government has been formed in the National Assembly, that parliamentary group shall have the right to nominate all three members and three deputy members of the Commission.

If, at the time of nominating members and deputy members of the Commission, only two parliamentary groups that voted in favour of the election of the Government have been formed in the National Assembly, the larger parliamentary group shall have the right to nominate two members and two deputy members of the Commission, while the smaller parliamentary group shall have the right to nominate one member and one deputy member of the Commission.

The three largest opposition parliamentary groups in the National Assembly (parliamentary groups that did not vote in favour of the election of the Government) shall each nominate one member and one deputy member of the Commission.

If, at the time of nominating members and deputy members of the Commission, only one opposition parliamentary group has been formed in the National Assembly, that parliamentary group shall have the right to nominate all three members and three deputy members of the Commission.

If, at the time of nominating members and deputy members of the Commission, only two opposition parliamentary groups have been formed in the National Assembly, the larger opposition parliamentary group shall have the right to nominate two members and two deputy members of the Commission, while the smaller opposition parliamentary group shall have the right to nominate one member and one deputy member of the Commission.

Associations of citizens shall, by mutual agreement, nominate three members and three deputy members of the Commission.

Procedure for Nominating Members and Deputy Members of the Commission

Article 22e

The procedure for nominating members and deputy members of the Commission shall be carried out on the basis of a public call addressed to the authorised proposers by the Speaker of the National Assembly, no later than three months prior to the expiry of the term of office of a member or deputy member of the Commission, or within 15 days from the date of termination of office or dismissal of a member or deputy member of the Commission, within the meaning of Article 22g, paragraph 2, points 2) to 8) and paragraph 4 of this Law. The public call shall be published on the website of the National Assembly.

Proposals of candidates for members and deputy members of the Commission shall be submitted to the committee of the National Assembly competent for public administration (hereinafter: the competent Committee) within 15 days from the date of publication of the public call on the website of the National Assembly.

A proposal of a candidate shall contain:

1. the candidate's full name;
2. the candidate's date and place of birth;
3. the candidate's residential address, telephone number, and e-mail address;
4. data on the candidate's education;
5. data on the candidate's work experience.

The proposal shall be accompanied by:

1. a written consent of the candidate accepting the nomination for a member of the Commission, containing their name, surname, Unique Master Citizen Number, and a statement that there are no obstacles to their appointment to the Commission as referred to in Article 22b, paragraph 3 of this Law;
2. a document proving that the candidate's identity card with microcontroller (chip) has been read, or a photocopy of an identity card without microcontroller;
3. proof of completed higher education;
4. proof of work experience in the relevant profession.

Associations of citizens shall submit, along with their proposal of a candidate, proof of compliance with the requirements referred to in Article 22b, paragraph 2 of this Law.

The competent Committee, within seven days from the expiry of the deadline for nominating members and deputy members of the Commission, shall examine the submitted proposals and verify whether they have been submitted by authorised proposers and whether the candidates for members and deputy members of the Commission meet the requirements for appointment to the Commission.

A proposal not submitted by an authorised proposer within the meaning of Articles 22b and 22d of this Law shall not be considered by the competent Committee, which shall notify the submitter of such proposal in writing.

If a parliamentary group that is an authorised proposer fails to submit a proposal for a member and deputy member of the Commission, the competent Committee shall address in writing the next parliamentary group, by size, which would have the right to nominate persons to the Commission, requesting that such parliamentary group submit its proposal for a member and deputy member of the Commission within seven days from the date of receipt of the request.

If the competent Committee establishes that any of the proposed candidates for a member or deputy member of the Commission does not meet the requirements for membership in the Commission, it shall request the authorised proposer who nominated that candidate to submit a new proposal within seven days from the date of receipt of the request.

The competent Committee shall draw up a Proposal List consisting of nine candidates for members and nine candidates for deputy members of the Commission (hereinafter: the Proposal List of Candidates) and shall submit it to the National Assembly for consideration and adoption.

Appointment of Members and Deputy Members of the Commission

Article 22f

The Speaker of the National Assembly shall be obliged to include the Proposal List of Candidates in the draft agenda of the first subsequent sitting of the National Assembly, so that the appointment procedure is conducted within the deadlines laid down by this Law.

If the National Assembly is not in regular session, the Government of the Republic of Serbia shall request that the National Assembly convene an extraordinary session and, in the request for the session, shall specify an agenda which must include the consideration of the Proposal List of Candidates referred to in Article 22e, paragraph 10 of this Law.

The National Assembly shall decide on the Proposal List of Candidates as a whole, by public vote, by a majority of the votes of all Members of Parliament.

If the Proposal List of Candidates does not receive the required majority of votes, the procedure for proposing members and deputy members of the Commission shall be repeated within 15 days from the date of conclusion of the sitting of the National Assembly at which the Proposal List of Candidates was put to the vote.

Duration and Termination of Mandate

Article 22g

A member or deputy member of the Commission shall be appointed for a period of five years and may be appointed no more than twice.

The mandate of a member or deputy member of the Commission shall terminate by operation of law, and the National Assembly shall, ex officio, determine the termination of their mandate:

1. upon expiry of the period for which they were appointed;
2. in the event of death;
3. if they lose the right to vote;
4. if they are convicted by a final court decision and sentenced to unconditional imprisonment of at least six months;
5. if they lose their working capacity;
6. if they submit a resignation;
7. if, during their mandate, a member or deputy member is elected as a Member of Parliament or is employed, elected, appointed, or nominated in the ministry competent for administrative affairs or the ministry competent for internal affairs;
8. in other cases provided for by law.

A member or deputy member of the Commission shall submit their resignation in writing to the Speaker of the National Assembly, and the signature of the submitter must be certified in accordance with the law governing the certification of signatures.

The National Assembly shall relieve a member or deputy member of the Commission of their duties:

1. if it is subsequently established that they do not meet the conditions for membership in the Commission prescribed by this Law;
2. if, without justified reason, they fail or refuse to perform the duties of a member or deputy member for a continuous period of at least one month, or within a 12-month period during which they fail to perform their duties for at least six months.

Filling a Vacant Position of a Member or Deputy Member of the Commission

Article 22h

The Speaker of the National Assembly shall initiate the procedure for the appointment of a new member or deputy member of the Commission no later than three months prior to the expiry of the mandate of the member or deputy member, or within 15 days from the date of determination of the termination of the mandate by operation of law, or from the date of dismissal from office of the member or deputy member of the Commission, within the meaning of Article 22g, paragraph 2, points 2) to 8) and paragraph 4 of this Law.

The new member or deputy member of the Commission shall be proposed by the same authorised proposer who nominated the member or deputy member whose mandate has been terminated.

When the mandate of a member or deputy member of the Commission appointed on the proposal of a parliamentary group that voted for the formation of the Government ceases, the right to propose a new member in place of the member whose mandate has expired shall belong to the parliamentary group which, at the time of the proposal, holds the same ranking by size among the parliamentary groups that voted for the formation of the Government, as well as to the parliamentary group that proposed the member whose mandate has been terminated.

When the mandate of a member or deputy member of the Commission appointed on the proposal of an opposition parliamentary group ceases, the right to propose a new member in place of the member whose mandate has expired shall belong to the parliamentary group which, at the time of the proposal, holds the same ranking by size among the opposition parliamentary groups, as well as to the parliamentary group that proposed the member whose mandate has been terminated.

If, at the time of the proposal, there are not a sufficient number of parliamentary groups in the National Assembly to ensure the ranking referred to in paragraphs 3 and 4 of this Article, the right of proposal shall belong to the largest parliamentary group in that category of authorised proposers (i.e., parliamentary groups that voted for the formation of the Government, or opposition parliamentary groups).

If, under the application of paragraphs 3 to 5 of this Article, the right of proposal falls to a parliamentary group that has already proposed more members or deputy members of the Commission than other parliamentary groups in the same category of authorised proposers (i.e., parliamentary groups that voted for the formation of the Government, or opposition parliamentary groups), then for the next filling of a vacant position, the right of proposal shall belong to a parliamentary group that is an authorised proposer within the meaning of this Law and has not yet proposed any members of the Commission whose mandate is still in force, if such a parliamentary group exists at the time of the proposal.

When the mandate of a member or deputy member of the Commission appointed on the proposal of an association of citizens ceases, the right of proposal

shall belong to the associations that are authorised proposers within the meaning of Article 22b, paragraph 2 of this Law and who submit a proposal for a new member or deputy member jointly.

The National Assembly shall appoint a new member or deputy member of the Commission within 45 days from the date of determination of the termination of the mandate, or from the date of dismissal from office of the member or deputy member of the Commission.

The provisions of Articles 22d, 22e, and 22f of this Law shall apply accordingly to the procedure for the election of a new member or deputy member of the Commission.

Dissolution of the Commission

Article 22i

The Speaker of the National Assembly shall dissolve the Commission if the Commission:

1. fails to adopt the Rules of Procedure, the Audit Methodology, or the Work Plan within 30 days from the expiry of the deadline established by this Law for their adoption;
2. fails to publish the Audit Report within 30 days from the expiry of the deadline for the publication of the report;
3. fails to carry out an activity specified in the Work Plan of the Commission within 60 days from the expiry of the last day prescribed in the Work Plan for the execution of that activity.

The decision to dissolve the Commission shall be taken by the Speaker of the National Assembly on the day following the occurrence of any of the cases referred to in paragraph 1 of this Article.

Simultaneously with the dissolution of the Commission, the Speaker of the National Assembly shall issue a call to the authorised proposers and publish it on the website of the National Assembly, requesting that within seven days from the date of publication of the call on the website, proposals for candidates for member or deputy member of the Commission be submitted to the competent Committee.

In the case referred to in paragraph 1 of this Article, the procedure for the appointment of new members of the Commission shall be conducted in accordance with the provisions of Article 22h.

The provisions of Articles 22d, 22e, and 22f of this Law shall apply accordingly to the procedure for the election of a new member or deputy member of the Commission, and the procedure must be completed within 45 days from the date of dissolution of the Commission.

First Session of the Commission. Chair of the Commission

Article 22j

The first session of the Commission shall be convened by the Speaker of the National Assembly.

At the first session, the Commission shall:

- elect the Chair of the Commission from among the members appointed on the proposal of associations of citizens;
- adopt the Rules of Procedure, which shall regulate in detail the organisation and manner of its work;
- adopt the Work Plan of the Commission.

The Chair of the Commission shall be elected by a majority of the total number of members of the Commission, including at least two members appointed on the proposal of associations of citizens.

The Chair of the Commission shall serve a term of six months.

Exceptionally, until the submission of the first report to the National Assembly on the audit, verification, and control of the accuracy and updating of the Voters' Register, the Chair shall serve a term of three months. The first Chair of the Commission shall be elected from among the members appointed on the proposal of associations of citizens.

The chairmanship of the Commission shall rotate, so that a member appointed on the proposal of the same category of proposers may not be elected Chair before the terms of members appointed on the proposal of other categories of proposers have elapsed.

Immediately after the election, the Chair of the Commission shall appoint a Deputy Chair from among the members of the Commission.

The Chair of the Commission shall convene sessions of the Commission, preside over the sessions, maintain order during the sessions, ensure the implementation of the Work Plan, and sign the acts of the Commission. In the event of the Chair's absence or incapacity, these duties shall be performed by the Deputy Chair of the Commission.

Scope of the Commission's Work

Article 22k

The Commission is authorised to perform the following tasks:

1. Analyse data from the Voters' Register;
2. Examine the legal validity of decisions on the basis of which changes are made to the Voters' Register;
3. Analyse and monitor statistical parameters regarding the Voters' Register;
4. Analyse the process of updating and authorising changes in the Voters' Register;
5. Analyse data on inspections conducted and on measures proposed or ordered during inspections regarding the application of regulations governing the unified Voters' Register;
6. Analyse data from the Ministry of Internal Affairs regarding citizens' permanent and temporary residence, the legal basis for registration or deregistration of residence, and the consistency of this data with the Voters' Register;
7. Analyse actions of the officials in the Ministry of Internal Affairs responsible for citizens' services (approval of residence and temporary residence);
8. Analyse data from the Ministry of Public Administration from the Civil Registry relevant for maintaining and updating the Voters' Register;
9. Initiate, coordinate, and supervise field verification of voters based on Voters' Register analyses, in cooperation with the Ministry of Internal Affairs and the Ministry of Public Administration;
10. Initiate the rectification of identified irregularities in the Voters' Register;

11. Initiate proceedings to establish accountability if, during the fact-finding process regarding the management and accuracy of the Voters' Register, there are reasonable grounds to suspect a legal violation, and report such violations to the competent authorities;
12. Obtain data from competent authorities on statistical trends in the Voters' Register, residence, temporary residence, deactivation, and other relevant data;
13. Prepare and publish annual and periodic reports on its work in accordance with this law;
14. Prepare and publish annual and periodic reports on the audit, verification, and control of the accuracy and updating of the Voters' Register;
15. Initiate campaigns to educate voters on updating the Voters' Register in cooperation with public media services, the Ministry of Public Administration, and the Republic Election Commission;
16. Conduct training for persons authorised to manage sections of the unified Voters' Register in local self-government units, in cooperation with the Ministry of Public Administration and the Republic Election Commission;
17. Initiate cooperation among relevant institutions to effectively implement measures to enhance the integrity of the Voters' Register;
18. Analyse information security of the Voters' Register software;
19. Initiate the adoption or amendment of regulations and provide opinions on draft laws and other regulations within the Commission's remit;
20. Analyse and compare citizens' records (civil registries and other registers) relevant for the maintenance of the Voters' Register;
21. Analyse the recruitment or engagement process of officials who manage the Voters' Register;
22. Analyse the actions and powers of officials who manage the Voters' Register, as well as the training they receive;
23. Analyse the hardware and software used by officials in maintaining citizens' records (civil registries and other registers) relevant to the Voters' Register, including the security of such equipment;
24. Analyse the security of data storage facilities (rooms, servers) for citizens' records (civil registries and other registers) relevant to the Voters' Register;
25. Analyse laws and subordinate regulations governing the maintenance of citizens' records (civil registries and other registers) relevant to the Voters' Register;
26. Analyse data from the national statistical authority and other authorities responsible for statistics and compare it with citizens' records and Voters' Register data;
27. Conduct other analyses necessary to determine the integrity of the Voters' Register updating process;
28. Adopt the Commission's Rules of Procedure and Work Plan;
29. Submit requests to initiate administrative offence proceedings against responsible persons in public authorities who fail to comply with its orders.

In performing its tasks, the Commission makes decisions, issues orders, provides opinions, and prepares reports.

To facilitate the Commission's work, state authorities (ministries) and specialised organisations, as well as authorities of territorial autonomy and local self-governments, are obliged to provide members or deputy members of the Commission with

information and access to records relevant for the maintenance and updating of the Voters' Register.

The Commission may issue orders for the provision of information or access to records. Such orders may include multiple supplements regarding the type and content of documents requested.

The authority or organisation to which an order is issued must comply within eight days from the date of delivery.

The Commission shall adopt an act regulating in detail the methodology for auditing, verifying, and controlling the accuracy and updating of the Voters' Register (hereinafter: the Audit Methodology).

The Commission shall adopt the act referred to in paragraph 6 within 60 days from the date of its formation.

Decision-Making

Article 22l

The Commission shall make decisions at its sessions.

Decisions of the Commission are adopted by a two-thirds majority of all members of the Commission, provided that at least:

- two members of the Commission appointed on the proposal of the three largest parliamentary groups that voted for the formation of the Government;
- two members of the Commission appointed on the proposal of the three largest opposition parliamentary groups; and
- two members appointed on the proposal of citizens' associations

have voted in favour, unless otherwise provided by this law.

A deputy member of the Commission substitutes for a member in the event of their absence or the termination of their mandate, until a new member is appointed.

A deputy member of the Commission has voting rights in the absence of the member they are substituting.

A deputy member of the Commission has the same rights and duties as the member they are substituting.

Participants in the Work of the Commission without the Right to Vote

Article 22m

The following participate in the work of the Commission without the right to vote:

- three representatives of the ministry competent for administrative affairs;
- one representative of the ministry competent for internal affairs;
- one representative of the Commissioner for Information of Public Importance and Personal Data Protection.

The authorities referred to in paragraph 1 of this Article are obliged to appoint their representatives within 15 days from the receipt of a written request from the Commission.

Commission sessions are held even in the absence of the representatives referred to in paragraph 1 of this Article.

Upon invitation by the Commission, the following may also participate in its work without the right to vote:

- representatives of international organizations and experts with knowledge relevant to the work of the Commission;

- civil servants in state administration bodies and officials in bodies of autonomous provinces or local self-government units with expertise relevant to the work of the Commission, appointed by the head of the body in which they are employed.

The persons invited under paragraph 3 of this Article are obliged to provide the Commission with all information necessary to achieve the objectives and tasks of the Commission as prescribed by this law.

Observers of the Work of the Commission

Article 22n

Representatives of other civic associations and international organisations whose objectives relate to the functions of the Commission (hereinafter: observers of the work of the Commission) may observe the proceedings of the Commission's sessions without the right to participate.

Observers of the work of the Commission who wish to attend a session shall submit their applications to the Commission in a timely manner, specifying the names of their representatives.

The Commission shall examine whether the conditions set out in the applications are met and shall decide on the approval of the applications for observation.

Representatives of the observers shall have the right to attend all sessions of the Commission, except in cases where the session is held in camera.

The Chair of the Commission is obliged to notify the observers in a timely manner of the holding of Commission sessions.

The Commission shall ensure that the observer and any interpreter accompanying them are able to observe the proceedings of the Commission without hindrance.

Representatives of the observers and any accompanying interpreter are obliged to wear their official identification prominently at all times.

Reports of the Commission

Article 22o

The Commission shall submit to the National Assembly its regular annual report on its work by the end of February of the current year for the preceding year.

The report referred to in paragraph 1 of this Article shall be published on the Commission's website, and the Commission shall notify the public media thereof.

The report referred to in paragraph 1 of this Article shall necessarily include an annual report on the audit, verification, and control of the accuracy and updating of the Voters' Register (hereinafter: the Audit Report).

The Audit Report shall contain recommendations to the competent authorities and organisations, including measures for improving the accuracy and updating of the Voters' Register.

The authorities and organisations to which the recommendations of the Audit Report relate shall be obliged to implement the recommendations and submit a report to the Commission on the measures taken within 120 days of receipt of the Audit Report.

In the course of carrying out the audit, the Commission may issue periodic reports containing recommendations to the competent authorities and organisations with measures for improving the accuracy and updating of the Voters' Register (hereinafter: Periodic Report), which shall be published on the Commission's website.

The authority or organisation to which the recommendations in the Periodic Report relate shall be obliged to implement the recommendations and submit a report to the Commission within 120 days of receipt of the Periodic Report.

The Periodic Report shall constitute an integral part of the Audit Report.

Monitoring Implementation of Recommendations

Article 22p

The Commission shall monitor the implementation of the recommendations referred to in Article 22o and examine the reports on actions taken pursuant to the recommendations submitted to it by the competent authorities and organisations.

Within 30 days of the expiry of the deadline for submitting reports under Article 22m, paragraph 5 of this law, the Commission shall review the implementation of the recommendations and submit a report thereon to the National Assembly.

A representative of the competent authority or organisation to which the recommendations relate is obliged to attend the Commission session at which the implementation of the recommendations is considered.

If, during the review of the report on implementation of the recommendations, it is established that the authority or organisation has not acted in accordance with the recommendations under Article 22o, paragraph 4 of this law, the Commission shall, by resolution, order the authority or organisation to implement the recommendations and submit a report to the Commission within 30 days of delivery of the resolution.

The Commission shall review the implementation of the resolution referred to in paragraph 4 of this Article within 15 days of receipt of the report and submit a report thereon to the National Assembly.

Public Nature of the Commission's Work

Article 22q

The work of the Commission shall be public.

Public access to the work of the Commission shall be ensured by the immediate publication on the Commission's website of: notices of Commission meetings, annual and periodic reports on its work, Commission decisions, annual and periodic reports on the audit, verification, and control of the accuracy and updating of the Voters' Register, Rules of Procedure, Audit Methodology, the Commission's Work Plan, minutes of Commission meetings, and other information within the Commission's remit of public interest.

The Commission shall issue public statements regarding its work and activities at least once a month via its website.

The Commission's website shall be established within 30 days from the entry into force of this law.

Citizens may use the Commission's website to submit notifications regarding possible irregularities in the work of the authorities responsible for maintaining and updating the Voters' Register.

Exceptionally, the Commission may, upon the proposal of a member, decide to exclude the public for reasons provided by law.

Conditions for the Functioning of the Commission

Article 22r

The conditions necessary for the functioning of the Commission shall be ensured by the National Assembly.

The funds for the Commission's operation shall be provided from the budget of the Republic of Serbia.

Members and deputy members of the Commission shall be entitled to a monthly remuneration for their work on the Commission, amounting to one and a half times the average salary before taxes and contributions paid in the Republic of Serbia, according to the most recent data published by the competent national statistical authority.

Commission members shall be entitled to reimbursement of expenses incurred in connection with their work on the Commission, in accordance with the Regulation on the Reimbursement of Expenses and Severance Pay for Civil Servants and Employees ("Official Gazette of the Republic of Serbia", No. 98/07 – consolidated text, 84/14, 84/15, 74/21, and 119/23) and in compliance with the Regulation on Remuneration and Other Benefits for Elected and Appointed Officials in State Bodies ("Official Gazette of the Republic of Serbia", No. 44/08 – consolidated text, and 78/12).

Administrative and technical tasks required for the work of the Commission shall be performed by employees of the National Assembly Service, as designated by the Secretary General of the National Assembly.

The Commission shall have a Secretary and a Deputy Secretary, appointed by the Secretary General of the National Assembly from among the employees of the National Assembly Service.

Only a person with a higher education degree in legal sciences may be appointed as Secretary or Deputy Secretary of the Commission.

Article 4.

In Article 25, after paragraph 1, new paragraphs 2–5 shall be added, as follows:

A monetary fine ranging from 100,000 to 2,000,000 dinars shall be imposed for an offence on a body or legal entity that uses personal data from the Voters' Register contrary to Article 14b of this Act, or breaches obligations stipulated in the confidentiality statement.

For the offence referred to in paragraph 2 of this Article, the responsible official in the body or legal entity shall also be liable to a monetary fine ranging from 20,000 to 150,000 dinars.

An individual who unlawfully accesses, uses, or discloses personal data from the Voters' Register shall be liable to a monetary fine ranging from 50,000 to 500,000 dinars.

A monetary fine ranging from 20,000 to 150,000 dinars shall be imposed on the responsible official in a body or organisation if:

1. the body or organisation to which an order for the provision of information or access to records was issued fails, within the prescribed deadline, to fully comply with the Commission's order, or fails to provide or allow access to records in its possession that are relevant for maintaining and updating the Voters' Register (Article 22k, paragraph 5);

2. the body or organisation to which the Commission's report recommendations relate fails to submit to the Commission a report on the implementation of those recommendations within 120 days from receipt of the report under Article 22o and transitional provisions of this Law;
3. the body or organisation fails to act in accordance with the Commission's recommendations within 30 days from the date of delivery of the conclusion under Article 22p, paragraph 4 of this Law."

Transitional Provisions

Article 5

The day following the publication of this Law in the "Official Gazette of the Republic of Serbia," the President of the National Assembly shall issue an invitation to the authorised proposers to submit, to the competent Committee within 15 days, nominations for members and deputy members of the Commission.

The competent Committee shall convene a session to establish the Proposal of the List of Candidates referred to in Article 22d, paragraph 4 of this Act, and shall submit it to the National Assembly for consideration and adoption within 15 days of the expiry of the deadline under paragraph 1 of this Article.

The National Assembly shall constitute the Commission by electing all nine members and their deputy members within 30 days from the submission of the Proposal of the List of Candidates under paragraph 2 of this Article.

Within one year of its constitution, the Commission shall submit to the National Assembly a report on the audit, verification, and control of the accuracy and updating of the Voters' Register, which shall include recommendations to the competent authorities and organisations with measures for improving the accuracy and updating of the Voters' Register.

Authorities and organisations to which the recommendations in the report under paragraph 3 of this Article relate shall act on these recommendations and submit a report on their implementation to the Commission within 120 days of receipt of the report.

Within 30 days of the expiry of the deadline for submitting reports under paragraph 4 of this Article, the Commission shall review the implementation of the recommendations at a session attended by a representative of the authority or organisation to which the recommendations relate. The Commission shall submit a report on the review of the recommendations to the National Assembly.

If, during the review of the implementation reports, the Commission determines that an authority or organisation has not acted in accordance with the recommendations under paragraph 6 of this Article, it shall, by conclusion, require the authority or organisation to comply with the recommendations and submit a report to the Commission within 30 days from the delivery of the conclusion.

The Commission shall review the implementation of the conclusion under paragraph 7 of this Article within 15 days from the submission of the report under paragraph 6 and shall submit a report to the National Assembly.

The Commission shall adopt its Rules of Procedure and Work Plan within 30 days of its constitution.

Final Provision

Article 6.

This Law shall enter into force on the eighth day following its publication in the “Official Gazette of the Republic of Serbia”.