

New Regulation on Trade as of 1 September – Margin Cap, Fee Control and Obligation to Submit Price Lists

In the Official Gazette of the Republic of Serbia, No. 76/2025, the Regulation on Special Conditions for the Performance of Trade in Certain Types of Goods (hereinafter: the “Regulation”) was published, introducing important obligations for both retail and wholesale traders.

The Regulation prescribes: special conditions for trading in certain types of goods, limitations of wholesale and retail margins, limitations of the total amount of fees, as well as the manner of submitting price lists.

The Regulation shall apply as of 1 September 2025 and remain in force for six months, until 1 March 2026.

The purpose of the Regulation is to regulate the formation of prices and fees in the trade of essential foodstuffs and consumer goods, and to ensure stable supply to consumers.

I. Goods Covered

The Regulation applies to a wide range of products, including:

- milk, dairy products, and eggs,

- bread and bakery products, flour, pasta, rice, sugar, honey, oils, salt, and spices,
- fresh and processed meat, fish, fruit and vegetables, frozen products, legumes,
- confectionery products and cereals,
- non-alcoholic beverages, coffee, and tea,
- household chemicals, personal hygiene products, and cosmetics,
- baby food and diapers.

II. Key Obligations for Traders

1. Margin Limitation

- The maximum margin in both retail and wholesale trade is capped at 20% (calculated on the price excluding VAT).
- If a lower margin applied on the day the Regulation enters into force, such lower margin shall remain applicable.
- The obligation applies to retailers and wholesalers whose total revenue in 2024 exceeded RSD 4.5 billion.

2. Fee Limitation

- The total amount of all fees that a retailer may charge a supplier may not exceed 10% of the total net invoice amount.
- The limitation does not apply to:
 - logistics rebate – up to 3%,
 - shortage or write-off – up to 1%,
 - promotional rebate (which must be fully transferred to the retail price).
- If logistics rebates and fees for shortage or write-off were not

contractually agreed on 1 August 2025, or were lower – they cannot be subsequently introduced or increased.

For any further consultations or legal assistance, please contact the team at Tasić & Partners via email at office@tasiclaw.com or by phone at [+381 11 6302233](tel:+381116302233).

3. Obligation to Submit Price Lists

- Retailers and wholesalers are obliged to electronically submit their price lists in Excel format to the Ministry of Trade at: cenovnik.trgovina@must.gov.rs
- Deadlines for submission: 1 April, 1 August, 31 August and 1 September 2025 (no later than 2 September at 10:00). Thereafter: every Monday by 14:00 during the validity of the Regulation.
- Price lists must include: product name, brand, unit of measure, price per unit, regular price, discounted price (if subject to promotion), and period of validity of the discount.

4. Supply Obligation

Retailers must ensure continuous supply of all categories of goods covered by the Regulation.

5. Penalties

Failure to comply with the Regulation shall result in the following sanctions:

- Legal entities – fine of RSD 300,000,
- Entrepreneurs – fine of RSD 150,000,
- Responsible persons – fine of RSD 50,000, with the possibility of an additional protective measure prohibiting the performance of certain activities for up to one year.