

## Licencing requirements for using Serbia's natural gas transmission system as a transit route

Recent amendments to the Energy Law, adopted in November 2024, introduced licencing requirements for entities using Serbia's natural gas transmission system as a transit route. Specifically, foreign legal entities and other entities using the natural gas transmission system solely for transit purposes are now required to obtain a **licence for the wholesale supply of natural gas**. This licence must be obtained by **6 December 2025**.

A wholesale natural gas supply licence is issued by the Energy Agency of the Republic of Serbia ("**AERS**") within 30 days from receiving a complete application. The **licencing fee** for the wholesale supply of natural gas amounts to **RSD 209,602 (approx. EUR 1,790)**.

The licence is issued for a period of **ten years** and may be extended upon request, provided that the application is submitted at least 30 days before its expiration. It is **non-transferable**.

A licence for the wholesale supply of natural gas may be issued to a foreign legal entity if it meets certain conditions, as prescribed by the Energy Law and the Regulation on licensing and certification of energy activities ("Regulation"):

- i. compliance with the financial requirements for performing energy activities (to be demonstrated as specified in the Regulation, e.g. by providing proof of payment of tax obligations, business plan for the relevant year, etc.);
- ii. the director and management body members have not been convicted of criminal offences related to economic activities;
- iii. the applicant is not subject to any measure prohibiting the performance of activities;
- iv. the applicant is not undergoing bankruptcy, liquidation, or is not subject to compulsory liquidation proceedings.

In addition, the applicant must be a participant in the natural gas market or exchange within the European Union or the Energy Community.

All foreign legal entities (incorporated outside Serbia) applying for a licence for the wholesale supply of natural gas are required to appoint a proxy in Serbia to receive official notifications during the licencing procedure in order to ensure an efficient and cost-effective process.

Transportgas Srbija d.o.o. Novi Sad, as the gas transmission system operator ("**TSO**"), adopted new Rules on the operation of the natural gas transmission system in January 2025. These "**Rules of Operation**", approved by the AERS Council on 30 January 2025, closely regulate access to the natural gas transmission system, conditions of use, and relations between the TSO and users of the system.

In addition to the Rules of Operation, the rights and obligations between the TSO and the users of the gas transmission system are further defined by the Natural Gas Transmission Agreement ("**Transmission Agreement**"), a model of which is available on the TSO's website. Users signing the Transmission Agreement are required to provide a security instrument in advance (bank guarantee, cash deposit, or promissory notes registered in Serbia). By signing the Transmission Agreement, the users gain access to the Serbian gas transmission system.

## Key contacts

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