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**Seminar organized by the Council of State of Italy and ACA-
Europe**

**“Techniques for the protection of private subjects in
contrast with public authorities: actions and remedies
– liability and compliance”**

Rome, 23 May 2022

Answers to questionnaire: Serbia



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“TECHNIQUES FOR THE PROTECTION OF PRIVATE SUBJECTS IN CONTRAST WITH PUBLIC AUTHORITIES: ACTIONS AND REMEDIES - LIABILITY AND COMPLIANCE”

INTRODUCTION

The seminar will analyse the types of actions that can be brought before the administrative judge: action of annulment, action of declaration and action of condemnation. With particular reference to the latter, the seminar will focus on compensatory measures, including damages for loss of opportunity and damages as a result of delay.

The seminar also intends to examine the possibility of any and eventual special or fast-track procedure, for introductory terms and methods which pertain to certain subjects under consideration, for example, for their economic or political relevance, such as those to be found in the sphere of public contracts (see also transversal analysis).

The aim of this questionnaire and of the subsequent seminar is to provide a wider comprehension of the similarities and differences that exist among the various legal systems of the member States insofar as they apply to the situations to be dealt with by the administrative court, paying particular attention to the content and subject matter of the relative rulings.

SESSION I

LEGAL PROCEEDINGS THAT CAN BE BROUGHT BEFORE THE ADMINISTRATIVE COURT

1. In your legal system, which judges are competent to pronounce on disputes in which one of the parties is the public administration?

- An ordinary judge
- An administrative judge
- A judge who deals with special areas
- Others

Serbian reply:

Judges of the Administrative Court render decisions in administrative disputes in which one of the parties is the public administration, while based on extraordinary legal remedies, in accordance with



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the Article 49 of the Law on Administrative Disputes (“Official Gazette of the Republic of Serbia” No. 111/09, in further text: LAD), decisions are rendered by judges of the Supreme Court of Cassation: “Against final Administrative Court decision a party or a responsible public prosecutor may file a request to the Supreme Court of Cassation to review the court decision. The request may be filed:

- 1) when the law allows it;
- 2) in cases that the court decides in full jurisdiction;
- 3) in matters in which the appeal was excluded in the administrative proceeding.

The request may be filed due to a violation of the law, other regulation or general act or violation of the rules of the proceeding which might affect the decision on the matter.”

2. Which actions can be brought before the administrative court in view of the exercise of administrative powers?

- Annulment of administrative acts
- action of condemnation
- Other actions

If you have replied ‘other actions’, please clarify which.

Serbian reply:

Before the Administrative Court a plaintiff may lodge following actions and requests:

- Lawsuit against the act (the term of act is defined under Article 4 of LAD “An administrative act, in terms of this Law, is an individual act by which a competent authority, in the direct application of regulations, decides on specific rights or obligations of a specific natural or legal person, or other party in an administrative matter”). In accordance with Article 24 para. 1 “An administrative act may be challenged by a lawsuit in an administrative dispute due to the illegality, if:
 - 1) in the act, the law, other regulation or a general act is not at all or not properly implemented;
 - 2) the act was issued by an incompetent body;
 - 3) in the process of issuing the act, the rules of the proceeding were not followed;
 - 4) the factual state is incompletely or incorrectly defined or if the identified facts brought to an incorrect conclusion in terms of the factual state;



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- 5) in the act issued based on a free assessment, the body has exceeded the limits of the legal authority or if such an act was not issued in line with the objective in which the authorisation was given.
- Lawsuit for determination, in accordance with Article 24 para. 2 : “A lawsuit may be filed also for the purpose of determining if the accused repeated his/her previous act which has been already annulled by the judgement, as well as for the purpose of determining the illegality of the issued act which has no legal effect”.
 - Lawsuit for silence of administration, in accordance with Article 15 of the LAD: “An administrative dispute may be initiated also when the competent authority fails to issue an administrative act upon the request or appeal filed by a party, in line with the conditions stipulated by this law”.
 - Within the lawsuit, there may be filed also a claim for compensation for damages and return of the things (Article 22 para. 5 of the LAD: “If the return of things or payment of compensation for damages is claimed by the lawsuit, it must include a specific claim in relation to these things or the amount of damages incurred.”)
 - Lawsuit for reopening of proceeding in the administrative dispute (Article 56 of the LAD: “Proceedings concluded with a judgement or a ruling shall be reopened upon a lawsuit by a party:
 - 1) if the party discovers new facts, or finds or obtains the opportunity to use new evidence on the basis of which the dispute would have been more favourably resolved for him/her if these facts or evidence had been presented or used in the previous court proceedings;
 - 2) if the court decision was rendered as a result of a criminal offence committed by a judge or a court employee, or if the decision was gained by a fraudulent act by an attorney or representative of a party, his/her opponent or the opponent’s representative or attorney and that act constitutes a criminal offence;
 - 3) if the court decision was based on a judgement rendered in a criminal or civil matter and that judgement was later annulled by another legally effective court decision;
 - 4) if the document on the basis of which the decision was made was false or fraudulently amended, or if a witness, expert witness or party gave false testimony at the hearing before the court and the court decision was based on that testimony;
 - 5) if the party finds or obtains the opportunity to use a previous court decision rendered in the same administrative dispute;
 - 6) if an interested person was not given the opportunity to participate in the administrative dispute;



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7) if the position of the subsequent decision of the European Court of Human Rights in the same matter may affect the legality of the final court proceeding.

For the circumstances in articles 1 and 5, paragraph 1 of this Article, a reopening of proceedings will only be permitted only if the party was not able to present these facts at the previous proceedings for no fault of his/her own.”

- Request for temporary suspension of execution of the contested administrative act as type of interim measure (article 23 of the LAD: “A lawsuit, as a rule, does not prevent the enforcement of an administrative act against which the lawsuit is filed.
At the request of the plaintiff, the court may postpone the legal effect of the final administrative act that was decided on the merits of the administrative matter, until the court decision is rendered, if the enforcement would cause harm to the plaintiff which would be difficult to rectify, and if the postponement is not against the public interest, or the postponement would not cause greater or irreparable damage to the opposing party, or interested party.

Exceptionally, parties in an administrative proceeding may request from the court to postpone the enforcement of an administrative act even before the lawsuit is filed:

- 1) in case of emergency;
- 2) in case of an appeal which, by law, does not have the suspensory effect, and proceeding on the appeal is not terminated.

At the request for the postponement of the enforcement the court shall render a decision, not later than five days from the day of receiving the request referred to in paragraphs 2 and 3 of this Article.”

- Request for execution of the Administrative Court decision (Article 71 of the LAD: “If the competent body, following the annulment of the administrative act does not pass a new administrative act immediately or within no more than 30 days, or pass an act on the enforcement of the judgement pursuant to Article 43 of this law, the party may by means of a separate filing request such an act to be passed. If the competent body does not pass the act referred to in paragraph 1 of this Article even after seven days from this request, the party may by means of a separate filing request the court which rendered the judgement to pass this act.

Upon the request by the party referred to in paragraph 2 of this Article, the court shall request the competent body to inform it of the reasons why it did not pass the administrative act. The competent body shall provide this information immediately, within no more than



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seven days. If it fails to do so, or if the information given, in the opinion of the court, does not justify the failure to enforce the court judgement, the court shall render a ruling which shall replace the act by the competent body in its entirety.

The court shall serve the ruling referred to in paragraph 3 of this Article on the body competent for enforcement, and at the same time inform the body responsible for supervision. The body responsible for enforcement shall execute this ruling without delay.”)

3. From which sources can actions be brought before the administrative court?

- Law
- Public authority regulations
- Guidelines
- Supreme Court rulings
- Other

Serbian reply:

Right to the judicial protection in administrative disputes is prescribed also by the Constitution of the Republic of Serbia.

4. Which administrative decisions can be challenged?

- Administrative acts which have a specific recipient
- General acts and regulations
- Acts inherent to the procedure
- Political acts

Serbian reply

In accordance with the Article 3 of the LAD : “In an administrative dispute, the court shall decide on the legality of final administrative acts, except on those which require a different judicial protection.

In an administrative dispute, the court shall also decide on the legality of final individual acts defining a right, obligation, or statutory interests, in terms of which, in certain cases, the law does not define a different judicial protection.

Court shall decide in administrative disputes on the legality of other final individual acts if stipulated by the law.



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Provision of this law which relate to an administrative act, shall also apply to other acts which may be subject to administrative disputes.”

5. On the grounds of which defects can the annulment of an administrative act be requested?

- Breaches of the law
- Breaches of competence
- Technicalities and procedural defects
- Breaches of general principles
- Other

Serbian reply

In accordance with the Article 24 of the LAD “An administrative act may be challenged by a lawsuit in an administrative dispute due to the illegality, if:

- 1) in the act, the law, other regulation or a general act is not at all or not properly implemented;
- 2) the act was issued by an incompetent body;
- 3) in the process of issuing the act, the rules of the proceeding were not followed;
- 4) the factual state is incompletely or incorrectly defined or if the identified facts brought to an incorrect conclusion in terms of the factual state;
- 5) in the act issued based on a free assessment, the body has exceeded the limits of the legal authority or if such an act was not issued in line with the objective in which the authorisation was given.

A lawsuit may be filed also for the purpose of determining if the accused repeated his/her previous act which has been already annulled by the judgement, as well as for the purpose of determining the illegality of the issued act which has no legal effect.”

6. Can the judge partially annul the challenged administrative act?

- Yes
- No

If your reply is yes, please elaborate.



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Serbian reply:

“If the lawsuit is accepted, the court shall render a judgement to annul the challenged administrative act in part or in its entirety and shall return the case to the competent authority for re-decision, unless a new act is required in this matter.” (Article 42 of the LAD)

7. Can the judge substitute the Administration by modifying the content of the administrative act?

- Yes
 No

If your reply is yes, please elaborate.

Serbian reply:

A Court may bring a judgement which replaces annulled act in full jurisdiction (Article 43 of the LAD), in case of active body failure to act upon judgement (Article 70 of the LAD) and in case of passive failure to act (Article 71 of the LAD).

8. When the judge annuls the challenged act, can he dictate provisions which the P.A. must abide by in the review proceedings of the subject-matter of the litigation?

- Yes
 No

If your reply is affirmative, please elaborate.

Serbian reply:

In accordance with the Article 69 para. 2 of the LAD: “If according to the nature of the matter, which was the subject of the dispute it is necessary to pass another administrative act in place of the one that has been annulled, the competent body shall pass it without delay, no later than 30 days after the day the judgement is served, and in doing so it shall be bound by the legal opinion of the court and the comments of the court in relation to the proceedings.”

9. When do the effects of the jurisdictional annulment of an administrative act become applicable?

- From the date of the adoption of the act (*ex tunc*)



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- From the date on which the judgement becomes final (*ex nunc*)
- Other

Serbian reply:

Article 69 para. 1 of the LAD: “When the court annuls an act, against which an administrative dispute was instituted, the case shall be returned to the state of a reopened proceeding based on the appeal, i.e. the state of a reopened proceeding based on the request of a party in the first instance proceeding, if the appeal was excluded by the law (the state before the annulled act was passed).”

10. Can the judge modulate the effects over time of the ruling of annulment of an administrative act?

- Yes
- No
- Other

11. Can the act of ordering payments for damages be proposed autonomously or must it always be proposed together with other kinds of actions?

- Yes
- No
- Only in certain cases

If your reply is yes, please elaborate

Serbian reply:

Only with the lawsuit for the annulment of the act.

12. In the light of what kind of behaviour is the compensatory action for damages feasible when dealing with a Public Administration?

- Implementation of an illegal and detrimental administrative act
- Non-observance of the deadline of the procedure
- Lesion of good faith and trust
- Resultant behaviour of the public administration
- Other

Please elaborate



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Serbian reply:

In accordance with Article 22 para. 1 of the LAD: “A lawsuit must contain the name and surname, address and place of residence, i.e. place and seat of the plaintiff, the administrative act against which the lawsuit is aimed, reasons for the lawsuit, the direction and scope of the proposed annulment of the administrative act, and the plaintiff’s signature.” Also, Article 72 of the LAD prescribes that “Due to the damage incurred by the failure to enforce, or the untimely enforcement of the judgement rendered in the administrative dispute, the plaintiff has the right to a compensation realised in the dispute before the competent court, pursuant to the law.”

13. Which are the different kinds of reimbursable damages?

- Material damage
- Non-material damage
- Loss of opportunity

14. Does the omission of lodging an action of annulment result in elision or reduction of the compensatory damages?

- Yes
- No
- Other

15. In order to award compensatory damages, is proof of the responsibility of the public administration required? If your reply is affirmative, which party is obliged to provide said proof?

- Yes – the party with burden of proof is...
- No

16. Can the judge convert *ex officio* one action into another?

- Yes
- No

If the reply is yes, please elaborate



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17. Is there a time-limit for the proposition of the compensatory action?

- Yes
 No

If the reply is yes, please elaborate

Serbian reply:

This subject is defined under the Law on Obligations.

18. Can the judge rule that the Administration implement an administrative act? If your reply is affirmative, what are the prerequisites for implementation?

- Yes – explain
 No

Serbian reply:

In administrative dispute judge may not order execution of administrative act. Execution of the decision is prescribed by the Article 191 of the Law on General Administrative Procedure ("Official Gazette of the Republic of Serbia" No. 18/16 and 95/18, in further text: LGAP): "(1) A decision shall be enforced for the purpose of settling pecuniary or non-pecuniary obligations. (2) Non-pecuniary obligations shall be enforced by administrative procedure (administrative enforcement), and pecuniary obligations – by judicial procedure (judicial enforcement) unless the Law states otherwise. (3) Administrative enforcement shall be executed in accordance with the Law."

SESSION II – SPECIAL PROCEDURES

1. Does your administration have provisions for special procedures

- Yes
 No

If the reply is yes, please elaborate

Serbian reply:

In accordance the Article 3 of the LGAP: "(1) This Law shall apply to the actions in all administrative matters. (2) Certain issues of the administrative procedure may be regulated by a special law only if necessary in certain administrative areas, and if in compliance with the basic



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principles set forth by this Law and only if it does not diminish the level of protection of the parties' rights and legal interests guaranteed by this Law.”

2. What do the specialities consist of?

- Ways of introducing the appeal
- Procedural time-limits
- Jurisdiction of the court
- Other

Serbian reply:

According to Article 153 para. 1 of the LGAP: “(1) The appeal shall be filed within 15 days from the date of notifying the party of the decision, unless otherwise prescribed by the Law.”

3. The special rites are established:

- According to subject (for example, tenders, procedures of expropriation, independent administration authorities)
- According to actions
- Both of the above

4. Does your system provide for appeals against the silence of the Administration at the request for an administrative provision presented by a private individual?

- Yes
- No

If the reply is yes, please elaborate

Serbian reply:

Article 19 of the LAD prescribes deadline for submission of lawsuit due to silence of administration. If a second instance authority fails to issue a decision on the appeal filed by the party against the first instance decision within 60 days from the date of receiving the appeal or within the shorter time period stipulated by the law, and fails to issue it within the extended period of seven days upon the subsequent request filed by the party to the second instance authority, the party may file a lawsuit, after the expiry of that time period, due to the non-issuance of the requested act.



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If a first instance authority, upon the request of a party, fails to issue a decision which may not be subject to an appeal, within the time period stipulated by the law regulating general administrative proceeding, and fails to issue it within the extended period of seven days upon the subsequent request filed by the party, the party may file an appeal, after the expiry of that time period, due to the non-issuance of the requested act.

Article 44 of the LAD prescribes that when the lawsuit is filed based on Article 19 of this law, and the court finds it grounded, it shall render the judgement to accept the lawsuit and order to the competent authority to render a ruling. If the court hold the necessary facts, and if the nature of the matter so allows, it may with its own judgement to directly decide the administrative matter.

5. Do the Administrations comply spontaneously with the decisions of the administrative courts?

- Yes, always
- No, never
- In the majority of cases, in any case more than in 50% of cases
- Hardly ever, in any case less than in 50% of cases

Serbian reply

The Administrative Court doesn't hold such records.

Article 69 of the LAD prescribes that when the court annuls an act, against which an administrative dispute was instituted, the case shall be returned to the state of a reopened proceeding based on the appeal, i.e. the state of a reopened proceeding based on the request of a party in the first instance proceeding, if the appeal was excluded by the law (the state before the annulled act was passed).

If according to the nature of the matter, which was the subject of the dispute it is necessary to pass another administrative act in place of the one that has been annulled, the competent body shall pass it without delay, no later than 30 days after the day the judgement is served, and in doing so it shall be bound by the legal opinion of the court and the comments of the court in relation to the proceedings.

6. In your legal system, is there a special procedure for ensuring the integral execution of the sentence?

- Yes
- No

If the reply is yes, please elaborate



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Serbian reply:

In the legal system of the Republic of Serbia a special procedure for ensuring the integral execution of the sentence is not prescribed, but the Articles 68-72. of the LAD define execution and procedure for case when public administration body doesn't execute the decision of the Administrative Court.

Provision of the Article 70 of the LAD prescribes legal consequences for active failure to follow a decision, while provision of the Article 71 prescribes legal consequences for passive failure to follow a decision of the Administrative Court.

7. Are the judge's decisions which are not of the last resort immediately enforceable?

- Yes
- No

If the reply is yes, please elaborate

Serbian reply:

Article 7 of the LAD prescribes that a judgement issued in an administrative dispute shall be obligatory. Against decision issued in an administrative dispute shall not be subject to an appeal (final judgement) and it may be executed immediately.

According to the Article 71 para. 1 of the LAD if the competent body, following the annulment of the administrative act does not pass a new administrative act immediately or within no more than 30 days, or pass an act on the enforcement of the judgement pursuant to Article 43 of this law, the party may by means of a separate filing request such an act to be passed.

8. Following the annulment of a decision characterized by discretionary power, the interested party is forced to challenge each of the ulterior negative decisions which have been deemed illegitimate by dint of defects which are different to those identified by the judge or, in alternative, are there certain mechanisms of "reduction" of the aforesaid discretionary power which ensure the definition of the litigation once and for all?

- Yes – elaborate

- No



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Serbian reply

The formulation of the question is not clear.

SESSION III – PRECAUTIONARY MEASURES

1. Does the proposition of an appeal automatically suspend the effectiveness of the administrative act?

- Yes
- No

Serbian reply:

In the Republic of Serbia, Article 23 paras. 2 and 3 of the LAD prescribe that a lawsuit, as a rule, does not prevent the enforcement of an administrative act against which the lawsuit is filed.

2. In your legal system, are precautionary measures provided for?

- Yes
- No

Serbian reply:

Article 23 of the LAD in the Republic of Serbia, prescribes that upon the request of the plaintiff, the Court may postpone the legal effect of the final administrative act that was decided on the merits of the administrative matter, until the court decision is rendered, if the enforcement would cause harm to the plaintiff which would be difficult to rectify, and if the postponement is not against the public interest, or the postponement would not cause greater or irreparable damage to the opposing party, or interested party.

Exceptionally, parties in an administrative proceeding may request from the court to postpone the enforcement of an administrative act even before the lawsuit is filed:

- 1) in case of emergency;



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2) in case of an appeal which, by law, does not have the suspensory effect, and proceeding on the appeal is not terminated.

At the request for the postponement of the enforcement the court shall render a resolution, not later than five days from the day of receiving the request referred to in paragraphs 2 and 3 of this Article.

3. What kinds of decisions can the judge apply as a precautionary measure?

- The suspension of the challenged act;
- (if the subject of the challenge is the refusal of an application) a positive measure which provisionally anticipates the effects of the administrative act being contested;
- The order to the administration to re-examine the application on the strength of indications contextually provided by the judge;
- Whatever measure necessary to satisfy, in each case, the precautionary requests presented by both parties

Serbian reply

In the Republic of Serbia, the suspension of execution of the final administrative act is only possible.

4. What are the conditions for the acceptance of a precautionary request?

- The probable validity of the action
- The probable validity of the action together with a serious prejudice
- The prevalence of public or private interest, based on the results of the equilibrium/assessment
- The required prerequisites of trial law to accord precautionary measures vary according to the different types of litigation
- Other prerequisites (please specify)

Serbian reply

Article 23 of the LAD in the Republic of Serbia, prescribes that upon the request of the plaintiff, Court may postpone the legal effect of the final administrative act that was decided on the merits of the administrative matter, until the court decision is rendered, if the enforcement would cause harm to the plaintiff which would be difficult to rectify, and if the postponement is not against the public interest, or the postponement would not cause greater or irreparable damage to the opposing party, or interested party.



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Exceptionally, parties in an administrative proceeding may request from the court to postpone the enforcement of an administrative act even before the lawsuit is filed:

- 1) in case of emergency;
- 2) in case of an appeal which, by law, does not have the suspensory effect, and proceeding on the appeal is not terminated.

At the request for the postponement of the enforcement the court shall render a resolution, not later than five days from the day of receiving the request referred to in paragraphs 2 and 3 of this Article.

5. Can the judge force the petitioner to pay bail?

- Yes
- No
- If yes, in which cases?

Serbian reply

In the Republic of Serbia, the plaintiff doesn't pay the bail.

6. Are precautionary measures generic?

- Yes
- No – are there some subjects in which precautionary measures are not admitted?
Which?

Serbian reply

In the Republic of Serbia, interim measures have generic effect and may be applied in all types of proceedings.

7. Can a precautionary request be introduced autonomously before the presentation of the main trial proceedings (*ante causam*)?

- Yes
- No

Serbian reply



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In the Republic of Serbia, request for the suspension of the execution of the administrative act may be filed even before filing a lawsuit against the act or with the lawsuit.

8. In the event of cautionary request *ante causam*, does the precautionary decision of the judge lose effectiveness?

- Yes, in the event that the interested party does not initiate main trial proceedings within the mandatory time-limit
- No, its effectiveness remains intact even if the main trial proceedings have not been initiated within the mandatory time-limit or even if the time-limit has expired

Serbian reply:

Article 23 of the LAD in the Republic of Serbia, prescribes that upon the request of the plaintiff, Court may postpone the legal effect of the final administrative act that was decided on the merits of the administrative matter, until the court decision is rendered, if the enforcement would cause harm to the plaintiff which would be difficult to rectify, and if the postponement is not against the public interest, or the postponement would not cause greater or irreparable damage to the opposing party, or interested party.

Exceptionally, parties in an administrative proceeding may request from the court to postpone the enforcement of an administrative act even before the lawsuit is filed:

- 1) in case of emergency;
- 2) in case of an appeal which, by law, does not have the suspensory effect, and proceeding on the appeal is not terminated.

At the request for the postponement of the enforcement the court shall render a resolution, not later than five days from the day of receiving the request referred to in paragraphs 2 and 3 of this Article.

9. When dealing with the precautionary request, does your legal system provide for specific procedure?

- Yes (give details of the main characteristics with regard to : trial deadlines, type of decision, motivational burden, ways for establishing debate)
- No



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Serbian reply:

In the Republic of Serbia, upon the request for suspension of the execution, Administrative Court decides within the deadline of five days upon receipt of the request from paras. 2 and 3 of the Article 23 of the LAD. There is no oral hearing in this procedure and by resolution the request may be adopted, rejected or dismissed.

10. Is the precautionary decision taken unilaterally or collegiately?

- Unilaterally;
- Collegiately;
- Collegiately, but in the event of extreme urgency, the precautionary decision can be taken temporarily by means of a simple unilateral decree;

Serbian reply:

The resolution upon the request for suspension of the execution of the final administrative act is adopted by panel consisted of three judges.

11. During the discussion of the precautionary request, can the judge directly define the judgement on the merit?

- Yes (explain in which conditions)
- No

Serbian reply:

In the Republic of Serbia, there is no obligation to hold oral hearing in the proceeding upon the request for suspension of the execution of the final administrative act.

12. Can precautionary measures be challenged before the Supreme Court /Council of State?

- Yes
- Yes, but only if they pass a test of eligibility
- No

Serbian reply:

In Serbian legal system, especially by the LAD, there is no ordinary nor extraordinary legal remedy against the resolution of the Administrative Court on suspension of the execution of the final administrative act.



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13. Can the Supreme Administrative Court / Council of State, as a precautionary measure, suspend the judgements on the merit of a judge of a lower level?

- Yes
- No

Serbian reply:

Jurisdiction of the Supreme Court of Cassation in administrative disputes refers to adjudicating upon extraordinary legal remedies and extraordinary legal remedy against resolution of the Administrative Court on suspension of the execution of the final administrative act is not prescribed by law.

14. On average, how many precautionary decisions are taken every year by the Supreme Court/ Council of State in comparison to the overall number of decisions taken?

Serbian reply:

The Supreme Court of Cassation doesn't decide upon appeals against resolutions of the Administrative Court on suspension of the execution of the final administrative act.

In 2019, the Administrative Court received the total of 604 requests for suspension of the execution of the final administrative act (with the lawsuit and before filling the lawsuit), out of which it resolved 601.

In 2020, the Administrative Court received the total of 533 requests for suspension of the execution of the final administrative act (with the lawsuit and before filling the lawsuit), out of which it resolved 536.



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