

Amendments to the Rulebook on Electronic Invoicing adopted

Tax Alert

February 2025

The Ministry of Finance of the Republic of Serbia has adopted the Amendments to the Rulebook on Electronic Invoicing (**Rulebook**), which are published in the Official Gazette of the Republic of Serbia No. 107/2024 dated 30 December 2024.

Respective changes apply as of 1 January 2025, unless specified differently in the text below.

The most important novelties are presented below.

Electronic recording of input VAT

The deadline for electronic recording of input VAT (including increase and decrease) has been extended from 10 to 12 calendar days after the end of the period for which electronic recording of input VAT (**EEPP**) is performed.

Electronic recording is performed with the balance on the day preceding the day of the recording of input VAT, unless it is performed after the 10th day of the calendar month following the tax period for which the EEPP is performed, in which case it will be performed with the balance on the 10th day of that calendar month.

In accordance with the amendments, the obligation to correct the EEPP in case of receipt of electronic invoices after submission of the EEPP and before the date of submission of the tax return, as well as the correction obligation due to other changes affecting the recording of input VAT, is abolished.

It is also specified that EEPP can be corrected in case of incorrect or incomplete data, with the exception of data that is entered automatically.

Amendments to the Rulebook also prescribe the day on which data is entered automatically in case of correction of the EEPP, depending on whether the correction is made by the 12th day of the calendar month or later.

Electronic recording of VAT

The deadline for electronic recording of VAT has been extended from the 10th to the 12th calendar day after the end of the tax period for which VAT is recorded.

The obligation to electronically record VAT based on retail supply (including advance payments) for which a fiscal invoice has been issued, is being introduced.

It is prescribed that the supply (including advance payment, increase and decrease) of travel agencies, used goods, works of art, collectibles and antiques, as well as retail supply, is recorded in summary records, in accordance with the Rulebook.

It is prescribed that the first transfer of ownership rights (including advance payment, increase and decrease) over newly built buildings, economically divisible units within those facilities and ownership shares in such properties, is to be recorded individually in accordance with the Rulebook, regardless of whether it involves retail supply, or not.

The obligation to record the calculated VAT in individual records in case when the electronic invoice has not been issued within 10 days after the end of the tax period for which the tax liability arose, as well as the obligation to correct the records in the event of subsequent issuance of the e-invoice, i.e. due to another change which has an impact on recording of VAT, has been abolished.

It is also specified that the electronic recording of VAT can be corrected in case of incorrect or incompletely stated data.

List of customs declarations

The method of creation and the content of the list of customs declarations is prescribed.

It is specified that the list of customs declarations is created in SEF automatically on the basis of customs declarations and other documentation related to the customs clearance of imported or delivered goods put into free circulation in accordance with customs regulations.

Such a list enables the user of SEF to view data from customs declarations and data related to customs clearance of goods, while the Rulebook specifies the data contained in this list in more detail.

Tax category N

In the case of issuance of an electronic invoice with the appropriate tax category, the amount that is not charged (in money, goods, or services) is expressed using tax category N, with the entry of data under the code for the application of that tax category.

Document on the decrease/increase

It is prescribed that, in the case of issuance of an electronic invoice as a document on reduction or increase (credit note/debit note), information on the date of the increase or decrease is also a mandatory element.

The respective change applies to tax periods starting as of 1st July 2025.

Delayed verification of accuracy of electronic VAT recording

In the period from 1st January 2025 to 30th June 2025, the Ministry of Finance will not take into account errors in the recording of data in VAT records, in the procedures of checking the accuracy of electronic VAT recording.

If you have any questions or need the support of our experts, feel free to contact us at tax@kpmg.rs

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