Beyond Reporting: Building Transparent and Accountable State Aid Registries in the Western Balkans



Policy Brief No. 88

1. Introduction

State aid is a policy instrument through which public authorities intervene in the economy by providing financial advantages to specific undertakings, in the form of subsidies, tax incentives, guarantees, grants, or other forms of public support. Such interventions are often justified on the basis of correcting market failures and promoting public policy objectives such as economic development, employment, or environmental protection.[1] Not every instance of such support constitutes State aid in the legal sense: under Article 107(1) TFEU, a measure qualifies as State aid only where it cumulatively (i) involves State resources and is attributable to the State, (ii) confers a selective economic advantage on the recipient, (iii) distorts or threatens to distort competition, and (iv) is liable to affect trade between Member States, as further clarified in the European Commission's 2016 Notice on the Notion of State Aid. At the same time, state aid is one of the most heavily regulated areas of European Union economic policy, given its potential to distort competition and create unequal market conditions. Within the EU, state aid control rests on the principle that aid which distorts or threatens to distort competition and affects trade between Member States is prohibited unless justified under specific derogations established under EU law. Effective State aid control therefore aims to balance legitimate public policy objectives with the need to preserve fair competition and market efficiency.

A State Aid Registry is the instrument through which this control is made operable and verifiable in practice. Basically, a registry is a structured record, ideally a searchable electronic database, of individual aid measures and awards, listing the granting authority, the beneficiary/ies, the legal basis, the amount and form of aid, the policy objective, and the duration of support.

[1] *European Commission. Treaty Article 107.*

Its purpose is twofold. Internally, it allows the responsible authorities to track the cumulative aid received by a single beneficiary and to ensure that aid stays within de minimis and cumulation limits, which is only possible if aid data is centralized and comparable across grantors. Externally, it allows citizens, businesses, competitors, and oversight bodies to see how public resources are allocated, which is the basis of accountability. A registry is therefore not just a reporting requirement attached to state aid policy, it is the record that makes state aid control possible to monitor, verify, and enforce. Its absence, or its weakness, is what allows a legally sound system to remain, in practice, unverifiable.

This is also why the registry function is directly regulated at EU level instead of being decided by individual states. The EU legal position is more differentiated: it layers several distinct obligations rather than mandating one comprehensive national registry. The European Commission's State Aid Modernization reform introduced transparency requirements that have been mandatory for EU Member States since 2016, obliging them to publish individual beneficiary-level information on aid awards above set thresholds, under particular legal bases such as the General Block Exemption Regulation and related sectoral regulations, primarily through the Commission's own Transparency Award Module and public search tool.[2] Separately, central public registration of general and SGEI de minimis aid at national or Union level applies These obligations continue to expand from 1 January 2026 with agricultural de minimis aid following from 1 January 2027.[3] Notably, the Commission has also clarified that publication can remain voluntary where neither the applicable legal basis nor a Commission decision expressly requires it -- underscoring that these are layered, threshold- and category-specific obligations (individual award publication, de minimis registration, annual reporting) rather than a blanket requirement for a single, comprehensive domestic State aid registry.[4] For the Western Balkans, approximating this layered framework as part of EU accession is therefore good administrative practice and the direction of travel candidate countries are expected to follow under the acquis -- although the acquis itself does not prescribe whether domestic implementation takes the form of one centralized registry or several interoperable ones.

Set against this regional and EU context, the main objective of this report is to critically assess the functioning of the state aid registries in WB, with particular emphasis on their institutional designs, governance structures, data management systems, transparency levels, and monitoring mechanisms. The report further seeks to identify structural and operational gaps within the current system and to provide evidence-based recommendations aimed at strengthening its effectiveness in line with European Union State aid standards. Rather than being purely descriptive, the analysis assesses whether a state aid registry ensures accountability, reliable data, and regulatory compliance.

2. Methodology

This policy brief adopts a regional, comparative, and evidence-based approach to assessing state aid registries in

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[2] European Commission, State Aid Modernisation (SAM), transparency requirements in force since 1 July 2016 under Commission Regulation (EU) No 651/2014 (General Block Exemption Regulation) and related sectoral regulations; European Commission, State Aid Transparency Public Search and Transparency Award Module (TAM).

[3] European Commission, Aid Beneficiaries - Competition Policy: from 1 January 2026, information on General and SGEI de minimis aid must be recorded in a central register at national or Union level; the same requirement applies to agricultural (AGRI) de minimis aid from 1 January 2027.

[4] European Commission, Aid Beneficiaries - Competition Policy: from 1 January 2026, information on General and SGEI de minimis aid must be recorded in a central register at national or Union level; the same requirement applies to agricultural (AGRI) de minimis aid from 1 January 2027.

six Western Balkan countries (Albania, Kosovo, Bosnia and Herzegovina, Serbia, North Macedonia, and Montenegro). Evidence was collected separately for each country by local partner organizations.[5] This consortium has also jointly developed a public platform presenting state aid information for the Western Balkans region.[6]

The research methodology combined desk research, analysis of legislation and institutional documents, review of available registries and databases, and interviews with institutions responsible for state aid and registry administration. For all six countries, the evidence was collected through document analysis and interviews with representatives of the relevant state aid control institutions/departments.

Based on this analysis, for each country, the strengths, institutional and technical gaps, limitations in transparency and verification, and practices that could serve as references for other countries in the region were identified. Finally, the findings were compared at the regional level and used to formulate concrete recommendations for strengthening State Aid Registries as instruments not only for administrative reporting, but also for transparency, accountability, monitoring, and evidence-based policymaking.

Note: comparability across countries has limits. The six countries are at different stages of institutional and registry development, and some legal and administrative terms do not map exactly from one system to another.

3. State Aid Registries in the Western Balkans

Across the six Western Balkan countries (Albania, Kosovo, Bosnia and Herzegovina, Serbia, North Macedonia, and Montenegro), legal frameworks are broadly similar to one another in their basic reporting requirements, while implementation varies considerably across countries. This similarity largely reflects each country's obligation, under its Stabilisation and Association Agreement, to approximate the EU State aid acquis; however, legal transposition does not by itself guarantee that national practice applies these rules correctly or completely, which is precisely the gap this brief examines. All countries have mechanisms requiring state aid providers to report information on aid measures, although the scope and institutional arrangements differ. The main regional gap is therefore not the absence of reporting obligations, but weak digitalization, limited integration, and restricted public accessibility of the information collected. In practice, reporting remains largely manual and fragmented, with individual aid grantors continuing to play a central role in reporting and submitting information to the relevant authorities.

While central authorities are formally responsible for coordinating or monitoring state aid information, the degree to which they consolidate and verify data varies considerably. Manual and excel-based reporting remain common, while only one of the six countries currently provides a fully operational, publicly accessible, and searchable electronic state aid registry. This limits the ability of citizens, businesses, researchers, and policymakers to monitor the volume, beneficiaries, objectives, and forms of state support.

Within this shared legal pattern, institutional and digital maturity varies most. Kosovo and Serbia have made the greatest progress towards centralized systems, although their remaining gaps are different in nature: Serbia's centres on public accessibility, while Kosovo's centres on institutional oversight Serbia has advanced further in the

[5] *Development Solutions Associates (DSA) for Albania, Centre for Development Evaluation and Social Science Research (CREDI) for Bosnia and Herzegovina, GAP Institute for Kosovo, Finance Think for North Macedonia, Centre for Advanced Economic Studies (CEVES) for Serbia, and Institute for Strategic Studies and Prognoses (ISSP) for Montenegro.*

[6] *Finance Think. State Aid - Official Website.*

technical development of its registry and in preparing grantors to use the system, but public accessibility remains limited. Kosovo, meanwhile, already has a centralized administrative database that combines information submitted by aid-granting institutions with data recorded directly by the State Aid Department through the state aid notification and approval process, meaning that the key challenge is not to create a registry from scratch but to transform the existing system into a modern, regularly updated, and publicly accessible electronic platform. This would require stronger institutional oversight, standardized data fields, systematic verification, and a public search interface.

Albania and Bosnia and Herzegovina fall somewhere in between. Both have established legal and institutional mechanisms for collecting state aid information and maintain regular reporting practices, but lack a fully integrated digital system that allows the information to be consolidated and easily accessed by the public. Their experience demonstrates that the existence of reporting obligations alone does not automatically translate into effective transparency. Bosnia and Herzegovina presents a particularly distinct model: given its decentralized institutional structure, linking registers from different institutions may work better than using one centralized database. This suggests that regional benchmarking should focus not on having the same institutional model, but on ensuring common standards for data quality, interoperability, and public disclosure.

North Macedonia represents the earliest stage of development. Unlike the other countries, it does not yet have a legal requirement specifically establishing a state aid registry, while its institutions have only recently moved towards designing such a system. Its experience illustrates the importance of establishing the legal and institutional foundations before investing in the technical infrastructure.

4. Key findings by country

4.1 Albania

Albania has established the legal and institutional foundations for collecting state aid information, but does not operate a fully functional, centralized, and publicly accessible Registry. The 2005 Regulation "On Procedures and Notification Forms" sets standardized annual reporting requirements, with the State Aid Directorate (SAD) as the central coordinating institution, collecting, verifying, and consolidating information submitted by ministries, tax and customs directorates, municipalities, the National Agency for Employment and Skills, and agencies such as AIDA. [7],[8] The State Aid Commission approves state aid measures, while the SAD provides administrative and technical support and manages day-to-day reporting.[9]

However, aid-granting institutions maintain separate programme-level records not automatically integrated into a shared national database - AIDA.[10] for instance, relies on its own beneficiary reports and inspections rather than a system linked to the SAD. The existing system already captures key elements of a registry (type and value of aid, legal basis, granting institution, and duration).[11] The main issue is fragmentation across reports, and institutional records, not absence of information.

The remaining gaps are mainly technological and organizational: manual, annual reporting with no automated updating or

[7] Republic of Albania (2005). Law No. 9374, "On State Aid," as amended, 21 April 2005. Article 18 and 19.
[8] Council of Ministers of the Republic of Albania (2005c). Decision No. 817, dated 28 December 2005, approving the Regulation "On Procedures and Notification Forms."
[9] Republic of Albania (2005). Law No. 9374, "On State Aid," as amended, 21 April 2005.
[10] Interview with AIDA representative (2026), on state aid implementation and programme-level monitoring.
[11] Council of Ministers of the Republic of Albania (2005c), Annex III reporting template; Ministry of Economy and Innovation (2025), Annual State Aid Report 2025.

interoperability with tax, treasury, or business registration systems. This limits tracking of cumulative aid and de minimis thresholds. The system is not publicly accessible as a searchable registry, with beneficiary-level information not systematically available.[12] Albania has the foundations for a centralized registry, but would need greater digital integration, standardized data-sharing, interoperability, and automated verification. Given its existing mandate, the SAD is well placed to coordinate such a system.[13]

4.2 Bosnia and Herzegovina

Bosnia and Herzegovina has a legal framework for a State Aid Inventory, but no centralized electronic State Aid Registry. The State Aid Council is responsible for maintaining the Inventory, which covers state aid by type, amount, duration, government level, and legal basis.[14]

In practice, however, operational responsibility is decentralized. Aid grantors submit annual information to the competent implementing institutions, primarily the Ministries of Finance of the Federation of Bosnia and Herzegovina and Republika Srpska, Brčko District authorities, and competent state-level institutions. These institutions verify submissions, consolidate entity-level data, and prepare annual reports for the State Aid Council. The system functions mainly as a decentralized administrative reporting rather than a continuously updated national registry, relying on internal Excel databases rather than a shared digital platform.[15]

Data quality depends on grantors submissions. Errors and inconsistencies, driven largely by limited institutional capacity. Reporting is often handled by a small number of officials with multiple responsibilities and limited familiarity with state aid rules, requiring repeated guidance each cycle.[16] The Council cannot formally return reports for revision when errors are found. There is also no public, searchable database. Annual reports and decisions are published, but detailed data stays within each institution.[17]

Institutions support modernization through connected electronic registers with common reporting standards. This would fit Bosnia and Herzegovina's decentralized system while making data sharing and reporting more efficient.[18] The main barriers are limited administrative and financial capacity, insufficient IT infrastructure, differences in reporting methodologies and digital readiness, and the need for fur more training.

4.3 Kosovo

Kosovo is one of the few Western Balkan countries with a formally established, centralized State Aid Registry. The Registry is an Excel-based database maintained and updated by the State Aid Department within the Ministry of Finance, Labour and Transfers (MFLT).[19] The Law on State Aid assigns the Department responsibility for collecting, recording and maintaining state aid data, including consolidating information submitted by aid-granting institutions.[20],[21]

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[12] *Interview with SAD representatives (2026), on state aid implementation and registry arrangements in Albania.*
[13] *Interview with Eralda Shtylla (2026), on state aid monitoring, reporting obligations, and registry arrangements in Albania.*
[14] *Law on the System of State Aid in Bosnia and Herzegovina, provisions establishing the State Aid Inventory and responsibilities of the State Aid Council*
[15] *Interviews with representatives of the State Aid Council of Bosnia and Herzegovina and the Ministries of Finance of the Federation of Bosnia and Herzegovina and Republika Srpska (2026).*
[16] *Interviews with implementing institutions confirming recurring classification errors and capacity constraints in the annual state aid reporting process (2026).*
[17] *Interview with the State Aid Council of Bosnia and Herzegovina (2026), concerning reporting governance, quality assurance, and public disclosure practices.*
[18] *Interviews with the State Aid Council and implementing-institution representatives on preferred models for modernizing the state aid reporting and registry system (2026).*
[19] *Registry refers to the Excel-based database maintained and regularly updated by the Department for State Aid Control within the Ministry of Finance, containing information on aid providers, beneficiaries, amounts, legal basis, objectives, and other relevant details.*
[20] *Official Gazette of the Republic of Kosova (2017). Law No. 05/L-100 on State Aid.*
[21] *Official Gazette of the Republic of Kosova. Law No. 05/L-100 on State Aid, provisions concerning the responsibilities of the State Aid*

The Registry covers aid measures and schemes, including grants, subsidies, guarantees, tax incentives, and de minimis aid. It records key details such as the legal basis, authority, purpose, type, sector, duration, and value.[22] However, the level of detail varies across institutions. Some provide full information, while others submit only the minimum required. This limits the Registry's use for analysis and policymaking. Budget organizations must notify the Department, which checks compliance before recording the measure.[23],[24] Approved measures are included in the Registry and annual reports. However, the Registry

is not linked to treasury, tax, procurement, or budget systems, making verification difficult and increasing the risk of underreporting.[25] The State Aid Commission, responsible for oversight and approval of state aid, has been non-operational since 2022.[26] Sanctions for non-reporting or inaccurate reporting are not applied in practice, weakening accountability and the effectiveness of the Registry.

The Registry is not publicly available through a searchable digital platform. Public access is mainly limited to State Aid Commission decisions published up to 2022.[27] The Registry is used primarily for internal monitoring and reporting to the Assembly, European Commission, and international partners. Overall, Kosovo has a centralized Registry, but it mainly serves as an administrative tool. Strengthening oversight, reporting, data exchange, and public access would improve its use.

4.4 North Macedonia

North Macedonia does not currently operate a centralized State aid registry. Under the existing legal framework, State aid providers are instead required to maintain records of granted aid and submit annual information to the Commission for Protection of Competition (CPC) by 1 March of the following year.[28] The submissions contain information on the type and amount of aid, the conditions and legal basis under which it was granted, and the beneficiaries, and are subsequently reflected in the CPC's annual reporting. However, the CPC does not currently maintain an electronic database or other centralized system through which these records can be systematically consolidated, searched, or updated.

The establishment of such a system has nevertheless been part of the reform agenda for several years. Earlier plans envisaged development of a State Aid Register within a broader State Aid Management Information System, involving both aid providers and the CPC. According to the CPC interview conducted for this research, a previous attempt to develop a de minimis registry through an externally funded project was not completed. More recently, a decision has been taken to develop a registry under the Ministry of Digital Transformation, with the CPC participating in its design and subsequently using the system for State aid control. The proposed model would assign data-entry responsibilities to designated representatives of individual grantors, while access is currently expected to be primarily institutional rather than fully public. At the time of the research, however, the system remained in the design phase, without a finalized architecture or implementation timeline.[29]

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[22] *DNSH Database, Registry database received by email (2026).*
[23] *Official Gazette of the Republic of Kosova. Provisions on reporting, monitoring, and control of state aid measures, Law No. 05/L-100 on State Aid. Ministry of Finance, State Aid Control Department, State Aid Notification.*
[24] *Official Gazette of the Republic of Kosova. Law No. 05/L-100 on State Aid, Article 8. State Aid Department.*
[25] *Ibid.*
[26] *Official Gazette of the Republic of Kosova. Law No. 05/L-100 on State Aid, provisions concerning the State Aid Commission.*
[27] *Official Gazette of the Republic of Kosovo. State Aid Commission, Decisions.*
[28] *Official Gazette of the Republic of North Macedonia, Law on State Aid Control, Official Gazette No. 145/2010, Art. 24.*
[29] *Interview with representatives of the Commission for Protection of Competition of the Republic of North Macedonia, conducted for the WEBecon regional research on State Aid Registries, 2026.*

The transition from annual document-based reporting to a centralized system is constrained primarily by administrative capacity and inter-institutional coordination. The CPC identified limited human and technical resources as a particular constraint, while development of a functioning registry will also depend on regular and standardized input from a dispersed group of ministries, agencies, municipalities and other State aid providers. The existing annual reporting mechanism therefore provides a basic information base, but does not yet offer the accessibility, regular updating or analytical functionality associated with a centralized registry.[30]

4.5 Serbia

Serbia has a clear legal basis for a centralized State aid registry, although implementation remained in transition at the research cut-off. Article 48 of the 2019 Law on State Aid Control requires the Commission for State Aid Control to maintain a single electronic register covering State aid and de minimis aid, while aid grantors are responsible for providing the underlying data [31]. The current electronic application was technically completed in 2025 in cooperation with the Office for Information Technology and eGovernment, and Commission representatives reported that data population and internal use were under way. However, the available evidence does not establish the extent of historical coverage or completeness across grantors and aid categories, and no public interface was operational at the cut-off date.[32]

The electronic register forms part of a wider State aid information architecture rather than functioning as Serbia's only source of State aid information. In addition to the Article 48 register, the system includes annual State aid reports, an annual inventory of aid schemes, annual de minimis files, published Commission decisions and the separate Inventory of State Aid 2017-2026, developed in the context of the Reform Agenda.[33] The latter provides a machine-readable overview of existing schemes and individual measures, but serves primarily as an alignment instrument and does not substitute for the award-level electronic register.

The statutory register contains information on the grantor and beneficiary, legal basis, aid type and instrument, and the amount of aid, while the completed application is reported to include notified, granted and disbursed State aid as well as granted and disbursed de minimis aid. Commission representatives reported certificate-based access for authorized users and the possibility to review awards by grantor and beneficiary and check previously received aid. Data collection nevertheless depends on a broad network of State aid providers at national, provincial and local level, making consistent population and data quality an important implementation issue. The Commission supported this process through standardized reporting and 14 training sessions for grantors during 2025.[34]

At present, the principal gap therefore concerns the transition from a legally established and technically completed system to a fully populated, transparent and externally usable registry. Public information remains distributed across several separate sources, while the Article 48 register itself was not publicly accessible at the evidence cut-off. Its actual coverage, validation procedures and level of routine use could not be independently verified because the internal database was not inspected.

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[30] *Ibid*

[31] *Official Gazette of the Republic of Serbia, Law on State Aid Control, Official Gazette of the Republic of Serbia No. 73/2019, particularly Arts. 4, 10, 48, 50, 51, 58, and 64. Article 48 establishes the single electronic State aid register, assigns responsibility for its maintenance to the Commission for State Aid Control, and specifies its minimum information fields.*

[32] *Commission for State Aid Control of the Republic of Serbia (2026), Activity Report for 2025*

[33] *Ministry of Finance of the Republic of Serbia (2026), Inventory of State Aid 2017-2026 and Action Plan for Alignment of State Aid Schemes for 2026*

[34] *Commission for State Aid Control of the Republic of Serbia (2026), Activity Report for 2025*

4.6 Montenegro

Montenegro has established a centralized institutional framework for the management of State aid data, with the Agency for Protection of Competition (APC) serving as the authority responsible for maintaining the Register of granted state aid and the Register of granted de minimis aid. Under the 2025 Law on State Aid Control, aid providers are required to record granted aid within 30 days, while the APC supervises reporting, verifies submitted information, and prepares the Annual report on granted state aid.[35] The current framework also benefits from strengthened institutional capacity and closer alignment with the EU State aid acquis following the adoption of the new legislation. At the same time, the present institutional arrangement should be distinguished from the study's 2018-2024 reference period, during which information on granted State aid was more fragmented and largely reconstructed from annual reports and other available sources.

The registry covers both individual aid and aid schemes, including subsidies, fiscal advantages, guarantees, debt write-offs and other forms of support falling under State aid legislation. Information is entered directly by granting institutions, while the APC performs a supervisory and verification role. The registry records a broad range of administrative information, including the granting institution, beneficiary, legal basis, objective of the measure, aid instrument, amount granted, dates of award and publication, and sectoral classification. The system is continuously updated, publicly accessible through the APC website, and intended to support a broad range of users, including public authorities, businesses, investors, researchers and the wider public. Beyond its transparency function, the registry also serves as the basis for annual reporting and verification of provider submissions.[36]



[35] *Official Gazette of Montenegro, Law on State Aid Control (Sl. list CG, br. 89/25, 70/26), particularly Art. 14 on the Register of granted state aid and the Register of granted de minimis aid*

[36] *Interview with representatives of the Agency for Protection of Competition of Montenegro, State Aid Control Sector, conducted for the purposes of the WEBecon regional research on State Aid Registries, 2026*

Table 1: Summary of findings by dimension and country

DIMENSION	ALBANIA	BOSNIA AND HERZEGOVINA	KOSOVO	NORTH MACEDONIA	SERBIA	MONTENEGRO
Existence of Registry	No centralized registry; only annual reports and internal databases exist.	No centralized registry; decentralized, mostly Excel-based collection.	Centralized registry (Excel-based); limited by inactive State Aid Commission since 2022.	No centralized registry; annual grantor reports. A centralized registry is currently in the design phase.	Single electronic register required by law; technical development completed in 2025 and internal rollout/ data population ongoing.	Centralized Register of Granted State Aid and separate Register of Granted De Minimis Aid are operational and publicly available.
Institutional ownership	SAD is the central coordinator; AIDA and other grantors keep their own databases	State Aid Council responsible for the Inventory; entity ministries and Brčko District handle collection.	State Aid Department (MFLT) is the central authority; Commission has oversight role but inactive since 2022.	CPC is the central State aid authority, while the planned registry is to be hosted by the Ministry of Digital Transformation; CPC will participate in design and use.	Commission for State Aid Control maintains the register; the Office for IT and eGovernment supported development. Grantors provide the underlying data.	APC is responsible for maintaining both registers; aid providers enter data, while APC supervises the process. Technical management is handled jointly by APC's IT Department and State Aid Control Sector.
Legal basis	Law No. 9374/2005 plus 2005 Regulation require annual reporting; no registry mandate.	Law on State Aid System requires a State Aid Inventory; implemented via annual reporting, not a digital system.	Law on State Aid (No. 05/L-100, 2017) assigns registry duties to the State Aid Department and Commission.	Law on State Aid Control requires annual grantor reporting, but does not mandate a centralized registry.	Law on State Aid Control requires a single electronic register and assigns responsibility to the Commission.	Law on State Aid Control requires reporting and entry of granted State aid and de minimis aid within 30 days; penalties apply for late, incorrect or incomplete entry.
Scope of incentives covered	Grants, tax incentives, subsidies, guarantees, other instruments (Annex III).	Grants, subsidies, tax exemptions, debt write-offs, guarantees, preferential loans.	Individual measures and schemes: grants, subsidies, guarantees, tax incentives, de minimis aid.	Annual reports cover State aid type, conditions, legal basis, amount and beneficiaries; no comprehensive registry exists yet.	Subsidies, tax exemptions, guarantees, debt write-offs and public-asset transactions.	Individual measures and schemes: subsidies, tax incentives, guarantees, debt write-offs, de minimis aid.

DIMENSION	ALBANIA	BOSNIA AND HERZEGOVINA	KOSOVO	NORTH MACEDONIA	SERBIA	MONTENEGRO
Data structure	Legal basis, aid type/ value, institution, sector, jobs, duration dispersed across records.	Standardized templates, but submissions often incomplete or misclassified.	Legal basis, authority, objective, type, sector, duration, value-varies by institution.	No structured database; data are contained in annual reports and include aid type, conditions, legal basis, amount and beneficiaries.	The notification, grantor, beneficiary, legal basis, aid type, instrument and amount.	Grantor, beneficiary, sector/ type, measure name and objective, legal basis, decision number, aid instrument, amount, and award date.
Data updating system	Annual cycle; manual entry and consolidation.	Annual cycle; Council cannot return adopted reports for revision.	Notify before/after a measure; not integrated with treasury, tax, or procurement systems.	Annual reporting cycle by 1 March; no electronic or continuous update mechanism.	Grantors provide data for the register (no prescribed general update interval); de minimis award data are submitted within 20 days. The deadline of 15 June concerns data for the annual report.	Continuously accessible and updated throughout the year; providers must enter data within 30 days, with automatic receipt confirmation.
Accessibility	Not public; only aggregate annual reports and Commission decisions. Finance Think (unofficial) partly fills the gap	Not public; reports/decisions online, but underlying data closed. Finance Think (unofficial) partly fills the gap	Not public; info limited to pre-2022 decisions. Finance Think (unofficial) partly fills the gap.	No public centralized registry. Planned access is expected to be mainly restricted to designated institutional users.	No public interface at the evidence cut-off; public information is dispersed across decisions, annual reports, de minimis files and the separate State Aid Inventory.	Publicly available on the APC website without any access restrictions.
Policy uses	Mainly compliance and EC reporting.	Compiles entity reports, the national Inventory, EC reporting; not a real-time tool.	Mainly internal monitoring/ reporting; little to no external stakeholder use.	Annual reports are used internally for monitoring and ex post control.	Used internally by the Commission and authorized grantors to review awards and previous aid received.	Supports transparency, annual reporting, verification and provider decision-making.

5. Shared Problems Across the Region

One of the clearest findings is that legislative frameworks are generally not the principal obstacle to establishing effective State aid registries. With the partial exception of North Macedonia, all countries have legal provisions requiring the collection and reporting of State aid information, while several already provide for centralized electronic registries. The main gap lies in implementation. Existing reporting obligations have not yet been translated everywhere into interoperable, continuously updated, and publicly accessible information systems. As a result, **reporting in some countries still remains largely manual, fragmented across institutions, and dependent on administrative capacity rather than automated processes.**

Although all countries publish some information on State aid through annual reports or institutional decisions, publicly searchable beneficiary-level information remains the exception rather than the rule. **Information is frequently dispersed across multiple institutions, available only in aggregate form, or accessible solely through internal administrative systems.** Montenegro is the only country with an unrestricted public interface; elsewhere, citizens and researchers depend on scattered annual reports, individual decisions, or the unofficial Finance Think platform. Even Montenegro's data is published only as static PDFs, not structured files. This limits public oversight, complicates independent analysis, and weakens the transparency objectives that increasingly underpin the evolving EU State aid framework.

Institutional oversight is also fragile even where the architecture exists. Kosovo's registry is undermined less by its design than by the State Aid Commission's inactivity since 2022, which has left ex-ante and ex-post scrutiny largely dormant even as the underlying database continues to be updated. Bosnia and Herzegovina's State Aid Council faces a related but distinct gap: once entity-level reports are formally adopted, it has no formal mechanism to send them back for correction when inconsistencies are later identified, leaving errors uncorrected within an otherwise functioning reporting cycle. Underlying both cases is a broader regional pattern, as data quality continues to depend heavily on the reporting capacity of individual grantors, a constraint that persists even in Montenegro, where the APC's own interview flags provider-side capacity as a live operational issue despite operating the region's most developed registry. A registry's reliability therefore rests as much on active institutional oversight as on the technical system itself, and that oversight cannot be assumed simply because a legal mandate or a database exists.

6. Good Practices

An important finding is that all six countries already possess at least part of the institutional architecture needed for effective State aid registries. Rather than introducing additional reporting obligations, reforms should focus on **digitalizing existing reporting arrangements, harmonizing data standards and improving interoperability between institutions**, which has been taking place in most of the observed countries. This approach reduces administrative burden while strengthening the quality and accessibility of information.

Where responsibilities for maintaining registry data are clearly assigned – as in Montenegro through the Agency for Protection of Competition or in Serbia through the Commission for State Aid Control – governance arrangements are more coherent and accountability for data quality is better defined. **Clear institutional ownership** should therefore accompany future registry development across the region.

The Serbian experience illustrates the importance of **supporting digital reforms with practical training for aid providers**, while Montenegro

demonstrates the benefits of **combining provider responsibility for data entry with central verification by the competition authority**. These examples suggest that technological solutions alone are insufficient unless accompanied by institutional capacity, standardized reporting procedures and quality-control mechanisms.

Bosnia and Herzegovina and North Macedonia illustrate a further, complementary lesson – **institutional design does not need to converge on a single model to be sound**. Bosnia and Herzegovina shows that a centralized database is not a precondition for good practice — given its decentralized constitutional structure, its institutions are instead converging on interoperable registers maintained by individual implementing bodies and linked through harmonized reporting standards, reflecting the country's administrative reality rather than importing a model that would not fit it. North Macedonia represents the opposite starting point, with its registry still in the design phase, but this stage is itself an advantage – it is giving North Macedonia a rare chance to build in shared regional data standards from the outset rather than retrofitting them later.

7. Conclusions and recommendations

All six countries already hold at least part of the institutional architecture needed, yet state aid reporting remains largely manual, systems rarely exchange data with one another, and public accessibility lags furthest behind – even in Montenegro's more advanced case. Kosovo, Serbia, Bosnia and Herzegovina, Albania and North Macedonia sit at different points along the same path, from design-stage to technically complete but not yet public, while Montenegro's model, though not without its own limitations, shows what a mature, centrally owned, publicly accessible registry can look like in practice. Closing this gap does not require identical institutional models, but it does require sustained attention to digitalization, interoperability, institutional capacity and public transparency, in line with the EU's State aid framework. Reform steps differ in sequence across countries but converge on a small set of shared priorities.

The first is to **open the data**. Registry content should be published through searchable public interfaces and in machine-readable formats, backed by an explicit statutory duty of public access. This is the main step still open in Serbia, Kosovo, Albania, and Bosnia and Herzegovina, while for Montenegro it means going beyond PDF-only publication. The second is to **connect and automate**: annual manual reporting should give way to continuous electronic entry, and registries should be linked to treasury, tax, budget, and business-registration data so that reported aid can be verified independently and the cumulative aid received by each beneficiary tracked against de minimis ceilings. This applies most directly to Kosovo, Albania, and Montenegro, while Bosnia and Herzegovina can reach the same goal through interoperable institution-level registers rather than a single database.

Third, each registry needs a **secure legal and institutional base**, meaning a clear mandate and an active owner. In practice, this means a legal basis for a registry in North Macedonia, a reactivated State Aid Commission in Kosovo, a formal mechanism for Bosnia and Herzegovina's State Aid Council to return flawed reports, and a formalised coordinating role for Albania's State Aid Directorate, with existing sanctions for non-reporting enforced. Fourth, **data quality has to be strengthened at the source** through systematic validation of what grantors submit and sustained grantor training, as Serbia's 2025 programme illustrates and Bosnia and Herzegovina's recurring classification errors confirm.

A smaller set of priorities can also be addressed collectively.

Rather than each country independently deciding what a registry should record, the six state aid authorities **should agree a common minimum dataset** – grantor, beneficiary, legal basis, instrument, amount, sector, decision number, and award date – aligned with the EU's Transparency Award Module fields. This would let cross-country comparison and future EU accession reporting build on shared definitions from the outset, rather than reconciling six independently designed systems later, and would directly address the comparability limits this brief's own methodology had to flag.

Create a **regional coordination mechanism** among the six state aid authorities. Registry development is currently tracked through periodic research exercises like this one, or informally through an NGO-run platform. A recurring forum among the authorities themselves would let the less advanced systems draw directly on the choices already made by their neighbours – North Macedonia's registry design, for instance, stands to gain more from a working session with the Montenegrin and Serbian teams than from a report describing their systems after the fact.

Institutionalize the comparative exercise from this policy brief. The eight-dimension framework used in this brief has value beyond a one-off study. Adopting it as a recurring regional benchmarking exercise – every two years, for example – would let progress (or its absence) be tracked consistently, rather than requiring a fresh research effort each time the question arises.

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