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Reform Agenda Update - Reform Monitor

2ND SEMESTER, 2025



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Reform Agenda Update - Reform Monitor

North Macedonia - 2ND SEMESTER, 2025

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This publication is part of the series “Reform Agenda Updates”, national monitoring reports that track the implementation of the Reform Agendas as part of the Reform and Growth Facility for the Western Balkans, within the Reform Monitor project.

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The “Reform Agenda Updates” assessment focuses on the implementation progress of country-specific obligations under the RGF. Monitoring is conducted through a set of procedural, reform implementation, and financial indicators. The core of the monitoring exercise tracks reform steps with defined deadlines, assessing their implementation status based on publicly available evidence and official documentation obtained by national authorities, and, where relevant, complemented by information from independent institutions and civil society sources. Cross-cutting attention is given to stakeholder participation and transparency.

The monitoring exercise covers selected reforms organised into so-called “*policy domains*,” created by coding the sub-areas of the harmonised policy areas in the Reform Agendas. The selected policy domains, which enable regional-level analyses, benchmarking, and comparability, are supported by the available human resources and the thematic expertise of the TEN network.

For methodological notes and the reform steps selection process, see the draft methodology note at the [link](#).

The Reform Agenda Update is structured as follows. The Key findings and recommendations provide a high-level summary. The Legal and Institutional Arrangements and Requests and Release of Funds sections monitor overall progress in the procedural and financial aspects of implementing the Reform Agenda. The last section, Reforms in Focus: Reform Monitor policy domains, provides independent monitoring findings on selected reforms. Here, each section provides a narrative snapshot of progress and obstacles in implementing Serbia’s Reform Agenda.

The cut-off date for data collection and assessment for this update is 31.12.2025. Further policy developments may shift the status of currently pending reforms and will be reflected in subsequent updates.

These monitoring updates are not a substitute for the European Commission’s formal assessment role.



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North Macedonia's Reform Agenda is being implemented within the border context of the country's EU integration process. The Reform and Growth Facility provides an additional framework to support reform efforts. At the same time, progress in accession continues to depend on developments in the fundamentals area, including the rule of law, governance, and institutional capacity. In this context, the RGF serves as both a source of financial support and a mechanism to advance reforms in line with the broader requirements of the accession process.

During the reporting period, **North Macedonia maintained compliance with the RGF framework, ensuring continued eligibility for funding.** The legal and institutional arrangements were completed on time, including the ratification of the Facility and Loan Arrangements, the establishment of the Monitoring Committee, the adoption of the Communication and Visibility Plan, and the operationalisation of the Anti-Fraud Coordination Service. Following the government restructuring, a new Minister for European Affairs was appointed at the end of 2025 and assumed the role of RGF Coordinator within the existing implementation framework. In addition, North Macedonia submitted both semi-annual payment requests and supporting RA documentation within the required timelines. Furthermore, the European Commission published its assessments on 20 July and 8 October, which found that North Macedonia had met the general and the pre-conditions for support, achieving 6 out of 21 due reform steps.

Transparency gaps remain a cross-cutting challenge. Semi-annual reports, reform fiches, and supporting documentation submitted to the EC were not made publicly available, limiting external stakeholders' ability to track implementation and undermining the transparency framework that supports RGF. Civil society participation in the Monitoring Committee is formally ensured. Still, it remains invitation-based and consultative, without guaranteed membership status or agenda-setting rights, raising concerns about predictability and stakeholders' substantive role in oversight processes.

The release and disbursement of funds continued to follow the framework's gradual and conditional approach. North Macedonia remained eligible, but benefits partial support during the reporting period due to partial reform delivery. While funds were formally released following the EC assessments, their disbursement progressed unevenly during the reporting period. The released funds channelled as loans to the national authority are disbursed, while funds as WBIF loans or grants are yet to be disbursed, pending the signature of arrangements with the European Commission and fund managers.

In accordance with the Reform Monitor project methodology, **this monitoring report tracked 25 of 44 reform steps scheduled by the cut-off date of 31 December 2025.** Across the selected policy domains, this report covers **steps due in December 2025 and unachieved steps from December 2024 and June 2025 that remained relevant under grace periods.** The monitoring findings indicate uneven implementation across policy domains that are covered in the project monitoring. More visible progress is recorded in areas where implementation depended primarily on the adoption of framework legislation, particularly in parts of the digital policy area. In contrast, more persistent delays can be observed in reform steps requiring coordinated legislative follow-up, institutional strengthening, staffing, and sustained implementation capacity, especially in rule-of-law, judiciary reforms, anti-corruption, organised crime, energy efficiency, and parts of the business environment-related reforms. These delays point to recurring cross-cutting bottlenecks, including slow parliamentary adoption, incomplete sequencing of interlinked reforms, limited transparency of supporting documents, and staffing shortfalls. As a result, several deadlines and grace-period commitments remain exposed to implementation risk, with possible implications for the timing and predictability of future RGF disbursements.

Progress across the monitored policy domains differed. **Positive developments are visible in legislative processes than in operational implementation.** In the rule of law area, progress remained partial, as delays in judicial and prosecutorial staffing, together with limited implementation of human resource strategies, continued to indicate structural capacity constraints that affect the broader operationalisation of reforms. A similar pattern was observed in the anti-corruption domain, where developments remained largely procedural and centred on legislative preparation. At the same time, several reform steps still depended on follow-up implementation measures, leaving them exposed to delays in subsequent assessment cycles. In the organised crime domain, implementation remained constrained by staffing shortages within specialised prosecutorial structures, with progress depending mainly on operational readiness rather than legislative action.

In the SOE domain, some legislative progress has been made, but it has not yet translated into the structural governance changes expected at this stage. The lack of a fully operational SOE register and the continued reliance on additional framework legislation have further slowed sequencing and implementation. In the energy efficiency domain, implementation remained underway. Still, it fell short of reform requirements, while limited transparency regarding targets and implementation progress continued to affect the assessment of alignment with Reform Agenda commitments. By contrast, the digital policy

domain recorded the most consistent progress, largely due to the adoption of primary legislation aligned with the EU acquis. Overall, this points to a broader trend in which reforms driven primarily by legal approximation have advanced more steadily than those requiring institutional strengthening, administrative capacity, and sustained operational follow-up.

Key Recommendations:

- Prioritise full operationalisation of the announced digital platform for RGF monitoring and reporting, including consideration of its public accessibility, to enhance transparency, facilitate systematic tracking of reform progress and strengthen reporting capacity.
- Strengthen the functioning of the RGF Monitoring Committee by introducing predictable and meaningful civil society participation, including the involvement of CSOs as members with clearly defined roles and rights, transparent selection criteria, improved access to documentation before and after meetings, and structured follow-up stakeholder inputs.
- Improve the transparency of RGF implementation by ensuring the systematic publication of semi-annual payment requests, national reports, and annual implementation reports to facilitate public oversight and enable evidence-based assessment of progress.
- Prioritise completion of reform steps within grace periods (particularly those with grace-period verification in June 2026) to reduce risks affecting future performance-based disbursements and the availability of allocated RGF funds.
- Strengthen coordination among responsible institutions to ensure the timely sequencing of legislation adoption, staffing decisions, and operational follow-up measures required to verify reform completion under the RGF framework.
- Strengthen the capacity and operational preparedness of institutions responsible for implementing reform steps, particularly by addressing staffing constraints, coordination gaps, and their operational readiness.
- Improve the timely delivery of reform steps by advancing legislative procedures and ensuring greater transparency and availability of implementation-related data and supporting evidence.
- Urgently accelerate implementation reform steps in the judiciary, anti-corruption and organised crime domains by closing staffing gaps, strengthening institutional capacity, completing key legislative procedures and ensuring that responsible bodies are fully operational to deliver reform commitments within the next assessment cycle.e formal compliance and facilitate verification within the RGF framework.

LEGAL AND INSTITUTIONAL ARRANGEMENTS

Procedural Step	Status	Progress Details
Reform Agenda Submission to the EU	Achieved	Formally submitted on 10 July 2024.
Reform Agenda Implementing Decision	Achieved	Adopted on 23 October 2024.
Facility Agreement Ratification and Entry into Force	Achieved	Entered into force on 4 February 2025.
Loan Agreement Ratification and Entry Into Force	Achieved	Entered into force on 3 January 2025.
National RA Coordinator Appointment	Achieved	The new Minister for European Affairs was elected on 25 December 2025 and became the new RA Coordinator.
Anti-fraud Coordination Service	Achieved	Part of the structure for implementation and oversight of the RGF, as defined by the Government Decree on 28 May 2025.
RGF Monitoring Committee Establishment	Achieved	RGF Monitoring Committee is established. The inaugural meeting was held on 2 July 2025.
RGF Monitoring Committee Functioning	Achieved	Rules of Procedure (RoP) set the framework for the functioning of the RGF Monitoring. Published on the MEA website.
Civil Society Participation in the RGF Monitoring Committee	Achieved	Participant status, providing consultative input, without agenda-setting rights, and voting power. The selection process is through nomination by the Government Council for Cooperation with CSOs and by the discretion of the co-chairs.
Technical Infrastructure for Monitoring and Reporting	Achieved	Established by the Government Decision and the Government Decree, which entered into force on 28 May 2025. The advanced preparation phase of the digital platform for monitoring and reporting of the RA is not yet publicly available. The process is supported by GIZ.
Communication and visibility plan	Achieved	Adopted on 10 March by the Government and sent to the EC on 14 March 2025.

North Macedonia previously complied with the main legal arrangement by ratifying the [Loan Agreement](#) and [Facility](#) in February 2025, thereby enabling access to RGF funding. The [Reform Agenda was formally in place, approved by the EC on 23 October 2025](#). On 20 May 2025, the Government adopted a [Decision](#) that set the institutional framework for implementing the Growth Plan for the WB and defined the role of the [Anti-Fraud Coordination Service](#), which entered into force on 28 May 2025.

During the reporting semester, the Ministry for European Affairs received a [digital platform for monitoring and reporting of the Reform Agenda](#), formally handed over on 19 December 2025 by the German Ambassador in North Macedonia, H.E. Ms Drekler and GIZ representatives. The platform, which is not yet publicly available, intends to improve efficiency, transparency, and data management through automated, integrated processes. According to MEA representative, the system is currently in an advanced preparation phase, with testing and user training forthcoming as part of efforts to further strengthen the ministry's administrative and technical capacities.

Furthermore, [a new Minister](#) for European Affairs, who also serves as RGF Coordinator, was elected on 25 December 2025. Following the government restructuring, the new minister assumed the role of RGF coordinator within the established implementation framework.

The [First Monitoring Committee meeting](#) was organised on 2 July 2025. Since the Facility Agreement entered into force on 4 February 2025 and Article 25(1) requires the first Monitoring Committee meeting within six months, North Macedonia's first meeting complies with the Article. The structures of the Monitoring Committee and the CSO participation are defined in the [Rules of Procedure \(RoP\)](#), which, along with the [Operational conclusions](#), were published on the MEA website. The Monitoring Committee serves as the primary oversight mechanism for the RGF, supported by a permanent Secretariat and a framework that engages non-state actors, including CSOs, in structured dialogue.

According to the operational conclusions, the selection of CSO representatives for the RGF monitoring committees follow the agreed RoP. The RoP does not establish mandatory, permanent membership of CSOs on the Monitoring Committee, as CSOs are not listed among the members in Annex 1 of the RoP. At the same time, CSO participation remains possible under the category of "other relevant bodies" in line with Annex 1 of the RoPs (under item 10) and Article 2(1). In addition, Annex 2 within the RoP explicitly provides for CSOs to be invited as "participants" and an ad hoc basis to attend Monitoring Committee meetings, meaning their participation depends on invitation and the practical arrangements put in place to ensure inclusiveness.

Overall, within this framework, the **CSO's participation in the Monitoring Committee is ensured by invitation through two mechanisms**. The first is the selection of CSO representatives by the Monitoring Committee Secretariat based on nominations requested from the [Government Council for Cooperation with CSOs](#), and the second is through proposals by the EU Delegation and the RGF Coordinator. In this context, the Secretariat of the Monitoring Committee selects participating organisations by sending requests to the Government

Council for Cooperation with CSOs to nominate representatives, applying the RoP requirement to ensure a well-balanced range of sector-specific expertise. Based on the first meeting and the RoP, CSO participation was participatory and by invitation, following the second mechanism of participant selection explained above.

While the invitation-based approach shapes who participates, the distinction between formalistic and meaningful CSO participation extends beyond the selection process and largely depends on the rights and modalities granted to CSOs within the Monitoring Committee. This includes timely access to information, clear opportunities to influence the agenda, the right to speak and submit inputs and structured follow-up on how contributions are considered.

Nevertheless, the current invitation-based selection mechanism may raise concerns about predictability, consistency, and transparency, thereby reducing the substantive role of the CSOs and shifting participation towards more formalistic rather than meaningful engagement.

Procedural compliance remains decisive for eligibility, continuity and timing of disbursements, as funding can only be released once the required requests and supporting evidence are submitted and subsequently validated. During the reporting period, North Macedonia submitted its second semi-annual request and supporting documentation on 15 July 2025, concerning the reforms due by June 2025 and pending reform steps from the previous period. On **20 July** and **8 October**, the EC published its assessments of North Macedonia's implementation of the Reform Agenda for the relevant cut-off dates, covering 21 reform steps in total, of which the country had achieved 6, representing a completion rate of 28.6%. In addition, the Implementing Decision of the EC confirms that the General Conditions and Pre-conditions are met. The unfulfilled reform steps are in a grace period.

The **third semi-annual request and supporting documentation were submitted on 15 January 2026**, on the reforms due by December 2025 and pending reform steps from the previous period. On the same date, the 2025 Annual Report on the RGF implementation was also submitted.¹ The European Commission is currently assessing the report within the standard 90-day review period. If no further clarifications or remarks are needed, the evaluation is expected to be finalised by mid-April 2026.

While the submission of the semi-annual report represents a significant step in the process, none of them has been made publicly available yet.

Procedural Step	Status	Progress Details
Pre-Financing request	Achieved	North Macedonia submitted the request for pre-financing in November 2024.
Pre-Financing disbursement	Achieved	Out of the 52,4 million euros allocated/released, 24.4 million euros have been disbursed as a loan to the treasury on 18 March.2025. No funds have been disbursed under WBIF loans and Grants.
Semi-annual payment request submission	Achieved	The second Semi-annual payment request submission was on 15 July 2025.
Supporting documentation for reform completion (national semi-annual reporting)	Achieved	North Macedonia submitted the fiches and supporting documentation together with the second semi-annual payment request and the documents on pending reform steps, but they have not been made public.
EC assessment on RA implementation	Achieved	20 July 2025 and 8 October 2025 EC implementing decisions are published in the MEA and EC websites.
General Conditions met	Achieved	According to both EC implementing decisions, general conditions are maintained.
Pre-Conditions met	Achieved	According to both EC implementing decisions, pre-conditions (democratic standards) were upheld.
Annual RGF Implementation Report Prepared and Submitted	Achieved	Official submission letter to EC submitted in March 2025. Not made public.

¹ According to MEA representative.

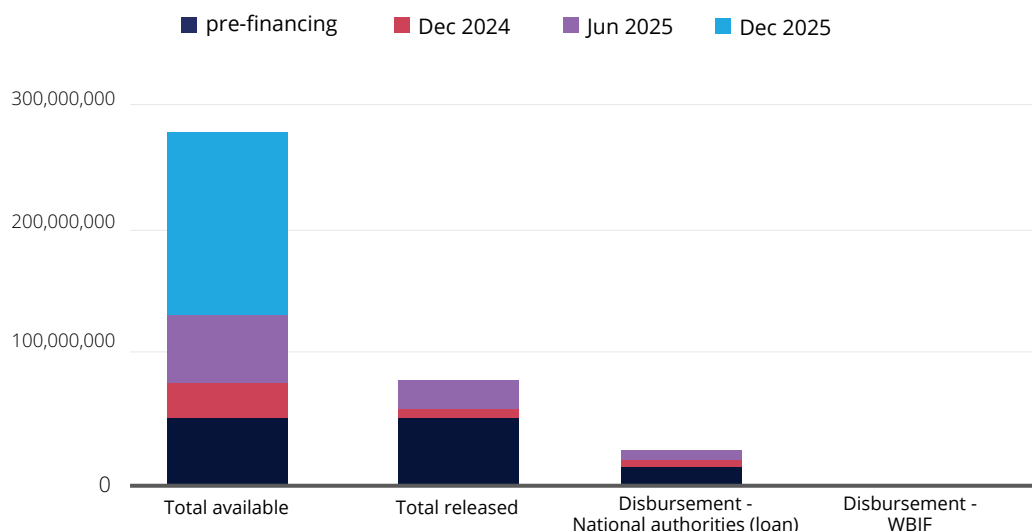
During the reporting semester, a total of 274.97 million euros under the RGF envelope was available to North Macedonia, including pre-financing (52.4 million euros) and allocations linked to reform steps due in December 2024 (17,1 million euros), June 2025 (70,6 million euros) and December 2025 (134,87 million euros). In line with the Facility and the Loan Agreement, each disbursement of pre-financing, gradually clears the corresponding share of the released pre-financing linked to both loan support and non-repayable financial support, until the total released amount of 52.4 million euros is fully disbursed.

The total amount of funds released to North Macedonia is approximately 76.4 million euros to date, including 7.9 million euros for the December 2024 cut-off date, 15.9 million euros for the June 2025 cut-off date, and 52.4 million euros in pre-financing.

The released funds for the RGF beneficiary consist of two-thirds loans (Loans to the national authority and Loans to WBIF) and one-third grants. [According to the EC Scoreboard](#), approximately 35.5 million euros has been disbursed to North Macedonia as loans to the National authority, while no funds have been channelled to the WBIF nor to the Grants, to date. Out of the total 52.4 million euros released for pre-financing, EC disbursed approximately 24.4 million euros to North Macedonia as Loans to the national authority.

The remaining disbursements of 11.1 million euros are linked to the reform steps achieved for the December 2024 and June 2025 cut-off dates, accounting for 3.7 and 7.4 million euros, respectively.

North Macedonia use of RGF funds, S2 2025 (Jul-Dec 2025)



In this update, the Reform Monitor tracked 25 reform steps across the selected policy domains, out of 44 reform steps scheduled for implementation by the cut-off date. The coverage includes reform steps with deadlines in the reporting semester, December 2025, as well as remaining steps from earlier deadlines, December 2024 and June 2025, that are relevant for implementation and RGF assessment, which is in the implementation grace period.

The table below provides a summary overview by policy area and policy domain, indicating which reforms are covered. It indicates how many reform steps are monitored in each case as an entry point to the detailed policy-domain analysis and reform-step assessments presented in the following sections.

Policy area (harmonised)		
Reform (ID & Title)	Progress Details	In focus [due and monitored]
Fundamentals and Rule of Law		
Judicial reforms	Reform 5.2.1. Improve judicial integrity by revising the processes of recruitment, selection, appointment, appraisal, promotion, transfer and dismissal of judges and prosecutors.	4/5 (2 grace period, 2 due Dec 2025 and 1 on upcoming period)
	Reform 5.2.2. Adopt and implement a new Action plan for the prevention of corruption in the judiciary for 2026-2029.	1/2 (1 due Dec 2025, 1 on upcoming period)
	Reform 5.3.1. Implement an improved regulatory framework of the Judicial Council, in particular regarding the disciplinary and appeal proceedings of judges (in line with the TAIEX peer review mission of Sep 2023).	3/3 (1 grace period, 2 due Dec 2025)
	Reform 5.4.1. Ensure a fully functional automated case management information system in courts and in the Public Prosecutors' Office, with no manual distribution of cases.	0/2 (0 due Dec 2025, 2 on upcoming period)
Anti-corruption	Reform 5.5.1. Additional resources allocated to the Office of the Basic Public Prosecutor for Organised Crime and Corruption, notably specialised prosecutors, financial experts, and digital forensic analysts.	1/1 (1 due Dec 2025)
	Reform 5.5.2. Increase the number of investigations, prosecutions, final judgements, seizures, and final confiscations in corruption, including high-level cases.	2 / 4 (2 due Dec 25, 2 on upcoming period)
	Reform 5.5.3. Increase the capacities of the investigative centres within the Public Prosecution Office, in line with the recommendations of the peer review mission from Sep 2023.	0/1 (0 due Dec 25, 1 on upcoming period)

REFORMS IN FOCUS: REFORM MONITOR POLICY DOMAINS

Fight against organised crime	Reform 5.6.1. Introduce a target-based approach to combating serious and organised crime, with a concrete action plan and strategy that leads to improving the track record of investigations, prosecutions, final judgements, seizures, and final confiscations in cases of organised crime, including high-level cases.	1/5 (1 due Dec 25, 1 grace period, 3 on upcoming period)
	Reform 5.7.1. Strengthen capacities with regard to asset confiscation and recovery in line with the EU acquis. Establish an Asset Recovery Office ARO in charge of the identification and tracking of criminal assets, in line with the EU acquis.	1/3 (1 grace period, 3 on upcoming period)
Digital Transition		
Digital public services	Reform 2.2.2.2. Digital Public Services.	3/6 (2 achieved, 1 due Dec 25, 3 on upcoming period)
	Reform 2.2.2.3. Widen the offer of public e-services offered through the governmental e-platform and simplify administrative and electronic procedures.	0/2 (0 due Dec 25, 2 on upcoming period)
Cyber resilience	Reform 2.2.1.1. Setting up a comprehensive framework for cyber resilience (introducing requirements of NIS2 Directive and strengthening relevant institutions).	1/4 (1 fully achieved, 3 on upcoming period)
Energy and Green Transition		
Energy efficiency	Reform 2.1.5.1. Implementation of the Energy Performance in Buildings and Energy Efficiency Directives.	2/6 (1 grace period, 1 due Dec 25, 4 on upcoming period)
Renewables	Reform 2.1.3.1. Deployment of renewable energy: Implementation of the Renewable Energy Directive (permitting, guarantees of origin, energy communities) and transparent and competitive procedures for the deployment of renewable energy.	0/4 (0 due Dec 25, 4 on upcoming period)
Human Capital		
Vocational education and training (VET)	Reform 3.1.1. Reinforce the education system to address the skills mismatch, increase access to and quality of VET, and improve access to work-based learning and dual education (including private sector involvement).	0/5 (0 due Dec 26, 5 on upcoming period)
Business Environment and Private Sector Development		
Competition policy / State aid	Reform 4.1.2. Make the state aid regime more transparent and efficient.	1/6 (1 due Dec 25, 5 on upcoming period)
State-owned enterprises (SOEs)	Reform 4.1.5. Reform the governance of State-Owned Enterprises with a focus on the Railways and Postal services.	4 /10 (1 achieved, 2 grace period, 1 due Dec 25, 6 on upcoming period)

Reform efforts in the **Judicial Reforms policy domain** aim to restore the legitimacy and effectiveness of the Judicial Council and strengthen judicial independence by addressing concerns over interference, weak accountability, and declining public trust, including contested leadership changes and procedures widely viewed by experts and civil society as irregular. Building on issues also highlighted by the EC and informed by recommendations from an EU TAIEX peer review mission, the reforms seek to improve the Council's transparency, decision-making integrity, and resilience to political influence. In parallel, the policy domain advances corruption prevention in the judiciary through implementation of the Judicial Council's anti-corruption programme and action plan, reinforcing integrity, accountability, transparency, digitalization, public awareness and safeguards in sensitive areas such as procurement and employment. A further core stand is to improve judicial integrity by revising the legal and procedural framework for the recruitment, selection, appointment, promotion, transfer, and dismissal of judges and prosecutors to ensure a merit-based, transparent, and credible staffing process.

Judicial reform implementation during the reporting period showed limited progress, with several formal deliverables completed, but systemic constraints continued to undermine effectiveness and predictability. On the legislative side, the new Law on the Judicial Council was adopted at the end of December 2025, representing a key step toward strengthening governance and accountability in the Council's work. In parallel, the Programme and Action Plan for the Prevention and Monitoring of Corruption in the Judiciary 2026-2029 was adopted and made publicly available. However, implementation remains in its early stages and will require continued monitoring to assess whether new procedures are consistently applied in practice.

In contrast, progress under reform steps targeting human resources planning and staffing remains limited. While appointments of judges from the 8th generation address open vacancies in 2025, the recruitment pipeline remains fragile due to the continued blockage of new Academy enrolment, linked to funding and approval constraints. Progress on the remuneration framework remains incomplete. While amendments to the Laws on judges' and prosecutors' salaries were adopted earlier, the broader legislative package, including the Laws on Judicial and Prosecutorial Services, made no progress during the reporting period. Moreover, later attempts to revise salary coefficients through a shortened procedure raised concerns about transparency and inclusiveness. In addition, the initiation of Constitutional Court proceedings introduced legal uncertainty with potential implications for judicial independence. Overall, the implementation of judicial reforms is partial and uneven, with recurring bottlenecks in staffing, transparency, and the timely completion of legislation.

In this domain, the project monitors four reforms in total, out of which one will be monitored in the upcoming period. During the reporting period within the Judicial reforms policy domain, the project monitors three reforms, comprising eight reform steps, as presented in the table below. This RA update monitors four due reform steps under this policy domain, of which three are in the grace period, five are due by the cut-off date, and four fall in the upcoming periods.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Reform 5.2.1 Improve judicial integrity by revising the processes of recruitment, selection, appointment, appraisal, promotion, transfer and dismissal of judges and prosecutors.			
Step: The vacant positions for judges and prosecutors are filled on a regular basis based on the projections by the Judicial Council/Council of Public Prosecutors following the implementation of the Human Resources management strategies in courts/PPOs (December 2024 and repeated December 2026). (double reform step).	Dec 2024	Not achieved - Grace period until Dec 2026	Staffing challenges remain. In 2025, 68 judges were appointed to basic courts (49 under the first call and 19 under the second call). The Council of Public Prosecutors selected 28 out of 97 candidates, highlighting ongoing staffing coordination challenges.
Step: Adopt amendments to the laws regulating salaries of judges and prosecutors, as well as of the court and prosecutorial administrations (by June 2025).	Jun 2025	Not achieved- Grace period until June 2026	Law amendments on the salaries of Judges and the salaries of public prosecutors were adopted (after the cut-off date), while the Laws on judicial and prosecutorial service remain pending. Laws contested before the Constitutional Court.
Step: New Law on Public Prosecution and new Law on Council for Public Prosecutors adopted and timely implemented, in line with the EU acquis and European standards, including the opinion of the Venice Commission (by December 2025).	Dec 2025	EC assessment pending	Draft Laws on Public Prosecution and Draft Law on Council of Public Prosecutors advanced. Parliamentary adoption is pending.
Step: Ensure the financial independence of the judicial system to attain the goals of the Judicial Strategy (2024-2028), in line with the Law on Judicial Budget.	Dec 2025	EC assessment pending	Preparatory steps were initiated to amend the judiciary's budgetary framework. While procedural progress was made on the Law on Judicial Budget and Law on Public Prosecution, the necessary legislative amendments have not yet been adopted.
Reform 5.2.2. Adopt and implement a new Action plan for the prevention of corruption in the judiciary for 2026-2029			
Step: Adopt the Action plan for the prevention of corruption in the judiciary for 2026-2029 (December 2025).	Dec 2025	EC assessment pending	The Programme and Action Plan for the Prevention and Monitoring of Corruption in the Judiciary (2026-2029) was adopted in December 2025.

Reform 5.3.1: Implement an improved regulatory framework of the Judicial Council, in particular, for disciplinary and appeal proceedings of judges (in line with the TAIEX peer review mission of Sep 2023).			
Step: New Law on Judicial Council adopted in line with the 'peer review' on the functioning of the Judicial Council, from Sep '23, and the opinion of the Venice Commission (by June 2025).	Jun 2025	Not achieved-Grace period until June 2026	New Law on Judicial Council adopted on 29 December 2025.
Step: New members of the Judicial Council (replacing those whose mandates have expired) elected in line with amended law (December 2025).	Dec 2025	EC assessment pending	Vacancy-filling procedures were launched before the new eligibility and election rules entered into force. The First appointments progressed after the cut-off dates (The President's proposals on members on 9 January 2026, the parliamentary vote on 12 January 2026, and a new call launched by the Parliament on 2 February 2026)
Step: Judges and prosecutors subject to disciplinary proceedings have all the guarantees of a fair trial (December 2025)	Dec 2025	EC assessment pending	New Law on Judicial Council adopted on 29 December 2025, while Law on Public Prosecution in Governmental procedure (not adopted by the cut-off date)

Reform 5.2.1. Improve judicial integrity by revising the processes of recruitment, selection, appointment, appraisal, promotion, transfer and dismissal of judges and prosecutors.

- **Step: The vacant positions for judges and prosecutors are filled on a regular basis based on the projections by the Judicial Council/Council of Public Prosecutors following the implementation of the Human Resources management strategies in courts/PPOs. (December 2024 and repeated December 2026), (Delayed, EC assessment: Not achieved)**

The monitoring tracks whether judge and prosecutor appointments occur consistently and follows the staffing projections of the Judicial Council and the Council of Public Prosecutors, while also emphasising merit-based recruitment and transparent, reasoned decisions to ensure institutions are adequately staffed. Over the reported period, the judicial staffing continued to face shortcomings. The EC assessment noted that the HR strategies remain outdated and are neither implemented nor monitored in practice. Enrollment at the Academy for Judges and Prosecutors remained stalled as the Ministry of Finance deferred funding approval pending the adoption of the 2026 State Budget. Consequently, at the end of 2025, the Management Board annulled the original 2023 public announcement for 130 candidates, as the continuous lack of financial resources rendered the initial recruitment process obsolete.

This delay effectively breaks the training pipeline for the 9th generation, further limiting the intake of new cohorts into the judiciary.² At the same time, raising the retirement age to 67 serves as a temporary measure that delays vacancies rather than establishing a sustainable recruitment solution for judges and prosecutors. Vacancies for judges and public prosecutors are publicly announced on the official websites of the respective councils. The required number of judges and public prosecutors, as set by the Judicial Council and the Council of Public Prosecutors, is communicated to the Academy when it launches a call for a new cohort of trainee judges and prosecutors. For the latest intake involving the 8th generation of trainees, which completed its training in February 2025, the Judicial Council initially indicated a requirement for 50 judges. During the appointment process in 2025, the Council significantly exceeded this quota; after selecting 49 judges in the first call, it issued a supplementary announcement to appoint an additional 19,³ bringing the total to 68 judges from this cohort of 97 graduates. From the perspective of the Council of Public Prosecutors, the agreed indicative staffing numbers were not respected, as the Judicial Council's over-selection disrupted the planned distribution of the available candidates. Consequently, only 28 public prosecutors were selected, partly due to administrative hurdles and withdrawn applications, but also reflecting a lack of adherence to the initial inter-institutional agreement.⁴ This discrepancy underscores a failure in following projected staffing needs and highlights the urgent need for stronger coordination and a more disciplined workforce assessment in the judiciary⁵.

Overall, while appointments of judges from the Academy's 8th generation partially addressed vacancies in 2025, persistent systemic constraints blocked Academy enrollment due to insufficient funding. In addition, limited institutional coordination on staffing needs continues to undermine a predictable staffing pipeline for the judiciary.

- ***Step: Adopt amendments to the laws regulating salaries of judges and prosecutors, as well as of the court and prosecutorial administrations. (June 2025), (Delayed, EC assessment: Not achieved)***

This reform step requires amendments to four laws governing remuneration for different categories of judicial and prosecutorial staff (Law on Judges' Salaries, Law on Public Prosecutors' Salaries, Law on Judicial Service, and Law on Prosecutorial Service). The intended effect is to strengthen independence and integrity, mitigate corruption risks, and make the judicial career more appealing.

2 More info at the EPI's Shadow Report on Chapter 23 for the period between October 2024 – September 2025 available in the following link: <https://epi.org.mk/post/32883?lang=en>

3 FOI reply on 24.02.2026 by the Judicial Council.

4 More info at the EPI's Shadow Report on Chapter 23 for the period between October 2024 – September 2025 available in the following link: <https://epi.org.mk/post/32883?lang=en>

5 According to report by the Coalition All4FairTrials Link: <http://all4fairtrials.org.mk/wp-content/uploads/2026/02/AN-SJOSS-2025.pdf>

On 27 December 2024, the amendments to the Law on Judges' Salaries and the Amendments to the Law on Public Prosecutors' Salaries, were adopted and applied in February 2024.

During the reporting period, in its 89th session, the Parliament adopted a package of Laws proposed by the parliamentary group of the ruling party to harmonise the salaries of elected and appointed officials. The stated aim of the package was to ensure a fairer distribution of budgetary resources and align these salaries with the country's economic conditions. The amendments foresee a reduction in the salaries of judges and public prosecutors. In this context, the Parliament adopted the Draft Law on Amendments to the Law on the Salaries of Judges and Amendments to the Law on the Salaries of Public Prosecutors, both under a shortened procedure, on 25 February 2026, raising concerns regarding transparency and inclusiveness of the drafting process.

Consequently, the Constitutional Court accepted initiatives filed by judges and public prosecutors, opened proceedings to review the constitutionality of the amendments reducing salary coefficients for judges, citing concerns that such reductions may undermine judicial independence and autonomy.

During the reporting period, no further developments were recorded regarding the Draft Laws on Judicial Service and Law on Prosecutorial Service, although the Draft Laws had previously been prepared and published on the ENER platform by the end of March and the end of June, respectively.

Overall, the Law amendments on Salaries of Judges and Salaries of Public Prosecutors were adopted and later amended, while the Laws on Judicial and Prosecutorial Service remain pending. Moreover, the Constitutional Court's decisions introduce legal uncertainty and require further monitoring of compliance with safeguards for judicial independence. As the grace period for this reform step expires at the end of 2026, the absence of progress on the legislative measures poses a risk to the timely and full completion of this reform step, as well as the possibility of accessing the RGF funds linked to it.

- **Step: New Law on Public Prosecution and new Law on Council for Public Prosecutors adopted and timely implemented, in line with the EU acquis and European standards, including the opinion of the Venice Commission. (December 2025)**

This reform step focuses on drafting and adopting two new laws: the Law on Public Prosecution and the Law on the Council of Public Prosecutors, through an inclusive working group process to strengthen governance, recruitment, and disciplinary rules, as well as alignment with EU GRECO and Venice Commission standards. During the reporting period, the Law on Public Prosecution

has not yet been adopted by the Parliament. The [Draft Law on Public Prosecution was adopted by the Government on 30 December 2025](#), at the 140th session, indicating progress within the executive track. The [draft law was published in ENER on 14 April 2025](#), including the [Regulatory Impact Assessment Report](#), which demonstrates that public consultations were launched. In addition, the Minister of Justice requested an opinion from the Venice Commission by letter dated 24 July 2025,⁶ which resulted in a [joint opinion of the Venice Commission and the Council of Europe DGI](#) on the draft laws, covering both draft laws. Overall, it assessed the laws as positive. Currently, after the cut-off date, the new Law on Public Prosecution is in a parliamentary procedure, and the plenary session is scheduled for [10 March 2026](#).

The second law, on the Council of Public Prosecutors, was also not adopted by the Parliament by the cut-off date. According to FOI reply,⁷ the [draft law was published for consultation on ENER on 26 May 2025](#), and a working group was established, indicating ongoing drafting and stakeholder engagement. After the cut-off date, on 5 March, the Government submitted the Law to the Parliament.

Overall, as the Parliament has adopted neither of the two key laws, but progress can be noted in the drafting consultation phase, including government adoption, publication on ENER, establishment of a working group for the Law on the Council of PPs and positive opinion by the Venice Commission, the implementation of this reform step is partial, indicating continued movement within the preparatory stage, but no completion of the reform step within the reporting period.

- ***Step: Ensure the financial independence of the judicial system to attain the goals of the Judicial Strategy (2024-2028), in line with the Law on Judicial Budget. (December 2025)***

This reform step aims to strengthen judicial and prosecutorial independence by securing legally guaranteed, adequate and autonomously managed funding and financial management capacity for the courts and the Public Prosecutor's Office, in line with European standards and peer-review recommendations. The reform step foresees raising allocations to define thresholds, notably 0.8% of GDP for the judiciary and 0.4% of the state budget for the Public Prosecution. In this regard, the focus of this reform is on two legislative changes: adopting a Law amending and supplementing the Law on the Judicial Budget, and adopting the Law on Public Prosecution.

During the reporting period, preparatory steps were initiated to amend the budgetary framework for the judiciary. According to the Ministry of Justice, a working group to draft amendments to the Law on the Judicial Budget was

⁶ According to representative from the Ministry of Justice

⁷ FOI reply on 17.11.2025

established on 31 October 2025,⁸ followed by an [ENER announcement on 14 November 2025](#), launching the process of preparing a draft law amending and supplementing the Law on the Judicial Budget. However, the Law amending and supplementing the Law on the Judicial Budget is not publicly available. The Law on Public Prosecution moved forward through key procedural stages, including the [publication of the Draft version of the Law on ENER for consultation on 14 April 2025](#), a [positive joint opinion from the Venice Commission and CoE DGI on 24 July 2025](#), and adoption by the [Government on 30 December 2025](#). The Parliament did not adopt the Law. It entered Parliamentary procedure on [6 February 2026](#) and is currently in the second reading stage.

While some procedural steps were taken, including progress on the Law on Public Prosecution and the initiation of amendments to the Law on the Judicial Budget, the overall progress on this reform remained partial, as the necessary legislative measures were not adopted by the cut-off date.

Reform 5.2.2. Adopt and implement a new Action plan for the prevention of corruption in the judiciary for 2026-2029

- **Step: Adopt the Action plan for the prevention of corruption in the judiciary for 2026-2029. (December 2025)**

During the reporting period, the Judicial Council advanced efforts to strengthen integrity and anti-corruption safeguards in the judiciary by developing the Programme and Action Plan for the Prevention and Monitoring of Corruption in the Judiciary (2026-2029). The [draft was presented on 25 November 2025](#), and the [Programme](#) and [Action Plan](#) were subsequently adopted in December 2025 and made publicly available, confirming that the Judicial Council has formally endorsed the key policy document.

The presentation of these documents was delivered to a broader audience, including CSO representatives. In addition, stakeholder outreach was initiated through [roundtables](#) held across the appellate regions of Skopje, Bitola, Gostivar, and Shtip. These events served to present the draft to the judges and court staff, suggesting an effort to engage relevant institutional actors during the drafting phase. However, additional documents, such as written feedback, are not publicly accessible, limiting the ability to assess the quality of consultations. The lack of published explanatory documents prevents verification of alignment with the EU policy framework.

⁸ According to representative from the Ministry of Justice

Reform 5.3.1. Implement an improved regulatory framework of the Judicial Council, in particular, for disciplinary and appeal proceedings of judges (in line with the TAIEX peer review mission of Sep 2023)

- **Step: New Law on Judicial Council adopted in line with the ‘peer review’ on the functioning of the Judicial Council, from Sep ‘23, and the opinion of the Venice Commission. (June 2025), (Delayed, EC assessment: Not achieved)**
During the reporting period, the new Law on the Judicial Council was adopted. The [Parliament adopted the law on 29 December 2025](#), and it was published in the [Official Gazette No. 269/2025 on 31 December 2025](#), confirming completion of the formal adoption process. The draft law introduces measures intended to strengthen transparency and accountability in the Judicial Council’s work, including measures to increase transparency in the procedure for dismissing the Council President. Clearer criteria for selecting a “distinguished legal expert”, and public hearings for the appointment of non-judge members, alongside reinforced rules and deadlines governing the selection, disciplinary responsibility, and dismissal of judge members.

The drafting process demonstrates a structured approach and efforts to gather broader input. The Ministry of Justice established a working group to prepare the draft law in line with recommendations stemming from the Peer Review Mission, and the group reportedly held 23 meetings⁹ to address the identified recommendations. In addition, there 5 public debates were organised.¹⁰ In addition, the draft law was [published on ENER on 15 May 2025](#), indicating that a formal consultation channel was used, while external expertise was incorporated through a [Venice Commission opinion requested on 25 April 2025 and adopted at the Commission’s 143rd Plenary Session](#), following reporters’ comments and online consultations held on 22 May 2025.

According to the statement to the media made by the Deputy Minister of Justice, the law’s provisions, as described, reflect alignment with European standards by strengthening procedural safeguards relevant to judicial independence, including requirements for reasoned decisions in appointment and accountability cases, clearer deadlines and more defended appeal procedures.¹¹ The law entered into force on the eighth day following its publication in the Official Gazette, meaning it became applicable on 8 January 2026. Initial implementation is therefore at an early stage. Further monitoring should verify whether new hearings, criteria, and accountability rules are applied consistently and whether they improve the Council’s transparency and decision-making.

⁹ According to representative of Ministry of Justice

¹⁰ Statement to the media by the Deputy Minister Alen Derebran Link:<https://shorturl.at/0DHMR>

¹¹ Ibid

- **Step: New members of the Judicial Council (replacing those whose mandates have expired) elected in line with amended law. (December 2025)**

This reform step implementation depends on the adoption of the new Law on Judicial Council, which was in a grace period to be implemented by June 2026. The new Law on Judicial Council was adopted by the Parliament on 29 December 2025. In this regard, several steps were initiated to fill vacant positions of two members in the Council, one from among judges belonging to the minorities that constitute more than 20% of the population, and one member nominated by the President of the state). These included the call announced by the Parliament on [17 November 2025](#) to elect a member to replace a member of the Judicial Council whose mandate and a public call announced by the Judicial Council for the election of a judge, a member from a minority that constitutes more than 20 % of the population, on [20 November 2025](#). However, these processes were launched while the new Law on the Judicial Council, which introduces stricter eligibility requirements and updated election procedures, was still pending. Consequently, the selection of the new members was conducted under the previous legal framework.

In his context, the [Blueprint Group for Judicial reforms raised concerns](#) as well that the call had been published and the selection process conducted before the adoption of the new Law on the Judicial Council, questioning the consistency of the process within the intended reform framework.

Before the cut-off date, there were no results or publicly announced decisions on the selection outcomes. In addition, more evidence is needed on the documentation that confirms how candidates were evaluated against the criteria as required under the existing law.

Appointment decisions for other positions occurred after the reporting cut-off period. The President of the Republic of North Macedonia indicated that [nominations would follow the adoption of the new law](#). On 9 January 2026, the President proposed two members, after which the [Parliament voted for the appointments](#), dated [12 January 2026](#). Additionally, on [2 February](#), the [Parliament announced a public call](#) for the election of a Judicial Council member who is elected by the Parliament of North Macedonia, and the process is ongoing. In this regard, on [26 February 2026](#), the Parliament held a public session for the presentation of candidates who applied under the call, in line with the provisions of the new Law on the Judicial Council.

These developments indicate that implementation progressed partially and beyond the cut-off date. While the new Law on the Judicial Council was adopted on 29 December 2025, key procedures on appointments were initiated

before its adoption and therefore carried out under the previous legal framework, raising concerns about alignment with the intended reform framework and prompting reactions from the CSOs.

- ***Step: Judges and prosecutors subject to disciplinary proceedings have all the guarantees of a fair trial. (December 2025)***

This reform step is tied to several key laws: the new Law on Judicial Council, the Law on Public Prosecution and the Law on the Council of Public Prosecutors. During the reporting period, legislative amendments linked to strengthening judicial integrity progressed through drafting, consultation and external expert review. The key laws tied to this reform step were published on the ENER platform on [13 May 2025](#), the new [Law on Judicial Council](#), on [14 May 2025](#), the [Law on Public Prosecution](#), and on [26 May 2025](#), the [Law on the Council of Public Prosecutors](#), which indicates that public consultations were initiated. In parallel, the Minister of Justice requested an expert opinion from the Venice Commission through a [letter on 24 July 2025](#), which led to a [Joint Opinion of the Venice Commission and the Council of Europe DGI](#) on the draft laws related to the Public Prosecutors' Office and the Council of Public Prosecutors.

Additionally, the [new Law on the Judicial Council was adopted on 29 December 2025](#), confirming completion of the legislative process for this act within the cut-off date. By contrast, the new [Law on Public Prosecution entered Government procedure on 30 December 2025](#) but had not been adopted by the end of the cut-off date, meaning that the reform step package remains incomplete from a legislative standpoint. The developments in this context, after the cut-off date, note that currently, the new Law on Public Prosecution is in a parliamentary procedure and the plenary session is scheduled for [10 March 2026](#).

Overall, while the procedural steps of drafting consultation via the ENER platform, public debates, working group meetings and external expert review were completed for both legislation frameworks needed, only the new Law on Judicial Council was adopted by the cut-off date. Further monitoring is needed to track the completion of the legislative process for the new Law of Public Prosecution and the new Law on the Council of Public Prosecutors, and to assess whether the adopted laws include safeguards for fair trials and effective appeal rights.

Reform efforts under the Anti-corruption policy domain focus on strengthening the institutional capacity and operational readiness of the bodies responsible for preventing, investigating, and prosecuting corruption, particularly the Public Prosecutor’s Office for Organised Crime and Corruption and its investigative support structures. This includes improving staffing and specialised expertise, ensuring adequate resources and infrastructure, including forensic and technical capacities, as well as reinforcing the ability of institutions to function effectively and deliver measurable results, especially in complex and high-level cases.

At the same time, reform efforts seek to address systematic barriers that continue to undermine performance, such as weak inter-institutional cooperation, limited resources for financial investigations and asset recovery, and delays or reversals in major corruption proceedings. A key reform track is strengthening the legal clarity by updating the criminal justice framework, following concerns that the September 2023 Criminal Code amendments weakened corruption-related provisions. This is to be achieved through drafting and adoption of a new Criminal Code and an updated Criminal Procedure Code, aligned with EU Acquis and international standards and prepared through an inclusive working group input and broader public consultations. In this domain, the project monitors two reforms.

During the reporting period within the Anti-corruption policy domain, the project monitors two reforms with three reform steps as presented in the table below. Overall, the project monitors reforms reform steps under this policy domain, out of which three are due by the cut-off date and three fall in the upcoming periods.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Reform 5.5.1 Additional resources allocated to the Office of the Basic Public Prosecutor for Organised Crime and Corruption, notably specialised prosecutors, financial experts, and digital forensic analysts.			
Step: Basic Public Prosecution Office for Organised Crime and Corruption is fully and adequately staffed with, notably, specialised prosecutors, financial experts, and digital forensic analysts.	Dec 2025	EC assessment pending	Staffing shortfalls and limited data. 13 Public Prosecutors (1 Chief Basic Prosecutor and 12 Prosecutors in the PPO OCC) Investigative centre staffing: 29 investigators and 2 professional associates. 3 investigators in the Digital Forensics Laboratory, 2 investigators in the Analytical Centre and 5 investigators conducting financial analysis supported by 7 operational officers. The key internal acts, the rule-book and the new systematisation are not available.

Reform 5.5.2: Increase the number of investigations, prosecutions, final judgements, seizures, and final confiscations in corruption, including high-level cases.			
Step: Adoption of the Criminal Code in line with the EU acquis and European standards, including the definition of abuse of functions, with sufficiently long statutes of limitations and effective, proportionate and dissuasive sanctioning (December 2025).	Dec 2025	EC assessment pending	The amendments to the Criminal Code entered parliamentary procedure on 17 December 2025, and the adoption was on 28 January 2026. Lack of transparency regarding the stage of drafting of the New Criminal Code.
Step: Adoption of a new Code for Criminal Procedure, aligned with EU acquis and international practice (December 2025).	Dec 2025	EC assessment pending	Amendments to the Code for Criminal Procedure had not been adopted by the Parliament by the cut-off date.

Reform 5.5.1. Additional resources allocated to the Office of the Basic Public Prosecutor for Organised Crime and Corruption, notably specialised prosecutors, financial experts, and digital forensic analysts.

- ***Basic Public Prosecution Office for Organised Crime and Corruption is fully and adequately staffed with, notably, specialised prosecutors, financial experts, and digital forensic analysts. (December 2025)***

This step requires the fulfilment of all vacant positions within the Basic Public Prosecution Office for Organised Crime and Corruption with the skilled and knowledgeable staff in line with the law and following merit-based procedures. Available information indicates continuing gaps in staffing and internal organisation of the Basic Public Prosecutor’s Office for Prosecuting Organised Crime and Corruption. The most recent publicly available [Decision determining the number of prosecutors](#) dates from 2023 and foresees 1 Chief Basic Public Prosecutor and 17 prosecutors in the office. However, the [website lists 1 Chief Prosecutor and 12 prosecutors \(out of 18 required\)](#), suggesting that the envisaged staffing level has not been reached and that a shortfall remains compared to the formally determined structure.

According to FOI reply,¹² the Investigative centre currently includes **29 investigators (out of the 30 required)** and two professional associates who work with prosecutors. The same response outlines the distribution of functions, indicating three investigators engaged in the Digital Forensics Laboratory that work in extraction from mobile phones and other electronic devices, two investigators that work in the Analytical Centre and five investigators conducting financial

12 FOI reply on 12.02.2026 by the Public Prosecution Office for Organized Crime and Corruption

analyses (out of the 20 required), supported by seven operational officers. The remaining staff are engaged by the Operational Technical Agency in relation to special investigative measures. Having only a few staff members focused on financial analysis indicates that specialised support in this area remains limited.

The relevant Rulebook on the Organization and Manner of Work of Investigative Centers is referenced as the key internal act governing investigative center, yet is not publicly accessible. Only the [Rulebook on Amendments and Supplements to the Rulebook on the Internal Operation of Public Prosecutors' Offices to internal operations](#) is publicly available, which merely notes that registers in offices with investigative centers are regulated by a separate rulebook.

According to the Reform Agenda, the current Systematisation Act that is adopted under the previous Law on Public Prosecutors foresees 72 **administrative posts** with only 31 filled. In addition, the Reform Agenda notes that a New Systematisation Act is under preparation to better reflect needs through an increased number of positions and staff reallocation. However, no Systematisation Act is publicly available, nor was it provided through FOI, which prevents any evidence-based assessment of administrative staffing arrangements or whether recruitment processes and announcements follow staffing projections and are published in line with timelines.

Overall, available information indicates persistent staffing gaps in the Basic Prosecution Office for Organised Crime and Corruption by the cut-off date. While some progress is evident in the staffing of the investigative centre, the absence of full staffing, limited specialised financial analysis capacity, and the lack of publicly accessible systematisation and internal organisation act to constrain a full assessment of compliance with legal requirements and merit-based recruitment procedures.

Reform 5.5.2. Increase the number of investigations, prosecutions, final judgements, seizures, and final confiscations in corruption, including high-level cases.

- ***Step: Adoption of the Criminal Code in line with the EU acquis and European standards, including the definition of abuse of functions, with sufficiently long statutes of limitations and effective, proportionate and dissuasive sanctioning. (December 2025)***

There is limited transparency and a lack of public information regarding the current stage of drafting of the New Criminal Code, while only amendments to the existing Criminal Code were adopted during the reporting period.

The amendments to the Criminal Code progressed from drafting to parliamentary adoption. This legislative process was initiated through an [ENER announcement published on 16 April 2025](#) on the preparation of a Draft Law amending and supplementing the Criminal Code. However, no draft text or accompanying materials were published on ENER, including no correspondence table. In this regard, the Ministry of Justice noted that preparation of the correspondence table is still pending and that additional alignment is required with four EU Directives.¹³ The Ministry of Justice further reported that a new working group was established on 26 September 2025¹⁴ to continue revising the prepared text.

The amendments to the Criminal Code [entered parliamentary procedure on 17 December 2025](#), but were adopted on [28.01.2026](#) after the cut-off date. Furthermore, the amendments entered into force on the eighth day following publication in the Official Gazette with selected provisions, Article 1,7,8,9 and 10 entering into force on 1 February 2026, which is also after the cut-off date.

The absence of published drafts and summaries limits the ability to assess the transparency and inclusiveness in the drafting process. Limited transparency and insufficient publicly available information continue to constrain insight into the current stage of drafting of the new Criminal Code.

- ***Step: Adoption of a new Code for Criminal Procedure, aligned with EU acquis and international practice. (December 2025)***

During the reporting period, amendments to the Code of Criminal Procedure remained at a preparatory stage and had not progressed to adoption in Parliament. The last available information on the Code for Criminal Procedure on [ENER dates back to 2008](#). According to the [Ministry of Justice's press release on 6 May 2025](#), a working draft version had been prepared, the text had been translated into English, and public hearings had been held as part of efforts to modernise and streamline criminal procedure. However, no public information is available on draft text of the law. The same communication indicated that the preparation of correspondence tables was ongoing, however, these tables are not publicly available. Overall, given that the amendments had not been adopted by the Parliament by the cut-off date, the reform step is still pending. Further monitoring is needed to track the progress in the consultation process and the adoption and implementation of the new Code of Criminal Procedure.

¹³ According to representative of Ministry of Justice

¹⁴ Ibid

Within the **Fight against Organised Crime policy domain**, the overall aim is to strengthen North Macedonia’s capacity to prevent, investigate, and effectively combat serious and organised crime through a threat-based, EU-aligned strategic framework, stronger inter-institutional coordination, and more robust tools for financial investigations and asset confiscation. In this domain, the project monitors 2 reforms (5.6.1 and 5.7.1). The reforms in this policy domain focus on strengthening coordination and improving effectiveness in preventing and combating serious and organised crime through the National Strategy and Action Plan for Organised Crime (2025-2029). In addition, it aims to strengthen North Macedonia’s capacity to run financial investigations and confiscate criminal assets through a new national strategy and key laws on asset recovery, management of confiscated property and civil (non-conviction confiscation) to strengthen the fight against organised crime and corruption. Progress in the organised crime domain remained capacity-dependent and limited by staffing gaps.

During the reporting period within the Fight against Organised Crime policy domain, the project monitors two reforms, including two reform steps in total, out of which one is in a grace period, and one is due in December 2025. Overall, the project monitors eight reform steps under this policy domain, out of which two are by the cut-off date and six fall in the upcoming periods.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Reform 5.6.1: Introduce a target-based approach to combating serious and organised crime, with a concrete action plan and strategy that leads to improving the track record of investigations, prosecutions, final judgements, seizures, and final confiscations in cases of organised crime, including high-level cases			
Step: Amended the Law on Weapons with the EU classification of weapons harmonised (by December 2025)	Dec 2025	EC assessment pending	The Law on Weapons had not been adopted by the Parliament.
Reform 5.7.1: Strengthen capacities with regard to asset confiscation and recovery in line with the EU acqui			
Step: All vacancies on the Agency for Management of Confiscated Property have been filled (by June 2025).	Jun 2025	Not achieved- Grace period until June 2026	The new systematisation provides for 65 job positions. In 2025-2026, 23 recruitments were approved (5 in 2025 and 18 in 2026), with 4 completed and 1 ongoing in 2026 and only 1 completed so far in 2026. Once fully implemented, the Agency projects 61 staff, leaving 4 positions unfilled.

Reform 5.6.1. Introduce a target-based approach to combating serious and organised crime, with a concrete action plan and strategy that leads to improving the track record of investigations, prosecutions, final judgements, seizures, and final confiscations in cases of organised crime, including high-level cases (1/ 5)

- **Step: Amended the Law on Weapons with the EU classification of weapons harmonised. (December 2025)**

The amendments to the Law on Weapons had not been adopted by the Parliament, and there was no evidence that the draft had entered the government procedure. Nevertheless, progress was recorded on the participatory track, as the [Draft Law on Weapons](#), together with the [draft Regulatory Impact Assessment Report](#), was published on the ENER platform for public consultation on 28 November 2025, indicating that the consultation phase with the public had been formally initiated within the reporting period.

Available information points to some degree of stakeholder engagement during drafting. A working group had been established,¹⁵ while the [regulatory impact assessment report](#) notes that stakeholder proposals were considered, including inputs from the Hunting Federation of North Macedonia and the Macedonian Sport Shooting Federation. However, no additional public documentation is available on the working group composition or further information regarding the incorporated suggestions through the ENER platform, limiting the assessment of transparency and inclusiveness.

In terms of EU alignment, the regulatory impact assessment report indicates that the proposed amendments are intended to harmonise national rules with key EU instruments, including standards related to categorisation and technical specification, notably for alarm and signal weapons, transport requirements, marketing firearms, export controls, and deactivation standards. At the same time, the Ministry of Justice indicated that correspondence tables are still pending¹⁶ and that the next step involves consultation with the EU, with an opinion not yet issued.

¹⁵ According to representative of Ministry of Justice

¹⁶ Ibid

Reform 5.7.1. Strengthen capacities with regard to asset confiscation and recovery in line with the EU acquis. Establish an Asset Recovery Office ARO in charge of the identification and tracking of criminal assets, in line with the EU acquis.

- **Step: All vacancies on the Agency for Management of Confiscated Property have been filled. (June 2025), (Delayed, EC assessment: Not achieved)**

This reform step focuses on reinforcing North Macedonia's asset recovery system by strengthening the institutional and procedural framework for tracing, seizing, managing, and confiscating assets linked to corruption and organised crime, with the aim of improving overall recovery results. This reform step was not achieved by the deadline, and its grace period is due June 2026.

During the reporting period, the Agency's staffing developments could not be fully assessed through publicly available sources, as the Agency's website provides limited information on recruitment and staffing movements. Based on FOI reply received on 19 February 2026, the Agency reported on the changes in job positions and employment in 2025. In this regard, in 2025, there was an increase to 41 permanent employees by November 2025 and 11 fixed-term staff were engaged in December 2025, which resulted in a total of 52 employees at the end of the year.¹⁷ The Agency reported entering January 2026 with 42 permanent staff, completing recruitment of a Head of Department for Accounting and payments on 9 January 2026, and maintaining an ongoing vacancy procedure for an administrative officer and an IT specialist.

In terms of organisational structure, the Agency reported that the review of job systematisation in December 2025 concluded a need for rationalisation due to a high share of technical staff and duplication of positions not aligned with expanded mandates. A revised Employment Plan for 2026 was submitted accordingly, with the Ministry of Finance issuing financial consent on 15.01.2026 and the new systematisation providing for 65 job positions.¹⁸ Overall, the Agency reported that across 2025-2026, 23 permanent recruitments were approved (5 in 2025 and 18 in 2026), with four completed and one ongoing in 2025, and one completed so far in 2026. According to the Agency, once fully implemented, the Agency expects to reach 61 employees, leaving four positions unfilled under the systematisation.¹⁹

¹⁷ FOI reply on 19.02.2026 by the Agency for Management of Confiscated Property

¹⁸ Ibid

¹⁹ Ibid

One public vacancy announcement is published on the Agency's website (after the cut-off date), while the FOI reply indicates additional recruitment activity that cannot be tracked on the website, limiting independent verification. In addition, based on the FOI reply by the Agency, the selection decisions and ranking lists are published following the vacancy announcement via the Agency for Administration, and recruitment criteria are set in the Law on Administrative Servants and the Law on Employees in the Public sector, and further specified by the Agency systematisation. However, no publicly available documentation was identified to verify the qualifications of recruited staff met the job requirements. On the Agency's website, only the [application form and the employment decision](#) related to the public vacancy posted on the website can be found.

The Agency further confirmed the adoption of an Annual Training plan dated 22 December 2025, which envisages training activities for 17 staff members. At this stage, an assessment of whether staffing developments have translated into improved Agency performance cannot be made.

Reform efforts in the **Digital public services policy domain** aim to modernise public administration by delivering accessible, efficient and transparent digital public services aligned with EU standards. In this domain, the project monitors two reforms (one of which is in the upcoming period). The Digital Public Services reform focuses on enhancing digital governance, making public services more accessible, efficient, and citizen-oriented. These efforts are reflected in legislative frameworks, IT infrastructure upgrades, and inter-sectoral strategies that aim to build a digitally capable and transparent public sector aligned with EU standards.

North Macedonia has made progress in this policy domain, completing two reform steps by adopting the Law on Electronic Documents, Electronic Identification and Trust Services, as well as the Law on Archiving of Electronic Documents.

During the reporting period within the Digital public services policy domain, the project monitors one reform with six reform steps. Two reform steps are achieved, one is due December 2025 and three should be implemented in the upcoming periods.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor finding
Reform 2.2.2.2 Digital Public Services			
Step: Compliance with the EU Digital Identity Regulation and eIDAS2 Regulation by adoption of the updated Law on Electronic Document, Electronic Identification and Trust Services, including compliance with the new EU Digital Identity Regulation, revising the eIDAS Regulation.	Jun 2025	Fully Achieved - EC assessment S2 2025	Law on Electronic Documents, Electronic Identification and Trust Services adopted on 4 July 2025
Step: Adopt legislation to allow for the archiving of electronic documents	Jun 2025	Fully Achieved - EC assessment S2 2025	Law on Archiving of Electronic Documents, adopted on 4 July 2025
Step: Join the EU Third Countries trusted list for the validation of electronic signatures as advanced electronic signatures in the EU as a first step towards pursuing mutual recognition of qualified trust services; Trust services available and start issuing qualified certificates; Ensure implementation of e-identity and e-signature services for citizens and businesses.	Dec 2025	EC assessment pending	Legal basis established. North Macedonia is not yet listed in the EU Trusted list.

Reform 2.2.2.2. Digital Public Services

- **Step: Compliance with the EU Digital Identity Regulation and eIDAS2 Regulation by adoption of the updated Law on Electronic Document, Electronic Identification and Trust Services, including compliance with the new EU Digital Identity Regulation, revising the eIDAS Regulation. (June 2025), (EC assessment: Fully achieved)**

This reform step is fully achieved according to the [EC's assessment](#). In addition, there were no additional remarks regarding this reform step in the first pilot-monitoring report of this project. The amendments to the [Law on Electronic Documents, Electronic Identification and Trust Services adopted on 4 July 2025](#) (which is after the cut-off date, 30 June 2025), represent a key step in bringing the national framework closer to the eIDAS2 requirements and enabling implementation of the European Digital Identity architecture, including the Digital Identity Wallet. In the European Commission's assessment, the adoption of these amendments constitutes the central milestone for this reform step as it establishes the core legal foundations needed for further operationalisation and follow-up measures.

- **Step: Adopt legislation to allow for the archiving of electronic documents. (June 2025), (EC assessment: Fully achieved)**

This reform step is fully achieved according to the [EC's assessment](#). In addition, there were no additional remarks regarding this reform step in the first pilot-monitoring report of this project. The Law on Archiving of Electronic Documents, adopted on 4 July 2025 (which is after the cut-off date, 30 June 2025), establishes the core legal framework for the long-term preservation of electronic records and provides the basis for developing a digital document management system. While implementing by-laws and operational measures is foreseen under subsequent steps, the EC assessed this reform step as fully achieved, given that the primary legislation is in place.

- ***Step: Join the EU Third Countries trusted list for the validation of electronic signatures as advanced electronic signatures in the EU as a first step towards pursuing mutual recognition of qualified trust services; Trust services available and start issuing qualified certificates; Ensure implementation of e-identity and e-signature services for citizens and businesses. Adopt legislation to allow for the archiving of electronic documents. (December 2025)***

During the reporting period, the adoption of the [Law amending and supplementing the Law on Electronic Documents, Electronic Identification and Trust Services](#) established the domestic legal basis for approximation with EIDAS2 and the future European Digital Identity framework. This reform step supports the wider digitalisation of public services and e-government by strengthening the regulatory environment for trust services and enabling future solutions such as an e-wallet.

The implementation is under the responsibility of the Ministry for Digital Transformation, which manages the Register of Trust Service Providers and electronic identification schemes, with key oversight and registration functions institutionally assigned.

In the absence of published organograms, staffing plans, and recruitment reporting linked to this function, the monitoring assessment cannot verify readiness beyond the existence of the legal framework and assigned responsibilities.

A progress towards EU-level recognition and cross-border interoperability is noted by the representative of the Ministry at the Second NKM-RA meeting. Namely, a request was submitted at the end of October 2025,²⁰ but by the cut-off date, no public response had been received. At the same time, despite the submission of an official request to DG CONNECT and ongoing efforts linked to digital public services, including the planned e-wallet, EU-level recognition has not yet been confirmed, as [North Macedonia is not listed in the EU Trusted List](#). The most recent update to the list was on 26 February 2026, when Ukraine was added. This indicates that full operationalisation remains ongoing.

²⁰ According to the representative of the Ministry for Digital Transformation at the Second NKM-RA meeting.

Reform efforts in the **Cyber Resilience policy domain** focus on building a secure and efficient digital environment. They involve legislative alignment with the EU, institutional strengthening, technical capacity-building, and the integration of cybersecurity principles into public administration and service delivery. In this policy domain, the project monitors one reform. This reform is foundational to achieving a digitally secure, transparent, and EU-aligned governance system.

During the reporting period within the Cybersecurity policy domain, the project monitors one reform with one reform step that is fully achieved.

Overall, the project monitors four reform steps in this policy domain, out of which one is fully achieved and three fall in the upcoming periods.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Reform 2.2.1.1: Setting up a comprehensive framework for cyber resilience (introducing requirements of NIS2 Directive and strengthening relevant institutions)			
Step: Adopt and implement a cybersecurity legislative framework that is fully aligned with EU cybersecurity policy and EU cybersecurity acquis, i.e. the Law on security of networks and information systems and updated cybersecurity strategy (by June 2025).	Jun 2025	Fully Achieved - EC assessment S2 2025	The Cybersecurity law was adopted on 4 July 2025.

Reform 2.2.1.1. Setting up a comprehensive framework for cyber resilience (introducing requirements of NIS2 Directive and strengthening relevant institutions)

- **Step: Adopt and implement a cybersecurity legislative framework that is fully aligned with EU cybersecurity policy and EU cybersecurity acquis, i.e. the Law on security of networks and information systems and updated cybersecurity strategy. (June 2025), (EC assessment: Fully achieved)**

This reform step is fully achieved according to the [EC's assessment](#). In addition, there were no additional remarks regarding this reform step in the first pilot-monitoring report of this project. [The Law on Cybersecurity](#) was adopted on 4 July 2025 (which is after the cut-off date, 30 June 2025), and the EC notes that it is largely aligned with NIS2, establishing obligations for essential entities and supervisory authorities. While some gaps remain, most notably the need to adopt implementing by-laws, which are addressed under subsequent reform steps, the EC considered the reform step fully achieved due to the level of alignment secured in the primary legislation together with the adoption of the Cybersecurity Strategy 2025-2028.

Reform efforts in the **Energy Efficiency policy domain** are integral to North Macedonia's broader strategy for a green transition. They are driven by substantial planned investments, collaborative initiatives, and legislative reforms focused on decreasing coal dependency, promoting environmental protection, and ensuring compliance with EU climate and energy objectives. The implementation in this policy domain showed uneven progress. While the 3-year Renovation Plan was formally adopted, it is not publicly available, highlighting transparency gaps. Limited implementation progress, infrastructure challenges and transparency remain key obstacles that require urgent attention.

During the reporting period within the Energy efficiency policy domain, the project monitors one reform, including two reform steps, out of which one is in a grace period, and one is due in December 2025. In addition, under this reform, two reform steps fall in the upcoming period.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Reform 2.1.5.1: Implementation of the Energy Performance in Buildings and Energy Efficiency Directives			
Step: A 3-year renovation plan for Central Government Buildings to be adopted, aligned with the annual 3% renovation target.	Jun 2025	Not achieved- Grace period until June 2026	The 3-year renovation plan was formally adopted, but it is not publicly available
Step: For consumption-based metering and billing at the individual level, individual meters shall be installed where technically feasible and cost-effective in terms of being proportionate in relation to energy savings in line with Directive 2023/955: -all newly constructed buildings	Dec 2025	EC assessment pending	No public reporting on this. FOI data show near full substation metering in four areas, but coverage is limited and individual metering remains unreported.

Reform 2.1.5.1. Implementation of the Energy Performance in Buildings and Energy Efficiency Directives

- **Step: A 3-year renovation plan for Central Government Buildings to be adopted, aligned with the annual 3% renovation target. (June 2025), (Delayed, EC assessment: Not achieved)**

This reform step was not achieved according to the EC assessment and is in a grace period until June 2026. During the reporting period, the 3-year renovation plan was formally adopted by the Government for the period November 2025-November 2028 at its [119th session](#) on 14 October 2025, but it is not publicly available. Based on the Ministry of Energy, Mining and Mineral Resources on [18 November 2025](#), the Plan sets clear and measurable targets, covering 14 public buildings with a total useful area of 102.992 m², hosting 33 institutions and serving over 5.000 daily users. It also frames expected outcomes in practical terms, reducing energy costs, improving working conditions, cutting emissions and modernising the public sector, supported by an estimated 29% CO₂ reduction.²¹

The Plan is presented as aligned with the EU energy efficiency framework and Energy Community obligations, including the requirement to renovate at least 3% annually of public buildings. However, full verification of alignment cannot be done as it is not confirmed whether selected buildings and the total renovated area meet the 3% per year threshold in practice. In addition, there is no publicly available implementation reporting that would allow independent tracing of progress and compliance.

Based on the same [announcement by the Ministry](#), financially, the Plan references an indicative overall value of 11.1 million euros. However, the Ministry notes that financing is not yet secured and that efforts are ongoing to mobilise resources. As a result, while indicative costs are noted, the level of confirmed budget allocation and secured funding cannot be verified at this stage.

21 According to an announcement by the Ministry for Energy, Mining and Mineral Resources on 18.11.2025. Link: <https://energy.gov.mk/mk-MK/odnosi-so-javnost/soopstenija/zapocnuva-najgolemata-energets-ka-obnova-na-drzavnite-institucii-trigodisen-plan-za-modernizacija-na-14,the> , which-javni-zgradi

- **Step: For consumption-based metering and billing at the individual level, individual meters shall be installed where technically feasible and cost-effective in terms of being proportionate in relation to energy savings in line with Directive 2023/955: all newly constructed buildings. (December 2025)**

The latest publicly available [annual report of the ESM](#) district heating provider in 2024 does not include key compliance metrics such as the share of new buildings equipped with meters. Regarding the share of new buildings with meters installed, according to the FOI reply²² from AD ESM Power Plants of North Macedonia, states that heat energy meters in the heating substation have been installed in 73 out of 74 buildings supplied with heat energy in Zhelezara, Triangle, Madzari and Hipodrom. In addition, their response notes that by the cut-off date, heat energy meters have been installed in the heating substation in all new buildings, which implies 98,6% coverage overall in these areas, and 100 % coverage for new buildings at the substation level.²³ However, the data are geographically limited.

According to a representative of the Ministry of Energy, Mining and Mineral Resources, billing based on individual consumption is expected to be supported through the installation of individual meters where it is technically feasible and cost-effective, in line with EU Directive 2023/955, but there is no publicly available reporting on implementation. The lack of regular publication of progress data on this reform step prevents verification on compliance trends over time and limits comparability across distributors and locations.

²² FOI reply on 03.03.2026 by AD ESM Power Plants of North Macedonia.

²³ Ibid

Within the **Renewables policy domain**, no reform steps are scheduled for this semester, which is the focus of the Reform Monitor project. Reform efforts in this policy domain aim to speed up North Macedonia's clean energy transition by aligning national laws with the Energy Community, EU rules (RED II and Clean Energy Package), enabling renewable energy communities and rooftop solar growth. A key focus is removing administrative barriers by simplifying and accelerating permitting procedures across the energy, urban planning, construction, and environmental frameworks, since long and complex authorisation processes delay projects, raise costs and risk missing climate targets. Furthermore, the reforms foresee establishing a national electronic Guarantees of Origin registry managed by MEMO to certify renewable electricity and support a transparent market, benefiting RES producers, investors and consumers while contributing to reduced emissions and improved energy security.

Overall, the project monitors one reform with four reform steps under this policy domain, which fall in the upcoming periods. In the upcoming period, the Reform Monitor will provide updates on the progress of reforms in this policy domain.

Within the ***Vocational Education and Training (VET) policy domain***, no reform steps are scheduled for this semester, which is the focus of the Reform Monitor project. Reform efforts in Vocational Education Training policy domain focus on aligning school programmes with labour market needs by strengthening cooperation between the Ministry of Education and Science, companies, chambers of commerce and local governments, expanding demand-driven VET profiles, improving practical training and career guidance, and advancing the establishment of Regional VET Centres through updated legislation and standards- based curricula.

Overall, the project monitors one reform with five reform steps under this policy domain, which fall in the upcoming periods. In the upcoming period, the Reform Monitor will provide updates on the progress of reforms in this policy domain.

Reform efforts in the State-Owned Enterprises policy domain are embedded within the broader structural and competitiveness agenda of North Macedonia. Their objectives include enhancing the transparency and operational performance of SOEs, aligning their practices with national and EU standards, fostering their role in promoting innovation, sustainability, and fair competition, as well as advancing their transformation into accountable public enterprises that contribute to inclusive economic development.

In this domain, the project monitors one reform with four reform steps. Of these four, one is fully achieved, two are in a grace period, and one is due in December 2025.

Overall, the project monitors one reform with ten reform steps under this policy domain, out of which four are due by the cut-off date and six fall in the upcoming periods.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Reform 4.1.5: Reform the governance of State-Owned Enterprises with a focus on the Railways and Postal services			
Step: Amend corporate law to introduce new rules on the appointment of independent board members of State-Owned Companies (December 2024)	Dec 2024	Fully Achieved - EC assessment S1 2025	Legislative procedures were fully achieved. The law was adopted by the cut-off date, but there were no public consultations, and it was not published on the ENER platform.
Step: Restructuring plan for state-owned railway operator and railway infrastructure manager adopted by January 2025 (June 2025)	June 2025	Not achieved-Grace period until June 2026	The Government formally adopted the Railway restructuring plan and approved the related Action plan. Implementation not evidenced.
Step: Create a register of SOEs and companies with State participation which is publicly available (June 2025)	June 2025	Not achieved-Grace period until June 2026	EC assessment notes that the register does not correspond to the type or register required under this reform step. Establishment of the register depends on legislative amendments (early-stage drafting)
Step: Adopt a State Ownership Strategy and a Law for State-Owned Companies (December 2025)	Dec 2025	EC assessment pending	The Law and the Strategy have not been adopted yet. (Early drafting stage)

Reform 4.1.5. Reform the governance of State-Owned Enterprises with a focus on the Railways and Postal services

- **Step: Amend corporate law to introduce new rules on the appointment of independent board members of State-Owned Companies. (December 2024), (EC assessment: Fully achieved)**

This reform step was assessed as fully achieved by the EC. Amendments to the [Corporate Law were adopted](#) on 27 December 2024, and entered into force on 4 January 2025, introducing new governance requirements for SOEs. The changes define the composition of Supervisory Boards and Boards of Directors, requiring a minimum number of independent members with basic eligibility criteria. In addition, it set standardised remuneration for non-executive and supervisory board members at one quarter of the average net salary.

The [first pilot monitoring report](#) of the Reform Monitor notes that, although the legislative adoption of this reform step was completed by the December 2024 cut-off date, the process lacked public consultations and the draft was not published on the ENER platform.²⁴

The remarks at the [EC assessment](#) are related to the criteria and the selection procedure of members, which are expected to be addressed through subsequent reform steps linked to the SOE Strategy, the new SOE law, and related measures.

- **Step: Restructuring plan for state-owned railways operator and railway infrastructure manager adopted by January 2025. (June 2025), (Delayed, EC assessment: Not achieved)**

This reform step was assessed as not achieved by the EC. Available evidence indicates that the restructuring plan for the railway sector was formally adopted at the governmental level. According to the Government information from the [149th session](#), under agenda item 69, the Government reviewed and adopted the Information and approved the Action Plan for Restructuring and Development of the Public Enterprise for Railway Infrastructure, Railways of the Republic of North Macedonia (2026-2027). In parallel, a document titled "[Reform Agenda and Restructuring Plan for ZRSM Transport 2025-2027](#)" is published on the [website of the Railways of the Republic of North Macedonia Transport JSC-Skopje](#), which provides some degree of public access to the reform framework. However, transparency remains limited. While this document is publicly available, there is no evidence of the adopted Action Plan, nor that draft versions were disclosed in advance, or that comments were solicited

²⁴ This was also confirmed by the Ministry of Economy and Labour at the FOI reply on 18.06.2025

from the relevant stakeholders. In addition, no information is available to confirm broader stakeholder consultation. A FOI request was submitted to the Ministry of Transport for further clarification, and there is no reply to date.

In terms of content, the published document that explains that the Action Plan establishes the main implementation parameters, including the 2025-2027 timeline, the designation of responsible institutions (ZRSM Transport AD-Skopje, the Ministry of Transport and the Ministry of Finance), as well as references to quarterly reviews, annual financial statements and monitoring and reporting arrangements. In this context, the plan consists of defined milestones and an allocation of institutional responsibility. The document refers to intended actions and future monitoring, but no verifiable implementation, progress update or other records that are publicly available can be identified to demonstrate that restructuring activities are ongoing.

- ***Step: Create a register of SOEs and companies with State participation which is publicly available. (June 2025), (Delayed, EC assessment: Not achieved)***

This reform step was assessed as not achieved by the EC. According to the [EC assessment](#), the register submitted by the Ministry of Finance in the first semi-annual report was developed under the Organic Budget Law and does not correspond to the type of register required under this reform step. Information obtained from representatives of the Ministry of Economy notes that interinstitutional coordination with the Ministry of Finance is ongoing, with further progress contingent upon the adoption of alignment of related legislation, including the Law on Public Enterprises and Commercial Companies Owned by or with Participation of the Republic of North Macedonia. At this stage, the register has not been formally established, nor is it operational. Furthermore, there is no publicly available information regarding the institutional set-up, including the designation of the register administrator or the procedure governing appointments.

With the grace period for this reform step nearing its end, and given that implementation remains dependent on legislative amendments, including a law still under preparation, there is a growing risk that the conditions for securing funds under this reform step will not be met within the required cut-off date and timeframe.

- ***Step: Adopt a State Ownership Strategy and a Law for State-Owned Companies (December 2025)***

During the reporting period, the Government initiated preparation of a new legal and strategic framework on state-owned enterprises, but the reform step remained at a preparatory stage. The Law and the Strategy have not been adopted yet. At the [129th Government session](#) on 18 December 2025, under the 145th agenda item, the Government instructed the Ministry of Economy and Labour to prepare amendments to the Law on State Owned Companies. Furthermore, on [23 December 2025, at the 138th Government's session](#), under the agenda item 29, it discussed information aimed at ensuring timely and compliant action by wholly or predominantly state-owned entities to improve public finance forecasting and management.

A working group has been established within the Ministry of Economy²⁵ to draft both a State Ownership Strategy and the related law, and the Ministry of Economy and Labour has indicated that the procedure is ongoing and expected to enter the government procedure soon.

Transparency and consultation safeguards remain limited based on available evidence. There was no open call for participation in the established working group, and by the cut-off date, neither the draft law nor the draft strategy was published on the ENER platform. The key working documents and circulated drafts in the consultation process within the working group on this law were noted by CSO representatives to remain internal and were not publicly accessible by the cut-off date. The formal [notification on initiating the drafting process for the Law](#) that is named as Law on Public Enterprises and Commercial Companies Owned by or with Participation of the Republic of North Macedonia was published on 27 January 2026 (after the cut-off date). Subsequently, the [Draft Law](#) and its [RIA](#) were published on 6 March 2026. According to the CSO representatives, several issues remain unclear in the draft discussions, including whether municipalities will be covered by the new law, how entities with partial state ownership will be treated and what the expected impact will be.

Overall, the progress in this reform step can currently be verified only through minted references and late initiation notice, rather than through published drafts, consultation reports or adoption records. This reform step is not achieved by the cut-off date.

25 According to Ministry of Economy and Labour officials.

Within the **Competition/State Aid policy domain**, the reforms bring together complementary measures to strengthen enforcement and long-term compliance. Starting with capacity building, introducing specialised training on Competition Protection Commission procedures and the EU state aid acquis, including relevant case-law to reinforce judicial and institutional expertise, then shifts towards more proactive implementation by establishing a standard methodology for risk-based ex officio enforcement and setting quarterly investigation targets with a focus on higher value cases above 200. 000 euros per company. Finally, it seeks to secure system alignment and sustainability by phasing out non-compliant state aid schemes once SAMIS is fully operational and by gradually increasing the CPC’s financial independence through own-revenue mechanisms, moving from 50 towards 100 self- financing.

During the reporting period within the Competition/State Aid policy domain, the project monitors 1 reform, including 1 reform step out of which 1 is due in December 2025.

Overall, the project monitors 6 reform steps under this policy domain, out of which 1 is by the cut-off date and 5 fall in the upcoming periods.

Reforms Reform steps	Deadline (due in)	Implementation status	Reform Monitor findings
Reform 4.1.2 Make the state aid regime more transparent and efficient			
Step: According to training needs, a sufficient number of Judges are specialised via training modules in the CPC procedure and the EU acquis in order to increase the expertise on State Aid in the Courts. An extensive training module on State aid rules in the EU covering substantially the EU acquis, including key case-law, provided by a trainer with significant experience and expertise in this area.	Dec 2025	EC assessment pending	A substantial number of judges were trained by the cut-off date (42 participants took part, including 20 judges, 13 professional associates and 19 representatives of other institutions). Sustainability is not ensured.

Reform 4.1.2. Make the state aid regime more transparent and efficient.

- **Step: According to training needs, a sufficient number of Judges are specialised via training modules in the CPC procedure and the EU acquis in order to increase the expertise on State Aid in the Courts. An extensive training module on State aid rules in the EU covering substantially the EU acquis, including key case-law, provided by a trainer with significant experience and expertise in this area. (December 2025)**

This reform step is under the responsibility of the Commission for Protection of Competition (CPC), which signed a Memorandum of Cooperation with the Academy for Judges and Public Prosecutors (AJPP) in 2025.

According to FOI reply²⁶ received on 11 February 2025, the AJPP, in cooperation with the CPC and the World Bank, organised a three-day training titled “Training of Judges on Proceedings before the CPP and on EU Law to Enhance Expertise in Courts-Reform Agenda”, held on 24-26 November 2025. Training materials for the programme were provided through the FOI response, confirming that the activity was implemented as planned.

Furthermore, participation data also confirms broad attendance, but the specific specialisation target cannot be fully verified. The FOI reply states that 42 participants took part, including 20 judges (which surpasses the minimum target of the defined benchmark at the RA, six judges), 13 professional associates and 19 representatives of other institutions. While this indicates that a substantial number of judges were trained, the available information does not provide outcome-based evidence demonstrating increased expertise on state aid matters in court practice.

Regarding the continuation of this practice of providing training in this topic, AJPP noted that there is no sustainability plan adopted as an official document, but based on the Memorandum of Cooperation, there is a basis for continuing the topic through regular trainings from 2026 onwards, with modules to be incorporated into the annual AJPP Training Catalogue. Overall, while these steps indicate an intention to institutionalise future trainings, the absence of a formally endorsed sustainability plan limits assurance that training continuity will be systematically maintained and resourced over time.

26 FOI reply on 11.02.2026 by the Academy for Judges and Public Prosecutors

