

PAR Monitor Report North Macedonia

ORGANISATION, ACCOUNTABILITY AND OVERSIGHT

2024/2025



European
Policy
Institute.
Skopje



IMPRESSUM

PUBLICATION:

**PAR Monitor Report North Macedonia -
ORGANISATION, ACCOUNTABILITY AND OVERSIGHT - 2024/2025**

PUBLISHER:

European Policy Institute - Skopje

AUTHORS:

Julijana Karai, European Policy Institute (EPI)—Skopje

Beba Zhagar, European Policy Institute (EPI)—Skopje

DESIGN:

Relativ

CONTENTS:

ACKNOWLEDGEMENTS	4
ABOUT WEBER 3.0	5
EXECUTIVE SUMMARY	6
LIST OF ABBREVIATIONS AND ACRONYMS	8
I. WEBER PAR MONITOR: WHAT WEMONITOR AND HOW?	9
I.1 WEBER'S APPROACH TO MONITORING PAR	9
I.2 WHY AND HOW WEBER MONITORS THE "ORGANISATION, ACCOUNTABILITY AND OVERSIGHT" AREA	11
II. ACCOUNTABILITY AND TRANSPARENCY OF STATE ADMINISTRATION	15
II.1 REACTIVE TRANSPARENCY – FREEDOM OF INFORMATION	16
II.2 PROACTIVE TRANSPARENCY	31
II.3 RECOMMENDATIONS FOR THE ORGANISATION, ACCOUNTABILITY AND OVERSIGHT AREA	50
II. 3.1 TRACKING RECOMMENDATIONS FROM PAR MONITOR 2021–2022	50
II. 3.2 RECOMMENDATIONS FROM THE 2024–2025 MONITOR REPORT	52
METHODOLOGY APPENDIX	53
LIST OF REFERENCED SOURCES IN THIS REPORT	58

ACKNOWLEDGEMENTS

As in the case of the previous editions of the National PAR Monitor reports, published for 2017/2018, 2019/2020 and 2021/2022, special acknowledgements go to the members of the WeBER Platform and the National Working Group in North Macedonia, as well as the other stakeholders in North Macedonia that shared their experiences through interviews, thus immensely contributing to the quality of this report. They are not individually identified in this report to protect their anonymity.

The WeBER3.0 team would also like to thank its main partners and associates, who have supported the project in research and other activities. Most notably, these are the SIGMA/OECD (Support for Improvement in Governance and Management)¹, the ReSPA (Regional School of Public Administration), and the Ministry of Public Administration, as a project associate.

¹ A joint initiative of the European Union and the OECD.

ABOUT WEBER 3.0

Building upon the achievements of its predecessors, the WeBER (2015 – 2018) and WeBER 2.0 (2019 – 2023) projects, the **Western Balkan Enablers for Reforming Public Administrations – WeBER 3.0** project is the third consecutive EU-funded grant of the largest civil society-led initiative for monitoring public administration reform (PAR) in the Western Balkans. Its implementation period is February 2023 – July 2026. Guided by the SIGMA/OECD Principles, the first two phases of the initiative laid the foundation for WeBER 3.0's ambition **to further empower civil society organisations (CSOs) to contribute to more transparent, open, accountable, citizen-centric and thus more EU-compliant administrations in the WB region.**

WeBER 3.0 continues to promote the crucial role of CSOs in PAR, while also advocating for broader citizen engagement in this process and inclusive reform measures which are user-tailored and thus lead to tangible improvements. By grounding actions in robust monitoring data and insights, WeBER 3.0 will empower civil society to more effectively influence the design and implementation of PAR. To foster collaborative policymaking and bridge the gap between aspirations and actionable solutions, the project will facilitate sustainable policy dialogue between governments and CSOs through the WeBER Platform and its National PAR Working Groups. Finally, through small grants for local CSOs, WeBER 3.0 bolsters local-level PAR engagement, amplifying the voices of citizens – the final beneficiaries of the public administrations' work.

WeBER 3.0 products and further information about them are available on the project's website at www.par-monitor.org.

WeBER 3.0 is implemented by the Think for Europe Network (TEN), composed of six EU policy-oriented think tanks in the Western Balkans:



By partnering with the Centre for Public Administration Research (KDZ) from Vienna, WeBER 3.0 has ensured EU-level visibility.



EXECUTIVE SUMMARY

This report assesses the accountability and transparency of state administration by observing two aspects: 1) reactive transparency – freedom of information, and 2) proactive transparency. The first aspect assesses the extent to which effective reactive transparency is ensured through enforceable free access to information rights, institutional oversight, compliant responses by public authorities, effective sanctions, and public confidence in exercising the right to access information of public importance. The second aspect examines whether public administration bodies systematically publish comprehensive, up-to-date, accessible, and citizen-friendly information on their work, organisation, services, budgets, and decision-making processes, while also looking into open data availability.

The legal and strategic framework on transparency and free access to information in North Macedonia is broadly established through the Law on Free Access to Public Information, the PAR Strategy 2023–2030, and the Government Transparency Strategy 2023–2026. The framework guarantees general access to public information, defines exceptions and rules on partial access, regulates response deadlines and formats, and establishes sanctions for non-compliance. The Agency for Protection of the Right to Free Access to Public Information (APRFAPI) is mandated to oversee implementation of the Law, handle appeals, and prepare annual reports on the implementation of FoI rights.

During the monitoring cycle, public authorities responded to 96.5% of submitted FoI requests, with all responses provided free of charge and in the requested format. Most responses were delivered within the legally prescribed deadlines, while 92.6% of responses contained the requested information and documentation in full.

APRFAPI publishes annual reports and citizen-friendly resources, including guidebooks, educational videos, and complaint forms. However, the 2025 annual report has not yet been published, while the institution has faced operational difficulties due to delays in appointing new leadership. In addition, the available reports contain only aggregate information on sanctions, without institution-specific data or qualitative analysis..

Overall, institutions generally comply with key FoI obligations related to response rates, deadlines, formats, and free access to information. Nevertheless, important shortcomings remain regarding proactive transparency, publication of work reports, impact assessments, open data, and dedicated consultation sections. Institutional websites often contain incomplete or inconsistently

updated information, while navigation difficulties and broken links continue to limit accessibility and usability.

Machine-readable datasets and certain high-value datasets are available through the national open data portal, although their availability and quality vary significantly across sectors and institutions. Public perception findings indicate moderate awareness of FoI rights among citizens, but more limited perceptions regarding institutional support and the accessibility of information published online.

LIST OF ABBREVIATIONS AND ACRONYMS

API	Application Programming Interface
APRFAPI	Agency for Protection of the Right to Free Access to Public Information
FOI	Freedom of information
KIs	Key informants
MDT	Ministry of Digital Transformation
MEPP	Ministry of Environment and Physical Planning
MoJ	Ministry of Justice
MPA	Ministry of Public Administration

I. WEBER PAR MONITOR: WHAT WE MONITOR AND HOW?

I.1 WeBER's approach to monitoring PAR

The Public Administration Reform (PAR) Monitor methodology was developed in 2015-2016, as part of the first Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform (WeBER) project. Since the onset, WeBER has adopted a markedly evidence-based approach in its endeavour to increase the relevance, participation and capacity of civil society organisations (CSOs) in the Western Balkans to advocate for and influence the design and implementation of PAR. The PAR Monitor methodology is a cornerstone WeBER product, enabling civil society monitoring of PAR based on evidence and analysis.

In line with WeBER's focus on the region's EU accession process, once the *SIGMA Principles of Public Administration* were revised in 2023, the WeBER PAR Monitor methodology was also redesigned in 2024, building on the Principles,² and on SIGMA Methodology,³ and complementing the monitoring by SIGMA by providing additional observations focused on transparency, inclusiveness, openness or other aspects of state administrations' work depending on PAR area in question. This revision helps maintain the focus of WeBER's recommendations on EU-compliant reforms, thus guiding the governments in the region towards successful EU accession and future membership. The main changes in the revised PAR Monitor methodology are briefly listed below.⁴

2 OECD (2023), *The Principles of Public Administration*, OECD Publishing, Paris, <https://doi.org/10.1787/7f5ec453-en>.

3 Available at: <https://www.sigmaweb.org/en/publications/documents/2024/assessment-methodology-of-the-principles-of-public-administration.html>.

4 For detailed information on the scope and process of methodology revision please visit <https://www.par-monitor.org/par-monitor-methodology/>.

Table 1: Main changes in the PAR Monitor methodology

Structure

In order to align with the new SIGMA methodological approach, the following structural changes are introduced:

- Introduction of single indicator per PAR area, divided into sub-indicators, further consisting of several sub-indicator elements (i.e. specific criteria assessed), in order to streamline the approach and emphasise the focus on transparency, inclusiveness and openness in each PAR area.
- Introduction of types of sub-indicator elements, ensuring that all following aspects of reform are covered:
 1. Strategy and Policy,
 2. Legislation,
 3. Institutional Setup,
 4. Practice in Implementation, and
 5. Outcomes and Impact.
- Introduction of a 100-point scale, for a more nuanced assessment of progress in each PAR area.

Data sources

- Introduction of interviews with “key informants”, i.e. key non-state actors engaged and familiar with the processes. These interviews serve as a data source for the “Outcomes and Impact” elements instead of the formerly implemented survey of civil society organisations.
- More systematic use of public perception survey results as a data source for “Outcomes and Impact” elements and expanding the scope of the survey to complement the assessment in five PAR areas – all except “Strategy for PAR”.
- Removal of the survey of civil servants as a data source due to persistent issues with ensuring adequate response rates across the region’s administrations.

PAR Monitor reporting

- Six national PAR Monitor reports, one per PAR area (36 in total for the entire PAR Monitor), in order to facilitate timely publication and advocacy for the monitoring results rather than publishing the results of 18 months of research at the end of the process.
- Six regional Western Balkan overview reports, one per PAR area (6 in total).

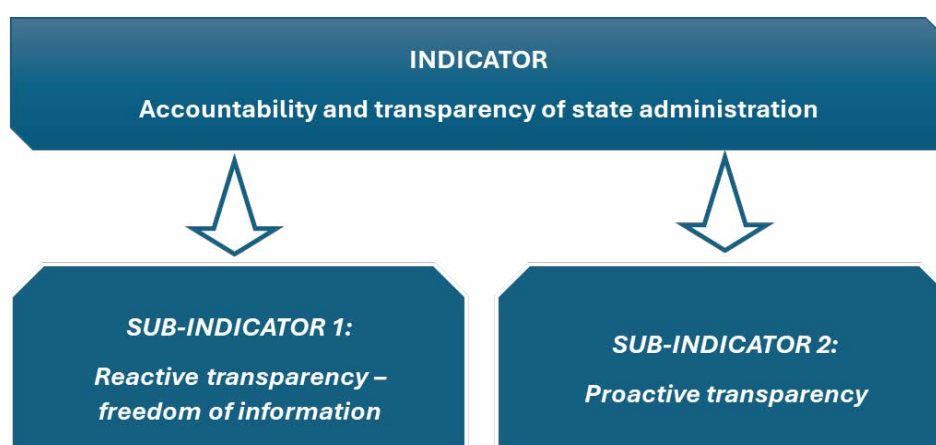
I.2 Why and how WeBER monitors the “Organisation, Accountability and Oversight” area

Access to information held by public authorities and the proactive disclosure of how those authorities work and make decisions determines how far government actions are open to external scrutiny, and how accountability in public administration functions in practice. When institutions publish information routinely and respond to requests in line with legal requirements, they demonstrate, in practice, the openness and service orientation they are required to uphold, and they reduce the information gap between the state and the public. Where delays, incomplete responses, and restricted access are common, this points to systemic weaknesses in administrative accountability and diminished space for external oversight. Monitoring this area aims to establish whether public administration operates in ways that let citizens and civil society access and scrutinise the decisions and activities of public authorities, and whether that scrutiny creates pressure for institutions to improve.

Monitoring in **the Organisation, Accountability and Oversight area** is based on one SIGMA Principle:

➡ **Principle 15:** Public administration is transparent and open.

This Principle is assessed from the perspective of institutional transparency and responsiveness to information requests, including timely, properly formatted responses, justified refusals, and effective oversight and enforcement. The focus on transparency also examines if public administration bodies publish comprehensive, up-to-date, accessible and citizen-friendly information on their work.



The monitoring period for the Organisation, Accountability and Oversight covers developments since the last PAR Monitor cycle, which lasted from January until November 2022. Thus, this report reflects any developments since 2022 and primarily focuses on proactive transparency practices of public authorities during the monitoring window for this area (April-May 2026) as well as on their practices in responding to free access to information requests that research team submitted during the entire PAR Monitor cycle 2024/2025 which lasted from October 2024 until May 2026. Although this report provides a comparison of findings with previous PAR Monitor editions, country scores are incomparable to the previous monitoring due to methodological changes.

The **first sub-indicator** examines the extent to which the legal and institutional framework, implementation practices, and oversight mechanisms ensure the effective exercise of the right to access information of public importance. Monitoring of strategy and policy, and legislation is performed by analysing strategic documents, legal acts and official data publicly available on the websites of relevant institutions, while the assessment of practice is based on a sample of freedom of information requests submitted during the entire monitoring cycle of 2024/2025 (October 2024-May 2026) and the review of websites of the relevant supervisory institution. For the assessment of outcomes and impact, researchers conduct three key informant interviews with non-state actors who possess significant expertise in the area and utilise the public perception survey data.

Table 2: Indicator elements under sub-indicator 1

Indicator element - number and title	Type
E 1.1 There is a strategic document in force that envisages improvements in reactive transparency of state administration	Strategy and policy
E 1.2 Regulations stipulate legal right of individuals and legal persons to access public information without justifying their request	Legislation
E 1.3 Regulations stipulate submission of responses to FOI requests in requested format, within prescribed deadlines, and free of charge	Legislation
E 1.4 Regulations stipulate obligatory disclosure of grounds for refusal of access to information	Legislation
E 1.5 Regulations stipulate sanctions, as preventive measures against non-compliance with FOI	Legislation
E 1.6 Regulations establish a supervisory authority that is mandated to monitor FOI rights and reports on its implementation	Institutional set-up

E 1.7 Responses to FOI are provided in requested format	Practice in implementation
E 1.8 Responses to FOI are provided within legally stipulated deadlines	Practice in implementation
E 1.9 Responses to FOI are provided free of charge	Practice in implementation
E 1.10 Public authorities submit information that was requested	Practice in implementation
E 1.11 Public authorities communicate grounds for refusal of access to information	Practice in implementation
E 1.12 Supervisory authority regularly publishes annual reports on application of freedom of information	Practice in implementation
E 1.13 Supervisory authority's annual reports include information on imposed and executed sanctions	Practice in implementation
E 1.14 Supervisory authority proactively publishes up-to-date citizen-friendly resources and fill-in forms for freedom of information	Practice in implementation
E 1.15 Key non-state actors consider supervisory authority's sanctions as transparent and effective	Outcomes and impact
E 1.16 Key non-state actors consider that public authorities adequately respond to requests with sensitive information and properly act when refusing access to information	Outcomes and impact
E 1.17 Citizens' perceived awareness of their right to access information of public importance	Outcomes and impact
E 1.18 Citizens' perception of institutional support in exercising the right to access information of public importance	Outcomes and impact

The **second sub-indicator** assesses whether the strategic and legal frameworks enable proactive information provision, by analysing strategic documents and legal acts, while also focusing on how proactive informing is applied in practice by public authorities. Assessment of practice type elements, performed during the monitoring window for this area (April-May 2026), is conducted based on a sample of five public administration bodies:

- Three line ministries (1 large, 1 medium, 1 smaller in terms of thematic scope)
- A ministry with a general planning and coordination function,
- A central-level service provider that is not a ministry, and that delivers public services to citizens (or citizens and businesses).

Assessment of outcomes and impact is based on key informant interviews and public perception survey data.

Table 3: Indicator elements under sub-indicator 2

Indicator element - number and title	Type
E 2.1 There is a strategic document in force that envisages improvements in proactive transparency of state administration	Strategy and policy
E 2.2 Regulation stipulates proactive transparency obligations	Legislation
E 2.3 State administration bodies publish relevant, up to date, easily accessible, and citizen-friendly information on scope of work	Practice in implementation
E 2.4 State administration bodies publish relevant, up to date, citizen-friendly and easily accessible information on policy documents and legal acts under their competence	Practice in implementation
E 2.5 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on public services	Practice in implementation
E 2.6 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on impact assessments and evaluations	Practice in implementation
E 2.7 State administration bodies publish relevant reports on their work in a timely, accessible and citizen-friendly manner	Practice in implementation
E 2.8 State administration bodies publish relevant, up to date, easily accessible, and citizen friendly budget information	Practice in implementation
E 2.9 State administration bodies publish relevant, up to date, easily accessible and citizen friendly contact information	Practice in implementation
E 2.10 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on organisational structure	Practice in implementation
E 2.11 State administration bodies publish relevant, up to date, easily accessible and citizen-friendly sections dedicated to public consultation processes	Practice in implementation
E 2.12 State administration bodies publish data in open, machine-readable format	Practice in implementation
E 2.13 Public administration publishes high-value open data-sets	Practice in implementation
E 2.14 Key non-state actors consider proactively published information as citizen-friendly	Outcomes and impact
E 2.15 Citizens' perception of accessibility of information on public authorities' websites	Outcomes and impact

II. ACCOUNTABILITY AND TRANSPARENCY OF STATE ADMINISTRATION

This section presents the assessment results for North Macedonia. Each sub-section presents the results for one sub-indicator (two in total), beginning with a brief overview of developments since the PAR Monitor 2021/2022. This is followed by a detailed assessment of the sub-indicator elements, starting with the policy, legislation and institutional framework, then moving to the practice in implementation, and ending with outcomes and impact. Each sub-indicator assessment concludes with the graph showing the awarded points.

The graph below displays the overall results for the Organisation, Accountability and Oversight area in North Macedonia, measured on a scale from 0 to 100 points

Accountability and transparency of state administration (score 0-100)



II.1 Reactive transparency – freedom of information



Principle 15: Public administration is transparent and open.

Awarded points per element in sub-indicator 1:

Reactive transparency – freedom of information⁵

Indicator elements	Element type	Score
E 1.1 There is a strategic document in force that envisages improvements in reactive transparency of state administration	Strategy and policy	0.25/0.25
E 1.2 Regulations stipulate legal right of individuals and legal persons to access public information without justifying their request	Legislation	2.5/2.5
E 1.3 Regulations stipulate submission of responses to FOI requests in requested format, within prescribed deadlines, and free of charge	Legislation	1.5/1.5
E 1.4 Regulations stipulate obligatory disclosure of grounds for refusal of access to information	Legislation	1/1
E 1.5 Regulations stipulate sanctions, as preventive measures against non-compliance with FOI	Legislation	1/1
E 1.6 Regulations establish a supervisory authority that is mandated to monitor FOI rights and reports on its implementation	Institutional set-up	1/1
E 1.7 Responses to FOI are provided in requested format	Practice in implementation	3.5/3.5
E 1.8 Responses to FOI are provided within legally stipulated deadlines	Practice in implementation	4/4

⁵ The first sub-indicator focuses on the following SIGMA sub-principles: The government has established strategic objectives to promote openness and transparency of public administration, assigning clear responsibilities to specific actors; Individuals, including non-residents, and legal persons have the legal right to access public information without justifying their request; Public information encompasses all information recorded in documents held by the public administration, individuals or legal persons who exercise public authority. Exceptions exist only when there are compelling reasons for classifying information; they are set down precisely in law; The public administration helps parties to identify the requested information and provides it promptly in the requested format and free of charge, except for the cost of reproduction and delivery; The public administration communicates the grounds for refusal of access to public information, and parties have the right to appeal this decision to an independent body or the courts; Responsibility for monitoring compliance with the legislation on public information, providing guidance and imposing sanctions is clearly assigned and implemented.

E 1.9 Responses to FOI are provided free of charge	Practice in implementation	4/4
E 1.10 Public authorities submit information that was requested	Practice in implementation	4/4
E 1.11 Public authorities communicate grounds for refusal of access to information	Practice in implementation	0/4
E 1.12 Supervisory authority regularly publishes annual reports on application of freedom of information	Practice in implementation	3/4.5
E 1.13 Supervisory authority's annual reports include information on imposed and executed sanctions	Practice in implementation	2/4
E 1.14 Supervisory authority proactively publishes up-to-date citizen-friendly resources and fill-in forms for freedom of information	Practice in implementation	4.5/4.5
E 1.15 Key non-state actors consider supervisory authority's sanctions as transparent and effective	Outcomes and impact	0/3
E 1.16 Key non-state actors consider that public authorities adequately respond to requests with sensitive information and properly act when refusing access to information	Outcomes and impact	0/3
E 1.17 Citizens' perceived awareness of their right to access information of public importance	Outcomes and impact	1.5/2
E 1.18 Citizens' perception of institutional support in exercising the right to access information of public importance	Outcomes and impact	1/2
Total score for sub-indicator 1		34.75/49.75

State of play

Since the previous WeBER monitoring cycle the findings indicate improvements in reactive transparency, particularly regarding institutional responsiveness to FoI requests. Authorities responded to the vast majority of submitted requests, most within legally prescribed deadlines, free of charge, and in the requested format. Statistical data further show that most requests result in access to the requested information, while a considerable number of refusals were overturned by the APRFAPI, which ordered the

respective authorities to provide the requested information.⁶ Statistical data further show that most requests result in access to the requested information, while a considerable number of refusals were overturned by the APRFAPI, which ordered the respective authorities to provide the requested information. Nevertheless, several challenges identified in the previous PAR Monitor remain present, including the limited effectiveness of sanctions, administrative silence, inconsistent enforcement, and the broad application of exemptions for refusing access to information.

Researchers reviewed valid government strategic documents from the reporting period to assess whether they include measures aimed at improving reactive transparency, particularly regarding responses to FoI requests. The assessment examined whether they contain clear objectives, activities, and assigned responsibilities related to improving access to information.

Within the PAR Strategy 2023–2030⁷, the third priority area, Responsibility, Accountability and Transparency, includes Specific Objective 3.4: Increased transparency of institutions at state and local level and Specific Objective 3.5: Creating an enabling environment for the use of public sector data. Under Specific Objective 3.4, several activities are aimed at strengthening the framework for access to public information and improving institutional transparency. These include: A3.4.1.1 Strengthening the capacities of the APRFAPI in exercising its competences; A3.4.1.2 Preparing amendments to the Law on Free Access to Public Information to enhance the APRFAPI's powers and further promote the right to free access to information; A3.4.1.5 Organising trainings and awareness-raising activities for institutions on the importance of access to public information and the use of the APRFAPI's e-portal; and A3.4.1.6 Raising public awareness among information requesters on how to exercise the right to free access to public information, with particular emphasis on the use of the APRFAPI's e-portal.

An important strategic document aimed at the overall improvement of transparency is the Government Transparency Strategy and Action Plan 2023–2026.⁸ Within this framework, Priority Area 2: Access to Public Information is specifically dedicated to strengthening reactive transparency. Its overall objective is to improve access to public information through measures that enhance the implementation and enforcement of the Law on Free Access to Public Information.

6 Public Administration in the Republic of North Macedonia 2024, SIGMA/OECD, https://www.sigmaweb.org/en/publications/public-administration-in-the-republic-of-north-macedonia-2024_071bad9d-en.html

7 PAR Strategy 2023–2030, <https://kvalitet.mioa.gov.mk/wp-content/uploads/2024/05/strategija-za-reforma-na-javna-administracija-2023-2030-so-akcziski-plan.pdf>

8 Transparency Strategy of the Government of the Republic of North Macedonia, 2023–2026, <https://portal.mdt.gov.mk/post-body-files/nacionalni-strategii-file-idF4.pdf>

The priority area includes several measures and activities focused on improving institutional responsiveness to FoI requests. These include M.1 Suppression of harmful practices related to administrative silence in responding to requests for access to public information, through activities such as A.1.1 Development of a performance indicator and A.1.2 Amendments to the legal framework aimed at expanding the competencies of the APRFAPI and removing the deadline for filing complaints in cases of administrative silence.

Additional measures include M.2 Implementation of the principle of delegation of competence in line with the Law on Free Access to Public Information, through A.2.1 Adoption of internal institutional acts; M.3 Acting upon requests for free access to public information, through A.3.1 Development of internal procedures for handling requests for access to information; M.4 Raising awareness of the harmful effects of initiating administrative disputes against complaints related to access to public information, through A.4.1 Trainings for information holders; and M.5 Introduction to and practical implementation of the Law on Free Access to Public Information, through A.5.1 Organisation of trainings and counselling sessions for officials and responsible persons within institutions holding public information.

The researchers reviewed the valid legal framework at the time of measurement to assess whether it guarantees free access to all information held by public authorities or entities exercising public authority, and whether access is ensured for any interested natural or legal person without the need for justification. They also examined whether the legal framework clearly defines limited exceptions to access to information, including areas such as national security, public safety, criminal investigations, privacy, commercial interests, and judicial proceedings. In addition, the researchers assessed whether the framework guarantees partial access, requiring disclosure of all parts of a document or information not covered by the prescribed exceptions.

Namely, the Law on Free Access to Public Information represents the general legal framework governing this area. Article 4 of the Law stipulates that: "(1) All legal entities and natural persons shall have free access to information. (2) Foreign legal entities and natural persons shall also have free access to information in accordance with this and other laws." This provision establishes the principle of universal access to public information, guaranteeing the right to access information to both domestic and foreign natural and legal persons without discrimination.⁹

Article 6 of the Law on Free Access to Public Information defines the exceptions to the general right of access to information. It allows information holders to refuse access where disclosure concerns classified information, personal data,

⁹ "Law on Free Access to Public Information, Official Gazette of the Republic of North Macedonia" No. 101/19, <https://duinspektorat.mioa.gov.mk/sites/default/files/zakon.pdf>

confidentiality of tax procedures, information related to ongoing investigations or judicial and administrative proceedings, as well as information that could endanger industrial or intellectual property rights. At the same time, the Law establishes the principle of partial access. Article 6(4) stipulates that when a document contains protected information that can be separated without compromising its security, the information holder is obliged to remove the protected parts and provide access to the remaining content of the document.¹⁰

The researchers reviewed the valid legal framework at the time of measurement to assess whether responses to Fol requests must be provided in the requested format, within the prescribed deadlines, and free of charge, except for justified material costs such as photocopying or printing. In addition, they noted any existing exceptions to these rules and assessed their justification for narrative purposes.

The Law's, Article 21 stipulates submission of responses in requested format and within prescribed deadlines:

“(1) The information holder shall be obliged to respond immediately to the request of the requester, and no later than within 20 days from the date of receipt of the request.

(2) The information holder shall provide the information in the requested form, unless the requested information already exists in a previously prescribed form and is available to the public and if it is more advantageous for the requester to provide the information in a different form than the requested one, for which the information holder shall explain the reason for this manner of provision.”¹¹

Article 22 of the Law provides for the possibility of extending the deadline for responding to requests for access to information. The deadline may be extended by a maximum of 30 additional days where partial access to information is required in accordance with Article 6(4), or where the volume of the requested information requires more time for processing. The Law further stipulates that the information holder is obliged to inform the requester electronically about the extension immediately, and no later than seven days from the date of receipt of the request.¹²

Article 28(1) stipulates that access to requested information is provided free of charge, establishing the principle that applicants should not bear costs for obtaining information itself.¹³

¹⁰ Ibid

¹¹ Ibid

¹² Ibid

¹³ Ibid

The researchers reviewed the valid legal framework at the time of measurement to assess whether public information holders are legally obliged to provide justification when refusing access to information, including any exceptions to this requirement and their justification. They also assessed whether the legal framework provides sanctions for non-compliance with FoI requirements, including the type and range of sanctions prescribed, the level of fines, and the types of breaches or misdemeanours to which they apply. The assessment further examined whether sanctions are prescribed for both public authorities as information holders and for the heads of institutions responsible for their overall functioning, while also identifying any additional sanctions targeting authorised officials responsible for handling FoI requests.

Namely, the Law in Article 20, stipulates the obligation of information holders to disclose the grounds for refusal of access to information. Specifically, the Law provides that where a request is partially or fully rejected, the information holder must issue a formal decision containing an explanation of the reasons for the rejection, as well as the results of the conducted harmfulness test.¹⁴

The Law in Articles 38 and 39, stipulates sanctions for non-compliance with FoI requirements. Article 38 prescribes a fine of EUR 500 in denar equivalent for the official or head of an information holder who fails to appoint an authorised person for mediating access to information or fails to publicly disclose information about that person, as required by the Law. Article 39 prescribes a fine of EUR 250 in denar equivalent for authorised officials of information holders in cases of various violations of the Law, including failure to maintain and publish lists of information, failure to assist applicants, unlawful requests for justification from applicants, unjustified delays in responding to requests, failure to keep records, unlawful charging for access to information, failure to implement APRFAPL decisions, and failure to prepare and submit annual reports on the implementation of the Law.¹⁵

In addition, the researchers reviewed the valid legal framework at the time of measurement to assess two criteria: whether it establishes a supervisory authority mandated to monitor the implementation of the right to free access to information, and whether it requires the preparation of annual reports on the implementation of FoI legislation.

The Law regulates the conditions, manner, and procedures for exercising the right to free access to public information held by state authorities and other bodies and organisations established by law, municipal authorities, the City of Skopje and the municipalities within the City of Skopje, institutions and public services, public enterprises, as well as legal and natural persons exercising public powers or performing activities of public interest established by law.

¹⁴ Ibid

¹⁵ Ibid

The Law also applies to political parties with regard to information related to their revenues and expenditures.¹⁶

The Law also regulates the competences and functioning of the APRFAPI. Article 30 clearly establishes the APRFAPI as the supervisory body responsible for overseeing the implementation of the Law and the exercise of the right to free access to information.¹⁷

Among its key competences, the APRFAPI is authorised to decide on appeals against decisions rejecting access to information, ensure implementation of the Law, prepare and publish a list of information holders, provide opinions on draft legislation, develop policies and guidelines related to FoI rights, conduct misdemeanor proceedings, organise trainings and educational activities for information holders, cooperate with institutions, and promote the right to free access to public information. The Law further stipulates that the APRFAPI is required to prepare an annual report on its work and submit it to the Assembly of the Republic of North Macedonia.

Article 36 of the Law regulates reporting obligations related to the implementation of FoI rights. It stipulates that authorised officials within information holders are required to prepare annual reports on the implementation of the Law, submit them to the APRFAPI by 31 January of the current year for the previous year, and publish them on the institution's website.

Based on these reports and its own activities, the APRFAPI is obliged to prepare a consolidated annual report on the implementation of the Law and submit it to the Assembly of the Republic of North Macedonia by 31 March of the current year for the previous year. Following its adoption by the Assembly, the report must also be made publicly available through public information channels, including the APRFAPI's website.¹⁸

Having said that, the APRFAPI meets both abovementioned criteria, as it is mandated to monitor the implementation of the right to free access to information and is also responsible for preparing annual reports on the implementation of FoI legislation.

The researchers reviewed responses to all FoI requests submitted during the ongoing PAR Monitor cycle to assess whether the requested information was provided in the format requested by the applicant (e.g. photocopy, digital copy, audio/video copy). Where information was provided in a different format, the response had to clearly state that the public authority lacked the technical capacity to provide access in the requested format. The researchers also referred to the relevant legal provisions governing this issue. If public authorities responded to fewer than 90% of the total submitted requests, the element was

¹⁶ Ibid

¹⁷ Ibid

¹⁸ Ibid

scored as zero. Researchers additionally tracked cases of administrative silence and responses submitted outside the legally prescribed deadlines, without the need to file complaints or appeals before the competent supervisory authority.

Authorities responded to 96.5% of all submitted FoI requests during this monitoring cycle (27 out of 28 requests), thereby exceeding the minimum 90% response threshold required for scoring this element. In addition, all received responses (100%) were provided in the format requested by the applicants, namely in electronic form.

Responses to all FoI requests submitted during the ongoing PAR Monitor cycle were reviewed to assess whether public authorities provided the requested information within the legally prescribed deadlines, including any lawfully permitted extensions to the response period. Where extended deadlines were used, the researchers additionally examined whether applicants had been notified in advance, in line with legal requirements. The researchers also referred to the relevant legal provisions covering this issue. If public authorities responded to fewer than 90% of the total submitted requests, the element was scored as zero. Namely, out of the 27 responses received during the monitoring cycle, only two responses (7.1%) were submitted after the legally prescribed deadline, indicating a generally high level of compliance with the timelines established under the Law.

Responses to all FoI requests submitted during the ongoing PAR Monitor cycle were reviewed to assess whether public authorities provided information free of charge, excluding justified material costs such as photocopying or printing. The assessment focused on whether access to information itself, including electronic copies and on-site inspection of documents, was provided without charge. The researchers also referred to the relevant legal provisions regulating fees for FoI requests and the conditions under which such costs may apply. If public authorities responded to fewer than 90% of the total submitted requests, the element was scored as zero. Namely, for the 96.5% of FoI requests to which a response was provided, all responses were delivered free of charge. This practice is in line with the Law's, Article 11 that stipulates that: "Every holder of information is obliged to provide free access to the information."¹⁹

Based on the FoI requests analysed the researchers assessed the full content of all formal responses to determine whether they fully corresponded, both quantitatively and qualitatively, to the information initially requested. Responses merely confirming receipt of the request were not taken into account. In cases where institutions indicated that the requested information was publicly available online, the researchers additionally assessed whether precise guidance was provided, such as direct links to the relevant information, rather than only general references to institutional websites or homepages.

¹⁹ Ibid

Authorities responded to 96.5% of all submitted FoI requests during this monitoring cycle (27 out of 28 requests). Out of the 27 responses received, three did not initially contain the full requested documentation. In one case, the institution clarified that it was not the holder of the requested information and redirected the request to the competent institutions, which subsequently provided a satisfactory and comprehensive response. In the remaining two cases, institutions provided only partial documentation. Consequently, only 2 out of 27 institutions (7.4%) ultimately failed to provide complete information.

The Ministry of Health did not respond to the request at all. The public enterprise “Joint Stock Company for Electricity Production Power Plants of North Macedonia” submitted only a partial response, providing the annual procurement plan but not all of its versions. Similarly, the Ministry of Public Administration (MPA) provided only part of the requested documentation and indicated that the remaining materials would be submitted at a later stage; however, the additional documentation was never delivered.

Overall, 92.6% of the responses received contained the requested information and documentation in full. The response provided by the State Audit Office stood out as particularly comprehensive, well-structured, and of notably high quality.

The researchers reviewed responses to all FoI requests submitted during the ongoing PAR Monitor cycle to assess whether public authorities provided clear reasons for refusing access to information in cases where requests were denied. They identified the number of refusals issued and examined whether each refusal contained sufficient and legally justified explanations. In cases of unclear or insufficient reasoning, the researchers consulted the relevant legal framework and discussed the cases internally within the research team. Administrative silence was treated as a refusal without justification. If no refusals were issued during the monitoring cycle, the element automatically received maximum points. For narrative purposes, the researchers also referred to the relevant legal provisions governing refusals of access to information and the manner in which such decisions must be communicated to applicants.

Namely, out of the 28 FoI requests submitted during the monitoring cycle, responses were received for 27 requests. The Ministry of Health did not respond to the request and, for the purposes of this assessment element, this case of administrative silence is considered an unjustified refusal to provide access to information.

The researchers also reviewed the websites of supervisory authorities responsible for FoI to assess whether they regularly publish annual reports covering the implementation of FoI rights and the conduct of public authorities. Regular publication was assessed based on the online availability of the last three annual reports, in accordance with the legally prescribed deadlines for their publication.

The latest annual reports publicly available on the official website of the APRFAPI are those for 2023 and 2024, while the report for 2025 has not yet been published. According to the legal framework, the APRFAPI is obliged to submit its annual report on the previous year's work to the Assembly of the Republic of North Macedonia for adoption no later than 31 March of the current year.²⁰

At the same time, the APRFAPI has reportedly been non-functional for approximately three months due to the failure to appoint a new Director following the expiration of the previous Director's mandate in December 2025. As a result, the APRFAPI's operations were effectively suspended, and employees reportedly had not received salaries since December.

The researchers reviewed the latest available annual report of the supervisory authority to assess whether it includes information on imposed and executed sanctions for non-compliance with FoI requirements, both at the aggregate level and per institution or type of public authority. They also noted any comments related to the implementation of sanctions. If no sanctions were imposed, maximum points were awarded, while inactivity of the supervisory authority or the absence of an annual report automatically resulted in zero points.

The most recently published annual reports available on the official website of the APRFAPI are those for 2023 and 2024, while the 2025 report has not yet been made publicly available, despite the legal obligation to submit it to the Assembly by 31 March of the current year.²¹

The available reports include only aggregate data on imposed and executed sanctions across all public authorities, without disaggregated information by institution or category of public authority. They also do not provide qualitative explanations or observations regarding the sanctions imposed, but only present the overall number of decisions adopted in misdemeanour proceedings.

The researchers reviewed the website of APRFAPI to assess whether they proactively publish updated citizen-friendly resources and fill-in forms related to the exercise of the right to free access to information. Citizen-friendly resources include materials such as guidebooks, multimedia guides, visual explanations of procedures, and other simplified resources aimed at helping citizens understand and exercise their FoI rights. The assessment also examined whether the websites provide fill-in forms for key procedural steps, including FoI requests and complaint forms. All identified resources were further assessed for their compliance with the current legal framework and relevant amendments.

²⁰ Annual Reports for 2023 and 2024 of the APRFAPI, https://aspi.mk/wp-content/uploads/2025/04/godisen-izvestaj-2024_konecen.pdf; <https://aspi.mk/wp-content/uploads/2024/04/godisen-izvestaj-2023-komplet.pdf>

²¹ Ibid

The official website of the APRFAPI contains several updated citizen-friendly resources aimed at facilitating the exercise of FoI rights.²² The landing page includes an educational video available in Macedonian and sign language, while additional written guidebooks and educational video materials on access to public information are also publicly available.²³ The website further provides fill-in forms for submitting requests for access to public information, as well as complaint forms addressed to the APRFAPI. All identified resources and forms appear to be up to date and aligned with the current legal framework regulating FoI rights.

Researchers conducted interviews with three key informants (KIs) from relevant non-state sectors to assess the transparency and effectiveness of supervisory authority sanctions in practice. Interviewees also completed a short survey evaluating their agreement with two statements: that supervisory authority sanctions are transparent and that they are effective. Responses were measured on a four-point scale, with point allocation based on the share of positive responses.²⁴

The first KI reported limited direct engagement with the supervisory authority, having submitted a complaint only once, which resulted in a positive outcome. Information on imposed sanctions had previously been considered accessible and easy to understand; however, access currently appears to be more limited, reportedly due to the APRFAPI's website being unavailable for a certain period. Sanctions were perceived as an effective mechanism for promoting compliance, with both their actual application and the possibility of their use positively influencing how public authorities respond to FoI requests. Nevertheless, the effectiveness of the supervisory authority was considered to be constrained by insufficient political support and limited human resources, particularly due to incomplete staffing within the institution.

The second KI indicated prior experience with submitting a complaint to the supervisory authority and expressed satisfaction with the manner in which the case was handled. Information on imposed sanctions was considered accessible and easy to understand. Sanctions were viewed as effective, with the respondent noting that the requested information was provided promptly following notification from the APRFAPI. Overall, no significant obstacles to the effectiveness of the supervisory authority were identified, while the legal framework governing free access to information was perceived as well functioning.

22 Official APRFAPI website, <https://aspi.mk/>

23 Educational materials, videos, <https://aspi.mk/%d0%b5%d0%b4%d1%83%d0%ba%d0%b0%d1%82%d0%b8%d0%b2%d0%bd%d0%b8-%d0%bc%d0%b0%d1%82%d0%b5%d1%80%d0%b8%d1%98%d0%b0%d0%bb%d0%b8-%d0%b2%d0%b8%d0%b4%d0%b5%d0%b0/>

24 Interview with INI Vinica was conducted on 08.04.2026; Interview with Organisation Zena – Delcevo was conducted on 08.04.2026; Interview with Metamorphosis Foundation was conducted on 15.04.2026

The third KI pointed out that over the past nine years, their organisation has continuously assessed the transparency and openness of state institutions through the Openness Index. As part of this monitoring process, annual requests for free access to public information are submitted to 40 institutions in order to evaluate response times and compliance with legal obligations. In the 2025 monitoring cycle, nearly one quarter of the monitored institutions (10 out of 40) failed to respond to the requests entirely. These included five ministries and five bodies within ministries, namely: the Ministry of Foreign Affairs and Foreign Trade; Ministry of Transport; Ministry of Justice; Ministry for European Affairs; Ministry of Energy, Mining and Mineral Resources; Administration for Execution of Sanctions; State Administrative Inspectorate; State Inspectorate for Local Self-Government; Commission for Relations with Religious Communities and Religious Groups; and the Bureau for Regional Development. Within the legally prescribed deadline, 21 institutions (52.5%) provided responses, including the General Secretariat, 10 ministries, and 10 bodies within ministries. An additional nine institutions responded after the legal deadline had expired. Complaints to the supervisory authority were submitted on several occasions throughout the year. In most cases, however, the requested information was provided by the respective institutions before the appeal procedures were formally concluded by the second-instance authority.

Information about imposed sanctions is accessible and clearly presented. The decisions and reports are published by the supervisory authority, at their official web page. Here can be found: Decisions ordering action; Decisions for re-examination (reconsideration) of the case; Decisions to terminate the procedure; Decisions rejecting the request; Decisions imposing an obligation; Decisions dismissing the request; Court decisions on lawsuits against decisions of the APRFAPL.

However, the language used can be technical (legal), making it difficult for the general public to fully understand the nature and implications of the sanctions. Sanctions have a limited impact on improving compliance. In some cases, the existence of sanctions may encourage authorities to respond more carefully to FOI requests. However, in practice, enforcement is not consistent, and sanctions are not always perceived as a strong deterrent. As a result, public authorities may not significantly change their behavior, especially when there are no serious consequences for non-compliance.

The main obstacles include limited institutional resources, such as insufficient staff and funding, which restrict the authority's capacity to monitor and enforce compliance effectively. The legal framework, while generally in place, also lack sufficiently strong or enforceable provisions, and implementation mechanisms are not always effective in practice.

KI's attitudes on how public authorities handle requests involving sensitive information and refusals of access to information were assessed through the same interviews and methodology. The assessment covered issues related to public integrity, including public procurement, conflict of interest, political financing, lobbying, security and defence, and personal data.²⁵

The first KI reported limited experience with the application of exemptions in FOI procedures and was unable to assess whether justifications are provided clearly or generically. However, it was noted that the Ministry of Internal Affairs is perceived as relying heavily on confidentiality grounds when responding to requests. The appeal process is not seen as having a significant influence on how public authorities handle requests, with uncertainty expressed regarding the extent to which requesters pursue administrative court proceedings. In terms of balancing transparency and protection of sensitive information, the respondent referred to the use of a classified information rulebook as the guiding framework. No clear observations were provided regarding routine treatment of sensitive information or the practice of granting partial access through redaction.

The second KI noted that, while generalisations are difficult, exemptions to FOI requests are in most cases justified clearly. Public authorities are perceived to rely primarily on confidentiality as the main basis for refusing access. The appeal process is considered effective, with a high degree of influence on how authorities handle requests, based on both personal and peer experience. In balancing transparency with the protection of sensitive information, authorities are seen to follow established rules that allow for the classification of information. Certain categories, such as military, health, or information of national interest, may be treated as sensitive, although the respondent expressed some uncertainty in this regard. In practice, authorities are perceived to more often refuse access in full rather than provide partial access through redaction.

The third KI underlined that exemptions applied in response to FOI requests are often justified in a rather generic manner. Public authorities tend to cite broad legal provisions without providing detailed reasoning or demonstrating how the specific harm test applies in each case. This limits transparency and makes it difficult for applicants to assess the legitimacy of refusals. There is a noticeable tendency among public authorities to rely on confidentiality and other exemption grounds. In some cases, these exemptions are applied broadly or even excessively, particularly when dealing with politically sensitive or institutionally inconvenient information. A prominent example is the agreement between the Bechtel–Enka consortium and the Macedonian government, which has been classified and is not publicly disclosed.

²⁵ Ibid

At the same time, there are instances where classification is justified. For example, the acts on internal organisation and systematisation of job positions within the Financial Police Administration (which include the organisational chart) are classified in accordance with the Law on Classified Information and therefore cannot be subject to free access. While the possibility of appeal may encourage some authorities to act more cautiously, it does not systematically influence initial decision-making across all institutions.

In practice, the balance between protecting sensitive information and serving the public interest is not always applied consistently. Although the legal framework envisioned a public interest test/harm test, its application is often weak or absent. There is no fully standardized approach, and different institutions may interpret confidentiality in varying ways.

Certain categories, such as information related to salaries, internal communications, or decision-making processes, or certain procurement procedures, are often routinely treated as sensitive. This can occur even in cases where there is a strong public interest in disclosure. Authorities more often tend to refuse access in full rather than provide partial access through redaction. The practice of granting partial access exists but is not consistently applied, indicating a preference for restrictive interpretations of the law.

Furthermore, citizens' perceived awareness of their right to access information of public importance was assessed through a public perception survey. Point allocation under this element is based on the percentage of citizens who responded with "agree" or "strongly agree" to the statement: "I have the right to request and obtain information of public importance from public authorities."

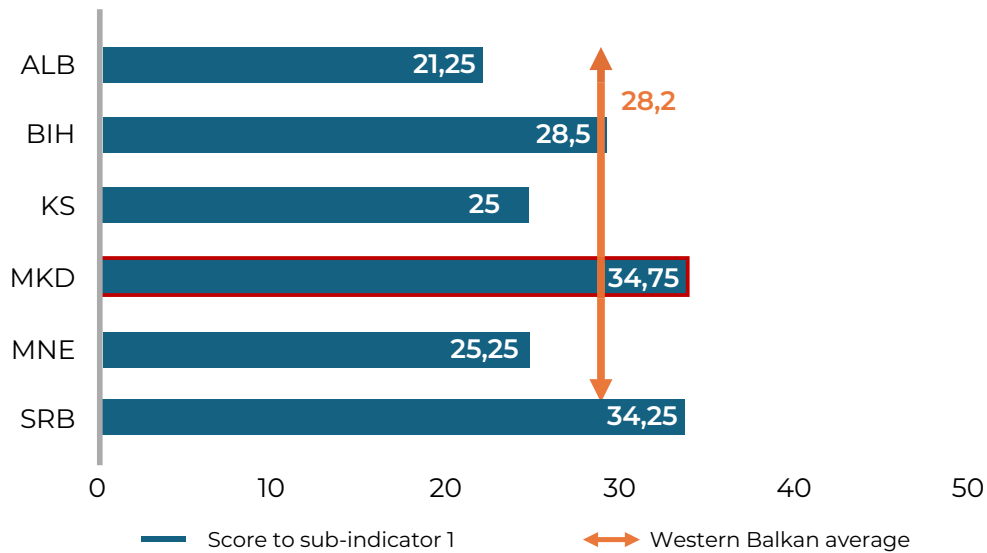
67.9% of respondents indicated awareness of their right to request and obtain information of public importance from public authorities, with 46.2% selecting "agree" and 21.7% selecting "strongly agree" in the public perception survey.²⁶ Citizens' perception of institutional support in exercising the right to access information of public importance was assessed through a public perception survey. Point allocation under this element is based on the percentage of citizens who responded with "agree" or "strongly agree" to the statement: "APR-FAPI assists citizens in exercising their right to obtain information of public importance." 48.3% of respondents perceived the APRFAPI as supportive in helping citizens exercise their right to obtain information of public importance, with 39.2% selecting "agree" and 9.1% selecting "strongly agree" in the public perception survey.²⁷

²⁶ The public perception survey was conducted from 1 February until the 22 February 2025, N=1008

²⁷ Ibid

How does North Macedonia do in regional terms?

Sub-indicator 1: Reactive transparency – freedom of information (maximum score 49.75)



II.2 Proactive transparency



Principle 15: Public administration is transparent and open.

Awarded points per element in sub-indicator 2:

Proactive transparency²⁸

Indicator elements	Element type	Score
E 2.1 There is a strategic document in force that envisages improvements in proactive transparency of state administration	Strategy and policy	0.25/0.25
E 2.2 Regulation stipulates proactive transparency obligations	Legislation	1/1.5
E 2.3 State administration bodies publish relevant, up to date, easily accessible, and citizen-friendly information on scope of work	Practice in implementation	3/3
E 2.4 State administration bodies publish relevant, up to date, citizen-friendly and easily accessible information on policy documents and legal acts under their competence	Practice in implementation	4/4
E 2.5 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on public services	Practice in implementation	3/4
E 2.6 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on impact assessments and evaluations	Practice in implementation	0/4
E 2.7 State administration bodies publish relevant reports on their work in a timely, accessible and citizen-friendly manner	Practice in implementation	0/4
E 2.8 State administration bodies publish relevant, up to date, easily accessible, and citizen friendly budget information	Practice in implementation	2/4

²⁸ The second sub-indicator focuses on the following SIGMA sub-principles: The government has established strategic objectives to promote openness and transparency of public administration, assigning clear responsibilities to specific actors; Public administration bodies proactively disclose public information, which is relevant, complete, accurate and up to date, accessible, understandable, machine-readable, in open-format and reusable.

E 2.9 State administration bodies publish relevant, up to date, easily accessible and citizen friendly contact information	Practice in implementation	3/4
E 2.10 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on organisational structure	Practice in implementation	4/4
E 2.11 State administration bodies publish relevant, up to date, easily accessible and citizen-friendly sections dedicated to public consultation processes	Practice in implementation	2/4
E 2.12 State administration bodies publish data in open, machine-readable format	Practice in implementation	0/4
E 2.13 Public administration publishes high-value open datasets	Practice in implementation	2.25/4.5
E 2.14 Key non-state actors consider proactively published information as citizen-friendly	Outcomes and impact	3/3
E 2.15 Citizens' perception of accessibility of information on public authorities' websites	Outcomes and impact	1/2
Total score for sub-indicator 2		28.5/50.25

State of play

Since the previous monitoring cycle, the findings show moderate improvements in proactive transparency, particularly regarding the publication of key institutional information, legislation, services, organisational structures, and the increased availability of open data through the national portal. However, significant shortcomings remain. Proactive information disclosure on the websites of state administration bodies continues to be inconsistent, with many institutions still failing to publish comprehensive information on organisational structures, contact details of heads of units, institutional competences, annual budgets, annual work plans, and annual reports. In some cases, information is not available in both official languages. Institutional websites are also affected by inconsistent updates, broken links, incomplete information, weak search functionality, and limited accessibility. In addition, many documents are still not published in open, machine-readable formats, limiting their usability and reuse.²⁹

²⁹ Public Administration in the Republic of North Macedonia 2024, SIGMA/OECD, https://www.sigmaweb.org/en/publications/public-administration-in-the-republic-of-north-macedonia-2024_071bad9d-en.html

The researchers reviewed valid government strategic documents at the time of measurement to assess whether they foresee measures aimed at improving proactive transparency in state administration work as a prerequisite for accountability. The assessment focused on identifying relevant goals, measures, and activities, as well as clearly assigned responsibilities within the analysed strategic documents. If no strategic document envisaged actions to improve proactive transparency, no points were awarded.

Within the PAR Strategy 2023–2030 several activities are aimed at strengthening proactive transparency and the use of open data. Under Specific Objective 3.4, the Strategy foresees activities related to the preparation of procedures for the proactive publication, management, and updating of information held by institutions (A3.4.1.3), as well as support to state administration bodies and municipalities for unified and comprehensive publication of data and the promotion of proactive transparency (A3.4.1.4).³⁰

In addition, Specific Objective 3.5 focuses on creating an enabling environment for the use of public sector data through activities aimed at improving open data governance and accessibility. These include the preparation of guidelines for identifying datasets and prioritising data opening (A3.5.1.1), preparation and publication of data catalogues in 25 institutions (A3.5.1.2), establishment of structures for managing the open data process within the Ministry of Digital Transformation and the APRFAPI (A3.5.1.3), strengthening institutional capacities for open data management (A3.5.1.4), preparation of a work plan for the organisational mechanism (A3.5.1.5), and organisation of trainings and awareness-raising activities on opening and using data (A3.5.1.6).³¹

The Strategy further envisages activities aimed at increasing public awareness and use of public sector data, including promotion of the Central Data Catalogue (data.gov.mk) and organisation of public events highlighting the benefits and opportunities of open data (A3.5.2.1 and A3.5.2.2).³²

An important strategic document aimed at the overall improvement of transparency is the Government Transparency Strategy and Action Plan 2023–2026. Priority Area 1 and Priority Area 4 are primarily focused on proactive transparency and open data measures, as they emphasise the publication of information without prior requests, improvement of institutional websites and social media communication, publication of datasets, development of open data portals, automated publication of data, and awareness-raising and promotional activities.³³

30 PAR Strategy 2023-2030, <https://kvalitet.mioa.gov.mk/wp-content/uploads/2024/05/strategija-za-reforma-na-javna-administracija-2023-2030-so-akcziski-plan.pdf>

31 Ibid

32 Ibid

33 Transparency Strategy of the Government of the Republic of North Macedonia, 2023-2026, <https://portal.mdt.gov.mk/post-body-files/nacionalni-strategii-file-idF4.pdf>

In this context, Activity A.2.1, which foresees the publication of data requested by civil society organisations and private companies through the ex post analysis of the implementation of the Law on the Use of Public Sector Data, is also more closely aligned with proactive transparency and open data policies than with reactive transparency. Although the activity refers to data “requested” by stakeholders, its primary objective is not to respond to individual FoI requests, but rather to identify high-demand datasets and ensure their proactive publication and wider public re-use.³⁴

The researchers reviewed the valid legal framework at the time of measurement to assess whether state administration bodies are required to proactively disclose key information related to their work. The assessment specifically examined whether the legal framework regulates the manner in which proactive transparency obligations should be implemented and whether it requires information to be published in open, machine-readable formats. The researchers also identified the relevant legal provisions defining the types of information that must be proactively published.

The Law on Free Access to Public Information, particularly Articles 9 and 10, establishes obligations related to proactive transparency. Article 9 requires information holders to regularly maintain, update, and publicly publish a list of the information they possess in a manner accessible to the public, including through institutional websites.³⁵

Article 10 further specifies a broad range of information that institutions are obliged to proactively publish on their websites. This includes information on institutional competences, contact details, organisational structure, strategic and annual plans, budgets and financial reports, audit reports, regulations and by-laws, procurement documentation, public services, statistical data, reports submitted to oversight bodies, and other information related to the work and competences of the institution. The Law also requires publication of information related to access to information procedures and public procurement documentation.³⁶ While the Law clearly establishes extensive proactive transparency obligations, it does not explicitly require that all proactively published information be made available in open, machine-readable formats.³⁷ However, the Law does not stipulate that public information needs to be available in open, machine-readable format.

Furthermore, the assessment was conducted through a review of the official websites of five state administration bodies: three line ministries of different sizes, one ministry with a general planning and coordination role, and one cen-

34 Transparency Strategy of the Government of the Republic of North Macedonia, 2023-2026, <https://portal.mdt.gov.mk/post-body-files/nacionalni-strategiji-file-idF4.pdf>

35 Law on Free Access to Public Information, Official Gazette of the Republic of North Macedonia” No. 101/19, <https://duinspektorat.mioa.gov.mk/sites/default/files/закон.pdf>

36 Ibid

37 Ibid

tral-level public service provider outside the ministerial structure. The assessment examined whether descriptions of the institutions' scope of work were available, accessible within three clicks from the homepage, and presented in a citizen-friendly manner using simplified and understandable language rather than legal text copied directly from legislation.

For the Ministry of Environment and Physical Planning (MEPP), information on the institution's scope of work is available on the MEPP's official website. The information is easily accessible, being available within two clicks from the homepage, and is presented in a citizen-friendly manner, using simplified and understandable language that is accessible even to citizens who are not familiar with the Ministry's competences.³⁸

For the Ministry of Justice (MoJ), general information on the institution's scope of work is not available on the official website in a separate and clearly designated section. Instead, information can only be identified indirectly through announcements and through the section on the Ministry's internal organisation, which describes the competences of individual organisational units.³⁹

For the Ministry of Digital Transformation (MDT), information on the institution's scope of work is available on the official website. The information is easily accessible, being available within two clicks from the homepage, and is presented in a citizen-friendly manner using simplified and understandable language that is accessible even to citizens who are not familiar with the Ministry's competences.⁴⁰

For the MPA, information on the institution's scope of work is available on the official website. The information is easily accessible, being available within two clicks from the homepage, and is presented in a citizen-friendly manner using simplified and understandable language that is accessible even to citizens who are not familiar with the Ministry's competences. However, the information provided is relatively brief and lacks a higher level of detail.⁴¹

For the Agency for Real Estate Cadastre (Cadastre), information on the institution's scope of work is available on the official website. The information is easily accessible, being available within two clicks from the homepage, and is presented in a citizen-friendly manner using simplified and understandable language that is accessible even to citizens who are not familiar with the Cadastre's competences.⁴²

38 Official website of the Ministry of Environment and Physical Planning: <https://www.moepp.gov.mk/mk-MK/ministerstvo/za-ministerstvoto>

39 Official website of the Ministry of Justice: <https://www.pravda.gov.mk/>

40 Official website of the Ministry of Digital Transformation: <https://mdt.gov.mk/mk-MK/ministerstvo/misija-i-vizija>

41 Official website of the Ministry of Public Administration: <https://mja.gov.mk/mk-MK/ministerstvo/ministerstvo>

42 Official website of the Agency for Real Estate Cadastre: <https://www.katastar.gov.mk/%d0%b7%d0%b0-%d0%bd%d0%b0%d1%81-2/%d0%b7%d0%b0-%d0%bd%d0%b0%d1%81/>

Additionally, the assessment examined whether sample institutions publish lists of relevant policy documents and legal acts within their competence on their official websites. Researchers assessed whether these documents are available, up to date, accessible within three clicks from the homepage, and presented in a citizen-friendly manner through dedicated website sections, consolidated versions, and downloadable formats. The validity of the documents was verified through comparison with versions published in the Official Gazette. For institutions without a policy-making role, the assessment focused on the legal acts regulating their competences and procedures.

For the MEPP, legislation within the Ministry's competence is available on the official website, including both laws and by-laws grouped by thematic areas, as well as relevant policy documents and strategies. The sample of documents randomly checked against the versions published in the Official Gazette was found to be up to date. All documents are easily accessible, being available within two clicks from the homepage, and are presented in a citizen-friendly manner through dedicated sections for legislation and policy documents. Consolidated versions are available alongside amendments, and all documents can be downloaded.⁴³

For the MoJ, legislation within the Ministry's competence is available on the official website through separate sections dedicated to laws, by-laws, and policy documents. The sample of documents randomly checked against the versions published in the Official Gazette was found to be up to date. All documents are easily accessible, being available within two clicks from the homepage, and are presented in a citizen-friendly manner through clearly designated sections for primary and secondary legislation and policy documents. Consolidated versions are available alongside amendments, and all documents can be downloaded.⁴⁴

For the MDT, legislation within the Ministry's competence is available on the official website through dedicated sections for legislation and policy documents. The sample of documents randomly checked against the versions published in the Official Gazette was found to be up to date. All documents are easily accessible, being available within two clicks from the homepage, and are presented in a citizen-friendly manner through clearly designated sections for legislation and policy documents. Consolidated versions are available alongside amendments, and all documents can be downloaded.⁴⁵

43 Official website of the Ministry of Environment and Physical Planning: <https://www.moepp.gov.mk/mk-MK/regulativa/zakonodavstvo>; <https://www.moepp.gov.mk/mk-MK/dokumenti/strategii>

44 Official website of the Ministry of Justice: <https://www.pravda.gov.mk/mk-MK/regulativa/zakoni>; <https://www.pravda.gov.mk/mk-MK/regulativa/podzakonski-akti>; <https://www.pravda.gov.mk/mk-MK/regulativa/strategii>

45 Official website of the Ministry of Digital Transformation: <https://mdt.gov.mk/mk-MK/regulativa/zakoni>; <https://mdt.gov.mk/mk-MK/regulativa/vazecki-strategii>

For the MPA, legislation within the Ministry's competence is available on the official website through dedicated sections for legislation and policy documents. The sample of documents randomly checked against the versions published in the Official Gazette was found to be up to date. All documents are easily accessible, being available within two clicks from the homepage, and are presented in a citizen-friendly manner through clearly designated sections for legislation and policy documents. Consolidated versions are available alongside amendments, and all documents can be downloaded.⁴⁶

For the Cadastre, the official website contains dedicated sections for regulations relevant their work, including primary legislation, rulebooks, tariffs, and other relevant acts. The sample of documents randomly checked against the versions published in the Official Gazette was found to be up to date. All documents are easily accessible, being available within two clicks from the homepage, and are presented in a citizen-friendly manner through clearly designated sections for legislation and related documents. Consolidated versions are available alongside amendments, and all documents can be downloaded.⁴⁷

The researchers also assessed whether sample institutions provide publicly available and up-to-date information on the services they offer, including both traditional and electronic services and whether service information is accessible within three clicks from the homepage and presented in a citizen-friendly manner, including the availability of FAQ sections and clear links or redirections to central e-service portals where applicable. They also reviewed the relevant legal framework to verify whether the assessed institutions are mandated to provide public services; where institutions do not provide services under the law, no points were deducted.

For the MEPP, a dedicated section on the services offered by the Ministry is available on the official website, with services categorised by thematic area. Each category contains general information on the services, relevant regulations, guidelines for obtaining services, forms, and decisions issued by the Ministry. All listed services are currently available, and the information provided is up to date. The section is easily accessible, being available within two clicks from the homepage once the relevant area is selected.⁴⁸ Although the

46 Official website of the Ministry of Public Administration: <https://mja.gov.mk/mk-MK/propisi/propisi>; <https://mja.gov.mk/mk-MK/dokumenti/strategii>

47 Official website of the Agency for Real Estate Cadastre: <https://www.katastar.gov.mk/%d0%bf%d1%80%d0%be%d0%bf%d0%b8%d1%81%d0%b8/%d0%b7%d0%b0%d0%ba%d0%be%d0%bd%d0%b8/>; <https://www.katastar.gov.mk/%d0%bf%d1%80%d0%be%d0%bf%d0%b8%d1%81%d0%b8/%d0%bf%d1%80%d0%b0%d0%b2%d0%b8%d0%bb%d0%bd%d0%b8%d1%86%d0%b8/>; <https://www.katastar.gov.mk/%d0%bf%d1%80%d0%be%d0%bf%d0%b8%d1%81%d0%b8/%d1%82%d0%b0%d1%80%d0%b8%d1%84%d0%bd%d0%b8%d1%86%d0%b8/>.

48 Official website of the Ministry of Environment and Physical Planning: <https://www.moepp.gov.mk/mk-MK/uslugi>.

website does not contain a dedicated FAQ section on services, clear information and redirection links to relevant e-service portals are provided where applicable.⁴⁹

For the MoJ, a dedicated section on the services offered by the Ministry is available on the official website, with services categorised by thematic area. Each category contains general information on the services, relevant regulations, guidelines for obtaining services, and the necessary forms. All listed services are currently available, and the information provided is up to date. The section is easily accessible, being available within two clicks from the homepage once the relevant area is selected. However, the website does not contain a dedicated FAQ section on services, and no e-services are offered.⁵⁰

For the MDT, a dedicated section on the services and digital platforms managed by the Ministry is available on the official website. The services are categorised by activities and platforms, with each section containing general information, relevant regulations, and guidelines for obtaining the services. All listed services are currently available, and the information provided is up to date. The section is easily accessible, being available within two clicks from the homepage once the relevant area is selected.⁵¹ Although there is no dedicated FAQ section on services, the website provides information and links to the national e-services portal managed by the Ministry.⁵²

For the MPA, no dedicated section on public services is available on the official website, as the Ministry does not provide services directly to citizens or businesses within its legally defined competences.

For the Cadastre, a dedicated section on the services offered by the APRFAP is available on the official website, with services categorised by type. Each section contains general information on the services, guidelines for obtaining them, relevant forms, and applicable tariffs. All listed services are currently available, and the information provided is up to date. The section is easily accessible, being available within two clicks from the homepage once the relevant category is selected.⁵³ In addition, the Cadaster's website includes a dedicated FAQ section on services, as well as information and links to the Cadaster's e-services portal.⁵⁴

49 Official website of the Ministry of Environment and Physical Planning: <https://www.moepp.gov.mk/mk-MK/uslugi/exim>

50 Official website of the Ministry of Justice: <https://www.pravda.gov.mk/mk-MK/uslugi>

51 Official website of the Ministry of Digital Transformation: <https://mdt.gov.mk/mk-MK/krucni-aktivnosti>

52 Official website of the Ministry of Digital Transformation: <https://mdt.gov.mk/mk-MK/krucni-aktivnosti/nacionalen-portal-za-e-uslugi>

53 Official website of the Agency for Real Estate Cadastre: <https://www.katastar.gov.mk/%D1%83%D1%81%D0%BB%D1%83%D0%B3%D0%B8/>

54 Official website of the Agency for Real Estate Cadastre: <https://www.katastar.gov.mk/%D0%BD%D0%B0%D1%98%D1%87%D0%B5%D1%81%D1%82%D0%BE-%D0%BF%D0%BE%D1%81%D1%82%D0%B0%D0%B2%D1%83%D0%B2%D0%B0%D0%BD%D0%B8-%D0%BF%D1%80%D0%B0%D1%88%D0%B0%D1%9A%D0%B0/>

Researchers assessed whether sample institutions publish impact assessment and evaluation documents, including ex-ante and ex-post analyses, related to policy areas within their competence. The assessment examined whether such documents are available for all policy sectors, whether at least one document had been published within the last two calendar years, whether the information is accessible within three clicks from the homepage, and whether the documents are presented in a citizen-friendly manner through dedicated website sections and downloadable formats. For service providers without policy-making competences, the assessment focused on the availability of analyses related to citizen feedback, service quality, and similar evaluations.

For the MEPP, impact assessment documents related to environmental protection and physical planning are available on the official website for various projects implemented by the institution. Several such documents were published in 2025 and 2026, alongside older assessments. The documents are easily accessible, being available within two clicks from the homepage, and are presented in a citizen-friendly manner through a dedicated website section where all documents can be downloaded.⁵⁵

For the MoJ, a report on the impact assessment of the draft Law on Preventing Corruption and Conflict of Interest from 2025 is available on the official website within the section dedicated to draft laws. The document is accessible within three clicks from the homepage and is available for download.⁵⁶ However, there is no specifically dedicated website section for impact assessment and evaluation documents, which limits the overall citizen-friendliness and visibility of such materials.

For the MDT, no published impact assessment or evaluation documents (ex-ante or ex-post) related to policy areas within the Ministry's competence were identified on the official website.

For the MPA, a dedicated section on regulatory impact assessment (RIA) is available on the official website, reflecting the Ministry's role as the central body responsible for coordinating the RIA process. The section contains annual reports on the implementation of RIA; however, all available reports are older than 2022.⁵⁷ The documents are easily accessible, being available within two clicks from the homepage, and are presented in a citizen-friendly manner through a dedicated website section where all documents can be downloaded.

For the Cadastre, no analyses related to citizen feedback on service provision, quality of services, or similar evaluations were identified on the official website.

55 Official website of the Ministry of Environment and Physical Planning: <https://www.moepp.gov.mk/mk-MK/uslugi/studii-za-ovzs>

56 Official website of the Ministry of Justice: <https://www.pravda.gov.mk/mk-MK/regulativa/zakoni>

57 Official website of the Ministry of Public Administration: <https://mja.gov.mk/mk-MK/dokumenti/pro-cenka-na-vlijanie-na-regulativa>

The assessment examined whether sample institutions publish annual or multi-annual work reports covering their full scope of responsibilities. Researchers assessed whether the reports are available, published within legally prescribed deadlines, accessible within three clicks from the homepage, and presented in a citizen-friendly manner through introductory summaries, visual elements, or other features that make the reports easier to understand. Where reporting obligations are fulfilled through Government-level reports, sample institutions' reports were considered eligible if they could be clearly identified within the Government's reporting documents.

For the MEPP and the MoJ, no work reports were identified on the official websites of the institutions.

For the Cadastre, a work report for 2024 is available on the official website.⁵⁸ The report is accessible within two clicks from the homepage and can be considered citizen-friendly, as it contains an introductory section explaining the results achieved in understandable language, as well as graphs and tables facilitating easier understanding of the data presented. However, the execution report for 2025 has not been published or made publicly available. In addition, it is not possible to assess whether the 2024 report was published in a timely manner, as the relevant legal framework does not prescribe a specific deadline for publication, while the adoption of the report falls under the responsibility of the Steering Committee.

For the MDT, reports on the implementation of the annual work plan for 2024 and 2025 are available on the official website. Both reports are timely, accessible within two clicks from the homepage, and can be considered citizen-friendly, as they contain introductory sections explaining the results of the Ministry's work in understandable language.⁵⁹

For the MPA, reports on the implementation of the annual work plan for 2024 and 2025 are available on the official website and the Government portal. The reports are timely and accessible within three clicks from the homepage. They can also be considered citizen-friendly, as they include introductory sections presenting the achieved results in a simplified and understandable manner.⁶⁰

The assessment examined whether sample institutions publish annual financial plans for the current year and financial execution reports for the previous year, or the latest reports required under the legal framework. Researchers assessed whether the published financial plans reflect the latest budget amendments,

58 Official website of the Agency for Real Estate Cadastre: https://www.katastar.gov.mk/wp-content/uploads/dokumenti/godisni_izvestaj/Godisen_izvestaj_za_rabota_na_AKN_28032025.pdf

59 Official website of the Ministry of Digital Transformation: <https://mdt.gov.mk/mk-MK/dokumenti/izvestaj>

60 Official website of the Ministry of Public Administration: <https://mja.gov.mk/mk-MK/dokumenti/izvestaj/izvestaj-za-sproveduvanje-na-godisniot-plan-za-rabota-za-2024-godina>; <https://portal.mdt.gov.mk/post-body-files/izvestaj-za-sproveduvanje-na-godisniot-plan-za-rabota-za-2025-ta-godina-file-vVjQ.pdf>

whether the information is accessible within three clicks from the homepage, and whether institutions provide citizen-friendly budget information, such as citizen budgets for the current year. Links redirecting users to central online budget platforms were also considered valid for point allocation.

For the MEPP, budget plans and budget execution reports are available on the official website; however, the most recent published documents date from 2023 or earlier and therefore cannot be considered up to date.⁶¹ The information is accessible within three clicks from the homepage. No citizen budget for the current calendar year was identified on the MEPP's website.

For the MoJ, budget plans and budget execution reports are available on the official website, including documents from 2025.⁶² Amendments to the financial plan for 2026 have been incorporated to reflect the latest budget changes, meaning the information can be considered up to date. Both budget plans and financial reports are accessible within three clicks from the homepage through separate sections dedicated to budgets and reports. However, no citizen budget for the current calendar year was identified on the MoJ's website.

For the MDT, budget plans and budget execution reports are available on the official website, including documents from 2026 and 2025 respectively.⁶³ As no amendments have been made to the latest budget, the published financial information can be considered up to date. Both budget plans and financial reports are accessible within two clicks from the homepage. However, no citizen budget was identified on the Ministry's website.

For the MPA, budget plans and budget execution reports are available on the official website, including documents from 2026 and 2025 respectively.⁶⁴ However, no budget execution report for 2025 was identified. As no amendments have been made to the latest budget, the published financial plan can be considered up to date. Both budget plans and financial reports are accessible within two clicks from the homepage. No citizen budget was identified on the Ministry's website.

For the Cadastre, budget plans are available on the official website, including documents from 2026 and 2025.⁶⁵ However, no budget execution reports more recent than 2020 were identified. As no amendments have been made to the

61 Official website of the Ministry of Environment and Physical Planning: <https://www.moepp.gov.mk/mk-MK/ministerstvo/dokumenti-od-oblasta-na-finansiite>

62 Official website of the Ministry of Justice: <https://www.pravda.gov.mk/mk-MK/odnosi-so-javnost/budzet>; <https://www.pravda.gov.mk/mk-MK/odnosi-so-javnost/zavrsni-smetki>

63 Official website of the Ministry of Digital Transformation: <https://mdt.gov.mk/mk-MK/dokumenti/izvestai>

64 Official website of the Ministry of Public Administration: <https://mja.gov.mk/mk-MK/dokumenti/godisni-planovi-i-programi>

65 Official website of the Agency for Real Estate Cadastre: <https://www.katastar.gov.mk/%d0%b4%d0%be%d0%ba%d1%83%d0%bc%d0%b5%d0%bd%d1%82%d0%b8/%d0%b1%d1%83%d1%9f%d0%b5%d1%82/>

latest budget, the published financial plan can be considered up to date. The budget information is accessible within two clicks from the homepage. No citizen budget was identified on their website.

The assessment examined whether sample institutions publish general contact information, including email addresses, phone numbers, and physical addresses, as well as dedicated contacts related to free access to information. Researchers assessed whether the contact information is available, up to date through verification by phone and email, accessible within three clicks from the homepage, and presented in a citizen-friendly manner through dedicated website sections that allow users to easily locate the information.

For the MEPP, general contact information is available on the official website, including a generic email address, phone number, and physical address.⁶⁶ However, the link to the section on free access to information was not functional in the reporting period, resulting in the absence of verifiable contacts related to FoI requests. The available contact information is up to date, accessible within two clicks from the homepage, and presented in a citizen-friendly manner through a dedicated contact section on the website.

For the MoJ, both general contact information and dedicated contacts for free access to information are available on the official website, including email addresses, telephone contacts, and a physical address for submitting FoI requests.⁶⁷ The information is up to date, accessible within two clicks from the homepage, and presented through a dedicated contact section.

For the MDT, general contact information and dedicated FoI contacts are available on the official website, including email and telephone contact details of the responsible person. The information is up to date, accessible within two clicks from the homepage, and presented in a citizen-friendly manner through a dedicated section.⁶⁸

For the MPA, general contact information and contact details for free access to information are available on the official website. While the FoI section contains the email address of the responsible person, no telephone contact is provided. The available information is up to date, accessible within two clicks from the homepage, and presented through a dedicated contact section.⁶⁹

For the Cadastre, both general contact information and dedicated FoI contacts are available on the official website, including email addresses and telephone contacts of the responsible person. The information is up to date, accessible

66 Official website of the Ministry of Environment and Physical Planning: <https://www.moepp.gov.mk/mk-MK/kontakt/kontakt>; <https://www.moepp.gov.mk/ministerstvo/transparentnost/informacii-javen-karakter>

67 Official website of the Ministry of Justice: <https://www.pravda.gov.mk/mk-MK/kontakt/kontakt>;

68 Official website of the Ministry of Digital Transformation: <https://mdt.gov.mk/mk-MK/kontakt/kontakt>

69 Official website of the Ministry of Public Administration: <https://mja.gov.mk/mk-MK/kontakt/kontakt>

within two clicks from the homepage, and presented in a citizen-friendly manner through dedicated website sections.⁷⁰

The assessment examined whether sample institutions publish information on their organisational structure, including a complete organisational chart or organigram showing the hierarchy of organisational units and their responsibilities. Researchers assessed whether the published structure is up to date and aligned with the valid acts on internal organisation, whether the information is accessible within three clicks from the homepage, and whether the organisational charts are presented in a readable and downloadable format.

For the MEPP, the organisational chart⁷¹ and detailed information on organisational units are available on the official website.⁷² The published structure is aligned with the valid Rulebook on internal organisation.⁷³ The information is accessible within three clicks from the homepage and is presented in a citizen-friendly manner, with readable and downloadable organisational charts.

For the MoJ, the organisational chart⁷⁴ and detailed descriptions of organisational units are publicly available on the official website⁷⁵ and are aligned with the valid Rulebook on internal organisation.⁷⁶ The information is accessible within three clicks from the homepage and is presented in a readable and downloadable format.

For the MDT, the official website contains the organisational chart for the entire Ministry, as well as a table overview of organisational units and employees.⁷⁷ The published structure is aligned with the valid Rulebook on internal organisation.⁷⁸ The information is accessible within three clicks from the homepage and is presented in a readable and downloadable format.

70 Official website of the Agency for Real Estate Cadastre:

<https://www.katastar.gov.mk/%d0%b7%d0%b0-%d0%bd%d0%b0%d1%81-2/%d0%ba%d0%be%d0%bd%d1%82%d0%b0%d0%ba%d1%82/>

71 Official website of the Ministry of Environment and Physical Planning: <https://www.moepp.gov.mk/mk-MK/ministerstvo/organogram>

72 Official website of the Ministry of Environment and Physical Planning: <https://www.moepp.gov.mk/mk-MK/ministerstvo/sektori>

73 Official website of the Ministry of Environment and Physical Planning: <https://portal.mdt.gov.mk/post-body-files/21-dokument-transparentnost-file-Qgoo.pdf>

74 Official website of the Ministry of Justice: <https://portal.mdt.gov.mk/post-body-files/sistemizacija-i-organizacija-pravda-file-pQOn.pdf>

75 Official website of the Ministry of Justice: <https://www.pravda.gov.mk/mk-MK/ministerstvo/sektori>

76 Official website of the Ministry of Justice: <https://portal.mdt.gov.mk/post-body-files/sistemizacija-i-organizacija-pravda-file-ijiN.pdf>

77 Official website of the Ministry of Digital Transformation: <https://portal.mdt.gov.mk/post-body-files/organizaciska-struktura-file-VrYj.pdf>

78 Official website of the Ministry of Digital Transformation: <https://portal.mdt.gov.mk/post-body-files/ministerstvo-mdt-file-UH8P.pdf>

For the MPA, the organisational chart⁷⁹ and breakdown of organisational units⁸⁰ are publicly available and aligned with the valid Rulebook on internal organisation.⁸¹ The organisational chart is readable and downloadable; however, the information is not accessible within three clicks from the homepage, as required under the assessment criteria.

For the Cadastre, the organisational chart⁸² and breakdown of organisational units⁸³ are available on the official website and aligned with the valid Rulebook on internal organisation.⁸⁴ The information is accessible within three clicks from the homepage and is presented in a readable and downloadable format.

The assessment examined whether sample institutions publish information on public consultation processes or links to central consultation portals, and whether this information is up to date, accessible within three clicks from the homepage, and presented through dedicated website sections. For service providers without policy-making competences, the assessment focused on the availability and functionality of online user feedback channels.

For the MEPP, up-to-date information on public consultation processes is available on the official website; however, consultations are published within the general “Announcements” section alongside other news and notices. There is no separate list or dedicated section for public consultations. The section is accessible within two clicks from the homepage.⁸⁵

For the MoJ, information on public consultation processes is also available and up to date, but consultations are published within the general “Announcements” section rather than through a dedicated consultation page or list. The section is accessible within two clicks from the homepage.⁸⁶

79 Official website of the Ministry of Public Administration: <https://portal.mdt.gov.mk/post-body-files/vnatresna-organizacija-javna-administracija-file-jcMu.docx>

80 Official website of the Ministry of Public Administration: <https://mja.gov.mk/mk-MK/ministerstvo/vnatresna-organizacija/vnatresna-organizacija-javna-administracij>

81 Official website of the Ministry of Public Administration: <https://mja.gov.mk/mk-MK/ministerstvo/vnatresna-organizacija/pravilnik-za-vnatresna-organizacija-na-ministerstvo-za-javna-administracija>

82 Official website of the Agency for Real Estate Cadastre: https://www.katastar.gov.mk/wp-content/uploads/za_nas/organogram_2015.pdf

83 Official website of the Agency for Real Estate Cadastre: <https://www.katastar.gov.mk/%d0%b7%d0%b0-%d0%bd%d0%b0%d1%81-2/%d0%be%d1%80%d0%b3%d0%b0%d0%bd%d0%b8%d0%b7%d0%b0%d1%86%d0%b8%d0%be%d0%bd%d0%b0-%d0%bf%d0%be%d1%81%d1%82%d0%b0%d0%b2%d0%b5%d0%bd%d0%be%d1%81%d1%82/>

84 Official website of the Agency for Real Estate Cadastre: https://www.katastar.gov.mk/wp-content/uploads/za_nas/finalna_organizacija_13.10.2015.pdf

85 Official website of the Ministry of Environment and Physical Planning: <https://www.moepp.gov.mk/mk-MK/odnosi-so-javnost/soopstenija/pokana-za-javna-rasprava-po-nacrt-na-zakon-za-proglasuvanje-na-belcisko-blato-za-zastiteno-podracje-vo-kategorija-iv-park-na-priroda>

86 Official website of the Ministry of Justice: <https://www.pravda.gov.mk/mk-MK/odnosi-so-javnost/soopstenija/predlog-izmenite-na-zakonot-za-zastita-na-licnite-podatoci-se-objaveni-na-ener>

For the MPA, up-to-date information on public consultation processes⁸⁷ is available on the official website through the “Announcements” section.⁸⁸ However, there is no separate list or dedicated website location specifically for public consultations. The section is accessible within two clicks from the homepage.

For the MDT, a dedicated section on public consultation processes is available on the official website, containing information on public hearings held during the past year. The section is accessible within two clicks from the homepage and can be considered citizen-friendly, as consultations are presented through a dedicated website location.⁸⁹

For the Cadastre, the official website contains an accessible section on a free telephone line for submitting remarks and complaints related to employee conduct, bribery and corruption, and for obtaining information on the status of specific cases. The feedback channel is functional and can therefore be considered citizen-friendly.⁹⁰

The assessment examined whether at least one dataset related to the work of sampled institutions is published in a machine-readable format, such as XML, XLSX, CSV, ODS, or JSON, through the national open data portal or dedicated institutional open data sections. Maximum points are awarded when such datasets are available through the national open data portal.

Machine-readable datasets related to the work of the MEPP⁹¹, the MoJ⁹², the MDT⁹³, and the Cadastre⁹⁴ are available on the national open data portal, although not on their respective institutional websites. In contrast, no machine-readable datasets related to the MPA were identified either on the Ministry’s website or on the national open data portal.

The researchers assessed whether government institutions publish high-value datasets in accordance with the requirements of EU Directive 2019/1024. The assessment examined whether these datasets are available free of charge, provided in machine-readable formats, accessible through Application Programming Interface (API), and available for bulk download where relevant.

87 Official website of the Ministry of Public Administration: <https://mja.gov.mk/mk-MK/odnosi-so-javnost/najavi/pokana-za-javna-debata-zakon-za-visoki-rakovoditeli-na-organite-na-drzavnata-uprava-i-fondovite>.

88 Official website of the Ministry of Public Administration: <https://mja.gov.mk/mk-MK/odnosi-so-javnost/najavi>

89 Official website of the Ministry of Digital Transformation: <https://mdt.gov.mk/mk-MK/odnosi-so-javnost/javni-raspravi>

90 Official website of the Agency for Real Estate Cadastre: <https://www.katastar.gov.mk/%D0%B8%D0%B-D%D1%84%D0%BE-%D0%BB%D0%B8%D0%BD%D0%B8%D0%B8/>

91 <https://data.gov.mk/dataset/ejiektpnheh-n-ejiektpohckn-otnad-6atepnn-n-akymyjiatopn>

92 <https://data.gov.mk/dataset/becnijiatha-nomow>

93 <https://data.gov.mk/dataset/jincta-co-be6-cepbncn-kon-ce-ha-pacnojiarahbe-nhteponopa6n jihoct>

94 <https://data.gov.mk/dataset/pernctap-ha-uehn-n-3akynhnhn-ha-hedbnxhoctn>

The analysis covered datasets in the areas of geospatial information, earth observation and environment, meteorology, statistics, companies and company ownership, and mobility.

For the geospatial category, the researchers identified that some entities within the National Spatial Data Infrastructure have published part of their spatial data as open data, available for free use, reuse, and distribution through the national geoportal. The available datasets are provided free of charge and in machine-readable formats. Access through APIs and bulk download options is available only partially, depending on the specific dataset and functionality provided through the platform.⁹⁵

For the earth observation and environment category, the researchers identified datasets available through the MAKSTAT PXWeb platform related to greenhouse gas projections. The datasets are available free of charge, provided in machine-readable formats, accessible through APIs, and available for bulk download.⁹⁶

For the meteorological category, the researchers identified datasets on precipitation available through the MAKSTAT PXWeb platform. The datasets are available free of charge, provided in machine-readable formats, and accessible through APIs. However, bulk download functionality is not available. While the dataset meets the technical criteria for open data, it does not represent real-time meteorological observations and therefore does not support continuous reuse, automated processing, or downstream data delivery to users.⁹⁷

For the companies and company ownership category, the researchers identified data published through the Central Registry platform. However, the available information is not provided free of charge, is not available in machine-readable formats, and is not accessible through APIs or bulk download options.⁹⁸

For the statistics category, the researchers identified datasets available through the MAKSTAT database of the State Statistical Office. The datasets are available free of charge, provided in machine-readable formats, accessible through APIs, and available for bulk download.⁹⁹

For the mobility category, the researchers identified transport network datasets available through the national geoportal. The datasets are partially available free of charge, provided in machine-readable formats, and accessible through

95 https://nipp2.katastar.gov.mk:8083/geoportal_3.0.2/#searchPanel?lang=mk_MK&search=Transport-networks

96 https://makstat.stat.gov.mk/PXWeb/pxweb/en/MakStat/MakStat_ZivotnaSredina_Vozduh/275_ZivSr_nac_stak_gas_proekcii_ml.px/

97 https://makstat.stat.gov.mk/PXWeb/pxweb/mk/MakStat/MakStat_ZivotnaSredina_Hidrometrolo-skipodatoci/175_ZivSr_MK_Vrnez_ml.px/table/tableViewLayout2/

98 <https://www.crm.com.mk/mk/otvoreni-podatotsi/objavi-na-upisi-za-subjekti>

99 https://makstat.stat.gov.mk/PXWeb/pxweb/mk/MakStat/MakStat_Naselenie_ProcenkiNasele-nie_ProcenkiPopis2021_Proceni30Juni/30062021_MKD_Za_PX.px/table/tableViewLayout2/

APIs. Bulk download functionality is also only partially available, depending on the specific dataset and access conditions.¹⁰⁰

Attitudes of the KIs on the citizen-friendliness of proactively published public information were assessed through the same interviews and methodological approach used above. Interviewees evaluated their level of agreement with the statement that information proactively published online by public authorities is citizen-friendly, while the findings were used both for point allocation and for qualitative analysis within the PAR Monitor reports.¹⁰¹

All interviewees agreed that the information proactively published on the websites of public authorities is generally presented in a citizen-friendly manner.

The first KI noted that proactively published information is often insufficient, making additional information requests necessary in many cases. Although some municipalities and ministries are perceived as relatively more transparent, this was largely attributed to pressure from civil society actors. The informant highlighted persistent technical and structural barriers on institutional websites, including poor navigation and lack of standardisation, which frequently make documents difficult to locate even when their existence is known. Annual reports and open data were identified as the types of information most commonly missing or difficult to access. Overall, the publication and updating of information were assessed as inconsistent across institutions, with frequent delays and gaps in availability.

The second KI considered proactively published information to be largely insufficient and incomplete, making FoI requests necessary in many cases. Institutional websites were described as difficult to navigate due to poor structure and lack of search functionality, while laws, regulations, and open data were identified as the types of information most commonly missing or difficult to access. Although some improvements in updating information have been noted, delays, weak follow-up, and limited enforcement mechanisms continue to undermine accountability.

The third KI noted that some documents previously published online are no longer accessible due to broken links or lack of updates, which limits transparency and public access to information. Information most commonly missing or difficult to access includes annual public procurement reports, policy documents, draft laws, internal decisions, comprehensive annual reports, and open data in usable formats. The informant also highlighted that the practice of updating information remains inconsistent across institutions, with many websites affected by delays and irregular updates that reduce the reliability and relevance of publicly available information.

¹⁰⁰ https://nipp2.katastar.gov.mk:8083/geoportal_3.0.2/#searchPanel?lang=mk_MK&search=Transportnetworks

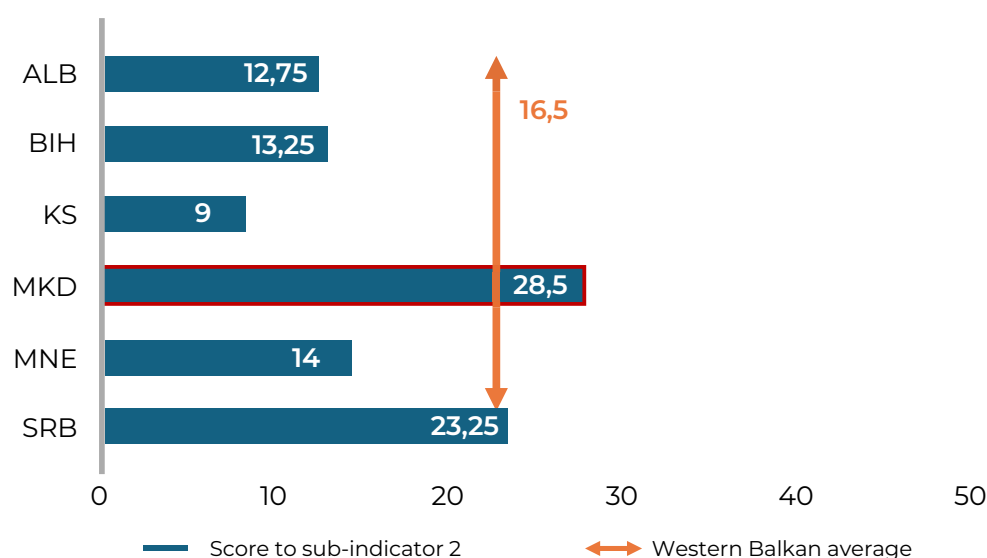
¹⁰¹ Interview with INI Vinica was conducted on 08.04.2026; Interview with Organisation Zena – Delcevo was conducted on 08.04.2026; Interview with Metamorphosis Foundation was conducted on 15.04.2026

Citizens' perception of the accessibility of information on the websites of public authorities and the Government was assessed through a public perception survey. The assessment measured the percentage of citizens who responded with "agree" or "strongly agree" to the statement: "I can easily find the information I need on the websites of public authorities and the Government."¹⁰²

A total of 47.2% of respondents perceived information on the websites of public authorities and the Government as easily accessible, with 36.9% selecting "agree" and 10.3% selecting "strongly agree" in the public perception survey.

How does North Macedonia do in regional terms?

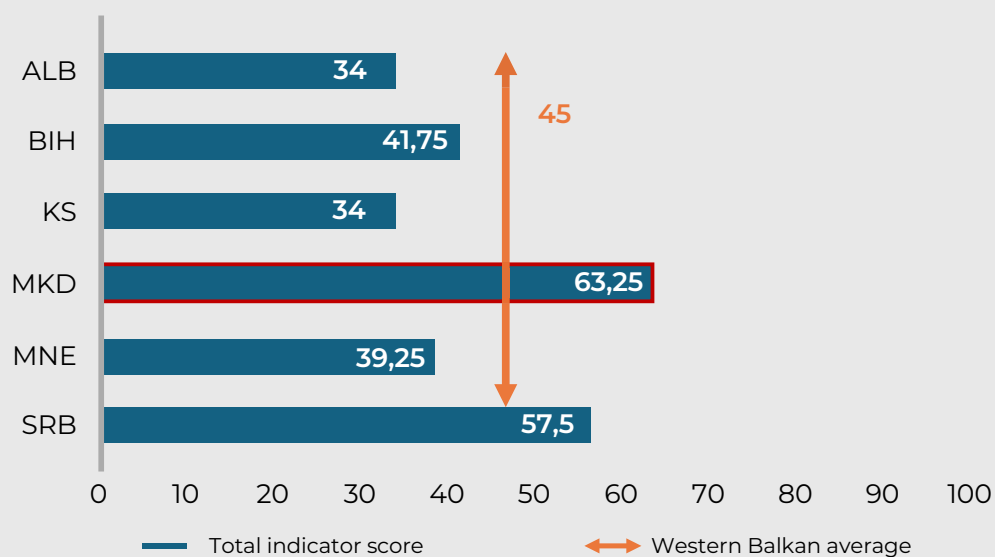
Sub-indicator 2: Proactive transparency (maximum score 50.25)



¹⁰² The public perception survey was conducted from 1 February until 22 February 2025, N=1008

Overall scores comparison in the Organisation, Accountability and Oversight area

Indicator: Accountability and transparency of state administration



Regional overview report for Public Financial Management area, with results for all WB administrations is available at: www.par-monitor.org

II.3 Recommendations for the Organisation, Accountability and Oversight area

II.3.1 Tracking recommendations from PAR Monitor 2021/2022

Recommendations	(short/medium/long term) ¹⁰³	Status	Explanation
1. State institutions, whether they are Ministries or subordinate government institutions (Agencies, Funds) should produce and publish their annual reports about their work.	Short term	Partially implemented	The findings indicate that the publication of annual work reports by state institutions remains inconsistent. While some ministries and agencies publish implementation or annual work reports, several institutions still do not make such reports publicly available. This highlights the need for ministries, agencies, funds, and other subordinate government institutions to systematically prepare and publish annual reports on their work in order to strengthen transparency and accountability
2. The Official Gazette should be accessible to all citizens since it requires a paid subscription.	Short term	No action taken	
3. The Office of the Prime Minister should be more visible, since at the moment it is embedded on the official website of the Government.	Short term	No action taken	

¹⁰³ Recommendations for which the assessed time for implementation is up to one year are labelled as short-term. Medium-term recommendations should be implementable within a period of one to three years. Long-term recommendations require more than three years to be implemented.

4. State institutions should start appointing contact persons for information about the cooperation with the civil society and other external stakeholders.	Short term	No action taken	The findings indicate that institutions generally lack dedicated information and structures related to cooperation with civil society and other external stakeholders, including for public consultation processes. The absence of dedicated consultation sections and weaknesses in institutional communication and accessibility support the need for state institutions to appoint contact persons responsible for cooperation with civil society and external stakeholders.
5. In terms of open data information, institutions should start publishing datasets in open format, since many institutions have one or even zero datasets published.	Short term	Partially implemented	The latest findings indicate moderate improvements in open data, supported by stronger strategic commitments under the PAR Strategy 2023–2030 and the Government Transparency Strategy 2023–2026. There is increased availability of machine-readable and high-value datasets through the national open data portal, particularly in areas such as geospatial information, environment, statistics, meteorology, and mobility. However, important shortcomings remain, including inconsistent availability across institutions, limited machine-readability, and weak accessibility and usability of some.

II.3.2 Recommendations from the 2024/2025 Monitor Report

Recommendations from the monitoring cycle 2024/2025 for the Organisation, Accountability and Oversight area are listed below. The recommendations are grouped into three types, according to the estimated time needed for their implementation. Recommendations for which the assessed time for implementation is up to one year are labelled as short-term. Medium-term recommendations should be implementable within a period of one to three years. Long-term recommendations would likely require more than three years to be implemented.

Short-term recommendations¹⁰⁴

1. State institutions, including ministries and subordinate government bodies such as agencies and funds, should regularly prepare and publish comprehensive annual reports on their work and activities.
2. The Official Gazette should be made freely accessible to all citizens, as the current paid subscription model limits equal access to legislation and official information.
3. The Office of the Prime Minister should be made more visible and accessible, as it is currently embedded within the Government's official website.
4. State institutions should appoint designated contact persons responsible for cooperation with civil society organisations and other external stakeholders in order to strengthen communication, coordination, and stakeholder engagement.
5. Institutions should significantly improve the publication of open data by proactively releasing datasets in open and machine-readable formats, particularly given that many institutions currently publish very few or no datasets at all.
6. Institutions should strengthen proactive transparency practices by regularly publishing complete, up-to-date, and machine-readable information, including annual work reports, impact assessments, budget-related information, and consultation documents.
7. Institutions should improve the functionality, accessibility, and standardisation of their websites by addressing broken links, ensuring regular updates, strengthening navigation and search functions, and making information consistently available in all official languages.
8. The Agency for Protection of the Right to Free Access to Public Information should strengthen its operational effectiveness and enforcement capacity by ensuring stable institutional leadership, publishing more detailed information on sanctions and enforcement practices, and applying stronger measures in cases of non-compliance with FoI obligations.

¹⁰⁴ The recommendations are short-term, particularly given that they have been consistently repeated across three consecutive WeBER monitoring cycles.

METHODOLOGY APPENDIX

For producing this report for North Macedonia, the following research methods and tools were used for data collection and calculation of elements:

- Analysis of official documentation, data, and official websites
- Requests for free access to information¹⁰⁵
- Interviews with stakeholders and key informants
- Public perception survey.

Monitoring heavily relied on the analysis of official documents publicly available on the websites of administration bodies and on the data and information contained therein. However, in cases where the data was not available, researchers sent requests for free access to information to relevant institutions in order to obtain information necessary for awarding points for the elements.

Interviews with key informants were conducted and used as a base for point allocation for elements 1.15, 1.16, and 2.14. Additionally, they were used to collect qualitative, focused, and in-depth inputs on monitored phenomena. Interviews with other stakeholders (such as representatives of public administration bodies) were additionally used in the research to complement and verify otherwise collected data and findings. The selection of interviewees was based on purposive, non-probability sampling, targeting interlocutors based on their expertise on the topic or involvement in the observed processes.

Key informant interviews were comprised of a set of up to four questions where the participants expressed their agreement on a four-point scale: fully disagree, tend to disagree, tend to agree and fully agree. Points under elements 1.15, 1.16, and 2.14 were allocated if all key informants stated that they tend to agree/fully agree with the statement. Additionally, a set of open-ended questions was used, allowing for a discussion with interviewees and on-the-spot sub-questions rather than strictly following a predetermined format. Interviewees were given full anonymity in terms of personal information and institutional/organisational affiliation.

Table 4. Interviews conducted in North Macedonia

Date	Interviewees
08.04.2026	INI Vinica
08.04.2026	Organisation Zena - Delcevo
22.01.2023	Metamorphosis Foundation

¹⁰⁵ No FOI requests were submitted for this policy area.

List of interview questions

- **Element 1.15**

The following questions are used for point allocation for element 1.15. Point allocation is determined based on fully agree/tend to agree responses. If all key informants fully agree/tend to agree with the statement, 1.5 points are allocated.

1. To what extent do you agree with the following statement: **Supervisory authority's sanctions are transparent.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
2. To what extent do you agree with the following statement: **Supervisory authority's sanctions are effective.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. Have you ever submitted a complaint to the supervisory authority? What was the outcome?
2. Is information about imposed sanctions easy to find and understand?
3. Do sanctions lead to improved compliance by public authorities, and does the possibility of sanctions influence how authorities respond to FOI requests?
4. What are the main obstacles limiting the supervisory authority's effectiveness, if any (resources, political support, legal framework, etc.)?

- **Element 1.16**

The following questions are used for point allocation for element 1.16. Point allocation is determined based on fully agree/tend to agree responses. If all key informants fully agree/tend to agree with the statement, 1.5 points are allocated.

1. To what extent do you agree with the following statement: **Public authorities adequately respond to requests containing sensitive information.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
2. To what extent do you agree with the following statement: **Public authorities properly act when refusing access to information.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. When it comes to exemptions when responding to FOI requests, are they typically justified clearly and specifically, or in a generic manner?
2. Do you consider that public authorities, or a certain body, extensively rely on confidentiality or other bases for exemption from providing information?
3. How effective is the appeal process in overturning unjustified refusals, and does the possibility of appeal influence the initial practice of individual bodies, in terms of deciding if and how they will respond to an FOI request?
4. How do authorities balance the protection of sensitive information with the public interest? Is there a standardised approach to classifying information as confidential or otherwise sensitive?
5. Are certain categories of information routinely treated as sensitive, even when disclosure might be justified?
6. Do authorities frequently provide partial access through redaction, or do they tend to refuse access in full?

- **Element 2.14**

The following questions are used for point allocation for element 2.14. Point allocation is determined based on fully agree/tend to agree responses. If all key informants fully agree/tend to agree with the statement, 3 points are allocated.

1. To what extent do you agree with the following statement: **Public information that is proactively published online, on websites of public authorities, is citizen friendly.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. Is proactively published information generally sufficient for your needs, or do you often need to request additional information?
2. Are there specific institutions that stand out as particularly transparent or non-transparent, and why do you think that is the case?
3. How easy is it to navigate institutional websites? Are there some technical barriers, such as broken links, poor website structure, lack of search functionality and others?
4. Have you encountered a situation where you know that a certain document produced by the institution exists, but you cannot find it online?
5. What types of information are most often missing or difficult to access? For example, it could be information about the services that the institutions offer, public policy documents and laws under the institutions' purview, annual work reports, open data, and such.
6. How would you assess the practice of information update? Are they updated regularly and provided timely or are there issues in this regard?

The public perception survey is based on a questionnaire targeting the general public (18+ permanent residents) of North Macedonia. The survey was conducted through computer-assisted telephone interviewing (CATI) in combination with computer-assisted web interviewing (CAWI).

The survey was conducted between 1 February until the 22 February 2025. The margin of error for the sample of 1008 citizens is $\pm 3,52\%$, at the 95% confidence level.

Table 5. Public perception survey questions in the area of Organisation, Accountability and Oversight

Statement	Strongly disagree	Disagree	Agree	Strongly agree	Don't know/ No opinion
I have the right to request and obtain information of public importance from public authorities.	1	2	3	4	99
I can easily find the information I need on the websites of public authorities and the Government.	1	2	3	4	99
The Agency for Protection of the Right to Free Access to Public Information, assists citizens in exercising their right to obtain information of public importance.	1	2	3	4	99

LIST OF REFERENCED SOURCES IN THIS REPORT

- Public Administration in the Republic of North Macedonia 2024, SIGMA/OECD
- PAR Strategy of the Government of the Republic of North Macedonia 2023-2030
- Transparency Strategy of the Government of the Republic of North Macedonia 2023-2026
- Law on Free Access to Public Information, "Official Gazette of the Republic of North Macedonia" No. 101/19
- Annual Report of the APRFAPI for 2023
- Annual Report of the APRFAPI for 2024



Funded by
the European Union

With funding from
 Austrian
Development
Agency

Produced within Western Balkan Enablers for Reforming Public Administrations – WeBER 3.0 project. WeBER 3.0 is implemented by Think of Europe Network - TEN and Centre for Public Administration Research – KDZ.

WeBER 3.0 is funded by the European Union and the Austrian Development Agency - ADA. Views and opinions expressed are however those of the authors only and do not necessarily reflect those of the European Union or ADA. Neither the European Union, ADA, TEN nor KDZ can be held responsible for them.

For more information, please visit www.par-monitor.org.