

PAR Monitor Report North Macedonia

STRATEGY FOR PUBLIC ADMINISTRATION REFORM

2024/2025



European
Policy
Institute.
Skopje



IMPRESSUM

PUBLICATION:

**PAR Monitor Report North Macedonia -
STRATEGY FOR PUBLIC ADMINISTRATION REFORM**

PUBLISHER:

European Policy Institute - Skopje

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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 "STRATEGY FOR PAR" AREA	11
II. TRANSPARENCY AND INCLUSIVENESS OF THE DEVELOPMENT AND MANAGEMENT OF THE PAR AGENDA	15
II.1 TRANSPARENCY AND INCLUSIVENESS IN DEVELOPING PAR PLANNING DOCUMENTS	15
II.2 TRANSPARENCY AND INCLUSIVENESS OF PAR MONITORING AND COORDINATION STRUCTURES	25
II.3 RECOMMENDATIONS FOR THE STRATEGY FOR PAR	31
II. 3.1 TRACKING RECOMMENDATIONS FROM PAR MONITOR 2021-2022	31
II. 3.2 RECOMMENDATIONS FROM THE 2024-2025 MONITOR REPORT	33
METHODOLOGY APPENDIX	34
LIST OF REFERENCED SOURCES IN THIS REPORT	37

ACKNOWLEDGEMENTS

The Strategy for PAR North Macedonia 2024/2025 report is a product of a month and a half long monitoring process, which relied on different data collection techniques and thus resulted in an abundance of findings.

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 members of the WeBER Platform and the National Working Group in North Macedonia, and other stakeholders in North Macedonia that shared their experiences through interviews, who immensely contributed to the content of this report and its quality, and who will not be identified due to the respect of the principle of anonymity.

Lastly, 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 (Support for Improvement in Governance and Management),¹ the ReSPA (Regional School of Public Administration), and the Ministry of Public Administration of North Macedonia, 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 expert support, especially for developing citizen-centred methodology for solving PAR issues at local level.



EXECUTIVE SUMMARY

The assessment of transparency and inclusiveness of the PAR agenda in this report focuses on two critical issues – 1) participatory development of PAR planning documents, that includes non-state actors, and 2) involvement of CSO in the work of the governmental PAR coordination and monitoring mechanisms. For the former, the assessment briefly emphasises basic regulatory requirements for conducting consultations, continuing with the assessment of practices in involving external stakeholders and the public in the different stages of policy development for a sample of 2 PAR planning documents adopted since the PAR Monitor 2021/2022. For the latter, this report examines the extent and methods of CSOs' and other non-state actors' involvement in the PAR coordination and monitoring, both at the political and at the administrative levels, highlighting how institutionalised, and how meaningful, any such involvement is in practice. Findings of this report reflect the period since the publication of the PAR Monitor 2021/2022, starting from the second half of 2022, and until the end of 2024.²

In North Macedonia, there are regulations in place that promote transparency and inclusiveness in the development of PAR planning documents and legislation. However, the process needs to be more transparent, especially regarding the transparency of WGs, their selection process, composition, and the results of their work.

Consultations with non-state actors are conducted during the development of PAR planning documents; however, the process requires improvement to become more comprehensive, accountable, and clearer. While stakeholders are invited to participate in the open consultations, the overall process needs to be more proactive, utilising all available means of communication and involving a wider range of external stakeholders.

There has been some progress in the preparation of the consultation process, but significant work remains to enhance it. The weakest link in the consultation process continues to be feedback, as noted in previous PAR Monitor cycles, feedback continues to be the weakest link in the process. CSOs should be informed of their contributions and provided feedback on the comments submitted during the consultation process. Their comments should be clearly visible, with the authors referenced and clearly indicated. Statements explaining how the comments were resolved and justification for each response should also be provided.

² For 2022, only developments not captured by the PAR Monitor 2021/2022 are included.

Regarding the work of the PAR monitoring and coordination structures at both administrative and political levels, responsible institutions are recommended to increase the transparency of their work, enhance CSO participation, improve the process for selecting CSOs in those structures, and increase the frequency of meetings to ensure their substantial and meaningful contribution and more significant impact on the work of administrative and political structures.

LIST OF ABBREVIATIONS AND ACRONYMS

CSO	Civil Society Organisation
EC	European Commission
ENER	Unique Electronic Register of Regulations of the Republic of North Macedonia
FOI	Freedom of Information
KIs	Key Informants
PAR	Public Administration Reform
MISA	Ministry of Information Society and Administration
MF	Ministry of Finance
MPA	Ministry of Public Administration
PDDP	Planning Document Development Process
PFMRP	Programme for Public Finance Management Reform 2022-2025
RIA	Regulatory Impact Assessment
WeBER	Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform project
WG	Working Group

I. WEBER PAR MONITOR: WHAT WEMONITOR 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 one of the main project results, seeking to facilitate 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 SIG-MA *Principles of Public Administration*³ were revised in 2023, the WeBER PAR Monitor methodology was also redesigned in 2024. This was done in order to keep 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

3 Available at: <https://www.sigmaweb.org/publications/principlesofpublicadministration.htm>.

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

- Introduction of single indicator per PAR area, divided into sub-indicators, further consisting of several sub-indicator elements (specific criteria assessed).
- Introduction of types of indicator elements, meaning that each element has a specific focus on one of the following aspects of reform:
 1. Strategy and Policy
 2. Legislation
 3. Institutional Set-up
 4. Practice in Implementation, and
 5. Outcomes and Impact
- Introduction of a 100-point scale, allowing 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.
- Use of public perception survey results as a data source for “Outcomes and Impact” elements, and expanding its scope to complement the assessment in five PAR areas, except for “Strategy for PAR”.
- Removal of 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 “Strategy for PAR” area

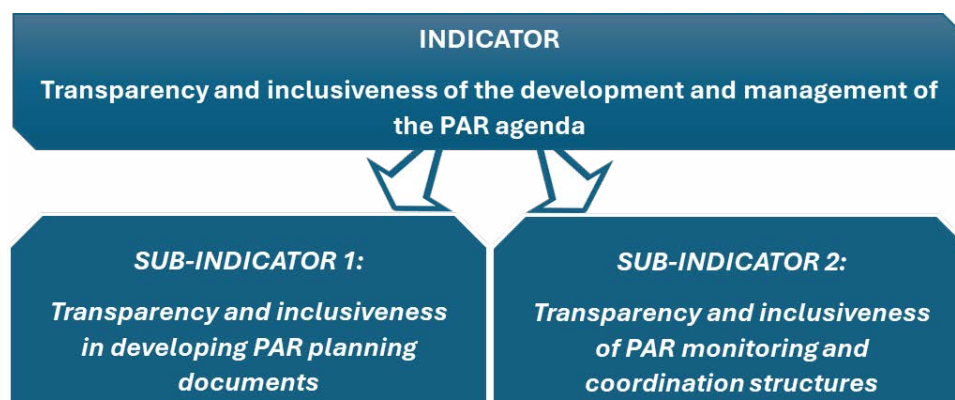
WeBER’s focus on PAR policy development and coordination is crucial for several reasons. A well-developed strategic framework for PAR – clear framework of PAR planning documents that define goals, measures, activities, and funding – provides for a clear roadmap for reforming the way public institutions interact with citizens. In order to keep reform process on track and ensure meaningful progress, external monitoring of government commitments to transparency and inclusiveness in this area is essential. This is where the role of non-state actors comes to the fore, by applying external pressure on governments to meet their commitments and regularly report on progress. Moreover, allowing non-state actors to participate in both the development and monitoring of PAR planning documents’ implementation strengthens the principles of transparency and inclusiveness - core tenets of good governance. Without these principles, no policy, including PAR as an overarching reform, can be effectively implemented for the society’s benefits. Ensuring civil society and other non-state actors’ engagement in processes of PAR policy development and coordination is, therefore, not only beneficial but essential for government accountability and long-term public administration improvement.

Monitoring in the Strategy for PAR is based on the one SIGMA Principle in this area:



Principle 1: A comprehensive, credible and sustainable public administration reform agenda is established and successfully implemented, fostering innovation and continuous improvement.

This Principle is entirely assessed from the perspective of quality of civil society and public involvement in the processes of developing PAR strategic documents and participation in the monitoring and coordination structures that should ensure their purposeful implementation. A focus on inclusivity and transparency aims to determine the extent to which relevant stakeholders’ needs and views are consulted and taken into consideration when developing and implementing PAR agendas.



The monitoring period for the Strategy of PAR covers developments since the last PAR Monitor cycle, that lasted from January until November 2022. Thus, this report focuses primarily on 2023 and 2024, as well as the end-of-2022 developments not covered in the previous cycle. Although this report provides comparison of findings with previous PAR Monitor editions, country scores are incomparable to the previous monitoring due to methodological changes.

The first sub-indicator focuses on the existence and quality of consultation processes in the development of PAR planning documents - official strategies/strategic plans, plans/programmes, their action plans, or any other type of PAR planning document with a minimum two-year implementation period, formally approved/adopted by the government or parliament. It assesses whether transparency and inclusiveness in the development process are legally regulated, continuing with the practical aspects of administering consultations – whether non-state stakeholders were engaged early, invited openly and proactively, provided with complete information, and given publicly disclosed feedback on their contributions. Additionally, it examines whether the public had the opportunity to contribute on draft documents through public debates, and finally, assesses the perceived impact of consultations on transparency and inclusiveness from the view of consultees.

Monitoring of legislation and practice aspects is performed by combining data sources to ensure reliability of results, including qualitative analysis of strategic documents, and official data that is publicly available or obtained from PAR responsible institutions. For the assessment of the outcomes and impact, researchers conduct key informants' interviews with non-state actors who participated in consultative processes.

Indicator elements that are assessed under the first sub-indicator are listed in the Table 2.

Table 2: Indicator elements under the sub-indicator 1

Indicator element - number and title	Type
E1.1 Regulations envisage transparency and inclusiveness of PAR planning documents development process	Legislation
E1.2 Consultations with non-state actors are conducted during the development of PAR planning documents	Practice in implementation
E1.3 Invitations to non-state actors to participate in the consultations are open	Practice in implementation
E1.4 Responsible institutions are proactive in ensuring that a wide range of external stakeholders become involved in the process	Practice in implementation
E1.5 Responsible institutions provide complete information in preparation for consultations	Practice in implementation
E1.6 Responsible institutions publish their feedback on the comments received in the consultation process	Practice in implementation
E1.7 Public debates are organised during the development of PAR planning documents	Practice in implementation
E1.8 Key informants consider that PAR planning documents development process is transparent and inclusive	Outcomes and impact

The assessment is done on a sample of PAR planning documents adopted in 2023 and 2024, along with those adopted in late 2022 after the completion of the last PAR Monitor's monitoring period. The analysis of this sub-indicator for North Macedonia includes:

- *Strategy for Public Administration Reform 2023–2030*
- *Programme for Public Finance Management Reform 2022–2025 (Action Plan for Public Finance Management 2023)*

The second sub-indicator monitors civil society participation in PAR coordination and monitoring structures at both the political and administrative levels. It focuses exclusively on bodies established for the most comprehensive PAR strategic document (e.g., PAR strategies). The assessment first examines whether the strategic PAR agenda provides for civil society participation in these structures. It then analyses the institutionalisation of this participation — specifically, the format of CSO involvement in administrative and political

PAR coordination bodies and whether selection processes are open and competitive. When it comes to practice, the sub-indicator assesses the regularity of meetings with CSO participation and the transparency of communication regarding the work of PAR coordination and monitoring bodies. Finally, it assesses whether CSOs can meaningfully contribute to these bodies' work, as an indication of outcome of participatory approach to PAR agenda coordination and monitoring.

The assessment is based on the review of official documents and designated websites related to the organisation and functioning of PAR coordination and monitoring structures. To assess outcomes and impact, researchers conduct key informant interviews with civil society representatives who are members of these bodies or have attended their sessions as invitees.

Indicator elements that are assessed under the sub-indicator 2 are listed in the Table 3.

Table 3: Indicator elements under the sub-indicator 2

Indicator element - number and title	Type
E2.1 Participation of civil society in monitoring and coordination structures is envisaged in the PAR agenda	Strategy and policy
E2.2 Format of CSO involvement in administrative structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional set up
E2.3 Format of CSO involvement in political structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional set up
E2.4 Involvement of CSOs is achieved based on an open competitive process	Institutional set up
E2.5 Meetings of the PAR coordination and monitoring structures are held regularly with CSO involvement	Practice in implementation
E2.6 The work of PAR monitoring and coordination structures is communicated transparently	Practice in implementation
E2.7 Key informants consider that they can meaningfully contribute during the meetings of monitoring and coordination structures	Outcomes and impact

II. TRANSPARENCY AND INCLUSIVENESS OF THE DEVELOPMENT AND MANAGEMENT OF THE PAR AGENDA

Transparency and inclusiveness of the development and management of the PAR agenda (score 0–100)



■ Awarded ■ Not achieved

II.1 Transparency and inclusiveness in developing PAR planning documents



Principle 1: A comprehensive, credible and sustainable public administration reform agenda is established and successfully implemented, fostering innovation and continuous improvement.

Sub-indicator 1: *Transparency and inclusiveness in developing PAR planning documents⁵*

Indicator elements	Element type	Score
E 1.1 Regulations envisage transparency and inclusiveness of PAR planning documents development process	Legislation	3/5
E 1.2 Consultations with non-state actors are conducted during the development of PAR planning documents	Practice in implementation	9/9
E 1.3 Invitations to non-state actors to participate in the consultations are open	Practice in implementation	4/8
E 1.4 Responsible institutions are proactive in ensuring that a wide range of external stakeholders become involved in the process	Practice in implementation	3.5/6
E 1.5 Responsible institutions provide complete information in preparation for consultations	Practice in implementation	9/9

⁵ Through the first sub-indicator, the following SIGMA sub-principle is monitored: All relevant stakeholders are regularly consulted and involved in PAR planning and monitoring; PAR is effectively communicated, and values of good public administration are promoted.

E 1.6 Responsible institutions publish their feedback on the comments received in the consultation process	Practice in implementation	2/9
E 1.7 Public debates are organised during the development of PAR planning documents	Practice in implementation	7/10
E 1.8 Key informants consider that PAR planning documents development process is transparent and inclusive	Outcomes and impact	4/4
Total score for sub-indicator 1		41.5/60

Since the previous WeBER monitoring cycle, two new planning documents, which are part of the PAR agenda, have been adopted: the Strategy for Public Administration Reform for the period 2023–2030, under the jurisdiction of the Ministry of Public Administration (MPA), and the Programme for Public Finance Management Reform 2022–2025 (PFMRP), and its Action Plan for 2023, under the jurisdiction of the Ministry of Finance (MF). These documents comprise the sample used for analysing elements conducted within this sub-indicator. As stated in the European Commission (EC) report on North Macedonia for 2024, the quality and scope of the PAR Strategy are adequate, as it covers all key reform areas, sets out a clear baseline, objectives, and targets, and identifies policy challenges.⁶ Regarding the PFM, the EC noted that in December 2023, the Ministry of Finance carried out a midterm review of the PFMRP and formulated a new reform programme covering 2024–2027, which has not yet been formally adopted by the government. Additionally, the implementation rate of the 2022–2025 PFMRP was quite low.⁷ SIGMA/OECD pointed out that North Macedonia established a comprehensive strategic framework for reforms across all priority areas covered by the Principles of Public Administration.⁸ Also, both PAR and PFM strategic planning documents are supported by detailed action plans, which have specific measures with clear institutional responsibilities and timelines for implementation established.⁹ However, financial sustainability of reforms is not fully ensured, with limited analysis of resource needs and risks related to sources of funding.¹⁰

6 “COMMISSION STAFF WORKING DOCUMENT North Macedonia 2024 Report” (European Commission, October 30, 2024), https://neighbourhood-enlargement.ec.europa.eu/north-macedonia-report-2024_en

7 Ibid.

8 sigmaweb.org/publications/Public-administration-in-the-Republic-of-North-Macedonia-2024.pdf

9 Ibid.

10 Ibid.

The Methodology for Regulatory Impact Assessment (RIA)¹¹ regulates the consultations with stakeholders and target groups during the policy development process. It stipulates the obligation for the ministries to conduct consultations in all phases of the planning document development process (PDDP). It also states that both internal and external stakeholders are involved.¹² According to the FOI response from the MPA,¹³ the consultation process for law drafting is regulated by the Rules of Procedure of the Government of the Republic of North Macedonia,¹⁴ the Guidelines on the manner of acting in the work of the ministries during the process of performing a regulatory impact assessment,¹⁵ the Decision on the form and content of the RIA report,¹⁶ and the Methodology for RIA.¹⁷ The responsible institution for this process is the MPA.¹⁸

The consultation process for strategic documents is regulated by the Guidelines on the structure, content and manner of drafting, implementing, monitoring, reporting, and assessing sectoral and multi-sectoral strategies.¹⁹ This process is led by the General Secretariat of the Government of the Republic of North Macedonia. According to the legal acts regulating RIA and the acts regulating sectoral and multi-sectoral strategies, consultations are compulsory, while the manner of including the relevant stakeholders is determined at the very beginning of drafting the laws and the strategic documents.²⁰

11 Chapter 4.1 of the Methodology for RIA (Official Gazette of the Republic of Macedonia no. 107/2013), https://www.mioa.gov.mk/sites/default/files/pbl_files/documents/pvr/Metodologija%20za%20PVR%20107-13.pdf

12 Ibid.

13 FOI requests were sent to the MPA on 12.11.2024. The MPA responded on 6.12.2024.

14 Rules of procedure of the Government of the Republic of North Macedonia (Official Gazette of the Republic of Macedonia no. 38/01, 98/02, 9/03, 47/03, 64/03, 67/03, 51/06, 5/07, 15/07, 26/07, 30/07, 58/07, 105/07, 116/07, 129/07, 157/07, 29/08, 51/08, 86/08, 114/08, 42/09, 62/09, 141/09, 162/09, 40/10, 83/10, 166/10, 172/10, 95/11, 151/11, 170/11, 67/13, 145/14, 62/15, 41/16, 153/16 and 113/17 and Official Gazette of the Republic of North Macedonia no. 228/19, 72/20, 215/20, 309/20, 41/21 and 56/21), http://www.sz.gov.mk/public/blog/fd/00fd_a96a.pdf

15 Guidelines on the manner of acting in the work of the ministries during the process of performing a regulatory impact assessment (Official Gazette of the Republic of Macedonia no. 106/2013), <https://fiskalnatransparentnost.org.mk/upload/pdf/pravilnici/2019/Упатство%20за%20начинот%20на%20постапување%20во%20работата%20на%20Министерствата%20во%20процесот%20на%20спроведување%20на%20влијанието%20на%20регулативата.pdf>

16 Decision on the form and content of the RIA report (Official Gazette of the Republic of Macedonia no. 106/2013), <https://dejure.mk/zakon/odluka-za-formata-i-sodrzhinata-na-izveshtajot-za-procen-ka-na-vlijaniето-na-regulativata>

17 Methodology for Regulatory Impact Assessment (Official Gazette of the Republic of Macedonia no. 107/2013), https://www.mioa.gov.mk/sites/default/files/pbl_files/documents/pvr/Metodologija%20za%20PVR%20107-13.pdf

18 FOI requests were sent to the MPA on 12.11.2024. The MPA responded on 6.12.2024.

19 Guidelines on the structure, content, and manner of drafting, implementing, monitoring, reporting, and assessing the sectoral and multi-sectoral strategies (Official Gazette of the Republic of North Macedonia no. 122/2022).

20 FOI requests were sent to MPA on 12.11.2024. The MPA responded on 6.12.2024.

The public debates for the interested public on the developed drafts are envisaged in the Methodology for RIA,²¹ It stipulates the ministry's obligation to conduct public debates before the official adoption of the law.²² Regarding the transparency of the consultation results—i.e., public availability of reports—the Methodology for RIA²³ stipulates the obligation to produce reviews/reports on the overall consultative process. According to the FOI response from the MPA²⁴ regarding consultations within the process of drafting laws, it is envisaged that a detailed review/report of the conducted consultations must be provided. This includes listing the relevant stakeholders, describing the manner of their inclusion, reviewing received and embedded opinions, describing opinions that were not taken into consideration, and providing an explanation.²⁵ The guidelines stipulate transparency regarding the composition of working groups. However, there are no provisions in the documents to regulate the transparency of the results of their work.²⁶

The improvement of the operations of the sectoral working groups to strengthen their capacity to implement the sectoral approach by maintaining constant dialogue between the Government and institutions, as well as donors and civil society, is an envisaged activity in the Action Plan (AP) of the PAR Strategy.²⁷ However, this does not apply to ad hoc established working groups (WGs) for developing laws and strategic documents.

According to the FOI response from the MPA,²⁸ it is regulated that consultations with relevant stakeholders may be conducted in the following manners: public review of the draft law; public hearings; requests for written opinions, remarks and suggestions by the relevant stakeholders; participation in a working group established by the ministry or the Government; meetings with the relevant stakeholders; and public debates on certain issues using electronic interactive tools available on the ENER.²⁹ Concerning drafting laws, the results of the work of the working group are embedded in the Regulatory Impact Assessment report, and its draft version is published on the ENER.³⁰

21 Chapter 4.2 of the Methodology for RIA (Official Gazette of the Republic of Macedonia no. 107/2013, https://www.mioa.gov.mk/sites/default/files/pbl_files/documents/pvr/Metodologija%20za%20PVR%20107-13.pdf)

22 Ibid.

23 Ibid.

24 FOI requests were sent to MPA on 12.11.2024. The MPA responded on 6.12.2024.

25 Item 5 of the RIA report.

26 Ibid.

27 Strategy for Public Administration Reform 2023–2030, <https://kvalitet.mioa.gov.mk/wp-content/uploads/2024/05/strategija-za-reforma-na-javna-administracija-2023-2030-so-akciski-plan.pdf>

28 FOI requests were sent to the MPA on 12.11.2024. The MPA responded on 6.12.2024.

29 Unique electronic register of regulations of the Republic of North Macedonia, ener.gov.mk

30 FOI requests were sent to the MPA on 12.11.2024. The MPA responded on 6.12.2024.

On the inclusiveness of the working groups, i.e., involvement of the non-state actors, including transparency of the selection process, it is stipulated that the ministries can include different stakeholders and target groups in the WGs. However, there are no provisions detailing the selection process of the WGs or the transparency of their operation.³¹

Regarding the consultations with non-state actors conducted during the development of the PAR Strategy and PFM Programme, the researchers analysed whether the consultations last at least 15 days in the case of written contributions (e.g., via email) or surveys or whether participants are given at least 7 days to prepare in cases other than written consultations (i.e., focus groups, interviews, etc.). They also examined whether working documents are published on the websites of the responsible institutions or ENER, whether at least one open call for participation is published, and whether documents are provided in a timely manner for focus groups, interviews, and WGs. Finally, they assessed whether the consultations include at least one face-to-face or virtual (online) meeting with external stakeholders (including participation in WGs to develop the documents, focus groups, interviews, etc.).

In cooperation and with the support of SIGMA, the Ministry of Information Society and Administration (MISA)³² organised a preparatory workshop for the PAR Strategy 2023–2030 on May 13, 2022, which was the official start of the process for drafting the document in a comprehensive and transparent manner, involving inclusive dialogue and collaboration between MISA and the stakeholders regarding the vision, priority areas, goals and plan for PAR.³³ The preparation of the PAR Strategy began with the adoption of the decision to establish a working group (WG)³⁴ comprising representatives from ministries and state institutions, as well as representatives from the CSOs, international organisations, and experts. The WG consisted of subgroups for each of the priority areas. All subgroups held regular meetings to prepare the text of the Strategy and the AP.³⁵

31 Chapter 2.2.1. of the Methodology for RIA (Official Gazette of the Republic of Macedonia no. 107/2013, https://www.mioa.gov.mk/sites/default/files/pbl_files/documents/pvr/Metodologija%20za%20PVR%20107-13.pdf) and Chapter 4. 2 of the Manual for RIA (https://www.mioa.gov.mk/sites/default/files/pbl_files/documents/Priracnik%20za%20PVR2_mk.pdf)

32 On 10.06.2024, the Parliament of the Republic of North Macedonia adopted the Law on Organization and Operation of State Administrative Bodies (LOOSAB), which resulted in changes in the government structure. In that regard, new ministries were created, some were separated into two new Ministries (some have merged competencies of two ministries), and competencies of the existing ministries were allocated. The Ministry responsible for public administration that held the title the Ministry for Information Society and Administration (MISA) was separated into two new ministries: the Ministry for Public Administration and the Ministry for Digital Transformation.

33 “COMMISSION STAFF WORKING DOCUMENT North Macedonia 2024 Report” (European Commission, October 30, 2024), https://neighbourhood-enlargement.ec.europa.eu/north-macedonia-report-2024_en

34 Decision for establishing a working group (WG), June 3, 2022, https://mioa.gov.mk/content/reshe-nie_na_rab.grupa_srja_2023-2030.pdf

35 Invitations were sent via email.

MISA prepared a working plan with a timeline and a stakeholder consultation plan, which was discussed and adopted by the PAR Secretariat.³⁶ The plan was then published on MISA's website, and the consultative process took place in November–December 2022.³⁷ On July 20, 2022, MISA organised an event with stakeholders to promote and discuss the working plan and timeframe for preparing the PAR Strategy (2023–2030). MISA published on its website a public call for the inclusion of representatives from CSOs in the thematic working groups tasked with preparing the Strategy.³⁸ In addition, MISA sent the call for the involvement of stakeholders through the Sectoral Working Group for PAR.³⁹ This channel of communication was chosen to confirm the significance and importance of the Sectoral Working Group for PAR, whose work has included representatives from institutions, civil society, and international organisations from the beginning. Eight organisations, representatives from CSOs, and representatives from international organisations expressed interest and were directly involved in the thematic working groups.⁴⁰

In addition to participating in the WGs, on December 1, 2022, stakeholders had the opportunity to participate in the public debate on the draft version of the Strategy, organised by MISA and supported by RESPA.⁴¹ The draft version of the PAR Strategy (2023–2030), along with the Action Plan, was uploaded to ENER on February 9, 2023, to inform stakeholders and allow them to submit comments and suggestions.⁴²

Regarding the PFM Programme⁴³ since the researchers were unable to find information online, they submitted an FOI request to the MF.⁴⁴ According to the FOI response, consultations were held within the framework of the Sectoral WG for PFM after the documents were published on the MF's website on 15th April 2022. Stakeholders were informed via email and given a 15-day deadline to submit comments, ending on 29th April 2022.⁴⁵ The Sectoral WF discussed the comments received regarding PFM, and the accepted comments were incorporated into the documents before being sent back to stakeholders.⁴⁶

36 At the session held on July 13, 2022, <https://www.mioa.gov.mk/content/Записник%20десетта%20седница.pdf>

37 Working plan with a timeline and a stakeholder consultation plan, https://www.mioa.gov.mk/content/vremenska_ramka_2023-2030.pdf

38 <https://www.mioa.gov.mk/content/povik.pdf>

39 Ibid.

40 Strategy for Public Administration Reform 2023-2030, <https://kvalitet.mioa.gov.mk/wp-content/uploads/2024/05/strategi%D1%98a-za-reforma-na-%D1%98avna-administraczi%D1%98a-2023-2030-so-akcziski-plan.pdf>

41 Public debate on the draft version of the Strategy, <https://www.nvosorabotka.gov.mk/?q=mk/node/739>

42 Draft version of the Strategy, https://www.mioa.gov.mk/content/nact_tekst_na_strategijata_za_ria_2023_-2030.pdf

43 Action Plan for Public Finance Management 2023, <https://finance.gov.mk/wp-content/uploads/2023/07/Акциски-план-за-ПФМ-за-2023-МК.pdf>

44 FOI request was sent to the MF on 12.11.2024. The MF responded on 23.12.2024.

45 Ibid.

46 Ibid.

However, interviewees/key informants (KI) stated that no such consultation process had occurred and that they had not been informed about any PFM-related activities in the past two years. It was also noted that the process was not inclusive in a meaningful sense but was instead merely informative.⁴⁷ This issue has been highlighted in all previous PAR Monitor cycles.

In developing the PAR Strategy, thematic WGs and subgroups were active during the entire preparation process and regularly held meetings.⁴⁸ Regarding the PFM Programme, the MF responded that the public consultation was held on 13 May 2022 in a policy dialogue format with the relevant stakeholders.⁴⁹

The researchers reviewed MPA and MF's official data and websites to determine whether invitations to non-state actors to participate in working groups to develop PAR planning documents or submit written contributions (via email or online public consultation portal) were open and inclusive. They also examined whether invitations were published on the ministries' websites or sent via ENER, relevant partner institutions, and organisations and whether at least one such invitation to CSOs was proactively advertised via traditional or social media.

Regarding the PAR Strategy 2023–2030, invitations were published on MISA's website⁵⁰ and were not published on ENER, as such calls are not typically published on ENER.⁵¹ Moreover, invitations were sent via the Sectoral PAR Group as well as via the platform "Dialogue with Civil Society Organizations—Platform for Structural Participation in EU Integrations" (CSO Dialogue).⁵² However, the invitations were not proactively advertised via traditional or social media. Regarding the PFM Programme, the MF said invitations were published on their website.⁵³

The state of play is as follows: the proactiveness of the MPA and MF in ensuring that a wide range of external stakeholders were involved in the process. Namely, the MPA informed⁵⁴ that CSO representatives, trade unions, expert associations, academia, organisations focusing on gender equality/women's rights and international organisations based in North Macedonia were included in the WGs for drafting the PAR Strategy 2023–2030. To ensure transparency in the process, the representatives of the CSOs and the relevant stakeholders were selected through a public call, as mentioned. The MF, in their FOI response, informed

⁴⁷ Interviews with the KIs were conducted on 22.11.2024, 26.11.2024 and 27.11.2024

⁴⁸ Communication regarding the meetings of the WG and subgroups took place via email.

⁴⁹ FOI request was sent to the MF on 12.11.2024. The MF responded on 23.12.2024.

⁵⁰ Call for participation in thematic working groups for the preparation of the new PAR Strategy (2023–2030), <https://mioa.gov.mk/content/povik.pdf>

⁵¹ FOI requests were sent to MPA on 12.11.2024. MPA responded on 6.12.2024.

⁵² Email communication.

⁵³ FOI request was sent to the MF on 12.11.2024. The MF responded on 23.12.2024.

⁵⁴ FOI requests were sent to MPA on 12.11.2024. MPA responded on 6.12.2024.

us that they invited representatives of the academia to the 7th PFM dialogue held on 13 May 2022,⁵⁵ and that eight CSOs are involved in the Sectoral PFM WG, including organisations focusing on gender equality/women rights, as well as representatives from the international community and IPA experts.⁵⁶

The researchers also analysed whether the MPA and the MF provided complete information for the preparation of the consultations: working or support documentation, information on the duration of the consultation process, as well as information on the channels and formats in which contributions should be submitted. Since there was no information online, we submitted FOI requests to the MPA and MF, and they stated that they had sent the necessary documentation to the involved stakeholders, informed them about the length of the consultation process, as well as the channels and formats for their contributions, as mentioned above.⁵⁷ KIs stated that timelines, agendas, and outcomes were shared but not always in a systematic or easily accessible manner.⁵⁸

On the feedback of the received comments during the consultation phase, the researchers analysed if there were official reports on the work of WGs, written contributions, minutes of meetings where the comments received in the consultations were discussed and deliberated, and, where applicable, other relevant documents to determine if responsible institutions provide feedback to civil society and other non-state actors on the comments and inputs received in the consultations. The following criteria for providing feedback were considered for point allocation: all comments were clearly visible either individually or grouped by topic (subject of comments); senders were clearly indicated (exact names of organisations that sent them, or individuals, if comments were submitted in a personal capacity); statements were provided on how comments were resolved (accepted, partially accepted, rejected); and explanation/justification was given for each response.

However, although FOI responses from the MPA to all the questions were positive, there was no information and evidence in the form of a link or document on the manner in which all those comments were made visible, senders clearly indicated, statements made, and explanations and justification given.⁵⁹ The same applies to the MF.⁶⁰ Namely, they informed us that the accepted comments/contributions were discussed within the Sectoral PFM WG; nevertheless, there

55 https://finance.gov.mk/wp-content/uploads/2022/07/Minutes-of-meeting_7th-PFM-policy-dialogue_Final-13052022.pdf https://finance.gov.mk/wp-content/uploads/2022/07/Conclusions_of_7th_policy_dialogue_en-final-1.pdf

56 FOI request was sent to the MF on 12.11.2024. The MF responded on 23.12.2024.

57 FOI requests were sent to MPA and the MF on 12.11.2024. MPA responded on 6.12.2024, and the MF responded on 23.12.2024.

58 Interviews with the KIs were held in the period 22–29.11.2024.

59 FOI requests were sent to MPA and the MF on 12.11.2024. MPA responded on 6.12.2024; the MF responded on 23.12.2024.

60 Ibid.

is no evidence of the manner in which all those comments were made visible, statements made, and explanation/justification given. KIs stated that, regarding the feedback and contributions from different stakeholders and their documentation and integration in the documents, they did not have information, which indicates that the process was not inclusive or accountable. The same applies to the clarity of communication of the decisions to all involved parties.⁶¹ Regarding the opportunity for continuous feedback throughout the process, the instances where stakeholder input significantly impacted the development process, as well as the implementation of different forms of consultations during the process, the KIs stated that they were not aware of such a possibility.⁶²

As public debates are a form of consultative process typically organised towards the end of the process of developing public policy documents or regulations, and they allow the wider public to become engaged in the development process and provide feedback, the researchers reviewed the websites of the MPA, the MP, and ENER to determine whether consultations in the development of PAR planning documents were open to the wider public, i.e., whether public debates were organised. The following criteria were considered for point allocation: online publication of a call to participate in public debates through the website of the ministries or ENER; publication of the draft PAR planning document with the call; information on the methods/channels for submitting comments and inputs (through portals for online public consultation, in-person at the event, by email, by post, or any combination of these methods) and contact information; public debates lasting a minimum 15 days for written contributions, or at least 15 days advance notice for participation in events; and whether the MPA and the MF published a report on the public debate containing comments and inputs from the interested public, feedback on how the comments were treated, and explanations.

Regarding the PAR Strategy, there was an online publication of a call to participate in public debate, along with the draft of the PAR Strategy.⁶³ Furthermore, there was information on the methods/channels for submitting comments and inputs via email, ENER, and verbally at the meetings of the WGs and subgroups, as well as public debates.⁶⁴ Namely, the stakeholders were informed 7 days prior to the public debate and could contribute/comment on ENER for 30 days. The MPA stated that the public debate reports were published on the ministry's website.⁶⁵

61 Interviews with the KIs were held in the period 22–29.11.2024.

62 Interviews with the KIs were held in the period 22–29.11.2024.

63 Call for participation in a public debate on the new PAR Strategy (2023–2030), <https://www.nvo-sorabotka.gov.mk/?q=mk/node/739>; <https://javnaadministracija.mk/2022/11/28/mioa-javna-rasprava-za-natsrt-verzijata-od-strategijata-za-reforma-vo-javnata-administratsija-2023-2030/>

64 FOI requests were sent to MPA and the MF on 12.11.2024. MPA responded on 6.12.2024; the MF responded on 23.12.2024.

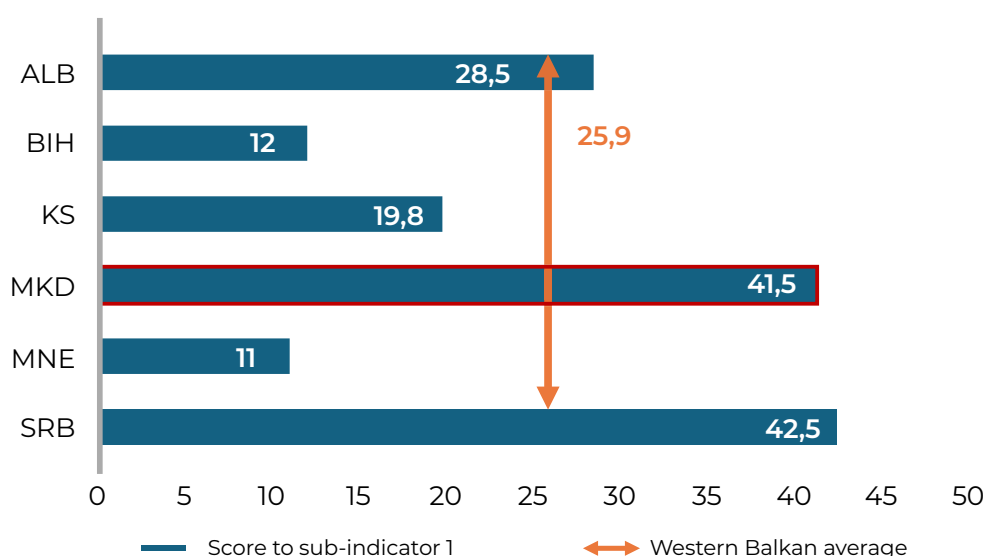
65 https://arhiva.mioa.gov.mk/sites/default/files/pbl_files/documents/rja/01.12.2022.pdf

Regarding the PFM Programme, as mentioned above, the MF stated that the public consultation/debate was held on 13 May 2022 in the format of policy dialogue⁶⁶ with the relevant stakeholders. However, no answers were provided on the visibility of given comments, a clear indication of the involved stakeholders, statements on how to resolve comments, or explanations or justifications for each response.

To complement the assessment with qualitative insights, the researchers organised interviews with the external stakeholders (key informants/KI) who participated in the consultations for the PAR planning documents to establish whether, in practice, the process of developing PAR planning documents was transparent and inclusive. In addition to the conversation or written interview, the KIs were asked to complete a short survey to express their position on the subject, using a four-point scale: fully agree, tend to agree, tend to disagree, and fully disagree. Point allocation was determined based on the ratio of fully agree/tend to agree responses regarding the transparency and inclusiveness of the development process of the PAR planning document.⁶⁷ Regarding the PAR Strategy and AP for PFM, the KIs consider that the process of developing of these documents was transparent and inclusive, where two KIs fully agree, and one tends to agree.⁶⁸

How does North Macedonia do in regional terms?

Sub-indicator 1: Transparency and inclusiveness in developing PAR planning documents



66 https://finance.gov.mk/wp-content/uploads/2022/07/Minutes-of-meeting_7th-PFM-policy-dialogue_Final-13052022.pdf; https://finance.gov.mk/wp-content/uploads/2022/07/Conclusions_of_7th_policy_dialogue_en-final-1.pdf

67 Interviews with the KIs were conducted on 22.11.2024 and 26.11.2024

68 Ibid.

II.2 Transparency and inclusiveness of PAR monitoring and coordination structures



Principle 1: A comprehensive, credible and sustainable public administration reform agenda is established and successfully implemented, fostering innovation and continuous improvement.

Sub-indicator 2: *Transparency and inclusiveness of PAR monitoring and coordination structures*⁶⁹

Indicator elements	Element type	Score
E 2.1 Participation of civil society in monitoring and coordination structures is envisaged in the PAR agenda	Strategy and policy	2/2
E 2.2 Format of CSO involvement in administrative structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional setup	3/3
E 2.3 Format of CSO involvement in political structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional setup	2/3
E 2.4 Involvement of CSOs is achieved based on an open competitive process	Institutional setup	2/4
E 2.5 Meetings of the PAR coordination and monitoring structures are held regularly with CSO involvement	Practice in implementation	0/10
E 2.6 Work of PAR monitoring and coordination structures is communicated transparently	Practice in implementation	0/10
E 2.7 Key informants consider that they can meaningfully contribute during the meetings of monitoring and coordination structures	Outcomes and impact	4/8
Total score for sub-indicator 2		13/40

⁶⁹ Through the second sub-indicator, the following SIGMA sub-principle is monitored: PAR is coordinated at political and administrative levels; sufficient resources are allocated, and the planned reforms are effectively implemented and monitored.

CSOs in North Macedonia are included only in the administrative-level structures for PAR monitoring and coordination. During the past two years, the PAR Council held two meetings, one in December 2022 and another in December 2023, while the PAR Secretariat held two meetings, one in December 2023 and another in December 2024. The EC noted that monitoring and management structures are not functioning fully or effectively.⁷⁰ SIGMA/OECD noted that the functioning the reform co-ordination structures was minimal over the reporting period.⁷¹ Due to ongoing political processes in 2022-2024, there were frequent changes in the political leadership of the MISA/MPA and these frequent changes create further challenges for effective co-ordination and management, and delays in reform implementation.⁷²

Researchers reviewed the current PAR planning documents to determine whether the involvement of civil society in administrative- and political-level monitoring and coordination structures was foreseen. Additionally, researchers cited government decisions on establishing these structures, meeting minutes, and rules of procedure for these structures, which confirm the involvement of CSOs. A point is allocated if the involvement of CSOs is explicitly stated. Administrative structures are those monitoring and coordination structures (secretariats, working groups, task forces, and other bodies) comprising civil servants from the various administrative bodies involved in PAR implementation. Political-level structures are those monitoring and coordination structures (committees, councils, etc.) comprising political-level officials (ministers, deputy ministers, state secretaries—those are political officials, etc.) from the various administrative bodies involved in PAR implementation.

The PAR Strategy envisages the involvement of representatives from the CSOs in the PAR Secretariat⁷³ and, if necessary and upon invitation, in the PAR Council.⁷⁴ The new composition of the PAR Secretariat has been established with the MISA decision issued in December 2023.⁷⁵ The first meeting of the PAR Secretariat took place on 14 December 2023.⁷⁶ Among representatives from

70 "COMMISSION STAFF WORKING DOCUMENT North Macedonia 2024 Report" (European Commission, October 30, 2024), https://neighbourhood-enlargement.ec.europa.eu/north-macedonia-report-2024_en

71 sigmaweb.org/publications/Public-administration-in-the-Republic-of-North-Macedonia-2024.pdf

72 Ibid.

73 Recommendation from the previous PAR Monitor 2021/2022, https://epi.org.mk/wp-content/uploads/NATIONAL-PAR-MONITOR-NORTH-MACEDONIA--2021_2022-1.pdf

74 Strategy for Public Administration Reform for the period 2023–2030, <https://kvalitet.mioa.gov.mk/wp-content/uploads/2024/05/strategija-za-reforma-na-javna-administracija-2023-2030-so-akcziski-plan.pdf>

75 Decision for establishing the PAR Secretariat from 7.12.2023 (sent to the CSOs by mail), is no longer available on the MPA website. Since the division into two ministries, there are problems with the site regarding the availability of some documents.

76 Minutes of the first meeting of the PAR Secretariat held on 14.12.2023, https://www.mioa.gov.mk/content/Записник_кон.pdf

state administrative bodies, the PAR Secretariat includes a member and deputy member from CSOs. Hence, the CSOs are full-fledged members (with full membership rights) and are subject to invitation for each meeting.⁷⁷ Namely, in April 2022, MISA sent an email invitation to all CSOs to become involved in the thematic working groups to prepare SPAR 2023–2030,⁷⁸ and eight CSOs expressed interest in participating.⁷⁹ The decision to establish the WG was issued on 26 December 2024 and emailed to the respective representatives. On 16 October 2023, the CSOs who expressed interest in participating in the thematic WGs for preparation of SPAR 2023–2030 received an email from MISA informing them that the SPAR had been adopted at the 166th Session of the Government and that a new decision for the PAR Secretariat would be issued.⁸⁰ In that regard, those eight CSO representatives were invited to nominate a representative of the civil society organisations (and deputy members) upon mutual coordination and agreement.⁸¹

Due to PAR's complex and horizontal nature, political leadership remains with the Prime Minister's Office, which presides over the PAR Council. In the absence of the Prime Minister, the Minister of Public Administration presides over the PAR Council. The Council is comprised of members of the government whose institutions are responsible for implementing the PAR Strategy.⁸² If necessary, and at the invitation of the chairperson of the PAR Council sessions, officials or heads of state institutions, as well as representatives of CSOs, may participate in the PAR Council sessions.⁸³ The members of the PAR Council are listed in the decision to establish the PAR Council on 26 December 2017⁸⁴ and its amendments on 12 August 2019.⁸⁵

In the last two years, three sessions of the PAR Secretariat have taken place: one on 29 June 2023⁸⁶, the constitutive session for the new members, including CSO members, was held on 14 December 2023⁸⁷, and the third session took place

⁷⁷ Invitations are sent by email.

⁷⁸ Strategy for Public Administration Reform for the period 2023–2030, <https://kvalitet.mioa.gov.mk/wp-content/uploads/2024/05/strategija-za-reforma-na-javna-administracija-2023-2030-so-akcziski-plan.pdf>

⁷⁹ https://www.mioa.gov.mk/content/Strategija%20RJA_MK%2003.pdf

⁸⁰ No longer available on the MPA website. Since the division into two ministries, there are problems with the site regarding the availability of some documents.

⁸¹ FOI requests were sent to MPA on 12.11.2024. The FOI responded on 6.12.2024.

⁸² Strategy for Public Administration Reform for the period 2023–2030, <https://kvalitet.mioa.gov.mk/wp-content/uploads/2024/05/strategija-za-reforma-na-javna-administracija-2023-2030-so-akcziski-plan.pdf>

⁸³ Ibid.

⁸⁴ Decision for establishing the PAR Council, <https://dejure.mk/zakon/reshenie-za-formiranje-sovet-za-reforma-na-javnata-administracija>

⁸⁵ Not publicly available.

⁸⁶ Minutes of the session of the PAR Secretariat held on 29.06.2023, <https://www.mioa.gov.mk/content/%D0%97%D0%B0%D0%BF%D0%B8%D1%81%D0%BD%D0%B8%D0%BA11.pdf>

⁸⁷ Minutes of the first meeting of the PAR Secretariat held on 14.12.2023, https://www.mioa.gov.mk/content/%D0%97%D0%B0%D0%BF%D0%B8%D1%81%D0%B-%D0%B8%D0%BA_%D0%BA%D0%BE%D0%BD.pdf

on 25 December 2024.⁸⁸ In the same period, two sessions of the PAR Council took place: one on 15 December 2022,⁸⁹ and a constitutive session for the new members was held on 26 December 2023.⁹⁰

Regarding the transparent communication of PAR monitoring and coordination structures, the state of play is as follows: there is an up-to-date⁹¹ section with PAR planning documents and monitoring reports on implementing the PAR agenda. However, there is only one draft report,⁹² since the PAR Strategy is a new document adopted on 11 July 2023. The PAR Secretariat adopted the draft report during the session held on 25 December 2024.⁹³ There are also decisions on their establishment with the lists of members;⁹⁴ however, the one for the PAR Secretariat is not available online; it was sent to the members of the PAR Secretariat via email. Also, there are agendas and meeting minutes but no rules of procedure for the PAR Secretariat. On 4.02.2025 the PAR Secretariat in cooperation with SIGMA/OECD organised a workshop for the PAR Secretariat members on the key challenges in functioning of PAR for North Macedonia.⁹⁵

Monitoring the PFM documents does not formally involve CSO representatives. Regarding the responsibility for coordination of the implementation and reporting on PFM, the MF is the responsible institution through the Sectoral PFM WG (composed of representatives from state institutions, CSOs, and the donor community), and the monitoring of the Programme is conducted by the PFM Council.⁹⁶ Before the adoption of each Programme, a new PFM Council is established. The last one was established on 17 June 2022. The participation of the CSOs in the Sectoral PFM WG is based on their own submitted initiative. The Sectoral PFM WG has plenary sessions at least two times a year and, if necessary, can invite various representatives.⁹⁷

88 <https://www.mioa.gov.mk/mk-MK/news/odrzana-vтора-sednica-na-sekretarijatot-za-reforma-na-javna-administracija.nspix>

89 Minutes of the session of the PAR Council held on 15.12.2022, <https://www.mioa.gov.mk/content/%D0%97%D0%B0%D0%BF%D0%B8%D1%81%D0%BD%D0%B8%D0%BA-%D1%81%D0%BE%D0%B2%D0%B5%D1%8210.PDF>

90 Minutes of the first session of the PAR Council held on 26.12.2023, <https://www.mioa.gov.mk/content/%D0%97%D0%B0%D0%BF%D0%B8%D1%81%D0%BD%D0%B8%D0%BA-%D0%BA%D1%81.pdf>

91 Up-to-date, meaning that the last two available reports are published.

92 Draft report on the implementation of the Strategy for Public Administration Reform for the period 2023–2030, <https://www.mioa.gov.mk/content/%D0%9D%D0%90%D0%A6%D0%A0%D0%A2%20%D0%93%D0%9E%D0%94%D0%98%D0%A8%D0%95%D0%9D%20%D0%98%D0%97%D0%92%D0%95%D0%A8%D0%A2%D0%90%D0%88%202023%20%D0%93%D0%9E%D0%94%D0%98%D0%9D%D0%90%2013.06.2024....docx>

93 Ibid.

94 Decision on the establishment of the PAR Council, <https://www.mioa.gov.mk/content/20231003103952331.pdf>

95 <https://www.mioa.gov.mk/mk-MK/news/mincev-reformata-na-javnata-administracija-e-klucen-prioritet-za-evrofskata-integracija-na-makedonija.nspix>

96 FOI request was sent to the MF on 12.11.2024. The MF responded on 23.12.2024.

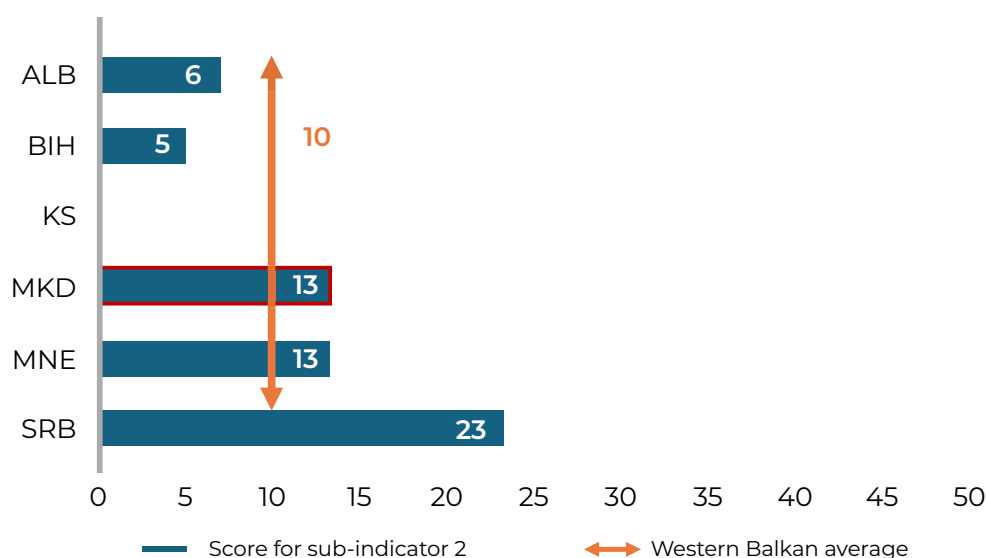
97 FOI request was sent to the MF on 12.11.2024. The MF responded on 23.12.2024.

Researchers organised interviews with CSOs to determine whether the format of the meetings allows for meaningful CSO contribution and impact on the work of political and administrative structures. KIs were asked to complete a short survey to express their position on the subject, using a four-point scale: fully agree, tend to agree, tend to disagree, and fully disagree. Point allocation was determined based on the ratio of fully agree/tend to agree responses. Interviewees responded to the statements related to the timeliness of the materials for the preparation of the meetings of the administrative and political structures, as well as the meaningfulness of the contribution to those meetings.

In that regard, KIs agreed that for the administrative-level structure, materials for preparation for the meetings were provided on time, with two key informants choosing the option “tend to agree” and one choosing “fully agree”. In addition, KIs agreed that the meetings of the administrative structures allow for meaningful CSO contribution, with all key informants choosing the “tend to agree” option.⁹⁸ Given that CSOs are not members of the political structures, no points were allocated for those criteria.

How does North Macedonia do in regional terms?

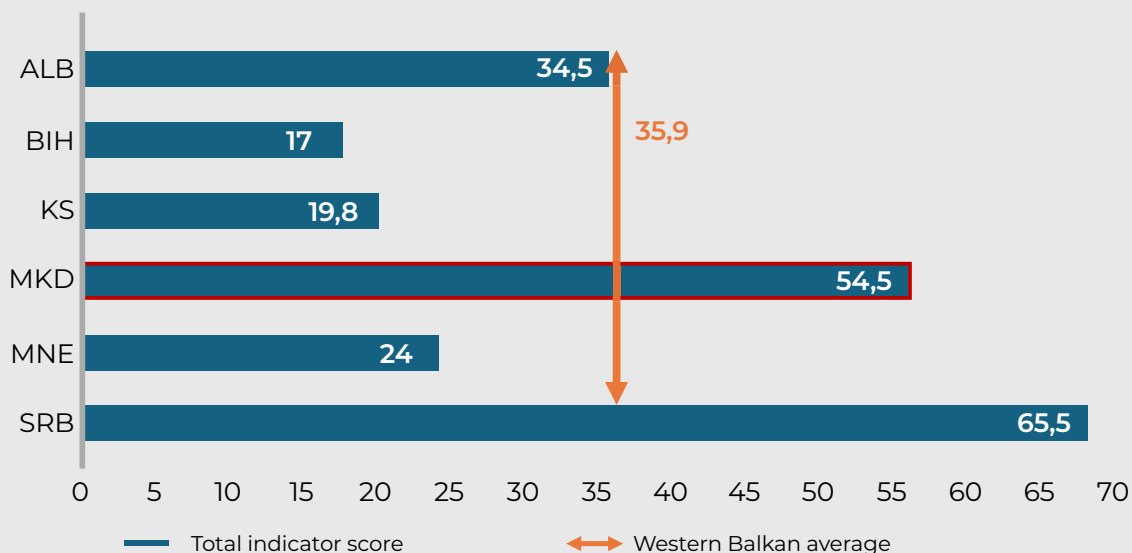
Sub-indicator 2: Transparency and inclusiveness of PAR monitoring and coordination structures



⁹⁸ Interviews with the KIs were conducted on 22.11.2024 and 26.11.2024

Overall scores comparison in the Strategy for PAR

Indicator: Transparency and inclusiveness of the development and management of the PAR agenda



A regional overview report for the Strategy area, with results for all WB administrations, is available at www.par-monitor.org

II.3 Recommendations for the Strategy for PAR

II.3.1 Tracking Recommendations from PAR Monitor 2021–2022

Recommendations	(short term/medium term/long term) ⁹⁹	Status	Explanation
1. The MISA and the MF should have joint consultations about issues of relevance for the effective implementation of the Strategic Framework, such as cost estimates and fiscal implications.	Short term	Not implemented	
2. The MISA should keep detailed records and documentation about the PAR Strategy consultations and publish them promptly on its website to inform the public about the issues discussed, proposals and remarks given, and whether proposals and remarks were accepted or rejected, along with the rationale behind such decisions.	Short term	Implemented	MISA has informed the WG members about the process of preparing the SPAR 2023–2030 and published information on the consultations. ¹⁰⁰
3. Open dialogue about contested issues and questions should be fostered to define common conclusions and solutions that are accepted and owned by all stakeholders involved in the process.	Short term	Implemented	There was a broad consultative process in the early phase of developing the SPAR 2023–2030, given that in April 2022, MISA sent an invitation to all CSOs to become involved in the thematic working groups for the preparation of the SPAR and later in the administrative coordination and monitoring structure. However, this should be a continuous practice.

⁹⁹ Recommendations for which the time needed for implementation is deemed to be up to one year are labeled as short term. Medium-term recommendations are those which can be implemented in a period from one year up to three years. Long-term require more than three years to be implemented.

¹⁰⁰ https://arhiva.mioa.gov.mk/sites/default/files/pbl_files/documents/rja/01.12.2022.pdf

4. CSOs should be informed and provided with feedback about their contributions and comments made in the consultations process.	Short term	Not implemented	
5. The MF should include all relevant stakeholders early in the consultation process, particularly when defining the strategic priorities and directions. Moreover, it should promptly invite and provide CSOs with all relevant documentation required for the consultation process.	Short term	Not implemented	
6. CSOs should be included in the PAR coordination bodies at the political and administrative levels.	Short term	Partially implemented	The SPAR 2023–2030 envisages the involvement of representatives from CSOs in the PAR Secretariat as full-fledged members and, if necessary, upon invitation by the chair of the Council (the President of the Government), in the PAR Council. The new composition of the PAR Secretariat was established with the Decision issued in December 2023. ¹⁰¹ This reflects a recommendation from the previous PAR Monitor cycle.
7. A systematic approach should be designed, clearly defining the format of consultations within sector groups established under the PAR Strategy.	Short term	Not implemented	

¹⁰¹ Decision for establishing the PAR Secretariat from 7.12.2023 (sent to the CSOs by mail), is no longer available on the MPA website.

Since the division into two ministries, there are problems with the site regarding the availability of some documents.

II. 3.2 Recommendations from the 2024–2025 Monitor Report

- The MPA and the General Secretariat should improve the transparency and inclusiveness in the development of the PAR planning documents, strategies, and legislation, particularly in terms of the transparency of the WG activities. They should introduce a suitable selection process for CSO representatives in the WG and publish the results of their work (short-term recommendation).
- The MPA should improve the overall consultation process in terms of its comprehensiveness, clarity, and accountability. The process should be more proactive by using all available means of communication and engaging a wider range of stakeholders (short-term recommendation).
- The MPA should improve the regulations related to providing feedback in the consultation process and establish mechanisms for monitoring the consultation processes in ministries to properly implement those regulations. Moreover, CSOs and all stakeholders should be informed and provided feedback about their contributions and comments submitted in the consultation process. Their comments should be visible, the comment providers should be referenced and clearly indicated, and statements should be made on how the comments were resolved, together with an explanation and justification for each response (short-term recommendation).
- The MPA and the MF should increase the transparency of the monitoring and coordination structures for PAR and PFM, improve the process of selecting CSOs, and increase the frequency of meetings. (short-term recommendation) and should improve the coordination of the reform planning and monitoring, especially in cross-cutting areas.¹⁰²

¹⁰² sigmaweb.org/publications/Public-administration-in-the-Republic-of-North-Macedonia-2024.pdf

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 information
- Interviews with stakeholders and key informants.

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.

Table 4. FOI requests sent in North Macedonia

Institution	Date of request	Date of reply to the request
MPA	12.11.2024	6.12.2024
MF	12.11.2024	23.12.2024

Interviews with key informants were conducted and used as a base for point allocation for elements 1.8 and 2.7. 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. Selection of interviewees was based on purposive, non-probability sampling, targeting interlocutors based on their expertise on the topic.

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 1.8 and 2.7 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 5. Interviews conducted in North Macedonia

Date	Interviewees
22.11.2024	Center for Knowledge Management (CKM)
26.11.2024	Rural Development (RD)
26.11.2024	Analytica

List of interview questions

- **Element 1.8**

1. To what extent do you agree with the following statement: **The development process of the PAR planning document was 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: **The development process of the PAR planning document was inclusive.**
 - 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. How are civil society organisations involved in the initial stages of developing PAR planning documents?
2. How transparent are the timelines, agendas, and outcomes of consultations during the development of the PAR planning documents?
3. How are feedback and contributions from different stakeholders documented and integrated?
4. How are key decisions made throughout the development of PAR documents, and are these decisions communicated clearly to all involved parties? (for example, decisions on adopting changes proposed by the non-state actors – specific measures, activities, and such)
5. Is there an opportunity for continuous feedback throughout the process?
6. Have there been instances where stakeholder input significantly impacted the development process of the planning process? Could you provide an example?
7. During the development of the PAR planning documents, did the responsible authorities implement different forms of consultations during the process (such as focus groups, surveys, interviews, submission of written contributions, etc.). If the answer is yes, please elaborate.

- **Element 2.7**

1. To what extent do you agree with the following statement: **Materials for preparation for meetings of administrative structures are provided timely.**
 - e) fully disagree
 - f) tend to disagree
 - g) tend to agree
 - h) fully agree
2. To what extent do you agree with the following statement: **Materials for preparation for meetings of political structures are provided timely.**
 - e) fully disagree
 - f) tend to disagree
 - g) tend to agree
 - h) fully agree
3. To what extent do you agree with the following statement: **Meetings of administrative structures allow meaningful contribution.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
4. To what extent do you agree with the following statement: **Meetings of political structures allow meaningful contribution.**
 - 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. Do you feel that your organisation has a meaningful voice in the decision-making processes within the administrative and political structures? Please elaborate
2. Have there been instances where your organisation's input has led to changes or influenced outcomes? Please provide an example
3. How do you receive updates or feedback on how your organisation's contributions are utilised?
4. How would you assess communication within the structures and from heads of the structures in terms of effectiveness and timeliness?
5. How would you assess the transparency of the decision-making processes within the structures?
6. Do you believe that the coordination and monitoring structures could better support engagement and utilise civil society contributions? In which way
7. How would you assess the availability of information on PAR implementation and monitoring, i.e., how would you assess the online availability of relevant information?

LIST OF REFERENCED SOURCES IN THIS REPORT

- Action Plan for Public Finance Management 2023
- Commission Staff Working Document—North Macedonia 2024 Report
- SIGMA/OECD Public Administration in the Republic of North Macedonia 2024
- Decision for Establishing a working group from 03 June 2022
- Decision for establishing the PAR Council from 26 December 2017 and its amendments from 12 August 2019
- Decision for Establishing the PAR Secretariat from 7 December 2023
- Decision on the Form and Content of the Regulatory Impact Assessment Report
- Draft Annual Report on the Implementation of the Strategy for Public Administration Reform in 2023
- Draft Version of the PAR Strategy (2023–2030) with the Action Plan
- Guidelines on the Manner of Acting Within the Work of the Ministries in the Process of Performing a Regulatory Impact Assessment
- Guidelines on the Structure, Content, and Manner of Drafting, Implementing, Monitoring, Reporting, and Assessing the Sectoral and Multi-Sectoral Strategies
- Manual for Regulatory Impact Assessment
- Methodology for Regulatory Impact Assessment
- Minutes of PAR Council Session held on 15 December 2022
- Minutes of PAR Council Session held on 26 December 2023
- Minutes of PAR Secretariat Session held on 13 July 2022
- Minutes of PAR Secretariat Session held on 29 June 2023
- Minutes of PAR Secretariat session held on 14 December 2023
- Public Call for the Inclusion of Representatives from the CSOs in the Thematic Working Groups for the Preparation of the Strategy
- Rules of Procedure of the Government of the Republic of North Macedonia
- Strategy for Public Administration Reform 2023–2030 and Action Plan
- Working Plan and Timeline for the Strategy for Public Administration Reform 2023–2030



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.

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