



**AGENCY FOR THE PROTECTION OF THE RIGHT
OF FREE ACCESS TO PUBLIC INFORMATION**

ANNUAL REPORT

Reporting period: 2021	<u>Responsible person:</u>
Total budget: MKD 16,287,000	Name and Surname: Plamenka Bojcheva
Number of Employees: 17	Title: Director of the Agency
www.aspi.mk	E-mail: aspi@aspi.mk
	Phone: 02/3118-038

CONTENTS:

1. SUMMARY	3
2. INTRODUCTION.....	5
3. STATUS, MANAGEMENT, COMPETENCE AND ORGANIZATIONAL STRUCTURE	7
4. REALIZED ACTIVITIES DERIVED FROM THE LEGAL COMPETENCES AND THE WORK PROGRAM.....	11
4.1. DECISION ON COMPLAINTS	11
4.2. RESOLVED CASES AND THEIR STRUCTURE.....	12
4.3. COMPLAINTS FILED AGAINST INFORMATION HOLDERS.....	13
4.4. character OF THE SUBMITTED COMPLAINTS.....	14
4.4.1. State of cases after lawsuits	16
4.4.2. Misdemeanor procedure	17
4.4.3. Implementation and experiences from the application of the Law.....	17
4.4.4. List of holders of information	19

4.4.5. Annual reports of the holders	20
4.4.6. Content of Annual Reports	24
4.4.7. Incomplete reports and recorded irregularities.....	25
4.4.8. Cooperation with officials at the holders	26
4.4.9. Training and education.....	27
4.5. Employee trainings	29
4.5.1. Agency's website.....	29
4.5.2. Public's involvement in the work.....	30
5. INTER-INSTITUTIONAL AND INTERNATIONAL COOPERATION OF THE AGENCY IN 2021.....	33
5.1. IPA 2 EU funded project.....	33
5.1.1. The status of the IPA 2 project funded by the EU	36
5.2. IPA 3 application (IPA 2023 AND IPA 2024).....	37
5.3. The TAIEX instrument.....	37
5.4. PUBLIC ADMINISTRATION REFORM STRATEGY – 2018-2022	38
5.4.1. Preparation of Reports for NPAA, the evaluation mission SIGMA and Preparation of materials for the contribution of North Macedonia to the Report of the European Commission.....	40
5.4.2. Accomplished meetings and realized activities with partners and related institutions.....	41
5.4.3. Cooperation with non-governmental organizations and project activities.....	43
6. BUDGET, FINAL ACCOUNT AND FINANCING.....	44
6.1. BRIEF FINANCIAL STATEMENT.....	44
6.2. BUDGET AND EXPENDITURES IN THE LAST THREE YEARS (comparative chart).....	47
6.3. FINAL ACCOUNTS 2021 FOR	48
7. CONCLUSIONS.....	48
8. RECOMMENDATIONS.....	49
9. APPENDIX.....	49
ATTACHMENT: COPY OF THE FINAL ACCOUNT FOR 2021.....	64

1. SUMMARY

The annual report of the Agency for the Protection of the Right to Free Access to Public Information (hereinafter - the Agency) derives from the legal obligation to submit an annual report to the Assembly of the Republic of North Macedonia, and it reflects the competencies of the Agency determined in Article 30 of the Law on Free Access to Information of a Public Character and refers to its operation during 2021.

According to the Law on Free Access to Information of a Public Character, adopted in May 2019 ("Official Gazette of the Republic of North Macedonia" No. 101 of 22.05.2019 - hereinafter referred to as the LFAPI), the Agency is the only state body that works in the

sphere of protection of the right to free access to public information.

The Agency is an independent and independent state body, i.e. an external body led by a director and a deputy director, appointed by the Assembly of the Republic of North Macedonia.

Acting in accordance with its legal competences, among which stands out the one that refers to and characterizes the Agency as a second-level authority in the administrative procedure, regardless of the current health circumstances and periodically expected reduction in the number of human resources, within the legally provided deadlines it managed to act upon the **798 cases** submitted to the Agency during 2021. The number of cases related to the operation of the Agency in the area of legal and general matters arising from the rest of its legal competences is not less, and which, of course, were completed in a timely manner during the reporting year.

It is not immodest to mention that the Agency, in the same period, drafted and adopted a large number of by-laws, which were published on the Agency's website, as auxiliary tools for holders and requesters of information of a public character, in the direction of efficient application of the provisions of the Law on free access to public information. In order to more efficiently and expeditiously act upon received requests for access to information of a public character, the Agency prepared a Guide for the delegation of authority and published it on its website and delivered it electronically to all holders of information.

The Agency within the framework of the IPA II Project prepared several documents that would emphasize the acts that regulate and facilitate the procedure for proactive publication of information of a public character and the Manual for the implementation of the Harm Test.

In the framework of this Annual Report, you are presented with the modest budget on which the Agency relied in the implementation of the legally defined activities. Despite the really low numbers and items, during 2021, the Agency managed, on a weekly basis, to organize and realize a total of **29** free trainings for the officials who mediate the public information with the information holders. Without the possibility of holding the trainings in the premises of the Agency, and in accordance with the health procedures and protocols due to the circumstances caused by the COVID-19 pandemic, the trainings were held online, through the ZOOM platform, permanently during the entire effective annual period.

Officials from a total of **592** institutions were invited to the trainings. The presence of their representatives was confirmed and implemented by **237** institutions (some with more than 1 participant), while **355** holders of information did not show interest in following the trainings even though they are conducted free of charge.

The above indicates the lack of interest among the holders of information to be continuously informed and instructed in the legally regulated obligations to act in accordance with the LFAPI, which results in an increase in the number of complaints by those seeking information, as well as a number of electronic and telephone calls from by untrained officials, who sought legal and other assistance from the Agency.

The current reporting period for the operation of the Agency during 2021 in brief (taking into account the number of received complaints and other written and electronic correspondence), shows the following results.

It is not tautology that we are forced to use, but only a finding that this reporting year, the right to free access to information of a public character, seen through the prism of an initiated appeal procedure before the Agency, in the largest part (**608 / 76.19%**) was used by non-governmental organizations and associations of citizens, as a tool for achieving goals related to the realization of own work programs.

Seen through numbers: the Institute for Democracy "Societas Civilis" from Skopje filed **328** complaints; the citizens' association "Centre for Civil Communications" - CGK from Skopje filed **72** complaints; the Institute for Strategic Research and Education – **51** complaints; Citizen initiative "Ohrid SOS" – **26** complaints; the Association of Citizens "Front 21/42" – **25** complaints, etc.

It is inevitable to note that citizens usually appear as information requesters, that is, as complainants, only in situations in which they reached out to the legal provisions for the purpose of realizing some of their personal interests, which derive from another material law, which regulates a different legal matter. In short, in most cases, citizens resort to the Civil Code only when they are unable to exercise their rights and obtain information and documents that derive from the official jurisdiction of the holders of information who did not act in accordance with their own *lex specialis* and, that is, according to substantive laws with which they are used in their work and decision-making. We would also add a large number of similar complaints initiated by lawyers and legal entities, submitted to the Agency for the same purpose and with the same goal.

Also, although positive, it is still unacceptable the fact that speaks of the analyzed summary results that point to the largest number of complaints submitted to the Agency for the period we are reporting on - **359, or 44.99%** - we are talking about cases in which the holders of information did not act on submitted requests within the legally prescribed deadlines (20 days after a submitted request, or 30 days if extensive information is required with the request), that is, due to **the silence of the administration**. If we compare with over 70% of such cases during last year's reporting period, the Agency should, but does not express definite satisfaction until the silence of the administration, both at the central and local level, is completely eliminated.

Therefore, the Agency, as the only competent state authority for the protection of the right to free access to information of a public character, sets an example, appeals, invites and encourages all institutions at the central and local level to raise the right of access to information of a public character at a higher social level, through increasing and promoting proactive transparency within the own institutions.

Continuing the professionalism in the sphere of free access to information of a public character, the Agency remains, within its competences, committed to the practice of finding appropriate legal solutions for the revealed problems and issues. For that reason, the Agency will continue, in direct contact with the holders and requesters of information, through its

officials, to provide unreserved free legal and other assistance to the requesters of information, as well as to the officials who mediate the information of a public character with the holders of information. At the same time, in a planned and continuous manner, throughout the year, the Agency will continue with the implementation of trainings for both stakeholders in the field of free access to information of a public character.

The agency, through records in the files from the first-level procedure, determined that most of the currently registered **1843** officials among **1445** information holders still do not know enough about LFAPI, and consequently, there is a need to continue actively working in the field of their further education through additional trainings and with advisory participation in building the capacities of information holders both at the central and local level.

At the same time, the Agency undertakes continuous measures to **favor proactive transparency** among the holders of information, combining it with the drafting of additional by-laws.

There is no question that there is no progress in using the right to free access to information of a public character, on the contrary, progress is evident, but the necessity to continue working on the advancement of this process through the proactive transparency of the institutions, as a top priority when it becomes a word about this right of man and citizen guaranteed by the Constitution of the Republic of North Macedonia (Article 16, paragraph 3).

Therefore, despite the improvement of the legal framework in this area, we must continue to work on raising awareness, especially among management structures in institutions, in order to build a mentality of self-initiative (proactive) publication of information of public interest, without waiting for requests by information requesters. The above is also due to the fact that LFAPI is an extremely important anti-corruption tool and its application is extremely important from the aspect of fighting corruption and strengthening the integrity of institutions.

2. INTRODUCTION

Excluding vis majeure and other objective circumstances in which the Agency currently operates, which are listed in the Summary of this Annual Report, **the Agency achieves and continues with its Mission**, with the primary goal of protecting the exercise of the constitutionally guaranteed right to free access to information of a public character, through efficient and independent implementation of the appeal procedure and tireless continuous informing of the public and education of the holders and of the information requesters. Within the framework of its stated Mission, the Annual Report for 2021 covers the operation of the Agency for the Protection of the Right to Free Access to Information of a Public Character in the area of the realization of its legal competences. For a better, more vivid presentation, we present you the following parameters:

In addition to the fact that, due to compliance with the legal deadlines, the Agency in 2021 transferred only **3** cases from 2020, in the reporting **year 2021**, additional positive changes

are also noticeable.

More specifically, during this year, a total of **798 cases /complaints** were submitted to the Agency, filed against administrative and real acts of the first instance authorities, or due to the so-called silence of the administration were filed against the non-action of the holders of information following requests for access to information of a public character **359 complaints (44.99%)**. This speaks of a greater positive result among the holders of information for the first time after the 15-year implementation of the Law on Free Access to public information.

Finally, it is safe to say that the silence of the administration has been significantly reduced in the last year, as a result of the commitment, engagement and synergy between the administrative officers and the management of the Agency in the realization of the vision and mission of the Agency.

As for the number of submitted annual reports on the operations of information holders in the field of access to information, it can be concluded that out of a total of **1445** submitted an Annual Report on the application of the law to the Agency **1334** , i.e. **92.32 %** percent of them, while the legal obligation is not fulfilled by **111** institutions, or **7.68%** of the information holders. Due to the above, the Agency, following the legally established practice, plans to initiate a misdemeanor proceeding against officials for mediating information of a public character, as well as against all holders of information who have not fulfilled the legal obligation to promptly submit an annual report to the Agency.

We would hereby like to emphasize that the Agency, unable to fully exercise its legal competences within the limits of its own modest budget funds at its disposal, tried in several segments, and mostly in the part of the legal obligation to undertake activities for the education of the holders of information, establishing or continuing cooperation with domestic and international stakeholders in the field of access to public information. We believe that, under the circumstances, the attempt was sufficiently successful.

In the context of what has been said, it is inevitable to emphasize that in order to fulfill its role even more successfully in accordance with the legal competences, adapting to the European values, the Agency has an urgent need for quality personnel re-equipment, a spatial solution, but also for a much stronger budgetary support, especially since the work of the Agency in the exercise of the right to free access to information of a public character is of exceptional importance from the point of view of the fight against corruption and the strengthening of the integrity of the institutions.

3. STATUS, MANAGEMENT, AUTHORITY AND ORGANIZATIONAL STRUCTURE:

The Agency for the Protection of the Right to Free Access to Public Information has been an independent agency and independent state body for two years, that is, a foreign body led by a director and a deputy director.

The competences of the Agency are exhaustively determined in Article 30 of the Law on

Free Access to Public Information ("Official Gazette of the Republic of North Macedonia" No. 101/2019), where it is established that the Agency performs the following tasks:

- It conducts administrative proceedings and decides on appeals against the decision by which the owner of the information refused or rejected the request for access to information of the applicants,
- It takes care of the implementation of the provisions of this law,
- It prepares and publishes a list of owners of information,
- It gives opinions on proposed laws which regulate free access to information,
- It develops policies and provides guidelines regarding the exercise of the right to free access to information,
- It conducts misdemeanor proceedings through the Misdemeanor Commission, which decides on misdemeanors in accordance with the law,
- It undertakes activities on the education plan to the holders of information on the right of free access to the information they have, cooperates with the holders of information in relation to the realization of the right of access to information,
- It prepares an annual report on its work and submits it to the Assembly of the Republic of Macedonia,
- It performs international cooperation related to the execution of the international obligations of the Republic of Macedonia, participation in the implementation of projects of the international organizations and cooperates with the authorities of other countries and institutions in the field of free access to information of a public character,
- It promotes the right to free access to information of a public character and
- It performs other tasks established by this and other laws.

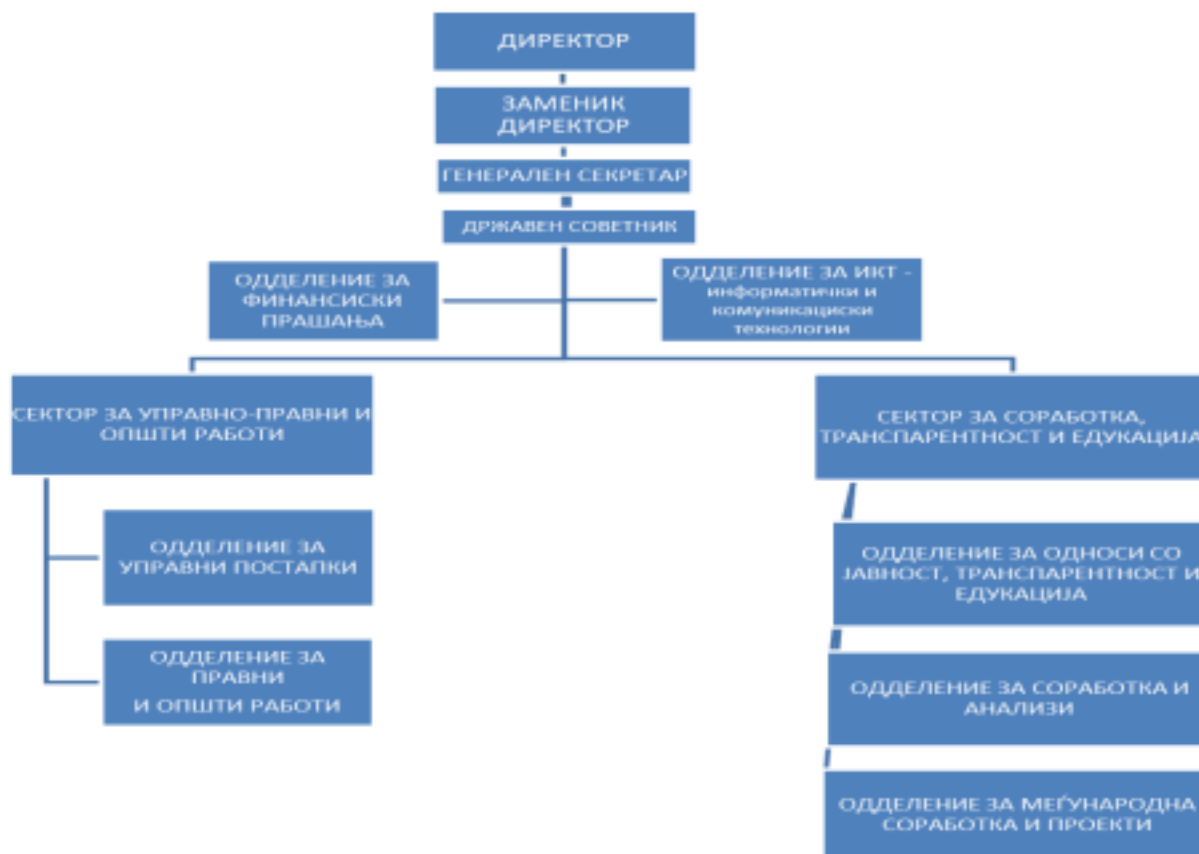
Starting from the type, scope and degree of complexity of the works and tasks performed by the Agency, the interconnection and kinship of those works and tasks and other conditions necessary for their performance, in the Agency in accordance with the Rules for internal organization and the Rules for the systematization of workplaces, which acts apply from 13.10.2020, the following functional units are formed:

1. Department of finances;
2. Information and communication technologies (ICT) Department;
3. Department for administrative-legal and general affairs;
 - 3.1. Department for administrative procedures;
 - 3.2. Department for legal and general affairs;
4. Department for cooperation, transparency and education;
 - 4.1. Department for public relations, transparency and education;
 - 4.2. Department for internal cooperation, ICT and analysis;
 - 4.3. Department for international cooperation and projects.

The organizational structure of the Agency is presented in the following graphic display:

ORGANIZATIONAL CHART

of the Agency for the protection of the right of free access to information of a public character



The systematization act determined and described jobs for a total of 49 executors, spread over nine organizational units, of which a total of eighteen (18) jobs were filled, of which seventeen (17) were employed for an indefinite period and one (1) on definite time. Out of the total number, fourteen (14) have higher education, and four (4) have secondary education.

The qualification structure of the employees with higher education is as follows: six (6) are law graduates, two of whom have a master's degree and two have passed the bar exam, one (1) is a journalist graduate, three (3) are economist graduates, of which one (1) is a graduate manager in marketing, two (2) are from the Faculty of Philology, one of whom has an master's degree, one (1) is a graduate of the Faculty of Philosophy and one (1) is a graduate manager in human resource management.

There are four (4) employees with secondary education, of which one (1) has a gymnasium, one (1) has a hospitality and tourism profession and two (2) have a secondary trade profession.

According to categories of administrative officers, the situation is as follows:

- General Secretary - one (1);
- State Councilor – none (0);
- Head of department - none (0);
- Assistant head of department - one (1);
- Heads of Department - three (3);
- Advisors - seven (7)
- Junior associates - two (2)
- Independent clerk - one (1);
- Senior referent - one (1) and
- Junior referents - two (2).

From the total number of employees at the time of preparation of this annual report, ten (10) are of Macedonian nationality (55.5%), four (4) are of Albanian nationality (22.2%), two (2) are from Aromanian nationality (11.11%) and two (2) are from Roma nationality (11.11%).

Percentage of the total number by nationality of employees in the Agency

	Systematized jobs	Filled jobs (%)	Total number of employees (%)	Higher education	Secondary education
Macedonians		10	55.5%	8	2
Albanians		4	22.2%	4	
Vlachs		2	11.11 %	2	
Roma		2	11.11 %		2
Total	(49)	18	100%	14	4

During this reporting period, the employment of two (2) executors with the title of Junior Associate of Aromanian nationality was terminated on April 30, 2021, one of them left at his request, and the employment of the other one terminated on December 1st, 2021 due to a disciplinary measure imposed.

The Agency for the Protection of the Right to Free Access to Public Information during 2021 published an internal announcement for the promotion of five (5) administrative officers for the following positions:

1. International cooperation consultant in the Department for International Cooperation and Projects, Sector for Cooperation, Transparency and Education - one (1) executor;
2. Translations consultant in the Department for Public Relations, Transparency and Education, Sector for Cooperation, Transparency and Education - one (1) executor;
3. Consultant for analyzes in the Department for Cooperation and Analysis, Department for Cooperation, Transparency and Education - one (1) executor and
4. Consultant for the implementation of administrative procedures in the Department for Administrative Procedures, Department for Administrative-Legal and General Affairs - two (2) executors. With this, five (5) employees were promoted from the position of Junior Associate to the position of Consultant.

According to the Agency's Annual Employment Plan for 2020, to which the consent of the competent institutions was obtained in October 2020, the Agency on the website of the Agency for Administration and the Agency for the Protection of the Right to Free Access to Public Information, as well as in the daily newspapers "Nova Makedonija", "Sloboden pechat" and "Koha" published on 26.12.2020, Public Announcement number 312/2020 for the employment of three (3) executors, which procedure will be carried out during 2021 and on 22.05.2021 published Public Announcement No. 207/2021 for the employment of one (1) executor, i.e. a total of four (4) employments to fill the following jobs:

1. Deputy Head of the Department for Legal, General Affairs and Administrative Procedures in the Department for administrative-legal and general affairs - 1 (one) executor
2. Head of the Department for International Cooperation and Projects, in the Department for Cooperation, Transparency and Education - 1 (one) executor
3. Junior associate for meeting with the holders of information in the Department for Cooperation and Analysis, Sector for Cooperation, Transparency and Education - 1 (one) executor, and
4. Deputy Head of the Sector for Cooperation, Transparency and Education in the Sector for Cooperation, Transparency and Education - one (1)) executor.

The Head of the Department for International Cooperation and Projects, in the Department for Cooperation, Transparency and Education, by Decision No. 04-110/1 of 15.03.2021, has been assigned to the position Head of the Department for Legal and General Affairs in the Department for Administrative legal and general affairs.

The administrative officer from the position Deputy Head of the Department for Cooperation, Transparency and Education in the Department for Cooperation, Transparency and Education, with the title of Assistant Head of Department by Decision No. 04-860/1 of 30.12.2021, has been appointed General Secretary in the Agency.

4. REALIZED ACTIVITIES DERIVED FROM THE LEGAL COMPETENCES AND THE WORK PROGRAM:

4.1. Decision-making on appeals

As a secondary authority in the process of implementing the exercise of the right of access

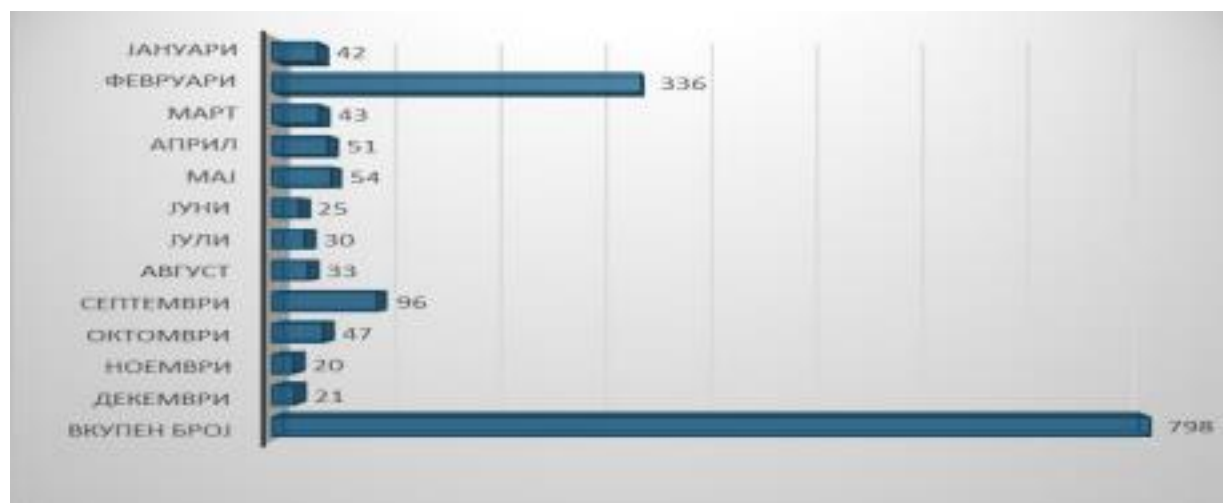
to public information, the Agency faces the biggest challenge, which stems from its basic competence - to conduct administrative proceedings and decide on appeals submitted by information requesters against the holders of information, regardless of whether the holders of information have not acted in accordance with the LFAPI, or have passed administrative or real acts by which they refused or rejected the requests for access to information of a public character.

The right to file a complaint is equal for all applicants who have submitted an oral, written or electronic Request for access to information of a public character to an institution at the central or local level (first-instance authority), i.e. to any of the registered holders of information. The agency, as the second-level body in the appeals procedure, forwards the complaints to the first-level authorities (the holders of the information) for adjudication, with a request to receive an answer and attachment from all the relevant files within 7 days, in order to react immediately and within the legally stipulated period of 15 days to make an appropriate decision.

Prejudging the educational rather than the repressive approach, the Agency delivers to the holders of information who have not acted on requests for access to information of a public character orders to act in accordance with the LFAPI within 15 days from the acceptance of the decision, with the obligation to notify the the Agency for their actions within that period. To those holders of information who acted in accordance with the provisions of the Law and did not pass an administrative act with which they responded to the requests, the Agency delivers decisions for their re-action, with instructions on how to do the same. If such initial decisions do not result in the realization of the goal of LFAPI, the Agency prepares and delivers to the holders of information meritorious decisions, which in most cases represent **obligations** for the holders to deliver the requested information to the requester.

Acting in accordance with the aforementioned legal principles, the Agency processed the data that shows the following:

In the reporting year 2021, the Agency received a total of **798** complaints. The status of received cases following complaints by information requesters by month is as follows: **42 cases**, February-**336**, March-**43**, April-**51**, May-**54**, June-**25**, July-**30**, August-**33**, September **96**, October-**47**, November-**20** and in the month of December-**21** subjects.



Graph 1: Number of submitted complaints by month

As for the structure of complainants to the Agency, it is noteworthy that the majority of complaint cases, a total of **608** were submitted by legal entities, i.e. by citizens' associations and foundations, were submitted by natural persons (**190** complaints).

4.2. Resolved cases and their structure

During 2021, the Agency acted on all **798** cases from the reporting year 2021. During the presented year, the agency acted on a total of **788** of them, while **10**, due to the legal deadlines that refer to the judgment of the holders of the appeals in question, as well as after observing the deadlines for the action of the secondary authority, were transferred for resolution during 2022.

Acting on the complaints received during 2021, until the date of preparation of this Annual Report, the Agency made a total of **798** final and **35** meritorious decisions.

We hope that the sum of the figures presented will not lead you into confusion because the Agency, taking into account the provisions of the Law on General Administrative Procedure, in addition to the initial decisions with which it instructed the first instance authorities to act in accordance with the LFAPI or returned cases, also adopted meritorious decisions in cases where the owners did not act according to its previous decisions. It has been established that this legal procedure proved to be productive, given that almost all holders of information acted in accordance with the final decisions of the Agency.

Those who did not comply with the decisions made upon the initiative of the complainants, or on the official duty of the authorized person in the Agency, faced a misdemeanor procedure carried out by the Misdemeanor Commission of the Agency. In this regard, there are:

-**166** decisions by which the Complaint is respected and the first-instance authority is ordered to act on the Claimant's Request;

-**29** decisions by which the Complaint is respected and obliges the holder to provide the

requested information;

-**24** decisions rejecting the Appeal as unfounded;

-**61** decisions rejecting the Appeal as untimely/inadmissible/premature;

-**116** decisions by which the Complaint is respected and the case is returned to the first-instance authority for further proceedings;

-**437** decisions that stop the procedure following a complaint due to its withdrawal, or due to an answer received in the meantime or with a delay.

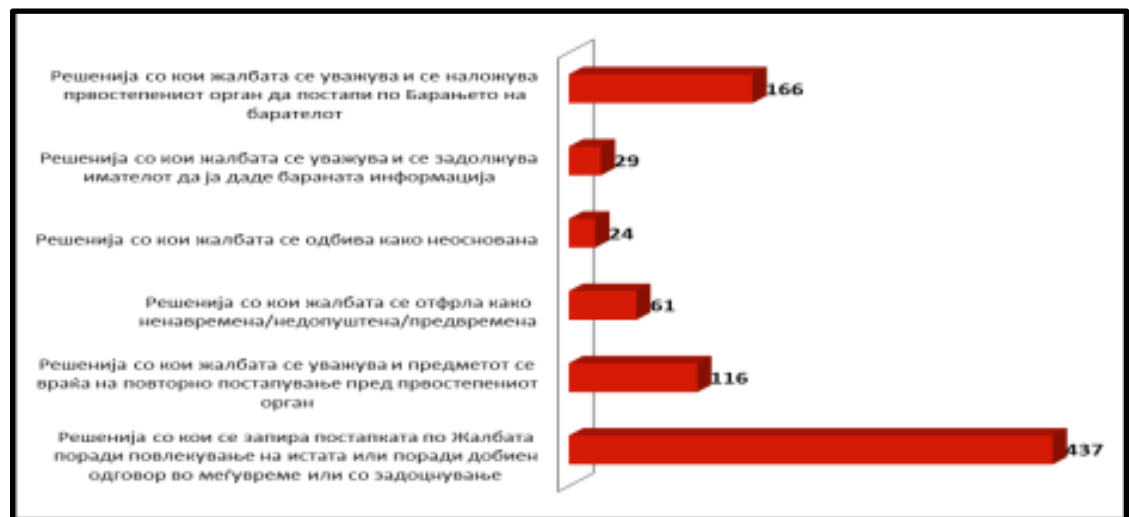


Chart 2: Resolved cases and their structure

4.3. Complaints submitted against the holders of information

The submitted complaints show that their most common destination is the following list of holders of information:

- **458** complaints cases were filed against state institutions at the central level
- **167** against municipalities,
- **35** against public enterprises,
- **30** against the judiciary,
- **37** against legal and natural persons exercising public authority,
- **15** against educational institutions,
- **31** against health institutions,
- **21** against political parties,
- **1** against public institutions,
- **2** against penitentiaries, and
- **1** against non-holder of information.



Chart 3: Complaints filed against information holders

4.4. The character of submitted complaints:

The information requesters directed their complaints for the following reasons:

- **359** due to the silence of the administration (**44.99%**),
- **356** against decisions by the information holders (**44.61%**)
- **82** against the response/notification from the information holders (**10.28%**) - **1** against non/holder of information.

The agency transmits received data from which it can be determined that in the reporting year 2021 the most complaints were filed against: state institutions at the central level, municipalities, public enterprises, health facilities, against legal and physical persons exercising public authority and against the judicial authority .

In contrast to previous years, we can state with reserved satisfaction that the trainings and workshops with the officials at the information holders gave a certain effect in removing the most common reason for submitting complaints to the Agency - **the silence of the administration which, compared to last year, is reduced by about a quarter.**

Otherwise, the number of complaints filed due to dissatisfaction of the claimants with the reasons for the decisions received from the first instance authorities is almost identical to the number of complaints against the administration's silence, as well as with the number of answers and notifications received from the information holders.

In the submitted complaints, the dissatisfaction of the complainants with the actions of the holders of information in relation to requests mostly refers to:

- How many and which detailed urban plans a certain municipality adopted in the (specified) period,
- How many and which DUPs are in progress of enactment and in what specific phase is each of them currently;
- What and how many drugs, which are intended for the treatment of rare diseases, are registered in RSM (how many funds were spent on such drugs);
- How many funds have been requested from the State Budget for assistance and protection of children in conflict with the law;

- Data on:

- * Number of hospitalized patients with COVID-19;
- * Total number of hospital days of patients with COVID-19;
- * Number of deceased patients from COVID-19;
- * Number of patients on oxygen support;
- * Number of patients on ventilatory (respiratory) support;
- * Number of hired medical personnel;
- * Consumed amount of the drug Enoxaparin (Clexan) for patients with COVID-19;
- * Oxygen consumption for patients with COVID-19; * Number of used masks for oxygen support for patients with COVID-19 and;
- * Number of used devices for ventilatory support (respirators);
- * Number of people who received two doses of vaccines, according to vaccine manufacturer - Sinopharm, Sinovak, Sputnik, Pfizer, Astra Zeneca, according to age groups;
- * Number of infected persons from COVID-19 who received two doses of vaccines according to the vaccine manufacturer;
- * Number of hospitalized persons due to COVID-19, vaccinated with two doses of vaccines, number of deceased persons due to COVID-19, vaccinated with two doses of vaccines, number of hospitalized persons who were reinfected with COVID-19, number of deceased persons who were reinfected with COVID-19;

-Information on the procedure for the public procurement of new medical equipment intended for the appropriate implementation of health treatment of patients suffering from COVID-19, for the needs of public health institutions in the area of the City of Skopje;

-A list of movable and immovable property that it owns political party, as well as a list of movable and immovable property that the political party leases from individuals and legal entities (provide us with information from whom the real estate is leased and the amount that the political party pays on a monthly basis for the leased space);

- Minutes of Government meetings of the Republic of North Macedonia;

- Copies of decisions on the removal of illegally built buildings in the municipalities of Ohrid, Struga and Debarca, which have been acted upon in their entirety and the buildings have been removed, as well as those which have not been acted upon and the buildings have not been removed and for which legal proceedings have been initiated procedures

- Planning documentation for the reconstruction project of Quay Macedonia in Ohrid;

- How many inspections have been carried out on the territory of the Municipality of Ohrid by the local environmental inspector;

- Copies of the quarterly reports on the progress in the implementation of the measures and activities contained in the Action Plan of the Plan for the Management of the World Natural and Cultural Heritage in the Ohrid Region;
- Total number of employees, with names, surnames, biographies and monthly incomes of all state advisers in the Ministry of Political System and Inter-Community Relations;
- Invoices for the purchase of furniture and art paintings for decorating the interior of the Ministry of Political System and Inter-Community Relations;
- Final accounts for the budget of municipality for the years: 2015, 2016, 2017, 2018, 2019 and 2020 at an analytical level (subset) of 6 digits;
- For the needs of comparative regional research within the project "Balkan tender watch", financially supported by the European Union, the public procurement plan for 2020 with all its amendments and additions;
- A copy of the Kjafasan-Struga highway solution;
- A copy of the finished project for the railway Corridor 8 in the western part of the country, with a new section from Kicevo to Lin;
- Advertisement of Struga municipality for alienation of non-construction land, with Minutes from a committee that decides on the alienation of construction land and contracts for the alienation of construction land;
- According to the Program for solving the problem of homeless animals in the area of the municipality;
- The submitted annual reports for 2019, 2020 and 2021 on the number of trapped and treated homeless animals;
- A complete list of real estate owned by the City of Skopje, for each property individually indicate whether and in what way it is used;
- Laboratory analyzes and super-analyzes of food samples made in all accredited laboratories, taken by the inspectors of the Food and Veterinary Agency;
- Biographies of members of supervisory and management boards and the amount of their fees;
- Copies of necessary evidence in court proceedings and others.

In 2021, according to the Agency's records, a total of 13 lawsuits were filed against its previously adopted decisions. Ten (10) of them were submitted by legal entities - holders of information, and only 3 by natural persons.

Five (5) of the aforementioned lawsuits against the Agency's decisions were filed by the Public Enterprise for the Management of Sports Facilities owned by the Republic of North Macedonia, **three (3)** lawsuits were filed by the Municipality of Struga and **one (1)** was filed each by EVN and the Film Agency of the Republic of North Macedonia. At the request of the Administrative Court, all the above-mentioned lawsuits have been answered by the Agency.

During the year 2021, the Administrative Court made only **one (1)** decision, with which the lawsuit of the Public Enterprise for the management of sports facilities owned by the Republic of North Macedonia is rejected as irregular. After the rest of the lawsuits, the decisions of the Administrative Court have not yet been submitted to the Agency.

Regarding the previously submitted lawsuits to the Administrative Court, which refer to cases from 2017 to 2020, the Administrative Court during 2021 passed and submitted to the Agency: **8** decisions (judgments and decisions) lawsuits as unfounded, or it is rejected as inadmissible and **5** judgments upholding the lawsuit. It is noticeable that during this reporting year, instead of the established legal practice for rejecting as inadmissible the lawsuits filed by the first-level authorities-holders of information against the decisions of the second-level authority - the Agency, for the first time the Administrative Court adopted a lawsuit filed by the holder of information, who was not satisfied with the decision made by the Agency. The Agency promptly acted on all decisions of the Administrative Court.

4.4.2. Misdemeanor procedure

Proceedings in accordance with the misdemeanor provisions of LFAPI in the Agency successfully continued in 2021. In this reporting year, the Agency conducted a total of **344** settlement procedures, of which **65** settlements were successfully conducted.

The misdemeanor commission acted on a total of **279** misdemeanor cases. Within these **279** cases, for **80** a Decision was made to release from responsibility, and for **7** cases a Decision was made to stop the proceedings. Then, **186** Decisions were made for misdemeanors, of which **184** cases were issued with a misdemeanor sanction - a warning, for **2** cases a misdemeanor sanction - a fine was issued. **6** cases have been transferred for processing in 2022.

4.4.3. Implementation and experiences from the application of the Law The

The Law on Free Access to Public Information was adopted for the first time in the Republic of North Macedonia in February 2006. It was first applied in September, the same year. More significant changes to LFAPI followed in 2010.

The law on free access to information of a public character, which is currently in force, dates from May 2019, and with this law several novelties have been implemented, of which we highlight the following:

- Former collegial body - the Commission for the Protection of the Right to Free Access to information of a public character has been transformed into an Agency, the first independent state authority in the sphere of free access to information of public character;
- Political parties have been added as holders of information of a public character in the section of their incomes and expenditures;
- The public interest in the exercise of the right of access to information of a public character has been taxatively regulated,
- The deadlines for action by the holders of information have been shortened by 10 days,
- Offenses Commission has been established in the Agency, with the relevant authority to lead infringement proceedings and to imposes misdemeanor sanctions; and
- The fines mainly fell on the officials responsible for mediating the information.

The aforementioned legal novelties essentially did not result in more drastic reactions on

the part of the applicants, or on the part of the holders of information.

The former still prefer to direct most of their requests against state institutions as holders of information, and the latter, unlike the holders of information at the local level, have not drastically reduced the trend of silence of the administration. Among the state institutions, the Ministry of Health and the Ministry of Transport and Communications stand out in terms of the total number of submitted complaints, and at the local level it is the municipality of Ohrid.

The large percentage of **54.51%**, or in numbers - **435** out of a total of **798** resolved cases with decisions stopping the appeal procedure due to the withdrawal of the same, or due to a late response, does not speak of changing the approach of the holders of information to the applicants. This success is due to the persistence, promptness and integrity of the officials in the Agency who act on the cases, i.e. their mediation between the two parties (the holders and the claimants), with a single goal - enabling access to public information as quickly and efficiently as possible.

In that context, an additional aggravating circumstance was the observed large number of changes in officials who mediate the information of the information holders during this reported period. After the training of all newly appointed officials, as well as those from the institutions that in the last year gave the least results in the field of free access, the Agency once again faced a common practice - a large number of information holders to appoint new officials for mediation with information, mostly junior associates, who for the first time take responsibility for dealing with information of a public character in accordance with the LFAPI, the Law on the General Administrative Procedure, other laws, and even according to their own *lex specialis*.

On the other hand, the established practice continues that most often the information requesters are the associations of citizens and foundations, which request information that can and should be provided to them proactively by the holders of information (the holders themselves should place them on their web pages), which in fact it should be common practice.

As for the citizens, the Agency believes that a broad campaign and education is needed, starting with the high school and student youth, the business sector, and all the way to the rest of the citizens, for the reason that the prevailing need is to approach the citizens and explain the purpose of the existence of LFAPI. But, unfortunately, the Agency does not have any funds available from the budget for this purpose and is forced to find other sources of funding for this type of activities. The necessity of education and familiarization of the general public with LFAPI stems from the fact that citizens request from the holders of information information that is not of a public but of a personal/private character, information that derives from the legal competence of the institutions, and all in order to achieve some of their own personal rights in judicial or other civil or administrative proceedings, which are implemented according to another substantive law.

During the upcoming year 2022, the Agency within the framework of the IPA 2 project, with the financial support of the European Union, will make an analysis of the experience

of the two-year application of the Law on Free Access to public information, in which analysis the experience of all stakeholders will be included.

The Agency for the Protection of the Right to Free Access to Public Information remains on its original vision - to be recognized and respected by the holders, applicants and the general public as the only competent state institution that takes care of the realization and protection of the right to free access to public information, which contributes to increased accountability and transparency of institutions in our society. The work of the Agency and the implementation of LFAPI is an extremely important anti-corruption tool and its application is of exceptional importance from the aspect of fighting corruption and strengthening the integrity of institutions. The agency believes that only this trend can lead to the desired European integration.

4.4.4. List of holders of information

In the List of information, this reporting year new holders were recorded for which we should emphasize that they submitted data about their institutions on their own initiative. Moreover, this reporting year there are newly registered holders in state institutions, legal and natural persons performing activities of public interest, public enterprises and institutions, as well as in educational institutions, with which the total number of registered entities on the List reached **1.445** holders. In the reporting year 2021, there are **8** new owners, and from the previous reporting period, three owners went out of business, that is, for various reasons, they stopped functioning.

The part of the List with state institutions has been expanded with two new holders, the Inspectorate for the use of languages and the Agency for the Quality of Higher Education of the Republic of North Macedonia, which makes the total number equal to **146** holders.

In the List of Legal and natural persons exercising public powers and activities of public interest, the number of holders is **73**, with the recording of two new holders: National Electricity Market Operator MEMO DOOEL Skopje and the Macedonian Sports Shooting Federation.

With two new owners, the List has been expanded in the section with public enterprises and institutions, and it now has **325** owners. Newly registered owners are: Elementary School, Sheltering Home for Children and Youth "Blagoj Mucheto"-Strumica and PE "Stipion 2011"- Shtip.

Institutions from the educational activity in all degrees, in the reporting year 2021, has also been expanded with **two** new entities and the total number of holders included in it is **579**.

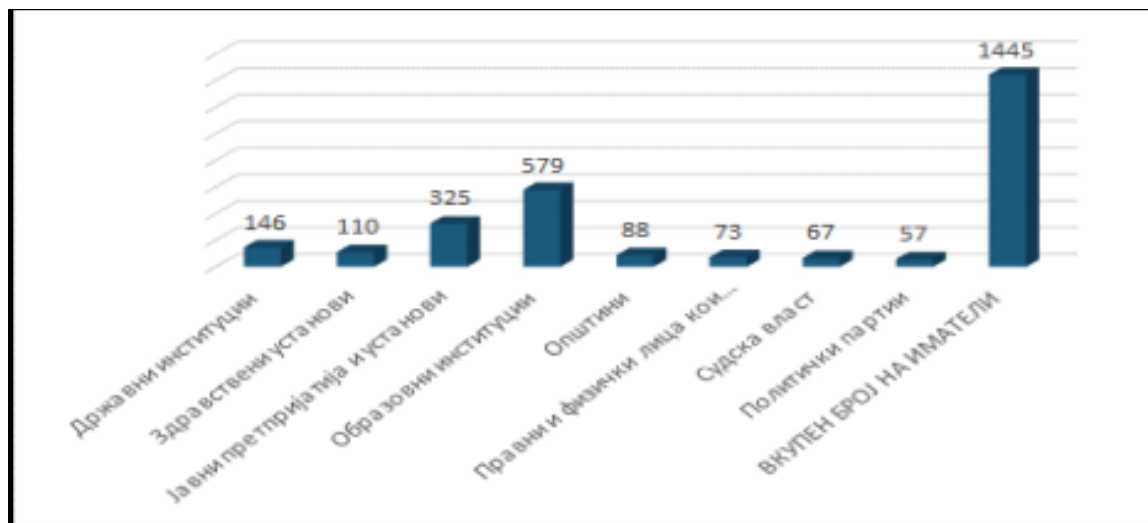


Chart 4: List of holders of public information

With **110** holders is the section with Health Institutions of the Republic of North Macedonia.

This reporting year, in terms of the number of holders, unchanged from the last reporting year, the **57** political parties registered in the single court register of political parties remain.

Holders from the Judicial Authority remain with **67** entities, as well as the section with Municipalities with Centers for the Development of Planning Regions, where the number of holders is **88**.

4.4.5. Annual reports of the holders

The legal obligation to submit an annual report within the legally stipulated term was respected by **1.334** holders or **92.32%** of the total of **1.445** holders as recorded in the List of Holders as of 2021. The discrepant data, inaccuracies and other inconsistencies found, out of the total number of reports – **5** were incomplete, i.e. invalid, which is why the data contained in them are not part of the Report.

Officials of a total of **111** institutions did not comply with the obligation to submit an Annual Report arising from Article 36 of the Law, which is why it is not possible to determine whether requests were submitted to these entities by the claimants.

In contrast to 2020, this reporting year is notable for the trend of submitting a larger number of reports, which if we compare with the report for 2020 we will notice that **299** holders did not submit a report, and this year the number is only **111** undelivered reports, i.e. **7, 68%** of the total number of holders. This difference is noticeable and we can state that the misdemeanor provisions had a great impact on the orderly and timely submission of reports by officials.



Chart 5: Number of Annual Reports

The data obtained from the reports showed that again **6** out of a total of **146** state institutions did not submit a report within the legally stipulated period. Out of a total of **88** holders registered in the section with local self-government units, including the City of Skopje, the Community of Local Self-Government Units (ZELS) and Centers for the Development of Planning Regions, the officials of **87** holders submitted a report and demonstrated their transparency regarding the application on free access to information of a public character, until only the Municipality of Rosoman has submitted a report.

Of the **67** registered bodies of the judicial authority **64** holders submitted valid reports in accordance with the law, and only **3** bodies from the judicial sphere did not submit data on the implementation of the Law.

Obvious compliance with the legal obligation to submit an annual report this year was shown by officials at educational institutions of all levels of the educational system, and out of **579** entities **541** holders submitted a report, while only **38** officials did not act on the obligation to submit a report.

The Agency received **102** reports from the recorded **110** health facilities. And in this group of holders, an improvement in the implementation of the Law can be observed, because only **8** health institutions did not submit a report on their work in relation to access to information of a public character.

Data on the application of free access in the reporting year were submitted by **302** public enterprises and institutions, while **23** institutions did not submit reports out of a total of **325** registered entities.

In the link legal and natural persons exercising public powers and activities of public interest, the Agency recorded **59** reports, while **14** holders did not comply with their legal

obligation, out of a total of 73 entities.

Of the 57 registered political parties, 39 submitted a report, and the officials of 18 parties did not submit annual reports on the implementation of the law.

From the received and processed reports (1,334 in total), it emerged that in 2021 a total of 8,910 requests were submitted to the holders, of which 8,540 were answered positively within the legal deadline. A greater number of requests were submitted to the holders this reporting year, in contrast to last year when the holders presented 7,163, which is 1,747 requests more.

In the reports, the officials also provide data on the exceptions to the free access prescribed in Article 6, or other legal regulations were the reason for denying or rejecting the access and that for 197 requests, which is 28 requests less than the last reporting year. The holders in their reports also show data on 141 unanswered requests, and 32 requests that were transferred for action in 2022, and which were received before the end of the calendar year 2021.

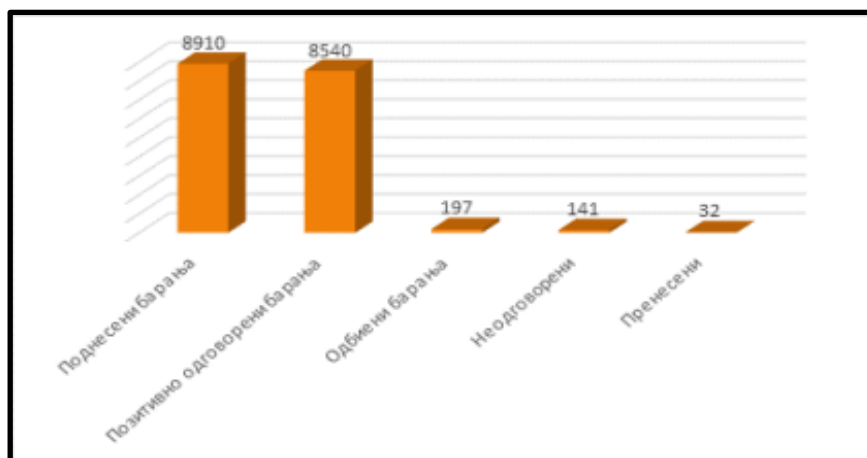


Chart 6: Procedures by request

The reports also contain data, according to which, as a sign of dissatisfaction with the actions of the officials, the claimants filed 474 appeals against the first-level decisions of the holders, of which 148 were accepted after consideration by a decision by the Agency. Moreover, the officials inform the holders of 62 amended first instance decisions after the Agency's action, for 35 rejected appeals by the Agency, as well as for 329 rejected appeals.

The officials at the state institutions show that 3,000 requests were submitted to them and after the analysis of them, it was concluded that the activity of this category of holders in the calendar year 2021 was of the greatest interest to the requesters, which is 342 more requests than in 2020. This time, the General Secretariat of the Government of the Republic of North Macedonia leads with 760 received requests among the state administration bodies, followed by the Ministries of Justice and the Ministry of Internal Affairs with 354 received requests from applicants.

Local government units and planning regions show 2,298 requests received, or 478 more than the requests submitted to the holders in the previous reporting period. Applicants also showed increased interest in health facilities, to which 847 applications were submitted, or 301 more than in 2021. For the work of educational institutions of all degrees, applicants showed interest by submitting 363 requests, which compared to the previous reporting period (296) is an increase of 67 requests.

Reports submitted by judicial authorities report 1,197 claims received, an increase of 87 claims. Also, an increasing trend can be seen among public enterprises and institutions that presented 826 requests, which is an increase of 143 requests. Applicants showed a reduced interest in the work of legal and natural persons who exercise public powers and activities of public interest, and whose officials registered 103 requests, that is, 43 requests less than the last reporting year. Applicants showed increased interest in the activities of political parties by submitting 276 requests to them, as opposed to last year when only 4 requests were submitted to them.



Chart 7: Number of requests submitted to holders

Eight requests were submitted to the Agency for the Protection of the Right to Free Access to Public Information, which were positively answered within the legal deadline.

This reporting year, the Agency also reports on the implementation of the commitment "Proactive publication of information of a public character on the websites of the institutions" from the Action Plan for Partnership for Open Government 2021-2023, which it implemented in cooperation with the Center for Civil Communications.

In the Annual Report Form submitted to all holders of information, the Agency prepared a section in which the holders were required to inform, that is, to show the links to which the citizens, that is, the applicants, will be able to access the requested information, which are specified in Article 10 of the Law. In this way, the Agency will be able to monitor the proactive publication of information by the holders and their legal obligation to respect and implement Article 10, i.e. the 22 categories listed therein.

On the part of the state institutions, 91 holders fulfilled the obligation, 44 did not submit a notification about their proactivity, 5 are partially transparent, while there is no data for 6 holders because the holders did not submit a report on their implementation of the legal obligation.

Five holders of information among the health institutions submitted a report on this obligation, 5 holders are partially transparent, and 92 holders did not submit links to monitor their transparency. Eight holders did not submit reports to the Agency within the legal deadline.

Among public enterprises, 52 holders showed proactive transparency, 17 are partially transparent, and 233 holders did not comply with this obligation in their reports. 23 holders did not submit annual reports.

Regarding the educational institutions, 441 holders are not proactively transparent, 33 are partially holders, and only 67 report their transparency to information requesters. The officials of 38 holders did not submit reports on the implementation of the Law.

Officials at 52 units of local self-government and Centers for the Development of Planning Regions report on their proactive transparency, while 30 holders have not submitted links for compliance with Article 10. 5 holders are partially transparent, while 1 holder has not submitted a report.

Only 5 political parties report on proactive transparency, 5 partially, while 29 did not report on the implementation of Article 10 of the Law. 18 holders did not submit a report on their work in relation to free access.

The officials of 24 holders of legal and natural persons who exercise public powers and activities of public interest report on their transparency, 6 are partially accountable, while 29 did not report on their proactivity in their work. 14 holders did not submit Annual Reports.

The judicial authority is proactive in 26 holders, 2 holders are partially transparent, and 36 do not present data on the proactive publication of information of a public character. The agency for 3 holders cannot present the transparency for the reasons that they did not submit a report within the legally stipulated period.

4.4.6. Content of Annual Reports

A conclusion can be drawn about the character of the requests that were submitted to individual holders from the submitted annual reports from the holders, as they refer to several findings regarding the implementation of the Law in 2021. Namely, the applicants, to a greater or lesser extent, showed interest in requests from all spheres of social life.

However, the largest number of **5298** requests was submitted by the information requesters to state institutions and local self-government units, which makes this reporting year the most interesting in terms of their operation and functioning.

According to the reports that contain a description of the requirements, the applicants were mostly interested in the work of the local self-government, namely: how many and which

detailed urban plans have been adopted by a certain municipality, how many and which DUPs are in the process of being adopted and in which specific phase it is currently each of them, final accounts for the municipal budget, for the situation with Ohrid Lake, as well as requests for the situation with the recommendations of UNESCO.

In the section of requests addressed to the health institutions that refer to work in the health sector, the requesters requested information on: what and how many drugs intended for the treatment of rare diseases are registered in the R.S.M (how much money was spent on such medicines), how many funds have been requested from the state budget for assistance and protection of children in conflict with the law, as well as requests for information related to the COVID-19 pandemic.

The applicants also expressed interest in the work of political parties, i.e. in a list of movable and immovable property owned by a political party, as well as a list of movable property that the political party leases from individuals and legal entities (information is requested from whom the real estate is leased and the amount that the political party pays on a monthly basis for the rented space).

The applicants also showed interest in their work for the state institutions, that is, the Government of the Republic of North Macedonia and the ministries. The requests referred to minutes of meetings of the RSM Government, the total number of employees, a list of names, surnames, biographies and monthly incomes of all state advisers in the Ministry of Political System and Inter-Community Relations, invoices for the purchase of furniture and art paintings for arrangement of the internal space of the Ministry of Political System and Inter-Community Relations, requests for information about projects that are financed and supported by the European Union, about public procurement plans with all its amendments and additions and their realization in their final phase, biographies of members of supervisory and management boards and the amount of their fees, for the fees of those hired with a work contract, for the incomes of special advisers, as well as copies of necessary evidence in court proceedings.

4.4.7. Incomplete reports and recorded irregularities

The reports of five holders from health, public enterprises and institutions and from educational institutions are incomplete and as such were not taken into account during the preparation of the Annual Report of the Agency.

The reports of PHI General Hospital with Extended Activity-Prilep, NU Center for Culture "Trajko Prokopiev"-Kumanovo, Culture Center "Iljo Anteski-Smok"-Tetovo, Primary School "Krstev Misirkov"-Kumanovo and Primary School "Vidoe Podgorec" - Strumica present requests that were not submitted in accordance with the Law on FAPI, but are primarily requests from their primary activity and official correspondence and correspondence with other competent institutions and relevant ministries and for those reasons their annual reports cannot be considered complete and consistent the legal obligations for implementing free access to public information.

The reports of the Primary Schools "Krstev Misirkov" from Kumanovo and the Primary School "Vidoe Podgorec" - Strumica are invalid for the second year in a row, despite the indications of the Agency, the owners did not submit corrected reports.

4.4.8. Cooperation with officials of the holders

The agency also intensively cooperated with officials in the reporting year 2021, as one of the basic prerequisites for a more successful implementation of the Law on FAPI. In order to achieve this goal, and during the current pandemic, compliance with the prescribed protocols for preventing the spread of the Covid 19 pandemic and carrying out the work process according to the principle of rotation, as the only safe for health, but at the same time the most practical solutions proved to be telephone and e-mail communication, that is, online contacts with the owners. In circumstances dictated by the pandemic, the employees of the cooperation and analysis department, as well as the officials of the Agency were constantly available to the officials, helping them to respond more successfully to their delegated competences.

Most often, these contacts were used to clarify the legal obligations that refer to the obligations of officials, indications about the way in which the new official is authorized, whether specific data is information of a public character or falls into the category of exception, the role of the offense commission, as well as for the correct filling and certification of the form for the annual report with the signature of the officials, i.e. in connection with the delegation of competences, and in connection with their appointment as officials. With this cooperation, the dilemmas and omissions in the implementation of the legal solutions were overcome, which arose from the lack of knowledge of the officials.

In order to obtain relevant and reliable data on the officials, their contacts and address data for the holders of information, the Agency implemented a procedure for updating the List of Holders in order for the holders to update or confirm the data about their institution that is published on the website of the Agency in the section of the List of Holders. Out of the then **1440** holders of information, **300** holders did not respond at all to the Agency's Urgency and Request for the accuracy of their data, and they are informed citizens-requesters of information.

In a more positive tone, it should be emphasized that the responsible persons of the Agency for the Quality of Higher Education of the Republic of North Macedonia, Elementary School, Sheltering Home for Children and Youth "Blagoj Mucheto"-Strumica, "Stipion 2011"-Stip, the MES "5th of October" - Nikushtak, MES "Nikola Karev" - Radovish and the Macedonian Sports Shooting Federation, on their own initiative submitted all the necessary data for their institutions, and then the Annual Report, which have become part

of the List of Holders.

This reporting year, even though there is no legal obligation, the Agency prepared a Reminder for the submission of the Annual Report, which together with the prescribed Form before the end of the calendar year, was submitted electronically to the record holders. The Agency also reminded of the same legal obligation through its website, creating a pop-up banner through which it pointed out to the owners apart from the submission of the Report on the application of LFAPI, to promptly submit information on any changes made in relation to the data for the officials or the contact data for the holders. Until the end of the deadline provided for the submission of the reports, the official telephone lines were functioning where the officials could consult about possible ambiguities when filling out the Report.

This year, the Annual Report Form had an addition that was prepared in accordance with the National Action Plan for Open Government Partnership and the commitment "Proactive publication of information of a public character on the web pages of the institutions". In addition to the Annual Report, officials with the holders of public information had to enter the links to the 22 categories of documents contained in Article 10 of the Law on Free Access to Public Information. This attachment only applied to public information holders who have web pages. A total **120** holders in the reporting year submitted Decisions for the appointment of new officials attached to the Reports.

4.4.9. Training and education

In compliance with the obligation stemming from Article 30 paragraph 1 paragraph 7 of the Law on Free Access to Public Information, i.e. exercising another of its legal competences, the Agency for the Protection of the Right to Free Access to Public Information fulfilled activities on the plan of education of the holders of public information about the right to free access to information during 2021.

Given the current circumstances caused by the COVID-19 pandemic and its modest budget, the Agency continued with the education of officials with holders of information of a public character at the central and local level, providing them with **FREE online trainings** about acting according to the provisions of the Law on free access to public information.

Using the ZOOM platform, the Agency held a total of 29 trainings once a week, throughout the year (excluding the annual vacation period), through a previously prepared and published on its website training program for officials to mediate information from the public character for 2021 were invited to the trainings **592** information holders.

Within the framework of the trainings, the Agency primarily focused on the proceedings under the Law on the Security and Intelligence Service adopted in May 2019, the implementation of which began at the beginning of 2020, and it devoted no less emphasis to the duty of the holders of information for their proactive action in the direction of the

publication of all information of a public character that they have at their disposal. At the same time, the benefits that they will have by practicing transparency and openness in their work were pointed out.

According to the published program for holding of the trainings, these informative sessions were targeted at officials for mediating information to holders of information that appear for the first time on the List of holders and officials who are newly appointed in the institutions of already existing holders of information. Officials who, despite having attended trainings, on their own initiative asked again to be part of the new trainings, were not bypassed, as were officials from institutions for which the Agency has ascertained that in the previous period they were not sufficiently successful or had difficulty in dealing with upon requests for access to public information.

The main goal of the trainings was to train the officials with the holders of information, how to properly and promptly respond to requests for free access to information of a public character, in accordance with the Law on FAPI. The specific goals of the trainings were for officials to get to know each other and, through practical exercises, to train them for: enactment of administrative acts based on law, for the proactive publication of information of a public character, familiarization with the goals and activities of the Agency and the establishment of mutual cooperation, preparation and acting on requests for free access to information of a public character through experiential exercises, simulations of the implementation of the harm test, as part of the process of acting on requests for free access to information, getting to know and learning the procedures for handling complaints, according to the LFAPI, as well as exercises with practical examples (subjects) from the experience of the Department in the Agency, which is engaged in administrative action.

The training included officials from all categories of information holders, from the central to the local level: state institutions, judicial authorities, municipalities and centers for the development of planning regions, public enterprises and institutions, health institutions, educational institutions (with special reference to the basic schools and kindergartens), legal and natural persons exercising public powers and activities of public interest, as well as officials from political parties.

Out of a total of **592** responded to the trainings with their representatives **237** (some with more participants), while **355** of the holders of information, although properly invited, did not respond to the FREE trainings. The aforementioned numbers clearly show the insufficiently expressed interest of the officials in mediating information, and also of the institutions themselves, whose information they are obliged to mediate to the public. The same causes an increase in the number of complaints against those institutions, which the Agency should act on, which gives an unfavorable image of the transparency and openness of information holders in the sphere of free access to information of a public character.

The on-line workshops organized by the Agency are FREE of charge and therefore appeal to the officials, as well as to the persons responsible for the holders of information, in the period in which new trainings will follow, to register for them on the electronic address: obuki@aspi.mk, which was opened by the Agency in order for officials to self-initiatively apply for participation in the trainings, for the reasons that through them they will become

familiar with the procedure for better implementation of the Law on FAPI, and are in the interest of the citizens and their right to be informed about the operation of the institutions.

On February 23, 2021, through the ZOOM digital room of the Agency, in cooperation with the Community of Local Self-Government Units, was carried out counseling on the topic: "Free access to information from the public character in local self-government units". Although the counseling was intended primarily for the managers in the municipalities, with the aim of increasing awareness of acting on received requests for access to information of a public character and in general for the constitutionally and legally guaranteed right of access to information, the same was followed in a larger number of by the appointed officials in the municipalities.

Within the framework of the cooperation that the Agency has with the Academy of Judges and Public Prosecutors "Pavel Shatev", a representative of the Agency participated in an online consultation on the topic: "Protection of personal data against the Law on free access to public information" which was held on December 1st, 2021. The lecturer from the Agency for the Protection of the Right to Free Access to Public Information, through the ZOOM platform, presented the Law on Free Access to Public Information to the officials for mediating public information in the courts and public prosecutor's offices in RSM with special reference to exceptions to free access.

4.5. Trainings for employees

In the reporting year 2021, the employees of the Agency took part in trainings, workshops and webinars that were organized by state institutions, in connection with the implementation of tools that are needed for their current work. The trainings were organized for the implementation of the Personal Data Protection Law, for the new modernized ISUHR - Human Resource Management Information System, for the Annual Plan for the Prevention of Corruption, for the e-market and low-value purchases, how to build a strong and a sustainable system for privacy protection, for media freedom in order to increase the understanding of European regulatory and political standards relating to the concepts of media freedom and the right of the public to be properly informed, for open data and their implementation, for protection of whistleblowers and for using the WEB application to monitor the implementation of the National Strategy for the Prevention of Corruption and Conflict of Interest 2021-2025.

4.5.1. Agency's Website

According to the EU-funded Project "Promotion of Transparency and Accountability in Public Administration", in which the Agency is a direct beneficiary of activities contained in Component 2: "Support to the Agency for the Protection of the Right to Free Access to Public Information", a new website of the Agency was prepared. It was prepared in accordance with the needs of the Agency and its competences, and all the necessary information related to its operation, legal regulations and, above all, proactive operation, have been moved.

The website has been enriched with two new portals: **E-portal for holders**, which will raise to a

higher level the cooperation of the Agency with the holders of information, and the **E-portal for applicants**, where applicants will be able to submit a request electronically to the holders and appeal, if they do not receive an answer to their request within the legally stipulated period. The website also has a new domain, i.e. name, which is used by applicants and holders of information of a public character: <https://aspi.mk/>. During the reporting period, the website was continuously updated and supplemented with new necessary documents in accordance with the competences of the Agency.

The updating of new owners took place on a daily basis by changing the address and contact data of the owners, that is, with data on the newly appointed officials. In a separate banner, labeled as SUBMITTED SOLUTIONS, the Agency started by publishing the Decisions that it acts on in accordance with its competences, thus quickly becoming available to those seeking information. Also, in the EDUCATIONAL MATERIALS banner, all the video materials prepared by the Agency according to the Project financed by the EU are uploaded.

In the PRESENTATIONS banner, the Agency moved the Instructions for using the two portals, that is, instructions and video instructions for applicants and holders, which explained to the users in a simple way how to use the portals and use them for their needs.

In cooperation with international experts and employees, the following documents were prepared and placed on the Agency's website: Manual for the implementation of the Harm Test, Guide for delegation of authority, Manual for Proactive Publication of Information, Guidelines for Proactive Transparency, as well as Guidelines for Proactive publication of public information about officials or managers. The same were delivered by e-mail to all officials for their familiarization and easier access during the implementation of the Law.

Furthermore, the Annual Report on the work of the Agency in 2020 has been moved, but data regarding the budgetary operation of the Agency, as well as the public procurements carried out, have been updated, so that the website presented the work of the Agency in 2021 in a proactive and transparent manner.

In a special banner entitled FREQUENTLY ASKED QUESTIONS (FAQs), fourteen questions and answers are placed that are most often asked by the applicants regarding their rights arising from the Law on FAPI. In this way, the Law is brought closer to its end users in a simple way, thus reaching to the citizens and pointing out their right to know.

The new look and functionality of the Agency's website receives commendable remarks, both from the holders of information of a public character, as well as from the applicants, citizens, civil associations, business and the academic community. The website is listed as proactive and transparent in terms of implementing the Agency's legal powers.

4.5.2. Public's Involvement in the Work

In the reporting year, through a large number of activities and collaborations with civil society organizations, journalists and institutions, the agency constantly raised its public awareness of its

work in a proactive and transparent manner, thereby presenting its work to the public.

At the beginning of the year, the Agency and the Government of the Republic of North Macedonia signed a Memorandum of Cooperation. The memorandum is part of the activities resulting from the Transparency Strategy, and aims to establish a partnership between the two institutions for the promotion of the right to free access to information of a public character.

In cooperation with the Center for Civil Communications, a debate was held on the implementation of the Law. The debate was held on the ZOOM online platform, in which more than 70 participants took part. The representatives of the public institutions, officials with the holders of information of a public character, discussed the previous experiences of the application of the law, with the aim of pointing out the inconsistencies and drawing recommendations for the improvement of the application in the future. A special focus was placed on active transparency.

Within the framework of the established cooperation and with the support of the TAIEX instrument of the European Commission, the Agency hosted a two-day workshop on the topic: "Free access to public information".

The agency signed a Memorandum of Cooperation with the Ministry of Information Society and Administration. By signing this Memorandum, the readiness for cooperation in the field of free access to public information, raising public awareness of the right to free access to public information and building capacities for the consistent implementation of legislation is raised.

The Agency, in accordance with its competences, monitored 47 holders, that is, the registered websites of public enterprises and institutions under the jurisdiction of the municipalities and 88 holders from the municipalities, the Community of Local Self-Government Units and the Centers for the Development of Planning Regions. The Department for Cooperation and Analysis was in charge of monitoring for the complete publication of documents and information that the holders of information are obliged to publish on their websites in accordance with Article 10 of the Law on Free Access to Public Information.

Proactively published information of the holders should be easily accessible and understandable, usable, relevant to citizens and regularly updated. It should be emphasized that the web pages of the monitored owners are updated according to their competences and they have their function as the first informant for the citizens and the services they provide.

We also want to emphasize that during the monitoring, a good practice was established among some of the holders for respecting the legal obligation to publish the Annual Report (Article 36 of the LFAPI) on their websites.

In a guest appearance on the "25 Minutes" show, director Bojcheva spoke about the challenges related to the implementation of the Law on FAPI, the conduct of misdemeanor proceedings, as well as the educational part of the legal obligation, i.e. the holding of trainings for officials with information holders of public character.

The director of the Agency, Plamenka Bojcheva, also gave an interview to the “Observer” portal, in which she emphasized the need to raise public awareness and the role of the citizen as the one to whom the institutions report. She also emphasized that the Agency “encourages the citizens to exercise their constitutional right of access to information, about the activities of the institutions and the costs of their operations, to educate them on how to exercise the right and how to contact the Agency if the holders of information from who requested, did not provide them with the information”.

At a hybrid event, the Agency marked September 28 – the International Day for Universal Access to Information. At the event, Frejk Janmaat - Head of Department at the Delegation of the European Union and Mr. Ljupco Nikolovski - Deputy Prime Minister of the Government for the fight against corruption and crime, sustainable development and human resources, delivered their speeches, while the Agency presented the results of the work of the agency, the created IT tools as well as the plans for the future advancement of the democratic processes in our country, by enabling an unimpeded flow and free access to information of a public character and facilitating the realization of the constitutionally guaranteed right of citizens to have insight into the work of the institutions.

The Director of the Agency, from October 3 to 5 in Bled, Republic of Slovenia, participated in the second meeting of the independent bodies for freedom of access to information, from Slovenia, Croatia, Bosnia and Herzegovina, Montenegro, Serbia, Kosovo and the Republic of North Macedonia from “Initiative 2020”, established in October 2020 at the proposal of the Information Commissioner of the Republic of Slovenia.

The Agency and the Association for Sustainable Development “Milieukontakt Macedonia”, Aarhus Center, Skopje, signed a Memorandum of Cooperation. This Memorandum establishes long-term cooperation between the Agency and the Association for promoting the principles and provisions of the Law on Free Access to Public Information, the Convention on Access to Information, as well as public participation in decision-making and access to justice for issues related to the environment (the Aarhus Convention).

Director Bojcheva, in a guest appearance on the program “Morning Briefing”, emphasized that “Citizens have the right to know how their money is spent through the budgets of the institutions, as well as to receive other data from various holders of information. The agency for the protection of the right to free access to information of a public character reacts whenever the requested information is not provided by the institutions”.

The agency organized a public debate as part of the project “Promoting transparency and accountability in the public administration of the Republic of North Macedonia” which is financed by the European Union. At the debate, the participants stated that there is progress in the use of the right to free access to information of a public character, but it is necessary to further work on the advancement of this process. Proactive transparency of institutions is a top priority, and when that stage is reached, it can be considered that quality progress has really been achieved.

In this reporting year, the agency also deepened its activity to bring the right of access to

information to the general public through its YouTube channel, as well as on the social network page (<https://www.facebook.com/aspi.mk>), are aimed at bringing the right of access to information closer to the younger population, introducing them to their constitutionally guaranteed right.

5. INTER-INSTITUTIONAL AND INTERNATIONAL COOPERATION OF THE AGENCY IN 2021

From the aspect of inter-institutional and international cooperation, in 2021 the main focus of the work of the Department for International Cooperation and Projects in the Agency was the IPA activities from the project application, as well as continuous maintenance of relations with its international collaborators and related institutions. Namely, in the direction of realization of project activities within the IPA EU funded project, preparation of reports, participation in trainings and participation in working groups, the Agency for the period January 1 to December 31, 2021 realized the following activities:

5.1. IPA 2 EU funded project

Within the IPA 2 2014-2020 project "Transparency and Accountability of the Public Administration in the Republic of North Macedonia", implemented with European support, under Component 2, which Component refers to the Agency, the following activities were implemented during 2021:

1. Strengthening the capacities of APRPI (2.1.2. activity from the tender documentation). In that direction, in the period from the end of March to June 2021, within the framework of the IPA2 project, the Agency started preparing a Strategic Document for the period 2021-2025 and Action Plan. It has been adopted and published on the website, at the following link:

<https://aspi.mk/wpcontent/uploads/2021/06/%D0%A1%D0%A2%D0%A0%D0%90%D0%A2%D0%95%D0%A8%D0%9A%D0%98%D0%9F%D0%9B%D0%90%D0%9D.pdf>.

Within the framework of the same activity, a three-day team building was realized with the employees of the Agency. Also, a part of the employees were trained to use the web platform and the electronic portals for holders and applicants.

2. Within the framework of activity 2.1.3 Support of the IT capacities of APRPI for the implementation of the legal regulation for free access to information of a public character, the IT adaptations of the electronic portals were completed.

The process of development and introduction of IT tools – such as a new website, DMS system and electronic archive started in May 2020, was an activity that continued during 2021. Within the new website of the Agency, www.aspi.mk, two new electronic portals were integrated in 2021.

The first of these is an e-portal for applicants. The main purpose of this portal is to enable the electronic delivery of the Request for Free Access to the holders of information, whereby the same

will be transparently visible to everyone, for the requesters and the holders, as well as for the Agency. With the introduction of this novelty, the Agency hopes to simplify the electronic delivery of Requests for claimants and citizens, at the same time it will encourage consistent action on the same by the holders, and thus reduce the use of the so-called "silence of the administration".

The second electronic portal intended for the holders of information, is actually a virtual "building a network of holders" created according to the current List of Holders of the Agency, which contains 1445 holders. The same allows electronic access, with a username and password of each holder individually, which is required to be used at each login. In addition to the basic data of the holders, name, address, telephone, mobile contact, e-mail address, the obligation of all holders will be to use this portal for the delivery of annual reports to the Agency.

The agency will have the opportunity to deliver announcements and notifications through the same portal to the electronic addresses of the holders, upon which they will have the obligation to act. Through the introduction of this tool, the Agency hopes to simplify the electronic delivery of Annual Reports and to facilitate and improve communication with information holders.

During the last update, a larger number of owners were noted as institutions without a website, and these are mostly owners from the following categories: education (secondary, primary schools and kindergartens), health facilities, public enterprises, etc. The e-mail is a key factor for communication with the Agency, while the web page is an important factor for implementing the monitoring of websites according to Article 10 of the Law.

The main purpose of these e-portals is to improve the transparency of information holders and to raise public awareness, to increase the use of the Law by the general public as applicants and to strengthen the Agency's communication with officials, i.e. . holders of information.

Within this activity, the project team prepared Manuals and videos for the use of the portals for both owners and applicants in the period from September to November. The agency delivered all prepared materials to all holders in electronic form, as well as published them on its website. In the period from the beginning of December 2021 to the first half of January 2022, 22 online trainings were conducted for 1300 officials on the use of electronic portals.

3. Within activity 2.2.3. Implementation of a campaign to raise public awareness for free access to public information, in the first half of 2021, the focus was placed on the implementation of the prepared 2020 Communication Strategy.

Namely, according to the above-mentioned strategy, in the period from June to December 2021, a campaign was carried out that the Agency implemented together with the SCSC, on the topic of raising public awareness about the Integrity of state institutions and employees under the hashtagged motto #Choose the Right Direction: Choose Integrity. Within this project activity, both institutions realized numerous joint activities and events such as workshops, activities on social networks and public events, such as drawing the graffiti Integrity on the quay of the Vardar River in Skopje.

Parallel to the above-mentioned campaign in 2021, a specifically designed campaign to raise public awareness of the right to free access to social networks was carried out, which lasted from June to January 2022 under the motto #I WANT TO KNOW. Within this activity, in cooperation with the marketing agencies Rerezent and IDEA plus, as external collaborators, posts were created for the Agency's Facebook page, educational and informative events and videos were produced. Two videos with information requesters from the non-governmental and media sectors, as well as with an information holder from the perspective of personal experience of implementing the Law in practice.

Also, a survey video was made including short answers of the passers-by, as well as a video with some of the Agency's employees, which was broadcast at the event organized to mark the International Day of Access to Information on September 28, 2021. The event was realized with full support of the project and accompanied by PR announcements to the media by the Agency's external collaborators.

Within the framework of this activity, several television guest appearances by employees of the Agency were made. In December, a prize game was held for the young target group as the last activity, that is, for their knowledge of the right to free access to information of a public character, for which purpose the Agency awarded a gift to the best submitted answer.

4. In December 2021, the Questionnaire was revised based on the prepared Questionnaire for measuring public awareness in relation to free access to public information, which in 2020 was implemented as a starting point, while in 2021 it will be an indicator of the effects of the conducted campaign and the general activities of the Agency in the current year. The research and processing of the received data will be conducted and presented by external experts. This intention of the Agency will continue with the continuous maintenance and sharing of contents from its work on the Facebook page, as well as with other activities.

5. During 2021, in cooperation with external experts, numerous materials were prepared for the implementation of LFAPI, such as:

- Manual for the implementation of the Harmfulness Test,
- Manual for Proactive Publication of Information,
- Guidelines for proactive transparency,
- Guidelines for proactive publication of information of a public character for officials or managers,
- Videos and Instructions for using the electronic portals for owners and applicants,
- Leaflet for applicants.

5.1.1. The status of the IPA 2 project funded by the EU

Due to the covid pandemic, part of the planned project activities intended for the holders of information from the IPA 2 tender documentation were redirected for implementation during 2022, especially those that include:

1. Raising the competences of the employees of the Agency and holders of information;
2. Upgrading the capacities of information holders, for officials at the local and regional level;
3. Realization of trainings and study visit;
4. Preparation of materials for specific groups of holders such as judicial authorities;
5. Preparation of materials and e-learning system for free access to public information;
6. Continuous support and completion of the development of ICT tools and support for the use of the specified tools.

5.2. IPA 3 application (IPA 2023 and IPA 2024)

In August 2021, the Agency received a forwarded notification from MIOA and the Secretariat for European Affairs as the National IPA Coordinator, that through the Delegation of the European Union, DG NEAR provided information on starting the process of revising the project fiches for programming within the framework of IPA 3. It was specifically requested in the strategic response section that we enter projects that would be taken into account during the 2023 and 2024 programming. It is a request that refers to a list of projects that have been entered tentatively and according to the information from SEP, they may be changed/adjusted during the programming process for 2023 and 2024.

In accordance with the given guidelines, the Agency prepared and submitted a new application for the Program Framework for IPA 3, namely the right to free access to public information belongs in the first window: Rule of law, fundamental rights and democracy.

Regarding this application, the Agency is still waiting for notification from the IPA coordinating bodies in the RSM.

5.3. The TAIEX Instrument

Within the framework of the established cooperation and with the support of the European Commission's TAIEX instrument, the Agency for the Protection of the Right to Free Access to Public Information hosted a two-day workshop on the topic: "Free Access to Public Information". The workshop was held online on the ZOOM platform and about 40 officials of the holders of information, representatives of civil society organizations and the media, as well as employees of

the Agency participated in its work.

In doing so, experts from Croatia, Slovenia and Bulgaria shared their experiences: Dr. Anamaria Musa, associate professor at the Faculty of Law at the University of Zagreb, Andze Novak, advisor for prevention, Information Commissioner of the Republic of Slovenia, and Aleksandar Kashumov, a key expert on free access to public information on a project funded by IPA2 “Promoting Transparency and Accountability in Public Administration” (ProTracco), North Macedonia, Head of the legal team for the access to information program.

The director of the Agency, Plamenka Bojcheva, and Makfirete Morina Sulejmani, an employee of the Agency, spoke about the Macedonian experiences and practice. The purpose of the workshop was to provide an exchange of experiences and practices in dealing with received requests for free access to information of a public character, what to be guided by in the implementation, that is, the application of the harmfulness test and how to correctly treat the exceptions from the Law, such as and possible solutions for overcoming problems arising from the application of the Law.

5.4. Strategy for Public Administration Reform 2018-2022

In 2021, the Agency, as part of the Public Administration Reform Strategy, consistently reported on the undertaken activities related to APRPI, which are part of the above-mentioned strategy. As an active member, the Agency prepared an updated status of indicators, conducted monitoring of the websites of state institutions, prepared and submitted materials for the report within the deadlines set by MIOA.

The agency presented them on June 16, 2021 at the working online meeting entitled “Presentation and discussion of the third Annual Report on the implementation of the Action Plan of the Public Administration Reform Strategy (2018-2022) for 2020, as well as preparation and participation with efficient and timely preparation for the eleventh meeting of the Special Group on Public Administration Reform to be held on September 23, 2021 via video conference.

The main focus of both meetings was the presentation of the activities undertaken following the conclusions of last year's meeting, as well as current activities that the Agency undertakes in the period for the realization of the activities and indicators from SRYJA, which relate to the Agency.

In the Action Plan of the Strategy for Public Administration Reform 2018-2022, the Agency is the bearer of activities listed in Special Objective 3.4. “Strengthened transparency of institutions and improvement of communication between institutions and citizens and the business community”, for which Passport indicators have been prepared for Measure 3.4.1, for activities related to the Agency, namely Activity 3.4.1.5 and Activity 3.4.1.6.

According to the Action Plan for the implementation of the Public Administration Reform Strategy 2018-2023, Measure 3.4.1.6 is foreseen in the special objective for strengthening of the mechanisms for the availability of public information. For this purpose, in 2021, the agency carried out monitoring of the web sites of the holders from the central government, which in 2021

amounted to 86.03%. The monitoring was conducted in accordance with Article 10 of the Law on Free Access to Public Information (Official Gazette of the Republic of Macedonia No. 101/2019).

PASSPORT INDICATOR 47% of institutions that regularly publish and update on their websites the documents that they are obliged to publish and update according to legal regulations

Out of 144 state institutions recorded in our List as holders, the websites of 116 holders were monitored. Out of this number of state institutions, 13 were not covered by the monitoring, because they do not have their own web sites. The website of one holder (Bureau of Metrology) could not be analyzed because it was hacked, while 13 regional units of the State Attorney's Office of RSM are an integral part of the State Attorney's Office.

This year, the monitoring was carried out according to a new methodology implemented in cooperation with external experts, hired by the IPA II Project "Transparency and Accountability of Public Administration", whose beneficiary is the Agency. The prepared questionnaire contained a total of 34 questions arising from Article 10 of the Law. Some of them contained one or more sub-questions, and the maximum number of possible points was 56.

Holders of published data received 0, 0.5 and 1 point, depending on the number and up-to-dateness of the published documents. The questionnaire was distributed to the holders, who were asked to carry out a self-evaluation of their own transparency.

Within the deadline for submitting the answers to the Agency, the holders answered 83 questionnaires, 20 of which did not contain links to the specific documents as requested and were not taken into account during the monitoring of the web pages.

Depending on the total number of points that the monitored holders received in relation to the published necessary documents and information in accordance with Article 10 of the Law, a gradation was made of the degree of fulfillment of the legal obligation for their active transparency, as follows: holders with many low level of transparency who have between 0 and 20 points, with a low level between 20 and 30 points, medium level holders between 30 and 40 points, and with a high level of transparency between 40 and 56 points. In doing so, it was determined that 26 holders have a high level of transparency in relation to the published information, 53 have a medium level of transparency, 27 have a low level and 10 have a very low level of compliance in terms of active transparency. According to the calculation formula, the percentage for this passport indicator is 86.03%.

According to the results of the monitoring, the most transparent are the Government of RSM - General Secretariat, ie the Ministry of Environment and Spatial Planning with 48 points, followed by the Ministry of Economy with 47 and the Ministry of Labor and Social Policy with 46.5 points.

The agency, conducting the monitoring, determined that the owners are improving on the plan of proactivity towards the citizens, and the information they publish should be placed in a separate banner/link under the title LIST OF INFORMATION. In that way, the documents will be available to the applicants, and the number of requests for free access to public information will be reduced.

And in the future, in the trainings that the Agency continuously organizes for officials with information holders, it will emphasize active transparency and consistent application of Article 10 of the Law on the Information Security, because in this way the holders help the citizens to better understand the functioning of institutions, their rights and obligations, the way in which they can influence the making of decisions that are reflected on their daily living and work, as well as to make it easier for them to access the services offered by the institutions of the central government.

However, from the overall monitoring carried out by the Agency and within the framework of SRPA and the other two, it was determined that the active transparency of the holders is a field that needs to be worked on, consequently appropriate changes were made in the material for the education of the holders of information, where the trainings for the officials for mediation with information, it is tried and emphasized that active transparency is a very important aspect of the operations of the holders, that is, it is insisted on the consistent application of Article 10 of the Law. In this direction, the Agency recognizes the necessity of establishing a positive practice between the holders of information in order to support the public for a better understanding of the role and function of the holders, as well as the rights and obligations of the citizens, because only in this way they can be encouraged to participate in the decision-making processes, as well as to have easier access to the services offered by the institutions.

5.4.1. Preparation of Reports for NPAA, the evaluation mission SIGMA and Preparation of materials for the contribution of North Macedonia to the Report of the European Commission

During the month of October - November 2021, the Agency prepared Reports on NPAA, material for the draft report of the SIGMA evaluation mission and Preparation of materials for Macedonia's contribution to the European Commission Report. In addition to the preparation of Reports on undertaken obligations with elaboration of undertaken actions related to the Agency's activities for the Special Group for Public Administration Reform, the Agency prepared and submitted material for the Annual Audit by SEP and other institutions for the updating of the NPAA 2020- 2025:

- NPAA 2020-2023 Anti-corruption policy for 2020 to SEP, - NPAA for 2021 for RPA to MIOA

- The Ministry of Justice during the preparation of the Action Plan for updating the data that is key to the observations given in the Report of the review conducted by Montenegro and the Republic of Moldova on the implementation of Articles 5-14 and 51-59 of the United Nations Convention against Corruption on the 2016-2021 review cycle and to overcome the challenges identified within the second review cycle of the implementation of the Convention.

In the reporting year, Reports on the contribution of North Macedonia to the Report of the European Commission to the Ministry of Justice, Anti-corruption Policy and MIOA (SRPA) were also prepared.

The prepared reports were submitted to the relevant institutions in a timely manner for each quarter in relation to the achieved results of the Agency's operations.

On November 17, 2021, the Agency in the Anti-corruption Policy section takes an active part in

the 16th meeting of the Subcommittee for Justice, Freedom and Security in the Government of RSM.

5.4.2. Meetings held and activities carried out with partners and related institutions

1. On March 12, 2021, the Agency signed a Memorandum of Cooperation with the Government of the Republic of North Macedonia. The signing of the Memorandum affirmed the already established cooperation between the Agency and the Government as partners who jointly advance the right to free access to public information. The established cooperation will contribute to raising the institutional responsibility by strengthening the active transparency of the Government and its constituent bodies. In this way, the consistent implementation of the strategic commitments contained in the Transparency Strategy of the Government of the Republic of North Macedonia (2019-2021) is guaranteed. The signing of the Memorandum confirms the already established cooperation between the Agency and the Government for the promotion of the right to free access to public information and the effective realization of the rights and freedoms of citizens.

2. On June 21, 2021, the Agency signed a Memorandum of Cooperation with the Ministry of Information Society and Administration, which establishes cooperation between the two institutions in the following areas:

- Active transparency;
- Strengthening the capacity of the Ministry of Human Resources in the area of access to information;
- Promotion of the right to access information of a public character by the Ministry through mutual cooperation and editing of the website of MIOA, which refers to information of a public character.

The realized educational workshop for the employees of the Ministry on the realization of the right of free access to information of a public character and increase of active transparency, was in the direction of consistent implementation of the provisions of the Law.

3. On February 1, 2021, the Agency participated in an online session entitled "Consultation on UNESCO Survey for SDG Indicator 16.10.2 (Public Access to Information) ATI Oversight Bodies (Part.1)", the United Nations authorized UNESCO to collect data on indicator 16.10.2, which it will submit to the General Assembly of the United Nations, that is, the preparatory session of the questionnaire for 2021. On April 27, 2021, the Agency submitted its responsive questionnaire for Indicator 16.10.21.

4. From October 3-5, 2021, a conference was organized by the Information Commissioner of Slovenia in Bled, which was attended by the Director of the Agency, Plamenka Bojcheva, together with senior representatives of the regulatory bodies for access to public information from Bosnia and Herzegovina, Croatia, Kosovo, Montenegro, Serbia and Slovenia.

This Initiative aims to strengthen cooperation and exchange of good practices in the promotion and protection of the right to free access to information of a public character. The independent

bodies for free access to information that participated in this year's meeting concluded that they are facing changed circumstances caused by the COVID-19 pandemic, in which it is even more important to provide citizens with timely access to information of a public character, and emphasized the action to the independent bodies that promote and protect this right.

The heads of delegations from “Initiative 2020” decided to strengthen mutual institutional cooperation, including participation in projects, mutual working visits and exchange of employee studies for capacity building and exchange of good practices in access to information. In order to strengthen the institutions for access to information in all participating countries, it was also agreed, the adoption of a joint declaration in order to ensure the independence of bodies in the field of access to public information and the implementation of their decisions. The next annual meeting of “Initiative 2020” will be held in 2022 in the Republic of North Macedonia.

5. In July 2021, the Agency published the Annual Plan for the Prevention of Corruption for 2021, the purpose of which is to increase institutional resistance to corruption and at the same time establish mechanisms to control and prevent the potential occurrence of corruption. The plan identifies several areas that are at risk of corruption within the competences of the Agency, and also contains an Action Plan and its operationalization, at the following link:

<https://aspi.mk/wpcontent/uploads/2021/07/%D0%B3%D0%BE%D0%B4%D0%B8%D1%88%D0%B5%D0%BD-%D0%BF%D0%BB%D0%B0%D0%BD-%D0%B7%D0%B0%D1%81%D0%BF%D1%80%D0%B5%D1%87%D1%83%D0%B2%D0%B0%D1%9A%D0%B5%D0%BD%D0%B0%D0%BA%D0%BE%D1%80%D1%83%D0%BF%D1%86%D0%B8%D1%98%D0%B0-%D0%B7%D0%B0-2021%D0%B3%D0%BE%D0%B4%D0%B8%D0%BD%D0%B0.pdf>

6. On November 15, 2021, the Director of the Agency, Plamenka Bojcheva, and the Executive Director of the Association for Sustainable Development “Milieukontakt Macedonia”, Aarhus Center, Skopje, Maja Markovska, signed a Memorandum of Cooperation. This Memorandum establishes a long-term cooperation between the Agency and the Association for promoting the principles and provisions of the Law on Free Access to Public Information, the Convention on Access to Information and Public Participation in Decision-Making and Access to Justice for Environmental Issues (the Aarhus Convention).

By signing this Memorandum, the parties express their willingness to cooperate in the field of free access to information of a public character, raising public awareness of the right to free access to information of a public character, increasing the transparency of information holders in the field of the environment. , as well as organizing educational events for the implementation of the provisions of the Law on FAPI and the Aarhus Convention.

5.4.3. Cooperation with non-governmental organizations and project activities

1. In February 2021, the Agency, in cooperation with the Community of local self-government Units of the Republic of North Macedonia (ZELS), held online training for officials at the local and regional level.

2. In March 2021, in cooperation with the non-governmental organization Impetus, the Agency, through its representative, conducted training for 15 high school students aged 15-20 years, within the framework of the Youth Development Program project.

3. On April 14, 2021, an online debate on the implementation of the Law was organized by the Center for Civil Communications. More than 70 participants attended the debate. Part of the participants - representatives from public institutions, some of whom were officials for mediating information, discussed the experiences so far in relation to the application of the Law for 2019, in order to point out the problems they face and draw recommendations to improve the application of the Law in the future.

The guest for the event was Mr. Ljupco Nikolovski, Vice Prime Minister of the Republic of Macedonia for the fight against corruption, and Mrs. Plamenka Bojcheva, Director of the Agency, who in her address highlighted the previous application of the Law and its implementation in practice, with a special emphasis on active transparency. The participants of the debate emphasized that in the future it is necessary to have as many debates as possible, through which they will exchange their experiences from the implementation of the Law, but also through practical examples they will resolve the ambiguities regarding the application of the Law.

4. In May 2021, in cooperation with the International Republican Institute (IRI), the Agency undertook a series of activities aimed at political parties, of which the first activity was a two-day training for officials to mediate information from political parties. By the end of 2021, as a result of the conducted training and the feedback that was collected from the participants, a manual will be prepared for them, which refers to their obligations according to the LFAPI, the Law on Political Parties and the Law on Financing Political Parties.

5. In the period from September-November 2021, in cooperation with the East-West Management Institute of USAID's Citizen Participation Project (CEP), potential activities for the affirmation of the Agency, LFAPI and raising public awareness in RSM were developed. The main goal of these activities is raising public awareness of free access by building a network of non-governmental organizations and media at the regional level. Realization of these activities will begin in 2022.

6. The Agency, as part of the Working Group for Political Integrity in Local Self-Government Units, continued its work in 2021.

7. During 2020-2021, following an invitation from the Office of the Coordinator for Economic and Environmental Activities of the Secretariat of the OSCE Mission in Vienna, the Department for International Cooperation and the Director of the Agency participated in several online webinars and meetings in 2021 year, as a series of conferences entitled "Open data in action: Digitization for a positive business climate", as well as continuation of the excellent cooperation with the OSCE Mission in Skopje.

6. Budget, final account and financing

The agency for the protection of the right to free access to information of a public character

provides the means for work from the Budget of the Republic of North Macedonia, on section 19302 program 20 - Free access to information, basic budget account 193026288063710 and donation budget account 193026288078511.

6.1. Brief financial report

By adopting the Budget of the Republic of North Macedonia for 2021, the Agency started the year with a budget in the amount of MKD 16,480,000.00. In the course of 2021, following the adopted amendments and additions to the Budget of the Republic of North Macedonia, the Agency was assigned a budget in the amount of 16,287,000.00 denars.

In relation to the structure of the budget with all approved transfers of funds during 2021, the distribution and realization of funds by item for both accounts is shown tabularly and graphically.

All funds were planned and executed in accordance with the competences, rights and authorizations of the Agency, with the aim of their legal, efficient and economical use.

Account 193026288063710

Budget 2021 item

Final account 2021

Percentage of realization

7.884.000,00	7.410.759,00
2.916.000,00	2.905.179,00
210.000,00	162.000,00
55.000,00	53.758,00
1.398.000,00	1.384.500,00
	856.585,00
	517.854,00
	10.061,00
165.000,00	164.727,00

178.762,00	178.654,00
227.974,00	221.570,00
140.000,00	139.584,00
0,00	0,00
112.264,00	111.348,00

401- Basic salaries 94.00%
402 - Social contributions insurance 99.63%
404 - Fees 77.14%
420 - Travel and daily expenses 97.74%
421 - Utilities, heating, communication and transport 99.03% / Utilities, heating 61.27%
Communication 37.04% Transport 0.72%
423 - Materials and small inventory 99.83%
424 - Repairs and current maintenance 99.94%
425 - Contractual services 97 .19%
426 - Other current expenses 99.70%
464 - Miscellaneous transfers 0.00%
480 - Purchase of equipment and machinery 99.18%
Total: 13,287,000.00 / 12,732,079.00 / 95.82%

Table no. 1: Budget and realization of the budget by item account 193026288063710

Account 193026288078511

Budget 2021 item

Final account 2021

Percentage of realization

2.600.000,00	69.030,00
400.000,00	0,00
0,00	0,00

481- Construction facilities 2.66%
 483 - Purchase of furniture 0.00%
 486 - Purchase of vehicles 0.00% Total 3,000,000.00 69,030.00 2.30%

Table no. 2: Budget and implementation of the budget by item account 193026288078511

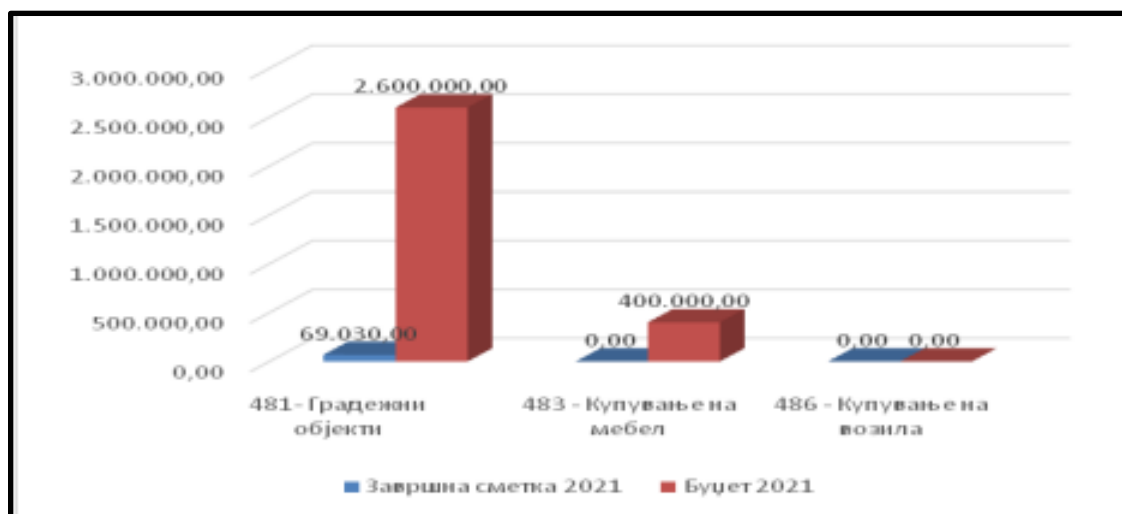


Chart 9: Budget and realization of the budget by account items 193026288078511

Analyzing the budget by types, the participation of individual types of expenses in the total realized expenses for the reporting period is as follows:

Account 193026288063710

- Item 401 – Basic salaries, expenditures in the amount of MKD 7,410,759.00 or 94.00% of the planned MKD 7,884,000.00 were realized;
- Item 402 – Contributions for social insurance, expenditures in the amount of 2,905,179.00 denars or 99.63% of the planned 2,916,000.00 denars were realized;
- Item 420 – Travel and daily expenses, 53,758.00 denars or 97.74% of the planned 55,000.00 denars were realized;
- Item 421 – Communal services, heating, communication and transport, 1,384,500.00 denars or 99.03% of the planned 1,398,000.00 denars were realized;
- Item 423 – Materials and small inventory, 164,727.00 denars or 99.83% of the planned 165,000.00 denars were realized;

- Item 424 – Repairs and ongoing maintenance, 178,654.00 denars or 99.94% of the planned 178,762.00 denars were realized;
- Item 425 – Contractual services, 221,570.00 denars or 97.19% of the planned 227,974.00 denars were realized;
- Item 426 – Other current expenses, realized 139,584.00 denars or 99.70% of the planned 140,000.00 denars;
- Item 464 – Miscellaneous transfers, expenditures in the amount of MKD 0.00 or 0.00% of the planned MKD 0.00 were realized;
- Item 480 – Purchase of equipment and machines, expenditures in the amount of MKD 111,348.00 or 99.18% of the planned MKD 112,264.00 were realized;

Account 193026288078511

- Item 481 – Construction facilities, expenditures in the amount of MKD 69,030.00 or 2.66% of the planned MKD 2,600,000.00 were realized;
- Item 483 – Purchase of furniture, expenditures in the amount of 0.00 denars or 0.00% of the planned 400,000.00 denars were realized;
- Item 486 – Purchase of vehicles, expenditures in the amount of MKD 0.00 or 0.00% of the planned MKD 0.00 were realized;

6.2. Comparative table of budget and expenditures in the last three years

The following is a tabular and graphical comparative overview of the budget and realized expenses from the final accounts of the Agency in the last three years is given.

Станка	Буџет 2021		Буџет 2020		Буџет 2019	
	Буџет 2021	Завршена сметка 2021	Буџет 2020	Завршена сметка 2020	Буџет 2019	Завршена сметка 2019
401 - Основни плати	7.884.000,00	7.430.759,00	9.133.000,00	6.535.237,00	8.833.000,00	7.538.448,00
402 - Придонеси за социјално осигурување	2.916.000,00	2.905.179,00	3.548.000,00	2.533.696,00	3.267.000,00	2.852.932,00
404 - Надоместоци	200.000,00	162.000,00	0,00	0,00	0,00	0,00
420 - Плати и дневни расходи	55.000,00	53.758,00	40.000,00	0,00	200.000,00	0,00
421 - Кооперативни услуги, греење, комуникација и транспорт	1.398.000,00	1.384.500,00	1.483.000,00	1.295.507,00	1.698.000,00	1.199.985,00
423 - Материјали и ситен инвентар	165.000,00	164.727,00	120.000,00	119.989,00	100.000,00	87.206,00
424 - Поправки и тековно одржување	178.762,00	178.654,00	340.000,00	339.636,00	400.000,00	399.708,00
425 - Договорни услуги	227.974,00	221.570,00	351.000,00	288.656,00	395.000,00	94.277,00
426 - Други тековни расходи	140.000,00	139.584,00	70.000,00	69.940,00	70.000,00	21.316,00
464 - Разни трансфери	0,00	0,00	111.000,00	105.688,00	50.000,00	50.000,00
465 - Исплати по извршени исправи	0,00	0,00	0,00	0,00	67.000,00	66.442,00
480 - Купување на опрема и машини	112.264,00	111.348,00	107.000,00	106.066,00	100.000,00	48.864,00
481 - Градежни објекти	2.600.000,00	69.030,00	0,00	0,00	100.000,00	0,00
483 - Купување на мебел	400.000,00	0,00	0,00	0,00	0,00	0,00
485 - Вложувања и нефинансиски средства	0,00	0,00	60.000,00	59.945,00	0,00	0,00
486 - Купување на возила	0,00	0,00	0,00	0,00	0,00	0,00
Вкупно	16.287.000,00	12.801.109,00	15.363.000,00	11.434.360,00	15.280.000,00	12.359.178,00

Table no. 3: Budget and realized expenses in the last three years

6.3. Final accounts for 2021

Copies of final accounts for the accounting period 01/01/2021 to 12/31/2021, for account

193026288063710 and account 193026288078511 are submitted as an attachment to the report.

7. CONCLUSIONS

1. The Agency will continue with activities to update the List of Information Holders in accordance with the legal solution, then it will continue with the education of the officials among the information holders, it will continue the cooperation with the information holders, by informing the public and international cooperation.
2. The agency will specifically work on the plan of educating the general public with the aim of familiarizing citizens with the right to free access to information of a public character and the method and procedure for using this constitutionally guaranteed right of man and citizen.

8. RECOMMENDATIONS

1. The Agency should get involved and take an active part in all activities in the field of transparency and accountability, and above all in the field of proactive transparency.
2. Undertaking activities with the aim of raising the awareness of the responsible/management persons and the officials among the holders of information for faster and more efficient action on received requests for free access and avoiding the use of the "silence of the administration" institute.
3. The Agency should continue to insist on increasing the Agency's Budget in order to create opportunities for improving working conditions, as well as for its more active and independent operation based on its own funds, primarily in the area of education.

9. ATTACHMENTS:

HOLDERS WHO HAVE NOT SUBMITTED AN ANNUAL REPORT: STATE INSTITUTIONS 6 holders

1. Port Authority-Ohrid
2. Ministry of Foreign Affairs
3. Ministry of Labor and Social Policy
4. Agency for drugs and medical devices
5. Council for the promotion and supervision of the audit
6. Directorate for technological industrial development zones

HEALTHCARE INSTITUTIONS 8 holders

1. PHI City General Hospital "8th September" - Skopje
2. PHI Health Center, Vinica
3. PHI Zdravstven dom, Radovis
4. PHI Center for Public Health, Tetovo
5. PHI University Clinic for Rheumatology, Skopje

6. PHI Clinic for Gastroenterohepatology, Skopje
7. AJIBADEM SISTINA Clinical Hospital, Skopje
8. Sante Plus Group, Skopje

PUBLIC ENTERPRISES AND INSTITUTIONS 23 holders

1. Public utility company "Saraj", Skopje
2. "Isar" Shtip
3. Public enterprise for communal activities and development of construction land, Lozovo
4. Public utility company "Shari", Bogovinje
5. Public enterprise for communal activities - "Komunalec-Polin", Star Dojran
6. Public utility company "Standard", Debar
7. "Markets", Kumanovo
8. Low Construction Ohrid, Ohrid
9. Public business enterprise with industrial zone, Zhabeni
10. Public institution Inter-municipal center for social work-Gostivar
11. Public institution Inter-municipal center for social work-Struga
12. Culture center "Aco Karamanov", Radovish
13. NU Institute and Museum, Bitola
14. NUB "Kliment Ohridski", Skopje
15. Public institution National Park "Pelister", Bitola
16. Branko Stanoevic Primary School, Gostivar
17. Student Dormitory "Boro Menkov", Kriva Palanka
18. PE "Plackovica", Karbintzi
19. "Oktisi" - Oktisi, Struga
20. "Shkupi Vjeter", Skopje
21. Center for early childhood development "Gyunesh" - Zhupa Center
22. "Water and sewerage", Struga
23. Institute for Communication Studies, Skopje

EDUCATIONAL INSTITUTIONS 38 holders

1. Faculty of Tourism and Hospitality, Ohrid
2. Technological-technical faculty, Veles
3. First private university FON, Skopje
4. Secondary school "Vancho Prke", Vinica

5. SSOU "Dimitria Cupovski", Veles
6. Secondary school "Krstev P. Misirkov", Demir Hisar
7. Secondary school "Gosho Vikentiev", Kochani
8. "Nace Budjoni", Kumanovo
9. Secondary school "8th of September", Skopje
10. DUCOR "Partenija Zografski", Skopje
11. DMUC "Sergei Mihailov", Shtip
12. Elementary school "7 March", Skopje
13. Elementary school "Brothers Ramiz-Hamid", Skopje
14. Elementary school "Emin Duraku", Bukovikj
15. Elementary school "Brothers Ribar", Tabanovce
16. Elementary school "Kiril and Methodius", Romanovce
17. Elementary school "Goce Delchev", Gostivar
18. Elementary school "Mehmet Derala", Gradec
19. Elementary school "Fan Noli", Trebosh
20. Elementary school "Liria", Tetovo
21. Elementary school "Elpida Karamandi", Bitola
22. Elementary school "Kole Kaninski", Bitola
23. Elementary school "Kocho Racin", Ivanjevci, Bitola
24. Elementary school "Dr. Trifun Panovski", Bitola
25. Elementary school "Blaze Koneski", Prilep
26. Elementary school "Tosho Arsov", Shtip
27. Elementary school "Zhivko Chingo", Velgoshti
28. Elementary school "Murat Labunishta" - Labunishta village
29. PMU "Vladimir Arsovski", Negotino
30. Elementary school "Rade Kratovche", Kochani
31. Elementary school "Kosta Racin", Podaresh
32. Elementary school "Saints Cyril and Methodius", Makedonska Kamenica
33. "Risto Jurukov", Kochani
34. "Metodi Mitevski Brico", Lozovo
35. Kindergarten "Olga Miceska", Kichevo
36. Kindergarten "Estreja Ovadija Mara", Bitola
37. Secondary school "7th March", Tetovo
38. OOU "Rilindia", Selce

MUNICIPALITIES WITH CENTERS FOR THE DEVELOPMENT OF PLANNING
REGIONS IN RSM 1 holder

1. Municipality of Rosoman

POLITICAL PARTIES 18 holders

1. Civic Democratic Union-GDU
2. National Democratic Revival-NDP
3. Political party ALTERNATIVE
4. United Party for Roma Equality - OPER
5. Party for Democratic Prosperity of Roma PDPR
6. Labor-Agricultural Party of Macedonia-RZP
7. Party of the Vlachs from Macedonia
8. Serbian advanced party in Macedonia - SNSM
9. Democratic Union of Vlachs from Macedonia - DSVM
10. VMRO-People's Party-VMRO-NP
11. Union of Tito's Left Forces-STLS
12. Democratic Party of Albanians-DPA
13. United for Macedonia-OM
14. New Alternative-NA
15. Party of Democratic Action of Macedonia
16. Bosniak Democratic Union-BDS
17. Movement for State and Justice-DDP
18. POPULI Party

LEGAL AND NATURAL PERSONS PERFORMING PUBLIC AUTHORITIES AND
ACTIVITIES OF PUBLIC INTEREST 14 holders

1. Macedonian Sports Climbing Federation
2. Football Federation of Macedonia
3. National Federation *SPORTS FOR ALL* of the Republic of North Macedonia
4. Mountaineering Federation of North Macedonia
5. Federation for Skating Sports of North Macedonia
6. Macedonian Archery Federation
7. Wrestling Federation of the Republic of North Macedonia

8. Bowling Federation of the Republic of North Macedonia
9. Swimming Federation of North Macedonia
10. National Federation for Sports and Recreation of the Disabled of North Macedonia - Paralympic Committee of North Macedonia
11. Judo Federation of North Macedonia
12. Rowing Federation of Macedonia
13. Ski Federation of Macedonia
14. Macedonian Sports Shooting Federation

JUDICIAL AUTHORITY 3 Holders

1. Council of Public Prosecutors of the Republic of North Macedonia
2. Primary Public Prosecutor's Office - Prilep
3. Basic Public Prosecutor's Office – Kumanovo

LIST OF INFORMATION HOLDERS WHOSE OFFICIALS ATTENDED THE TRAININGS:

1. State Attorney's Office of RSM
2. AD TEC Negotino
3. Center for Development of the Eastern Planning Region - Shtip
4. JP Parkinzi Kavadarci
5. Republic Council for Road Traffic Safety
6. JP Laika
7. PHI Center for Public Health – Bitola
8. Kisela Voda municipality
9. State Election Commission
10. NU Ohrid summer
11. PE ZHRSM Infrastructure
12. PZU Re-Medica, Skopje
13. Inspection Council
14. PHI Zdravstven dom, Veles
15. PHI Health Center, Kriva Palanka
16. PHI Health Center, Lipkovo
17. AD MEPSO
18. PHI OB with expanded activity - Debar

19. Institute of Public Health
20. PHI Center for Public Health - Skopje
21. PHI Center for Public Health – Veles
22. PHI Center for Public Health – Tetovo
23. PHI OB with expanded activity - Kavadarci
24. PHI OB – Struga
25. PHI UC for Dermatology
26. Ministry of Defense
27. PHI Clinical Hospital – Tetovo
28. PHI UK for children's diseases
29. Agency for commodity reserves
30. KJP Low Construction – Bitola
31. Regulatory Commission for Energy and Water Services
32. Municipality of Bitola
33. Center for the Development of the Skopje Planning Region - Skopje
34. Central register of RSM
35. Airport Municipality
36. Center for Development of Northern Planning Region Kumanovo
37. Kisela Voda municipality
38. RSM Mountaineering Federation
39. Athletic Federation of Macedonia
40. PE HS Zletovica Probishtip
41. Democratic reconstruction of Macedonia - DOM
42. Public utility Kriva Palanka
43. Administration for Public Revenues
44. Bureau of Education Development
45. University “St. Kliment Ohridski” - Bitola
46. Ministry of Foreign Affairs
47. JP Vodovod and Sewerage Skopje
48. OSU Aco Ruskovski – Berovo
49. RSM Philharmonic
50. Faculty of Education, Bitola
51. Elementary school Rampo Levkata, Prilep
52. Elementary school Goce Delchev, Gostivar

53. Secondary school JaneSandanski, Shtip
54. JOUDG Prva Radost, Vasilevo
55. Elementary school Krume Kepeski, Skopje
56. UKIM Skopje
57. Office of the President of RSM
58. Center for Public Health, Tetovo
59. DUFK Metodi Mitevski Brico, Skopje
60. Municipality of Prilep
61. Shuto Orizari municipality
62. City of Skopje
63. Office for representation of RSM to ECHR
64. Inspectorate for use of languages
65. RSM health insurance fund
66. Inspection Council
67. DSU Sports Academy
68. Administration for affirming and promoting the culture of the members of the communities
69. State Inspectorate for Construction and Urbanism
70. Municipality of Lipkovo
71. Real Estate Cadastre Agency
72. Dental Chamber of Macedonia
73. Municipality of Staro Nagoricane
74. NU Center for Culture, Bitola
75. Agency for Administration
76. Elementary school Kiril i Metodij, Oraovica, Radovish
77. Elementary school Bitola Congress, Lopate, Kumanovo
78. Elementary school Vuk Karadzic, Kumanovo
79. "Kozjak", Staro Nagoricane
80. Elementary school Hristijan Todorovski-Karposh, Rankovce
81. TMRO
82. Party for Economic Changes
83. Alliance of Albanians
84. Social Democratic Party of Macedonia - SDSM
85. Voice for Macedonia
86. Serbian Party

87. Political party GROM
88. PDT
89. BESA
90. RISE
91. INTEGRA
92. DEMOCRATS
93. LEFT
94. DEMOCRATIC UNION
95. LDP
96. SRM
97. DPTM
98. DUI
99. SDU
100. PDSH
101. VMRO-DPMNE
102. Sports Gymnasium Metodi Mitevski Brico – Skopje
103. Elementary school Bratstvo Edinstvo village. Middle Konjari
104. JU Special Institute Demir Kapija
105. Elementary school Bajram Shabani Kondovo Saraj
106. Elementary school Kumanovo
107. Gostivar Theater, Gostivar
108. Elementary school Liria Skopje
109. Nikola Stein, Tetovo
110. Sports Academy
111. Elementary school Pece Daskalot - village. Lower ones
112. Municipality of Konche
113. OSTU Gostivar
114. Elementary school Kliment Ohridski, Obleshevo
115. SOU Ljupcho Santov, Kochani
116. Municipality of Kumanovo
117. Elementary school Steve Naumov, Bitola
118. Elementary school Mirce Acev, Lazhani, Dolneni
119. House of Culture Lazar Sofianov, Kratovo
120. Elementary school Shemshevo, Shemshevo

121. AVRSM
122. Elementary school Bratstvo- Migeni, Tetovo
123. Quality and Accreditation Agency
124. Local Library Goce Delchev, Veles
125. Bureau of Public Procurement
126. MANU
127. PHI General Hospital Re-MEDIKA, Skopje
128. PHI TOARILUC
129. PHI Specialized hospital for prevention, treatment and rehabilitation, Oteshevo
130. Faculty of Medicine, Skopje
131. Secondary school Pero Nakov, Kumanovo
132. Elementary school Andrej Savevski-Kikish, Tetovo
133. Basic Civil Court Skopje
134. Vinica Basic Court
135. Food and Veterinary Agency of RSM
136. Pension and disability insurance fund
137. Municipality of Bosilovo
138. PHI Center for Public Health - Bitola
139. PHI UC for Dermatology
140. JOUDG September 11, Resen
141. Elementary school Ljuben Lape, Aerodrom, Skopje
142. Faculty of Economics, Skopje
143. Elementary school Hristian Karposh, Dragomance
144. Elementary school Malina Popivanova, Kochani
145. Elementary school Svetozar Markovikj, Staro Nagoricane
146. International Slavic University, Sveti Nikole
147. GoceDelchev, Ilinden
148. Elementary school Straso Pindjur, Sokolarci
149. PHI Zdravstven dom, Ohrid
150. Public Institute for Rehabilitation of Children and Youth
151. PHI Hospital for Lung Diseases and Tuberculosis "Jasenovo", Veles
152. PHI University Polyclinic "St. Cyril and Methodius", Skopje
153. PHI Specialized Hospital for Lung Diseases, Leshok
154. PHI Zdravstven dom, Valandovo

155. PHI University Clinic for Surgical Diseases
156. PHI UC for Toxicology, Skopje
157. Elementary school Tosho Arsov, Shtip
158. OUH Karposh, Mlado Nagoricane
159. Kindergarten, Mayski Cvet, Skopje
160. PZU SANTE PLUS GROUP, Skopje
161. PHI Clinical Hospital “Dr. Trifun Panovski”, Bitola
162. MEMO DOOEL, Skopje
163. DT Balkan Energy LLC, BEG-Skopje
164. Medical Chamber of RSM
165. JUGB “Miladinovci Brothers”, Skopje
166. NUC for Culture “AtsoShopov”, Shtip
167. Elementary school Braka Miladinovci, Kumanovo
168. Elementary school Krste Misirkov, Kumanovo
169. PUC “Tetovo”, Tetovo
170. JP Official Gazette of RSM, Skopje
171. PVPU Euro College, Kumanovo
172. Elementary school Makarenko, Skopje
173. Secondary school Jane Sandanski, Shtip
174. SUGS Lazar Tanev, Skopje
175. Kindergarten Goce Delchev, Vinica
176. Elementary school Karposh, Umin Dol, Kumanovo
177. Elementary school Drita, Rasche
178. Elementary school Gotse Delchev, Shtip
179. Elementary school Krume Kepeski, Skopje
180. Veterinary Faculty, Bitola
181. Elementary school “5th October”, Nikushtak
182. Faculty of Dramatic Arts, Skopje
183. Josip Broz Tito, Valandovo
184. JOUDG July 12, Conche
185. MIOA
186. JP Vodovod, Kumanovo
187. JU Intermunicipal Center for Social Work - Delchevo
188. Elementary school “Jan Amos Komenski”, Skopje

189. Detelinka, Kriva Palanka
190. Elementary school Dane Krapchev, Skopje
191. Elementary school Rajko Jinzifov, Orizari, Veles
192. Water and sewerage, Prilep
193. Intermunicipal Center for Social Work, Skopje
194. Special Institution, Demir Kapija
195. City Cemetery, Ohrid
196. Local library “GoceDelchev”, Veles
197. “KochoRacin” Primary School Library, Pehchevo
198. Blazhe Koneski Primary School, Veles
199. Faculty of Pharmacy, Skopje
200. House of Culture, Gevgelija
201. Home for the elderly “Kiro Krsteski-Platnik”, Prilep
202. Kindergarten Orce Nikolov, Skopje
203. JP Studenchitsa – Kicevo
204. Secondary School Taki Daskalo – Bitola
205. DMBUC Ilija Nikolovski Luj – Skopje
206. Municipality of Resen
207. Agency for promotion and support of tourism, Municipality of Delchevo
208. Municipality of Ilinden
209. Municipality of Butel
210. Municipality of Kavadarci
211. Emigration Agency of RSM
212. Fund for innovation and technological development
213. National Bank of RSM
214. Real estate cadastre agency
215. Commission for Prevention and Protection from Discrimination
216. Ministry of Agriculture, Forestry and Water Management
217. Automotive Union of Macedonia, Skopje
218. Party for Social and Economic Progress – POINT
219. Tetovo Basic Court
220. Gevgelija Basic Court
221. JPV Lisice – Veles
222. JU Intermunicipal Center for Social Work – Shtip

223. Struga Municipality
224. JU for children - DG "8th March", Struga
225. Elementary school Dimitar Makedonski, Skopje
226. Dimitar Vlahov, Strumica
227. PE for State Roads
228. Kuzman Shapkarev, Bitola
229. Negotino Basic Court
230. Secondary school Kiro Spandzov-Brko, Kavadarci
231. Elementary school "Slavko Lumbarkovski", Novaci
232. "Josip Broz Tito" High School, Bitola
233. Ministry of Economy

LIST OF INVITED INFORMATION HOLDERS WHOSE OFFICIALS DID NOT ATTEND THE TRAINING:

1. American University of Europe-FON
2. Makedonski Telecom AD-Skopje
3. Company for communication services A1 Macedonia LLC, Skopje
4. Committee for the investigation of aviation accidents and serious incidents
5. National Institution-Film Center Vardar Film Macedonia, Skopje
6. NU Ensemble of Albanian folk dances and songs in RSM, Skopje
7. Macedonian Academic Research Network MARnet
8. NU Manifestation Struga evenings of poetry, Struga
9. PUC Gazi Baba 2007, Skopje
10. PUC Petrovec, Petrovec
11. JP Collector System, Skopje
12. Kindergarten of Centar Municipality 13 November, Skopje
13. Agency for electronic communications
14. Public enterprise for public parking lots Veles-Parking, Veles
15. Open Civil University for lifelong learning "Kuzman Shapkarev", Ohrid
16. PHI Specialized hospital for nephrology, Struga
17. PHI Institute for rehabilitation of hearing, speech and voice Skopje
18. PHI Institute for rehabilitation of hearing, speech and voice - Bitola
19. PHI Zdravje Health Center, Valandovo
20. PHI "Dr. Haim Abravanel" Health Center Bitola

21. PHI Health Center Kumanovo
22. PHI Zdravstven dom Ohrid
23. PHI Zdravstven dom Gostivar
24. PHI Zdravstven dom Tetovo
25. PHI Zdravstven dom "Zeleznicar" - Skopje
26. PHI Zdravstven dom Krushevo
27. PHI Kratovo Health Center
28. PHI Strumica Health Center
29. PHI Struga Health Center
30. PHI Prilep Health Center
31. PHI Kichevo Health Center
32. PHI Berovo Health Center
33. PHI Demir Hisar Health Center
34. PHI Makedonski Brod Health center
35. PHI Vevchani Health Center
36. PHI Resen Health Center
37. PHI Negotino Health Center
38. PHI Health Center "Dr. Ruse Boskovski", Rostushe
39. PHI "Goce Delchev" Health Center, Delchevo
40. PHI Vinica Health Center
41. PHI Health Center "Nada Mihailova", Probishtip
42. PHI Radovish Health Center
43. PHI Health Center "Primarius Dr. Gjorgji Gavrilski", Sveti Nikole
44. PHI Health Center Skopje
45. PHI "Dr. Ivan Georgiev" Health Center, Pehchevo
46. PHI Health Center "Dr. Panche Karagjozov", Shtip
47. PHI City General Hospital "8th September", Skopje
48. PHI General Hospital Kumanovo
49. PHI General Hospital "Ferid Murad", Gostivar
50. PHI General hospital with expanded activity, Gevgelija
51. PHI General Hospital, Ohrid
52. PHI General Hospital "Borka Taleski", Prilep
53. PHI General Hospital Strumica
54. PHI – General hospital with extended activity Kochani

55. PHI Kichevo General Hospital
56. PHI Public Health Center, Strumica
57. PHI Public Health Center, Prilep
58. PHI Center for Public Health, Kumanovo
59. PHI Public Health Center, Ohrid
60. PHI Public Health Center, Shtip
61. PHI Public Health Center, Kocani
62. PHI for the needs of the university clinics, institute and emergency center, Skopje
63. Elementary school Dame Gruev, Bitola
64. PHI University Clinic for Thoracic and Vascular Surgery - Skopje
65. PHI University Clinic for Endocrinology, Diabetes and Metabolic Diseases-Skopje
66. PHI University Clinic for Rheumatology - Skopje
67. PHI University Clinic for Psychiatry - Skopje
68. PHI University Clinic for Pulmonology and Allergology - Skopje
69. PHI - University Clinic for Surgical Diseases "St. Naum Ohridski" - Skopje
70. PHI University Clinic for Cardiology-Skopje
71. PHI University Dental Clinical Center "Saint Panteleimon"-Skopje
72. Public health institution-Clinic for surgery of the face, jaws and neck maxillofacial surgery "Academic Ilija Vaskov"-Skopje
73. PHI – Clinic for plastic and reconstructive surgery-Skopje
74. PHI University Clinic for Eye Diseases-Skopje
75. Public health institution University Clinic for Gynecology and Obstetrics-Skopje
76. Javno Zdravstvena Ustanonova - Clinic for Gastroenterohepatology Skopje
77. PHI University Clinic of Neurology
78. NU Center for Culture "Beli Mugri"-Kochani
79. Public institution for the care of children with educational-social problems and disturbed behavior-Skopje
80. Technical Faculty-Bitola
81. State Communal Inspectorate
82. Ministry of Political System and Inter-Community Relations
83. Ministry of Labor and Social Policy
84. Municipality of Saraj
85. Municipality of Mavrovo and Rostusha
86. Agency for youth and sports

87. PE for protection and maintenance of main and regional roads
88. JP Low Construction Ohrid-Ohrid
89. PE Waterworks and sewerage – Struga
90. PU for communal production and service activities "ISAR"-Shtip 91. PU "Tetovo"-Tetovo
92. JP "Parks and Greenery" - Skopje
93. PHI University Clinic for Urology-Skopje
94. Skopje Sever AD-Skopje
95. Municipal waste disposal company "Drisla"-Skopje D.O.O. Batinci village, Studenichani
96. SSOU Dimitria Cupovski- Veles
97. Center for the Development of the South-Eastern Planning Region- Strumica
98. Center for the Development of the South-West Planning Region - Struga
99. Center for the Development of the Vardar Planning Region - Veles
100. Community of local self-government units of RSM-ZELS
101. Chair Municipality
102. Municipality of Karposh
103. DSULUD Lazar Lichenoski-Skopje
104. Gazi Baba Municipality
105. Municipality of Demir Kapija
106. Municipality of Sopsishte
107. Municipality of Kratovo
108. Plasnica Municipality
109. Rankovces municipality
110. Administration for the protection of cultural heritage
111. State Office of Statistics
112. Badminton Federation of Macedonia
113. Bowling Federation of the Republic of North Macedonia
114. Boxing Federation of Macedonia
115. Swimming Federation of North Macedonia
116. Public utility company "Komunalec", Pehchevo
117. PI for communal activities "Community", Novo Selo
118. Public Institution Student Dorm of the City of Skopje, Zdravko Cvetkovski, - Skopje 119. State Student Dormitory "Skopje", Skopje
120. Public institution Intermunicipal Center for Social Work, Debar
121. National Institution, Center for Culture "Miladinovci Brothers", Struga

122. "Krstev P. Misirkov", Kavadarci
123. Public enterprise for managing sports facilities owned by the Republic of North Macedonia
124. Cycling Federation of Macedonia
125. National Federation for Sports and Recreation of the Disabled of North Macedonia - Paralympic Committee of North Macedonia
126. Karate Federation of Macedonia
127. Kendo-Iaido Federation of Macedonia
128. Judo Federation of North Macedonia
129. Ski Federation of Macedonia
130. Pingpong Federation of North Macedonia
131. Rowing Federation of Macedonia
132. Public enterprise "Komunalec"-Bitola
133. J.P. "Water and sewerage", Skopje
134. Public utility company "Saraj", Skopje
135. Public utility company "Kozjak", Staro Nagoricane
136. Public enterprise for communal activities "Komunalec", Kicevo
137. "Ograzhden", Bosilovo
138. Bar Association of R.S.M.
139. Ohrid municipal utility, Ohrid
140. Public utility company "Pazari", Prilep
141. Public utility company "Komunalec", Sveti Nikole
142. Public utility company "Ilinden", municipality of Ilinden
143. Public utility company "Komunalec", Gostivar
144. Public utility company "Proleter", Resen
145. Public enterprise "Communal", Struga
146. Public utility company "Komunalets", Demir Hisar
147. Public utility company "Komunalets", Prilep
148. Public enterprise Communal Service, Valandovo
149. Public Institution Student Home of the City of Skopje "Zdravko Cvetkovski", Skopje
150. Public Institution Intermunicipal Center for Social Work, Debar
151. Public enterprise for communal activities "Bregalnica", Delchevo
152. PHI General hospital with expanded activity, Prilep
153. Public enterprise for managing sports facilities owned by the Republic of North Macedonia

154. Elementary school "Strasho Pindzur",
155. Elementary school "Dituria", Saraj
156. Elementary school "Kliment Ohridski", Oblesevo
157. Grigor Prlichev Elementary School, Ohrid
158. St. Cyril and Methodius, Ohrid
159. Elementary school "Krstev Misirkov", Gevgelija
160. SUGS "Lazar Tanev", Skopje
161. Secondary school "Jane Sandanski", Shtip
162. Elementary school "Goce Delchev", Jablanica
163. Elementary school "Goce Delchev", Saint Nikole
164. Elementary school "RampoLevkata", Prilep
165. Elementary school "Krumchev Kepeski", Skopje
166. OSMU "Dr. Jovan Kalauzi", Bitola
167. Elementary school "Nevena Georgieva-Dunja", Skopje
168. Elementary school "Vera Tsiriviri Trena", Skopje
169. Elementary school "Goce Delchev", Gostivar
170. European University of Republic of Macedonia, Skopje
171. University "St. Cyril and Methodius", Rectorate, Skopje
172. Kindergarten "Astibo", Shtip
173. Elementary school "AS Makarenko", Skopje
174. Elementary school "Liria", Vrutok
175. "First joy", Vasilev
176. State secondary school - regional center for vocational education and training Kiro Burnaz, Kumanovo
177. Secondary school "Kole Nekhtenin", Shtip
178. Elementary school "Grigor Prlichev", Ohrid
179. Elementary school "Dimitar Miladinov", Skopje
180. Elementary school "Dimitar Miladinov", Tetovo
181. PHI Health Center "Nada Mihajlova", Probishtip
182. PHI University Clinic of State Cardiac Surgery-Skopje
183. PHI Clinical Hospital, Tetovo
184. Agency for foreign investments and export promotion of the Republic of North Macedonia
185. Office for representation of the Republic of North Macedonia before the European Court of Human Rights

186. Agency for regulation of the railway sector
187. Health Insurance Fund of the Republic of North Macedonia
188. Administration for affirming and promoting the culture of the members of the communities
189. JOUDG "Goce Delchev" Ilinden
190. Customs Administration of the Republic of North Macedonia
191. Public enterprise for communal works Komunalec, Kavadarci
192. Faculty of Information Sciences and Computer Engineering, Skopje
193. SUGS Gymnasium "Zef Ljush Marku" Skopje
194. Faculty of Tourism and Hospitality, Ohrid
195. Faculty of Biotechnical Sciences, Bitola
196. Private higher education institution - MIT University - Skopje
197. Elementary school "Jashar Bey Shkupi", Skopje
198. High School of Journalism and Public Relations
199. International Balkan University
200. Open civil university for lifelong learning "Gostivar", Gostivar
201. State music school, Bitola
202. Secondary school "Krstev P. Misirkov", Demir Hisar
203. Secondary school "Naum Naumovski Borche", Krusevo
204. "St. Kliment Ohridski", Ohrid
205. High School "Mirche Acev", Prilep
206. SUGS "Kocho Racin", Skopje
207. State School of Art "Lazar Lichenoski", Skopje
208. DSU for rehabilitation and education "St. Naum Ohridski", Skopje
209. SETU "Mihajlo Pupin", Skopje
210. SUGS High School "Pance Arsovski", Skopje
211. Secondary school of the City of Skopje
212. Elementary school Riste Ristevski, Dolno Kosovrasti
213. High School "Kiril Pejcinović", Tetovo
214. Elementary school "Brotherhood", Skopje
215. Elementary school "Vasil Glavinov", Skopje
216. Elementary school "Ljuben Lape", Aerodrom municipality, Skopje
217. Elementary school "Christian Todorovski-Karposh", Skopje
218. Elementary school "G.K-Skenderbeg", Arachinovo

219. Elementary school "Naim Frasheri", Studenicani
220. Elementary school "Goce Delchev", Ilinden
221. Elementary school "Emin Duraku", Bukovikj
222. Elementary school "Ibe Palikuća", Bojane
223. Elementary school "Liman Kaba", Loving
224. Elementary school "Faik Konitsa", Radusha
225. Elementary school "11th of October", Kumanovo
226. Faculty of Economics, Skopje
227. JP Studenchica, Kicevo
228. State school "Mirka Ginova", Bitola
229. Municipality of Petrovec
230. NU Institute for the Protection of Cultural Monuments and Museum, Ohrid
231. OOU Kliment Ohridski, Obleshevo
232. NU Institute for the Protection of Cultural Monuments and Museum - Bitola
233. Institute for Rehabilitation of Children and Youth, Skopje
234. OOU "Kultura", Matejche, Lipkovo
235. PHI Psychiatric Hospital, Demir Hisar
236. PJU UC for Radiotherapy and Oncology, Skopje
237. Republic of North Macedonia Airports AD for airport services, Skopje
238. PHI University Clinic for Infectious Diseases and Febrile Conditions
239. State Audit Office
240. Elementary school Kultura, Matejche
241. "Mitko Penjukliski" Secondary School, Kratovo
242. Public Health Institution University Dental Clinical Center Saint Panteleimon-Skopje
243. Local Library "Goce Delchev", Veles
244. State Audit Office
245. OJO-Prilep
246. OJO – Bitola
247. Municipality of Vasilevo
248. Public Health Institution University Dental Clinical Center Saint Panteleimon-Skopje
249. PHI Special Hospital for Lung Diseases and Tuberculosis "Leshok", Leshok
250. PHI University Clinic for Radiotherapy and Oncology-Skopje
251. Institute for Rehabilitation of Children and Youth - Skopje
252. Institute for Lung Diseases in Children "Kozle" - Skopje

253. PHI Health Center Nada Mihajlova, Probishtip
254. PHI Strumica Health Center
255. Public health center, Skopje
256. OU Dimitar Pop Georgiev-Berovski, Skopje
257. Primary school Vrapchiste, Vrapchishte
258. Majski Cvet Kindergarten, Skopje
259. Institute for Communication Studies-Skopje
260. DSULUD Lazar Lichenoski-Skopje
261. Blaze Koneski Primary School, Prilep
262. Medical Faculty, Skopje
263. Elementary school Kultura, Matejche
264. Elementary school Hristijan Todorovski - Karposh, Rankovce
265. Secondary school Gostivar, Gostivar
266. PHI University Clinic for Radiotherapy and Oncology - Skopje
267. Kindergarten Aco Karamanov, Radovish
268. Mustafa K. Atatürk Elementary School, Gostivar
269. Elementary school Brakja Miladinovci, Carev Dvor, Resen
270. Elementary school Christian Todorovski - Karposh, Mlado Nagoricane
271. Elementary school Naim Frasheri, Studenicani
272. Todor Janev Elementary School, Chaska
273. Official Gazette of the Republic of North Macedonia, Skopje
274. State Sanitary and Health Inspectorate
275. Chamber of Commerce of R.S.M.
276. City shopping center AD Skopje
277. "Markets" - Kumanovo
278. Official Gazette of the Republic of North Macedonia, Skopje
279. Public institution Intermunicipal Center for Social Work, Negotino
280. Public enterprise for managing sports facilities "Park - sport and parking lots" - Veles
281. Children's Kindergarten Children's Joy Gostivar
282. JPK activities "Communal hygiene", Novaci
283. Intermunicipal Center for Social Work, Prilep
284. PI for the construction and maintenance of a public space for parking and arranging the organization of public local transport of passengers in the Municipality of Bitola, Bitola
285. Kindergarten of the Municipality of Centar 13 November - Skopje

286. DSU - regional center for vocational education and training Kiro Burnaz - Kumanovo
287. Primary school Braća Miladinovci - Kumanovo
288. Secondary school Kiro Spandzov - Brko - Kavadarci
289. High School Kiril Pejcinovikj-Tetovo
290. Public institution for children - Kindergarten 11 October - Skopje
291. Elementary school Njegosh, Skopje
292. Primary school Goce Delchev, Bosilovo
293. Bratstvo Edinstvo Elementary School, Ohrid
294. Primary School Straso Pindjur, Kavadarci
295. Gjorgi Sugarev Elementary School, Bitola
296. Elementary school Mihail Grameno, Brest
297. Primary school Jashar Bey, Skopje
298. Elementary school Riste Ristevski, Dolno Kosovrasti
299. Elementary school Kliment Ohridski, Miravci
300. Ministry of Political System and Inter-Community Relations
301. Vaso Karajanov, Gevgelija
302. Elementary school Risto Krle, Kadino
303. Elementary school Aleksandar Makedonski, Skopje
304. Secondary municipal school Metodi Mitevski-Brico, Delchevo
305. 23 August Kindergarten, Berovo
306. Ramiz-Hamid Brothers Elementary School, Skopje
307. JOUDG 8 April, Skopje
308. Elementary school Josip Broz Tito-s. Zhirovnica
309. Steve Naumov Elementary School, Skopje
310. KOCHO RACIN National Library, Tetovo
311. JCommunal hygiene, Skopje
312. Public institution Center for social work, Vinica
313. Plackovica, Karbinici
314. City Parking and Greenery, Gostivar
315. Gostivar Theater, Gostivar
316. City Market, Ohrid
317. Local Museum Gallery, Kavadarci
318. JOUDG Avionche, Petrovec
319. Elementary school Christian Todorovski-Karposh, Skopje

320. Public institution National Park "Galičica", Ohrid
321. Tetovo Theater, Tetovo
322. House of Culture "Jane Sandanski", Pehcevo
"TANE GEORGIEVSKI" Library, Kumanovo
323. Theater for Children and Youth, Skopje
324. Elementary school Metodi Mitevski Brico, Lozovo
325. Center for Culture "Iljo Anteski-Smok", Tetovo
326. Public cleanliness and greenery, Kumanovo
327. Elementary school Kocho Racin, Kumanovo
328. St. Cyril and Methodius Elementary School - Makedonska Kamenica
329. St. Kliment Ohridski Elementary School, Delchevo
330. Basic Public Prosecutor's Office, Gevgelija
331. Municipality of Zelenikovo
332. Administration for the development and promotion of education in the languages of the members of the communities
333. Municipality of Tetovo
334. Ministry of Transport and Communications
335. Administration for execution of sanctions
336. Intelligence Agency
337. Food and Veterinary Agency of the Republic of North Macedonia
338. Employment Agency of the Republic of North Macedonia
339. Administration for the development and promotion of education in the languages of the members of the communities
340. State Examination Center
341. National Security Agency
342. State Archive of the Republic of North Macedonia - Ohrid Department
343. Ministry of Economy
344. Agency for Audio and Audiovisual Media Services
345. Wrestling Federation of the Republic of North Macedonia
346. United Macedonia - EM
347. Macedonian Unifying Reform Organization-Workers Party-MORO-RP
348. Democratic Forces of the Roma-DSR
349. BASIC PUBLIC PROSECUTOR'S OFFICE - KUMANOVA
350. Basic Public Prosecutor's Office, Prilep
351. Basic Public Prosecutor's Office, Strumica

352. Agency for foreign investments and export promotion of the Republic of North Macedonia