

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

ANNUAL REPORT

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| <p>Reporting period: 2022</p> <p>Total budget: MKD 15,507,000.00</p> <p>Number of employees: 19</p> <p>www.aspi.mk</p> | <p><u>Responsible person:</u></p> <p>Name and Surname: Plamenka Bojcheva</p> <p>Title: Director of the Agency</p> <p>Email: aspi@aspi.mk</p> <p>Phone: 02/3118-038</p> |
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1. SUMMARY

The right of access to public information is one of the democratic values of modern society. Its primary goal is to provide users with effective access to public information, realizing the public interest through coordinated dual action:

- Systematic **proactive publication of information on the websites** of the public institutions, and
- Efficient **provision of information based on the individual requirements** of the information requesters.

Therefore, the right of access to public information is a strong indicator of the quality of work of the public institutions, their openness and transparency in the society. The consistent affirmation and application of the concept of access to information also contains the instruments for ensuring the participation of users in the adoption of regulations, strategic documents and general acts of public institutions, thereby strengthening the quality of the creation of public policies, their normative design and directly positive influence on the rule of law.

This report aims to present the work of the Agency for Protection of the Right to Free Access to Public Information (hereinafter - the Agency) during 2022, in front of the Assembly of the Republic of North Macedonia.

According to the Law on Free Access to Public Information¹, (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 deputy director, appointed by the Assembly of the Republic of North Macedonia.

During 2022, the Agency, as a secondary authority in the administrative procedure, acted upon **343** cases in accordance with its legal competences, within the legally provided deadlines. At the same time, the Agency dealt with cases arising from its operation in the field of legal and general affairs, and in accordance with its other legal competences, which were also completed in a timely manner during the reporting year.

In the current reporting period, the following data emerged from the operation of the Agency as a secondary authority:

The right of free access to public information in 2022, according to the data on appeal procedures initiated in front of the Agency, has been used by citizens' associations and non-governmental organizations as a tool for the realization of their own work programs, with

the aim of achieving transparency of the institutions and enabling the realization of public interests (a total of **92** appeals - **26,82%**). As evident from the Agency's statistical data, the largest number of submitted appeals belong to Citizens' Association "Center for Civil Communications" (CCC) from Skopje, which submitted 30 appeals; the citizen initiative "Ohrid SOS" submitted 18 appeals; Macedonian Association of Young Lawyers submitted 14 appeals; Association for Emancipation, Solidarity and Equality of Women (AESEW) submitted 13 appeals; Balkan Investigative Reporters Network BIRN submitted 9 appeals; while the Association of Citizens "Front 21/42" submitted 8 appeals.

As far as natural persons are concerned, during 2022, citizens usually appear as information requesters, i.e. as complainants, only in situations in which they resorted to the legal provisions of LFAPI in order to exercise some of their personal rights and interests, which arise from other material laws, regulating a different legal matter.

More specifically, according to the content of the appeals submitted to the Agency, it is evident that in the largest number of cases, citizens use LFAPI most often when they are unable to exercise their rights and obtain the information and documents they need, which derive from the institutions' native competences - the holders of information who did not act in accordance with the material laws that are used in their operation and decision-making in a certain administrative procedure. There are also cases of appeal procedures initiated by lawyers, law firms and legal entities, submitted to the Agency with the same purpose and with the same goal, for the purpose of providing evidence for a certain administrative or judicial procedure.

After the conducted analyzes and summary results, the fact that points to the still present, but certainly unacceptable practice, is striking. Namely, the largest number of appeals submitted to the Agency, for the period covered by this report, i.e. **211 appeals**, or **61,51%** are cases in which the holders of information did not act on submitted requests within the legally prescribed deadlines (20 days after the submitted request, or 30 days if the request requires extensive information) **due to "the silence of the management/administration"**. The Agency makes great efforts to emphasize the importance of proactive transparency and the publication of information by the institutions - holders of information, and especially the timely action on requests for public information, i.e. as long as the silence of the administration is not completely eliminated both at the central and at the local level.

In this context, it is necessary to point out that the Agency paid special attention to the promotion of proactive transparency among the institutions - holders of information at the central and local level in order for the institutions to recognize the public interest as one of the fundamental pillars of the democratic society and in that sense applying the LFAPI as one of the key anti-corruption laws.

We believe that it is necessary and important to highlight the activities undertaken by the Agency in the direction of facilitating the submission of requests for free access and increasing the transparency of the institutions. Namely, within the framework of the IPA 2 project, financed by the European Union, the two electronic platforms, which were put into operation in 2021, are actively used on the Agency's website:

- **E-portal for information holders**, which aims to raise the cooperation of the Agency with the information holders to a higher level, and

- **E-portal for information requesters**, through which applicants can submit a request electronically to all information holders, or file a complaint if they do not receive an answer to their request within the legally stipulated period.

The expectations from the active use of these platforms are increased transparency and accountability of the institutions, increased awareness of citizens about the right of free access to public information, as well as an improved, faster and more economical way for citizens to reach the requested public information. The future of a democratic society with open, transparent and service-oriented and digitalized institutions is a sure direction for building citizens' trust in such institutions.

During 2022, the Agency realized a total of **19** free trainings through the ZOOM platform, intended for officials who mediate public information in institutions-holders of information. The trainings were organized in two periodic cycles from January to June the first cycle, and from September to December in the second cycle of trainings, which were attended by officials from **257** institutions. The trainings are of exceptional importance when dealing with requests for free access to public information, especially because of the significance of the institutions' proactive transparency.

Considering the fact that there is a frequent change of officials for mediating public information (partially due to retirement, change of job, etc.), the Agency hereby points out that it is necessary to work on continuous education of officials through implementation of regular and additional trainings, including advisory participation of the Agency in building the capacities of information holders, both at the central and local level.

In addition to regular trainings for officials to mediate public information, the Agency, in cooperation with non-governmental organizations, and with financial support from international and domestic organizations (OSCE, USAID, NED) across several cities in our country, conducted trainings for the promotion of the right of access to public information, intended for the youth and the civil sector as requesters of public information, as well as for the holders of information, to promote the way in which citizens can obtain public information, as well as to encourage the transparency and accountability of the institutions-holders of information, who in

the course of their work create or dispose public information which, in fact, belong to the citizens, while the institutions are service-oriented and serve to all citizens in our society.

Through its representatives, in 2022, the Agency took an active part in the explanatory screening for Public Administration Reform in September 2022 in Brussels where we heard experiences and advice on how best to meet the requirements and new benchmarks of the EU legislation from this area as an important prerequisite in the process of the European integration of the Republic of North Macedonia in the EU and bilateral screening in December 2022, also in Brussels for Public Administration Reform and Chapter 32 – Financial Control and Functioning of Democratic Institutions, Cluster Fundamental Values, an area that is for the first time presented with the new revised methodology for negotiations on membership in the European Union.

The prepared presentations of the representatives of the Agency were highly evaluated by the representatives of the European Commission. Considering the fact that the process of approaching full membership in the European Union will continue in the current year 2023, the Agency works dedicatedly in all fields of its activities, in the interest of citizens, as well as for the civil rights and freedoms in terms of free access to public information.

Moreover, the Agency promoted the previously drafted by-laws, which are published on the Agency's website, as auxiliary tools for applicants and holders of public information, in the direction of efficient application of the LFAPI provisions.

To inform the young population about the basic goals and benefits of LFAPI, but also to guide them on how to exercise the right of access to public information, the Agency, in cooperation with the Association for Democratic Initiative (ADI), and with the support of The United States Agency for International Development (USAID) has prepared a handbook for youth on exercising the right to free access to public information in printed form and published it on its website.

Also, the Agency, in cooperation with ADI, and with the support of the USAID, prepared a Guide for appointing an official to mediate public information to help managers and responsible persons in the determination of officials for mediating information and specifying their obligations in the direction of correct application of the LFAPI, which leads to the building of open and transparent institutions and strengthening of the democratic processes in society.

Within the framework of the IPA 2 project "Transparency and Accountability of Public Administration" financed by the European Union, representatives of the Agency made a three-day working visit to the Commission for Access to Administrative Documents (CAAD) in Lisbon, Portugal. Such exchange of experiences and good practices are of particular importance and significance for affirmation and raising awareness of the importance of applying the right to

free access to public information as a part of the fundamental values and functioning of democratic institutions.

Furthermore, through the Campaign for Integrity, the Agency was part of the hybrid public debate on the topic: "Efficient use of the right to free access to public information in the process of strengthening the integrity of public institutions with a special emphasis on young people." This public debate was part of a series of online thematic debates that are organized within the project "Promoting transparency and accountability in the public administration of North Macedonia", financed by the European Union.

At the invitation and in the organization of the International Republican Institute, IRI - International Republican Institute from the USA, and in cooperation with the PAI Organization (Public Administration International from the United Kingdom), the Agency, through its representative, made a study visit to London, United Kingdom of Great Britain and Northern Ireland, together with representatives of political parties from North Macedonia.

The meetings with the political parties, as well as representatives of other relevant institutions in the United Kingdom allowed us to gain a lot of new knowledge about the work in the field of transparency and accountability of political parties in the United Kingdom in the sphere of finance (income and expenditure). The gained knowledge and the exchange of experiences provide an opportunity to make comparisons and apply good practices from the work of British institutions and political parties, in the work of institutions and political parties in our country, with the aim of increasing integrity, transparency and accountability, thus contributing to the prevention of corruption and the promotion of a modern democratic society.

By increasing citizens' awareness of the use of the right to free access to public information as a constitutionally guaranteed right, the necessity of continuous improvement of the proactive transparency of the institutions as a top priority also grows. For this purpose, in addition to improving the legal framework in this area, it is necessary to continue to work on raising awareness, especially among officials and managers in institutions, to build awareness of self-initiated (proactive) publication of public information.

It is particularly important to re-emphasise the fact that LFAPI represents an extremely important anti-corruption tool, recognized and highlighted as such by the authorities of the European Union, and its consistent application is extremely important from the aspect of fighting corruption and strengthening the integrity of institutions and employees in the public sector, as a service to citizens.

2. INTRODUCTION

The primary goal of the Agency is to promote, exercise and protect the constitutionally guaranteed right of free access to public information, through efficient and independent implementation of the appeal procedure and continuous education of the holders and requesters of information.

The annual report for 2022 covers the work of the Agency in the area of the realization of its legal competences. For a better, more vivid display, we hereby present the following parameters:

Due to compliance with the legal deadlines, in the reporting year 2022, a total of **13** cases were transferred to appeal procedure from 2021. During 2022, the Agency acted upon a total of **329** cases from the submitted appeals, while **14** cases, due to the legal deadlines that refer to the judgment of the holders of the appeals in question, as well as due to the observance of the deadlines for the action of the second-level authority, were transferred in 2023 to be resolved.

During 2022, a total of **343** cases/appeals, submitted against administrative and real acts of the first instance authorities, or due to the so-called silence of the administration. Against non-action of the information holders following requests for access to public information i.e. due to the silence of the administration, a total of **211** appeals (**61,51%**) have been submitted. The Agency states that the silence of the administration has had constant variations in the last year. For that reason, the Agency remains committed and engaged in the realization of the vision and mission of the Agency, through educations for the information holders for efficient building of the capacities of the holders of information both at the central and and at the local level.

Regarding the submitted annual reports on the operations of information holders in the field of access to information, it can be concluded that from the total number of **1449** information holders, **1402** information holders submitted an Annual Report on the application of the law to the Agency, which is **96,76%**.

This is the result of the increased efforts of the Agency made by implementation of regular trainings that instructed the officials to regularly and timely fulfill their legal obligations for submitting the annual report, but also applying the legally established practice, through its authorized person, in front of the the Misdemeanor Commission of the Agency, to initiate a misdemeanor procedure against the officials appointed for mediation with public information towards all information holders, who did not fulfill the legal obligation to submit an annual report to the Agency in a timely manner.

On this occasion, we would like to emphasize again that the Agency is still facing the challenge of fully exercising its legal powers within the limits of its own modest budget funds, which are practically impossible to achieve. For that reason, during the reporting year 2022, the Agency made attempts in several segments of its operations, and mostly in the part of the legal obligation to undertake activities for the education of the information holders, establishing or continuing cooperation with domestic and international participants in the field of access to public information.

We believe that, under the given circumstances, the attempt was successful, but we also emphasize that it is more than necessary that the Agency should be able to carry out its activities relying primarily on its own budget. This is particularly important due to the fact that the right to free access to public information is one of the key segments of fundamental values, as part of the pre-accession negotiations for the membership of the Republic of North Macedonia in the European Union and as such is of exceptional interest for the transparency and accountability of the institutions, as well as an irreplaceable tool for preventing corruption.

In this context, we would like to clearly emphasize the fact that in order to be able to carry out its activity in accordance with the legal competences more successfully, as well as to adapt and consistently apply the European values, the Agency has an urgent need for quality personnel re-equipment, primarily for much stronger budgetary support, especially since the work of the Agency in the area of the exercise of the right to free access to public information is of exceptional importance in terms of the realization and affirmation of fundamental values as well as the fight against corruption and the strengthening of the integrity of institutions.

These and other activities that were carried out during 2022 represent guidelines to which the Agency is directed in achieving its -

Mission

"Continuous implementation, promotion and protection of the right to free access to public information in the direction of increasing the transparency and accountability of institutions and facilitating access to public information", and to fulfill its

Vision

"Institutional recognition of the Agency as a credible affirmer and protector of the right to free access to public information".

3. STATUS, MANAGEMENT, COMPETENCE AND ORGANIZATIONAL STRUCTURE

The Agency for the Protection of the Right to Free Access to Public Information has been an independent and autonomous state body for three years, that is, an external body governed by a director and a deputy director.

The competences of the Agency are exhaustively determined by Article 30 of the Law on Free Access to Public Information ("Official Gazette of the Republic of North Macedonia" no. 101/2019), in accordance to which the Agency performs the following tasks:

- Leads administrative proceedings and decides on appeals against the decision by which the information holder refused or rejected the request for access to information of the applicants,
- Implements the provisions of this law,
- Prepares and publishes a list of information holders,
- Gives opinions on proposed laws regulating free access to information,
- Develops policies and provides guidelines regarding the exercise of the right to free access to information,
- Leads misdemeanor proceedings through the Misdemeanor Commission, which decides on misdemeanors in accordance with the law,
- Undertakes activities in terms of education of the holders of information about the right of free access to the information they have,
- Cooperates with the information holders regarding the realization of the right of access to information,
- Prepares an annual report on its work and submits it to the Parliament of the Republic of North Macedonia,
- Performs international cooperation activities related to the execution of the international obligations of the Republic of North Macedonia, participates in the implementation of projects of international organizations and cooperates with the authorities of other countries and institutions in the field of free access to public information,
- Promotes the right to free access to public information, and
- Performs other tasks determined by this and other laws.

Based on the type, scope, and degree of complexity of the works and tasks performed by the Agency, the interconnection and relatedness of those works and tasks and other conditions necessary for their performance in the Agency in accordance with the Rulebook on internal

organization and the Rulebook on the systematization of work positions whose acts are applied from 13.10.2020, the following organizational units are established:

1. Department of Financial Affairs;
2. Department of ICT - Information and Communication Technologies
3. Department for Administrative, Legal, and General affairs
 - 3.1) Administrative Procedures Sector, and
 3. 2) Legal and General Affairs Sector,
4. Department for Cooperation, Transparency, and Education
 - 4.1) Public Relations, Transparency, and Education Sector
 - 4.2) Cooperation and Analyses Sector
 - 4.3) International Cooperation and Projects Sector

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

ORGANOGRAM

The systematization act determined and described work positions for a total of 50 executors, spread over nine organizational units, of which a total of nineteen (19) jobs were filled on 31.12.2022, of which seventeen (17) are permanent employees and two (2) for a fixed period of time. Of the total number, sixteen (16) employees have higher education, while three (3) employees have secondary education.

The qualification structure of the employees with higher education is as follows: five (5) are law graduates, two of whom have passed the Bar Exam, five (5) are Economy graduates, one (1) of whom has a master's degree in Organizational Sciences-Human Resource Management, one (1) is an Economy graduate in the field of Management, and one (1) is Economy graduate in Marketing and Advertising, three (3) are graduates of the Faculty of Philology, of which one (1) has a master's degree, one (1) is Albanian language and literature graduate, one (1) is English language and literature graduate, one (1) is Faculty of Philosophy graduate, one (1) is human resources management graduate, and one (1) is Mechanical Engineering graduate.

There are three (3) employees with secondary education, of which one (1) is a high school graduate, while two (2) are economic technicians.

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

- Secretary General: - one (1);
- State Counselor: – none (0);
- Head of Department: - none (0);
- Assistant Head of Department: - one (1);
- Department Head: - three (3);
- Advisor: - seven (7)
- Junior Associate: - three (3)
- Independent Clerk: - one (1);
- Senior Officer - one (1), and
- Junior Officer:- two (2).

From the total number of employees, ten (10) are of Macedonian nationality (52.63%), four (4) are of Albanian nationality (21.05%), one (1) is of Turkish nationality (5.26), two (2) are of Aromanian nationality (10.53%), and two (2) are of Roma nationality (10.53%).

Percentage of the total number by nationality of employees in the Agency is as follows:

| | Systematized jobs | Filled work places | Percentage of total number of employees | Higher education | Secondary education |
|-------------|-------------------|--------------------|---|------------------|---------------------|
| Macedonians | | 10 | 52,63% | 9 | 1 |

| | | | | | |
|------------|----|----|---------|----|---|
| Albanians | | 4 | 21,05% | 4 | / |
| Turks | | 1 | 5,26% | 1 | / |
| Aromanians | | 2 | 10,53% | 2 | / |
| Roma | | 2 | 10,53 % | / | 2 |
| In total | 50 | 19 | 100% | 16 | 3 |

The total number of employees in the Agency by nationality is as follows: ten (10) are of Macedonian nationality, of which four (4) are male and six (6) are female, four (4) are of Albanian nationality of which one (1) is male and three (3) are female, one (1) female of Turkish nationality, two (2) females of Aromanian nationality, and two (2) are of Roma nationality, of which one (1) is male and one (1) is female. Of the total number of employees, six (6) employees are male, and thirteen (13) are female, aged between thirty (30) and sixty-three (63).

During this reporting period, two (2) job executors of Macedonian nationality, both from the Department for Cooperation and Analysis in the Sector for Cooperation, Transparency and Education had their employment in the Agency terminated - one (1) executor with the title of Head of Department for Cooperation and Analysis had his employment terminated on 03/19/2022 due to retirement, and the other executor, Junior Associate for Cooperation with Information Holders, terminated his employment on 03/31/2022 at his request.

In accordance with the Annual Employment Plan for 2022, which received financial consent from the competent institutions, a procedure was carried out through the publication of a Public Job Vacancy Advert for employment of a total of three (3) job executors by filling the following positions during this reporting year:

1. Senior Officer for Administrative and Professional Affairs, Department for International Cooperation and Projects, Sector for Cooperation, Transparency and Education - (1) job executor, and
2. Head of the Department for ICT - Information and Communication Technologies - one (1) job executor.

The procedure for employment of these two (2) job executors was carried out in the reporting 2022 year, while the employment procedure for the following position:

3. Head of the Department for Administrative-Legal and General Affairs - one (1) job executor, the employment procedure ended in 2023.

After receiving financial approval, the Agency published an internal announcement for the promotion of three (3) administrative officers for the following job positions in this reporting year:

1. Head of the Department for Financial Affairs - one (1) job executor, the procedure in this reporting year ended with non-election, and **the procedure for the promotion of the other two (2) administrative officers ended in 2023 for the following work positions:**
2. Independent clerk-accountant in the Department of Financial Affairs - one (1) executor and
3. Independent clerk-archivist in the Department for Legal and General Affairs, Administrative, Legal and General Affairs Sector - one (1) executor.

Furthermore, after previously receiving financial approval from the competent institutions and conducting a public announcement, the Agency concluded fixed-term contracts with two (2) job executors for the following work positions:

1. English translations adviser, Department of Public Relations, Transparency and Education, Cooperation, Transparency and Education Sector - one (1) job executor, and
2. Junior associate for project work, Department for International Cooperation and Projects, Cooperation, Transparency and Education Sector - (1) job executor.

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

4.1. Adjudication of appeals

The Agency for the Protection of the Right to Free Access to Public Information, as a secondary authority in the process of implementation of the realization of the constitutionally and legally guaranteed right of citizens to obtain public information, fulfilled its basic competence in the reporting year 2022 - to lead administrative procedures and to decide upon appeals from information requesters filed against information holders who adopted administrative or real acts that refused or rejected requests for access to public information submitted by applicants or used the so-called "silence of the administration".

We would hereby like to note that the right to file an appeal is the right of all applicants who have submitted a verbal, written or electronic request for access to public information to an institution at the central or local level, i.e. to any of the registered information holders (primary authorities acting upon requests from the information requesters).

The Agency, on the other hand, as a secondary authority in the procedure, forwards the received appeal from the dissatisfied applicants to the information holders for a decision, with a request that within 7 days they should make a decision on the appeals and submit a response to the Agency for the appeal, as well as attach all relevant documents, in order for the Agency to react immediately and make an appropriate decision within the legally stipulated period of 15 days.

Even in this setting, the Agency practices the corrective, rather than the repressive approach by delivering decisions to the holders of information who have not acted at all upon requests for access to public information, ordering them to act in accordance with the LFAPI within 15 days of receiving the the decision, with the obligation to inform the Agency about their actions within that period.

To the information holders who, on the other hand, did not act in accordance with the provisions of the Law, i.e. passed an administrative act that partially or fully rejects the request, the Agency delivers decisions for them to act again, with instructions on how to do it. If such initial decisions do not achieve the goal of LFAPI, after a second appeal has been submitted by the applicant, the Agency prepares and delivers meritorious decisions to the information holders, which in most cases result in obligations for the information holders to deliver the requested information to the applicants, i.e. requesters.

Fully respecting the legal guidelines, the Agency hereby submits the processed data for the reporting year 2022.

During the course of 2022, the Agency received a total of **343** appeals. These are the case appeals received from the information requesters.

In January, a total of **18** complaints were submitted to the Agency, in February-**17**, March-**50**, April-**59**, May-**23**, June-**18**, July-**19**, August-**36**, September-**14**, October-**30**, November-**17**, and in December-**42**.

Chart 1: Number of submitted appeals by month

Structurally, for the first time almost even numbers appear as complainants to the Agency, i.e. in total **195** appeals were submitted by legal entities, i.e. by citizens' associations and foundations, while by natural persons have lodged **148** appeals. In the past reporting periods, without exception, above **80%** of the appeals were lodged by the first-mentioned category of applicants, while the number of appeals filed by natural persons was minor.

4.2. Solved cases and their structure

During 2022, i.e. until the date of preparation of this Annual Report, the Agency acted upon all **343** cases.

While acting upon the appeals received in 2022, the Agency brought a total **343** final and **46** meritorious solutions. These figures are the result of the observance of the provisions of the Law on the General Administrative Procedure according to which, in addition to the initial decisions with which the Agency ordered the first instance authorities to act in accordance with the LFAPI or returned cases to them for re-processing, it also adopted meritorious decisions in cases when the holders did not act after its previous decisions after a second appeal was filed. This legal procedure proved to be productive, given that almost all information holders acted in accordance with the final decisions of the Agency.

Those holders who did not act in accordance with the decisions of the Agency, upon the initiative of the claimants/complainants, or upon the official duty of the authorized person in the Agency, faced a misdemeanor procedure carried out by the Misdemeanor Commission of the Agency.

The performance of the Agency in the field of conducting administrative procedures is shown statistically as follows:

- **106** decisions by which the Appeal is respected and the first-instance authority is ordered to act on the request of the applicant;
- **30** decisions by which the Appeal is respected and obliges the holder to provide the requested information;
- **29** decisions rejecting the Appeal as unfounded;
- **39** decisions by which the Appeal is rejected as untimely/inadmissible/premature;

- **111** decisions by which the Appeal is respected and the case is returned to the first-instance authority;
- **74** decisions that stop the Appeal procedure due to the withdrawal of the appeal by the applicant, due to a response received from the holders in the meantime, or with a delay.

Chart 2: Solved cases and their structure

4.3. Appeals filed against information holders

From the submitted appeals, it is established that most of the time they are directed against the following information holders:

- **151** against state institutions at the central level,
- **114** against municipalities,
- **18** against public enterprises and institutions,
- **12** against the judiciary,
- **25** against legal and natural persons exercising public powers,
- **13** against educational institutions,
- **10** against health institutions.

Chart 3: Complaints filed against information holders

4.4. Nature of submitted appeals:

The above-mentioned appeals were submitted by the claimants:

- **211** due to the silence of the administration (**61,51%**),
- **85** against decisions by information holders (**24,78%**),
- **47** against response/notification from information holders (**13,70%**).

To this end, the percentage of appeals filed due to non-action of the information holders according to the requests within the legally provided deadlines, i.e. they were submitted due to silence of the first-instance authority, is worrying.

Despite the efforts made by the Agency, through continuous online and physical trainings during the year to include as many officials as possible among the information holders, this percentage does not decrease, on the contrary. The Agency, from the processing of the files in

question, as well as from the regular electronic and telephone communications with the officials and with the managers of the information holders, concludes that the readiness for openness to the public is greater among the officials, in contrast to the attitudes of the management structures, which go in the reverse direction.

Therefore, the Agency considers that it is more than necessary to organize additional trainings, workshops, round tables, and similar presentations of LFAPI for the managers among the information holders.

Otherwise, the dissatisfaction of the information requesters becomes evident from the submitted appeals, stemming from the failure/action of the information holders, i.e. from the received negative decisions and answers in relation to requests relating to:

- The operation of the Sectoral Working Group for competitiveness and innovation;
- Licenses issued for the production of medical marijuana in the territory of the Republic of North Macedonia;
- Number of inhabitants in the municipality and their structure;
- Percentage (or number of inhabitants) from the municipality that are supplied with water from a public water supply system;
- Settlements in the municipality that have problems with contaminated drinking water;
- Establishing protective zones of water supply sources;
- Existence of major pollutants that affect water quality;
- The use of water for drinking and for watering agricultural crops;
- Activities for the rehabilitation of the Ohrid coastline and its return to its original state;
- Information on established zones for sanitary protection for Biljanini Izvori (springs) in Ohrid;
- Action of the Ministry of Culture in connection with the conservation approval issued by the Administration for the Protection of Cultural Heritage for a new building on Hristo Uzunov Str.17, Ohrid;
- Procedure for the alienation/sale of land owned by the Republic of North Macedonia and the complete documentation for privatization of construction land in state ownership;
- Records of samples taken from food, products and materials that come into contact with food, compiled by official veterinarians/food inspectors when taking laboratory analyzes and tests during 2017, 2018, 2019, 2020 and 2021, based on The Law on Food Safety;
- All documents for specific procedures for public procurement of specific institutions;
- Building approvals for II category buildings under the jurisdiction of the municipalities;
- Funds collected in 2020 and 2021 in the name of excise taxes on beer, ethyl alcohol/pure alcohol and cigarettes;
- List of online media (Internet portals) that were registered for paid political program (PPR) of the last local elections, Price list of all registered online media (Internet portals) for PPR of the

last local elections, invoices for payment for participation in PPR by of online media (Internet portals) and summary data of how much public money from which political party or other entity was paid to online media (Internet portals) based on PPR for the last local elections;

- The amount of the divided financial resources that are intended by the municipality for 2018, 2019, 2020 and 2021 for the media, and to which media the financial resources were paid;
- Data on all management contracts concluded in the period from 01.01.2011 to 31.12.2021 in specific joint-stock companies, monthly remuneration (salary or other type of remuneration);
- Copies of invoices for the months of January and February 2022 for account 425990 (other contractual services) paid by the municipality;
- Rulebook or other legal act that defines the method of charging for "Hospital day", which defines what is meant by "Room and Stay";
- Whether the municipality adopted a Program for the treatment of homeless animals;
- Photocopy of all registered dogs individually in the Information System of the Food and Veterinary Agency (ISFVA) and annual reports on the number of captured and treated stray animals in the territory of a specific municipality;
- All contracts for the purchase of coal, lignite, and fuel oil that AD "ESM" concluded with private companies in a specific period. The complete offer and documentation that the private companies submitted to AD "ESM" for the above contracts;
- Has the municipality prescribed special procedures that ensure the exercise of the right of access to information and public participation in making decisions related to the state of the environment in accordance with Art. 17 of the Law on the Environment;
- Decisions on the executive selection of judges and presidents in the courts of the Republic of North Macedonia, decisions on the dismissal of judges and presidents due to unprofessional and negligent performance of the judicial function, decisions on imposed disciplinary measures due to established disciplinary responsibility for judges, reports on the evaluation of judges and presidents in the courts of Republic of North Macedonia;
- Which company received the concession to manage Popova Shapka?;
- Which legal entities were exporters of firewood during the current year 2022 and how many quantities were exported through each of them?;
- Documents related to property-legal relations, and others.

4.4.1. Status of cases after lawsuits

During 2022 there were **4** invitations to respond to lawsuits filed against the Agency's decisions made in 2021, of which three (**3**) were submitted by information holders, and one (1) by an information requester. Moreover, thirteen (**13**) lawsuits were filed against Agency decisions made in 2022, of which four (**4**) lawsuits were filed by information requesters, and nine (**9**) from information holders (of which **7** are submitted by AD Elektrani of North Macedonia).

The agency acted upon all invitations to respond to lawsuits of the Administrative Court and prepared responses to all lawsuits.

During 2022, the Administrative Court, out of a total of thirteen lawsuits filed, decided only on the part of the request for the imposition of a temporary measure, and in all cases it passed a decision rejecting the requests for the imposition of a temporary measure as unfounded. These decisions of the Administrative Court are also confirmed by the Higher Administrative Court.

From the administrative disputes initiated against the decisions of the Agency in the past years, in 2022 decisions were submitted to the Administrative/Higher Administrative Court whereby in two cases (one initiated by a requester and one by information holder) the Agency's decisions are annulled and the cases are returned to the Agency for further proceedings, while three cases in which the lawsuits of the plaintiffs (two from the holders and one from the information requester) are rejected as unfounded.

In the reporting year 2022, the Agency was again faced with the abandonment of the practice, established in the operation of the Administrative Court and the Higher Administrative Court, to reject the lawsuits of the information holders as impermissible. Despite the indications of the Agency that they do not have foreign capacity (active identification), i.e. they cannot demonstrate protection of their legal interest before the Administrative Court when, as a first-instance authority, they decide on the rights and interests of information requesters, when it is necessary to enable realization and protection of the public interest.

This year, decisions of these courts have been made by which the lawsuits of the information holders are again considered permissible, referring to the legal interest of the information holders, whilst neglecting and/or minimizing the public interest in publishing of the requested information.

4.4.2. Misdemeanor procedure

Proceedings according to the misdemeanor provisions of LFAPI in the Agency continued successfully in 2022. In this reporting year, the Agency conducted a total of 136 settlement procedures, 130 cases were about the failure to submit the Annual Report within the legal deadline, and six cases were for non-implementation of the Agency's decisions. For 38 cases, the settlement was successfully carried out.

For 9 cases where the holders of information were political parties, the procedure was not carried out, because for 8 of them the Agency, even after several attempts, failed to get in touch with the address data received from the Basic Civil Court Skopje, and for one (1) political party is determined that it is no longer registered in the Unified Court Register of Political Parties.

After a request was submitted for initiation of misdemeanor proceedings, the Misdemeanor Commission acted upon a total of 89 misdemeanor cases. After the misdemeanor procedure was carried out, for 18 cases, a Decision was made for release from responsibility, and for the remaining 71, decisions were made that imposed a misdemeanor sanction, of which 64 cases were reprimands, and seven (7) cases were fines.

In the course of 2022, lawsuits were filed before the Administrative Court of the Republic of North Macedonia against three (3) resolutions passed by the Offenses Commission, which imposed a misdemeanor sanction (two (2) warnings and one (1) fine). The misdemeanor commission acted upon the invitation from the Administrative Court and submitted a response to the lawsuit for all three (3). The procedure for these lawsuits is ongoing, that is, a decision has not yet been made by the Administrative Court.

4.4.3. List of information holders

New information holders were recorded in the List of information during the submission of the annual reports for this reporting year, and we should emphasize that they submitted data about their institutions on their own initiative as new holders of information. These newly registered holders are among legal and natural persons who perform activities of public interest and educational institutions. Thus, the total number of registered entities on the List reached **1.449**.

Furthermore, there were **5** new holders of information recorded in the reporting period, and from the previous reporting period, one information holder reported that they no longer function, that is, they had their work license revoked. In the List of information holders with legal and natural persons exercising public powers and activities of public interest, the number of holders is **74** by registering two new information holders: the Olympic Committee of North Macedonia and the Heat Energy Supply Company ESM Heat Supply LLC Skopje. The list of educational institutions in all degrees, in the reporting year 2022, has also been expanded with three new information holders, which makes the total number of these institutions **582**.

The list of state institutions, as in the last reporting year, is **146** holders. We have the same image for the section with public enterprises and institutions where there are 325 registered institutions as information holders. The link with Health facilities in the Republic of North Macedonia contains **110** holders, while the number of holders at the political parties registered in the single court register of political parties is 57. Holders from the Judiciary 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**.

We should emphasize that the list of holders is variable and the number of institutions published in it depends on new entities that will be detected as ones that perform activities of public interest within their competence.

Chart 4: List of public information holders

4.4.4. Annual reports of information holders

In the legally provided term, 1,404 holders or 96.86% of the total 1,449 holders are recorded in the List of Holders in 2022. There are reports of **3** information holders that were considered invalid from the total number of submitted reports, which is why the data contained in them are not part of the Report.

The legal obligation arising from Article 36 of the Law was not respected by the officials of **45** institutions in total, despite the four reminders for the submission of the annual report form delivered to them, which is why it is not possible to determine whether the requests were submitted to these holders by the applicants.

There's an increasing trend of submitting a larger number of reports, which if we compare it with the reporting year 2021 when **111** holders did not submit a report on the implementation of the Law, we can note that this year the number of undelivered reports is only **3,11%** from the total number of holders. The difference is noticeable indeed.

For this improved implementation in the submission of annual reports, there were misdemeanor provisions implemented against officials who behaved ignorantly in the reporting year 2021.

Chart 5: Number of Annual Reports

Officials at all **88** information holders registered with local self-government units, including the city of Skopje, the Community of Local Self-Government Units (ZELS) and the Centers for the Development of Planning Regions, are the only holders who fulfilled the obligation to report on their implementation of free access to public information in its entirety. Only **one holder** from a **total of 67** registered bodies of the judicial authority did not submit an annual report.

This reporting year only **3** information holders out of total 146 state institution did not submit a report within the legal term. Improvement in compliance with the legal obligation to submit an annual report this year was shown by officials at educational institutions from all levels of the educational system, from **582** information holders a total of **567** holders have

submitted a report, while only **15** officials did not act upon the obligation to submit a report to the Agency.

Out of the 110 registered health facilities, 107 reports to the Agency fulfilled the legal obligation. Only **3** health institutions did not submit a report on the implementation of access to public information in relation to their work. A total of **316** holders showed how they respect the legal obligation by acting upon requests submitted to public enterprises, while only **9** institutions did not submit an annual report of the total **325** registered entities.

In contrast to last year, there is a big improvement in the implementation of the legal obligation among legal and natural persons who exercise public powers and activities of public interest, when **72** entities submitted an annual report to the Agency, while only **2** entities did not comply with the obligation arising from the Law. Out of the **57** registered political parties, **45** submitted a report, while 12 officials did not submit annual reports. The officials of 8 holders, as in the reporting year 2021, despite the misdemeanor proceedings against them and this reporting year did not submit a report through which they will show their reactive transparency in relation to the requests submitted by the applicants.

In 2022, the received and processed reports (1,404 in total), which were submitted to the Agency by the holders, show that a total of 7,286 requests were submitted to them, of which 6,915 were positively answered within the legal deadline. The reports show that this reporting year, unlike last year, 1,624 fewer requests were submitted to the holders. The reduced number of requests to the holders, this reporting year, is the result of the Agency's activities to promote and encourage institutions to apply proactive transparency as much as possible, by publishing as much information as possible on their web pages.

The proactive publication of information contributes to increasing transparency, because it improves access to public information, but also its quality. In this way, the conditions and opportunities for public participation and influence on the processes of creating policies and bringing public decisions, but it also contributes to the improvement of public accountability, because it improves the rules, regulations and mechanisms for public responsibility of the responsible persons in the institutions.

In the reports, the officials also submit data on the exceptions from free access prescribed in Article 6, or by other legal regulations, which were the reason for refusing or rejecting the access for 246 requests, which is **49** requests more than the last reporting year. Also, in their reports, the holders show data on 112 unanswered requests, as well as on 13 requests that were transferred for handling in 2023, and which were received before the very end of the calendar year 2022.

Chart 6: Handling of the appeals

The reports of the holders contain data, according to which, as a sign of dissatisfaction with the actions of the officials, the claimants filed **214** appeals against the first instance decisions of the holders, of which **142** appeals were accepted after consideration by the Agency.

Officials also show about **40** changed first instance decisions after the Agency's action, about **28** rejected appeals by the Agency, as well as about 16 rejected appeals.

The annual reports of the Units of Local Self-Government and Planning Regions state that a total of **2,458** requests were made to them; this reporting year saw the highest number of requests ever received by the holders, but this figure was **160** fewer than the previous reporting period. **2,087** requests were submitted to the state institutions by the applicants, which represents a decrease of **913** requests from the reporting year 2021.

This year, the Ministry of Internal Affairs got the most requests (193), followed by the Agency for Youth and Sports with 121 requests, the Ministry of Labor and Social Policy with 93 submissions, and the Ministry of Health with 93 submissions.

According to the judicial authorities, the requesters' interest in their work has fallen to 467 requests, and 730 requests for free access to public information have been received this year. There is also a decrease of 239 submitted requests to the health institutions, where the officials report that 608 requests have been received. Applicants exhibited similar interest in the work of educational institutions of all degrees in the previous reporting year, with 364 applications submitted to them.

This reporting year, applicants have demonstrated the least interest in the activity of political parties, with only **42** applications submitted, compared to **276** applications made previous year.

There is a slight increase in public enterprises and institutions that presented **843** requests, which is **17** requests more than the reporting year 2021. Requesters showed increased interest in the information created and available to the holders of legal and natural persons who exercise public powers and activities of public interest, and whose officials recorded **154** requests, which is **51** requests more than the last reporting year.

Chart 7: Number of requests submitted to holders

They were **6** requests submitted to the Agency for the Protection of the Right to Free Access to Public Information as the holder of the information, which were answered positively within the legal deadline.

In addition, the Agency reports on the implementation of the commitment "Proactive publication of public information on the websites of institutions" from the Partnership for Open Government Partnership's Action Plan 2021-2023, which it carried out in collaboration with the Center for Civil Communications. Again, in the Annual Report Form submitted to all holders of information, the Agency included the part in which the information holders were instructed to inform, i.e. to show the links through which the citizens, i.e. the applicants, will be able to access the requested information on their web pages, as specified in the article 10 of the respective Law.

One of the goals of this commitment is for the Agency 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.

Regarding the state institutions, **119** fulfilled the obligation, **17** didn't provide notice of their proactivity, **7** are partially transparent, while for **3** holders there is no data explaining the reasons why the information holders did not submit a report on their implementation of the legal obligation.

Officials from 60 local government units and Centers for the Development of Planning Regions report on proactive transparency, while 23 holders failed to provide links and thus comply with Article 10. Five (**5**) information holders are partially transparent. The judicial authority is proactive in **25** holders, **3** holders are partially transparent, while **38** do not present data on the proactive publication of public information. Transparency cannot be shown for **1** holder due to the fact that he did not submit a report within the legally stipulated period.

Among the health institutions, **7** holders submitted a report on this obligation, **8** are partially transparent, while **92** holders did not submit links to monitor their transparency. There were **3** holders among the health institutions that did not submit reports to the Agency within the legal deadline.

The officials of **24** holders of legal and natural persons who exercise public powers and activities of public interest report on their transparency, **9** are partially accountable, while **39** did not report on their proactivity in their work. There are **2** holders did not submit an Annual Report.

Only **6** political parties report on proactive transparency, **4** report only partially, and **35** do not report on the implementation of Article 10 of the Law. In terms of proactive transparency, **12** holders among the political parties failed to submit a report.

Among the public companies, **47** holders showed proactive transparency, **31** are partially transparent, **238** holders did not comply with this obligation in their reports, while **9** holders did not submit an annual report.

Among the educational institutions, **484** holders are not proactively transparent, **37** of the holders are partially transparent, and only **46** report their transparency to information requesters. The officials of **15** information holders did not submit reports on the implementation of the Law, and they also did not report on their proactive transparency.

4.4.5. Contents of Annual Reports

The holders in their annual reports report on the nature of the requests that were submitted to the institutions and from the submitted requests it can be concluded that the requesters showed interest in all spheres of the social life. The information seekers submitted the largest number of requests (4,545) to state institutions and local self-government units, which is why they are continuously the most interesting in terms of their operation and functioning for citizens.

The applicants were mostly interested in the work of the local self-government, namely: how many and which detailed urban plans a certain municipality has adopted, how many and which DUPs and BUPs are in the process of being adopted and in which specific phase each of them is currently, granted construction permits, final accounts for municipal budgets, for public procurement procedures, for granted projects and financial resources related to culture, citizens' associations, for the work of the media, as well as information on the World and Cultural Management Plan heritage of the Ohrid region with an Action Plan (2020-2029).

The requests sent to health institutions pertain to who and for what the public procurements were carried out in the institutions, data on money granted for the treatment of uncommon illnesses, for marginalized groups, and for their financial operations.

The applicants were also interested in the operation of government institutions. The requests involved tenders for public procurement, tenders for medical equipment and vaccines, tenders for energy and information from their competence, data on members of supervisory and management boards, and the amount of their fees.

The greatest interest among applicants has been shown in obtaining information related to tenders for coal mining, for the purchase of electricity, natural gas, and information related to the purchase and distribution of energy among legal and natural persons who perform activities of public interest.

4.4.6. Incomplete reports and recorded irregularities

The reports of three holders from the educational institutions, legal and natural persons performing activities of public interest and public enterprises and institutions are incomplete and as such were not taken into account during the preparation of the Annual Report of the Agency.

The reports of the elementary school "Tosho Arsov" from Shtip, the Boxing Federation of Macedonia and the Public Institution Intermunicipal Center for Social Work from Debar contain data related to their competence, as well as information related to their financial operations, financial reports.

From the specified information in their reports, it can be concluded that no requests were submitted to the specified holders based on the Law on the FAPI. In the coming period, the officials will be invited to the trainings that the Agency organizes to become familiarized with what information they need to provide in the future when they fill out the report on the implementation of the law.

4.4.7. Cooperation with officials at the holders

Moreover, in the reporting year 2021, the Agency cooperated intensively with the officials, as one of the basic prerequisites for a more successful implementation of the Law on FAPI. The employees were constantly available to the officials helping them to respond more successfully to their delegated responsibilities. The contacts were used to clarify the legal obligations relating to the obligations of officials, the manner in which a new official is authorized, but also for the correct filling and certification of the form for the annual report with the signature of the officials, i.e. the delegation of competences who have the newly appointed legal obligation.

This continuous communication eased the dilemmas and omissions that arise among the newly appointed officials for the best possible implementation of the law, and stem from the lack of familiarity of the officials in the new area of activity. As a positive example of institutions that submitted requests on their own initiative to be part of the List of holders, i.e. holders who will implement free access in their work, are: **KIC "Romansa"- Makedonska Kamenica, Heat Energy Supply Company ESM Heat Supply LLC Skopje, Municipal Primary School "Nikola Karev"-Radovis, Municipal Primary Music School-Struga and JOUDG "Srcko"-Lozovo.**

The Agency, like every reporting year, although there is no legal obligation, 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 holders and their officials. Official phone lines remained operational until the conclusion of the deadline for the submission of the yearly reports, during which time authorities spoke with holders about any issues that arose when filling out the Report Form.

This reporting year, the Form also included a new subsection created in accordance with the National Action Plan for Partnership for Open Government and the commitment "Proactive

publication of public information on the web pages of the institutions," which the Agency is obligated to implement.

By this commitment, the officials had to enter the links to the 22 categories of documents contained in Article 10 of the Law on Free Access to Public Information to the holders of public information. This attachment only applied to public information holders who have web pages. During the reporting year, 107 holders submitted Decisions for the appointment of new officials and trainings were held for them to familiarize themselves with the Law and its implementation in practice.

4.4.8. Training and education

In accordance with the provisions of Article 30, paragraph 1, paragraph 7 of the Law on Personal Information, the Agency carried out activities on the education plan of holders of public information on the right to free access to information during the course of 2022, in order to fulfill another of its legal competences.

To this end, the agency continues to educate authorities with public information holders at the central and municipal levels, offering them free online training on how to operate in accordance with the provisions of the LFAPI.

The Agency held a total of 19 trainings on the ZOOM platform, as part of a previously developed training program for officials to mediate public information for 2022, which it published on its website. Officials for information mediation from institutions/information holders were invited to the trainings.

Within the context of the trainings, the Agency stressed the responsibility of information holders to take proactive steps for the publishing of all public information at their disposal. Simultaneously, the benefits of exercising transparency and openness in their work were highlighted to them.

Officials were invited to the trainings to mediate with information of holders who appear for the first time on the List of Holders and officials who are newly appointed in institutions of current holders of information. The trainings were also attended by officials who, despite having previously attended trainings, expressed interest and an eagerness to participate in the new trainings, as well as officials from institutions that the Agency noted were not successful enough in the previous period or were more difficult to deal with in handling requests for access to public information.

The main goal of the trainings was to train the officials with the holders of information, how to correctly and timely respond to the requests for free access to public information, according to LFAPI.

The specific goals of the trainings were for the officials to get to know each other and through practical exercises to train them for: enactment of administrative acts based on the Law, familiarization with the goals and activities of the Agency and the establishment of mutual cooperation, for the proactive publication of public information, preparation and handling requests for free access to public information through experiential exercises, simulations of the implementation of the harmfulness test, as part of the process of handling requests for free access to information, familiarization with the procedure for handling appeals in the second instance authority, and exercises with practical examples (cases) 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, namely: state institutions, judicial authorities, municipalities and centers for the development of planning regions, health institutions, public enterprises and institutions, educational institutions, legal and physical persons exercising public powers and activities of public interest.

There were 257 institutions that registered their representatives for the trainings (some with more participants), while some officials from the holders of information, although duly invited, did not respond to the free trainings.

The Agency emphasizes that the trainings that are organized are FREE and appeals to the officials, and above all to the persons responsible for the information holders, to regularly register for the trainings at the email address: **obuki@aspi.mk**, which the Agency has opened for the purpose of the officials persons to apply for participation in the trainings upon their own initiative. This was done for the simple reason that through these trainings they will become familiar with the procedure for better implementation of the LFAPI. Also, these trainings are of interest for the citizens and their right to be informed about the operation of the institutions.

4.5. Employee Trainings

In the reporting year 2022, the employees of the Agency took part in trainings, workshops and webinars that were organized by state institutions, trainings organized within the framework of cooperation with civil society organizations, trainings realized within the framework of the IPA 2 project, and in connection with the implementation of tools that are needed for their current work.

The trainings were organized for the preparation of projects for grand support from the EU and other donor programs, training for trainers, for promoting transparency and accountability of the public administration, the experiences of the EU Ombudsman, the use of the DMS system in the Agency, the new geopolitical consequences of misinformation in Western Balkans, for the implementation of a policy of integrity, support in the implementation of the modernized legal framework for the protection of personal data, building services aimed at citizens for a digital future, as key helpers for strengthening/improving the digitization of the delivery of public services in the Western Balkans region, how to expand its utilization, as well as to raise awareness of the digital future and how to use it for cross-border services.

4.5.1. Agency's Website

The website continued to promote proactivity in the work of the Agency in this reporting year as well. The E-portals intended for information requesters and holders, which become recognizable by users, were used in 2022 by all stakeholders who use and implement free access to public information.

The Agency informs that the citizens/requesters of public information have recognized the Portal for Requesters - <http://slobodenpristap.mk/> as a convenient tool for a quick way to get the required information that the information holders possess.

The data from the one-year implementation of this tool shows that **93** requests were submitted by information requesters to holders of public information through the E-portal for Requesters. The fact that 2 requests for free access were also submitted by foreign persons is encouraging, which is made possible by the Law on Free Access to Public Information. Legal entities submitted 2 requests through the portal. At most, **38** requests were submitted to the Municipality of Prilep and **5** requests to the Municipality of Centar.

The applicants exercised their constitutional right by submitting requests for access to public information to all holders of information, namely to state institutions, municipalities, health institutions, holders from the judicial authority, public enterprises and institutions, as well as holders from educational institutions and legal and natural persons exercising public powers and activities of public interest.

Requesters have the right to request information from any public information holder and receive a response. This Free Access portal helps them electronically create and send a request for free access to public information. All the created requests are publicly available on the portal and the requesters can familiarize themselves with the requests that were submitted to the information holders.

The Agency used the portal for holders to communicate with the holders, by sending reminders to all registered holders from the List of Holders to submit the annual report, as well as the Conclusion adopted at the Sixty-third session of the Government of the Republic of North Macedonia, with which the Agency asked all holders of information to make a list of the most frequently requested data in accordance with the Law on free access to public information in the period from 1.1.2020 to 30.06.2022, with the exception of already published data in accordance with Article 10 of the Law.

Through the portal, 137 holders fulfilled this obligation within the legally stipulated deadline for submitting Annual Reports. The holders also used the tool to ask questions to the Agency related to its competences, and in connection with the implementation of Articles 8 and 36 of the Law.

The Agency invites applicants and holders to continue using the Portals to create their application in order to obtain the necessary public information and to fulfill their legal obligations related to the implementation of the Law in a quick and efficient manner.

Through its website, the Agency also informed the citizens about its activities in the reporting year 2022, as well as about the prepared analyzes and reports from its scope of work. The prepared monitorings for the proactive publishing of information on the websites of the holders in accordance with Article 10 by the judicial authority and state institutions were published in the PUBLICATIONS section.

On the website, the Agency continued the practice of publishing information from its financial operations in an open format, as well as for data from the Annual Report, with which its proactive operation is an added value in implementing free access to public information.

4.5.2. Transparency in the work

The Agency raised its visibility in the public in a transparent way through a large number of activities and collaborations with civil society organizations, journalists and institutions.

To begin with, director of the Agency, Ms. Bojcheva, had a guest appearance in the morning program of Telma Television, where she spoke about free access to public information and introduced viewers to their constitutionally guaranteed right to request and receive information from institutions/information holders.

Furthermore, director Bojcheva, and the Secretary General, Ms. Tanja Kovachev, had a meeting with the Deputy Prime Minister of the Republic of North Macedonia, in charge of policies for good governance, Ms. Slavica Grkovska. At the meeting, the representatives of the Agency emphasized the good cooperation and partnership relationship with the General

Secretariat of the Government aimed at promotion of the right of access to public information, which stems from the signed Memorandum of Cooperation between these two institutions.

Tanya Kovachev, Secretary General of the Agency and Katica Mihajlovic - project manager at the Association For Democratic Initiatives (ADI) were also guests in Telma Television's morning show, in which they introduced the viewers to the current activities carried out with the support of the USAID Project for Citizen Participation to promote the available tools and procedures for exercising the right to free access to public information.

The Director of the Agency and the President of the Judicial Council, Pavlina Crvenkovska, signed a Memorandum of Cooperation to increase the active transparency of the courts in the direction of consistent implementation of the provisions of the Law on Free Access to Public Information and the realization of the right of citizens to free access to information.

The Agency, in accordance with its competences and in accordance with the signed Memorandum of Cooperation with the Judicial Council for increasing the active transparency of the courts in the direction of consistent implementation of the provisions of the Law on the Public Prosecutor's Office and the realization of the citizens' right to free access to information, carried out monitoring of the websites of the Basic Court, the Appellate Courts, the Administrative Court, the Higher Administrative Court, the Supreme Court, and the Judicial Council regarding compliance with Article 10 of the Law.

To continue with, director Bojcheva addressed the panel session dedicated to "Ethics and anonymization of data" at the international conference Open Data Conference in Skopje, organized by the Foundation "Metamorphosis"-Skopje. This conference was focused on the topic "Data and the Culture of Openness".

In the opening address, Ms. Bojcheva emphasized that "when the holders of public information are open to the public, the citizens find out what and how the state government bodies and other establishments and institutions work. This enables them to participate equally in public life and continuously control the work of the authorities."

The Director and General Secretary of the Agency also met with the Deputy Prime Minister, in charge of good governance policies, Slavica Grkovska and a delegation from Estonia, led by Ular Jakso. At the meeting, experiences were shared on how to increase the transparency of institutions and the digital transformation of society.

The agency prepared a six-month report on the implemented activities resulting from the legal competences for the period January-June 2022. 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 arising from its basic competence - to conduct administrative proceedings and

decide upon the appeals lodged by information requesters against the information holders, in cases where the information holders did not act in accordance with the provisions of the Law on free access to public information.

Furthermore, director Bojcheva had an interview for the Balkan Research Reporter Network-BIRN Macedonia, which was used as part of the methodology for the preparation of BIRN's program activities.

The Agency prepared a Report on the conducted analysis for the promotion of transparency and accountability of information holders for free access to public information. According to the Conclusion adopted at the 63 Session of the Government of the Republic of North Macedonia held on 20.07.2022, the Agency is directed to ask all holders of information to make a list of the most frequently requested data in accordance with the Law on Free Access to Public Information in the period from 1.1.2020 to 30.06.2022, with the exception of the already published data in accordance with Article 10 of the Law.

To this end, the Agency submitted a request to all 1445 holders of information published on the List of Holders of Information to act upon the Conclusion of the Government of Republic of North Macedonia no later than August 10, 2022.

The Director and General Secretary of the Agency had a working meeting with the Minister of Information Society and Administration, Admirim Aliti. The meeting discussed the increasing responsibility in strengthening the transparency of institutions as a critical factor for reducing corruption and the professionalism of public administration, including the efficiency of services to citizens.

In the organization of the Center for Change Management (CCM), and in cooperation with the Agency for the Protection of the Right to Free Access to Public Information and the Deputy President of the Government of the Republic of North Macedonia in charge of good governance policies, a conference was held on the topic "Improvement of the system for free access to public information". The purpose of the conference was to present the Analysis of the most frequently requested data through the instrument for free access to public information, as well as to encourage the proactive approach of the holders of public information to the publication of information of public interest.

In the first panel, a draft of the Guidelines for improving the transparency of public sector institutions was presented, based on the analysis prepared by the Change Management Center in cooperation with the Agency for Free Access to Public Information. In this process, a list of information will be drawn up, which will further become an obligation to be published on the web pages of the institutions, for better access to the information they have. It will also improve the proactive transparency of the information holders.

Representatives of the Agency also took an active part in the round table on the topic: "Integrity standards in the public sector according to the United Nations Convention against Corruption (Articles 7, 8 and 10)", organized by the Ministry of Justice, with the support of UNDP.

Agency officials met with a group from SIGMA/OECD and representatives from the nonprofit sector to discuss upcoming initiatives. The mission of SIGMA/OECD is to learn about the functioning of the administrative courts in the countries of the Western Balkans and what impact their decisions have on the work of the institutions, especially in the procedures related to free access to public information.

According to the Action Plan for the implementation of the Public Administration Reform Strategy 2018-2023, in the special objective Measure 3.4.1.6. Strengthening the Mechanisms for the Availability of Public Information the Agency conducted monitoring of the web sites of the holders of the central government for 2022. The objective of the monitoring were the 22 categories of information, in accordance with Article 10 of the Law on Free Access to Public Information and their consistent publication on the websites of the information holders.

The Agency and the Association "Journalists for Human Rights" – NCP, signed a Memorandum of Cooperation. This Memorandum of Cooperation foresees the joint cooperation of the Agency and the Association, as well as of other state institutions, in terms of free access to public information as a tool for faster obtaining of institutional information related to the protection of children from disappearance.

Last but not least, director Bojcheva participated in the "25 minutes" show on Television 24 discussing the topic: "Non-transparent institutions - a second name for corruption".

5. INTER-INSTITUTIONAL AND INTERNATIONAL COLLABORATION AND PROJECTS OF APRFAPI IN 2022

For the period from January 1 to December 31, 2022, in terms of inter-institutional and international cooperation and in addition to the realization of the IPA2 activities from the project application, the Agency continuously maintained the already established relations with its international collaborators and related institutions.

The Agency also participated in working groups, trainings, preparation of reports and implementation of numerous project activities.

5.1. INTER-INSTITUTIONAL COOPERATION OF APRFAPI IN 2022

5.1.1. Bilateral screening for public administration reform and functioning of democratic institutions

The key institutions that are directly involved in the screening process participated in the bilateral meetings, among which were also representatives from the Agency and that of the bilateral screening for Public Administration Reform, Chapter 32 - Financial Control and Functioning of Democratic Institutions, from the Fundamental Values Cluster.

The Secretary General of the Agency, Ms. Tanya Kovachev, participated in the bilateral screening with the European Commission on PAR and chapter 32 - Financial control. The bilateral screening for public administration reform is one of the key priorities, part of the Copenhagen criteria and an important prerequisite in the process of the European integration of The Republic of North Macedonia in the EU.

Modernization and improvement of state and public administration are constantly important and are seen as the basis of the entire public sector on which the processes and development of a democratic society depend.

At the screening within the Functioning of Democratic Institutions, Cluster Fundamental Values, an area which is presented for the first time with the new revised methodology for negotiations, a presentation was held by Mr. Petar Gajdov, Deputy Head of the Department for Administrative, Legal, and General Affairs at the Agency.

The prepared presentations that were presented by the representatives of APRFAPI were excellently evaluated.

To this end, the Agency remains committed to strengthening the transparency, accountability and openness of institutions, in the interest of building a democratic society based on European values.

5.1.2. Strategy for Public Administration Reform 2018-2022

In 2022, the Agency, as part of the Public Administration Reform Strategy, consistently reported on the undertaken activities related to APRFAPI, which are part of the above-mentioned strategy.

As an active member of the working group, the Agency prepared an updated status of the indicators, conducted monitoring of the websites of the state institutions, prepared and submitted materials for the report within the deadlines set by MISA and participated in all working meetings.

In the Action Plan of the Strategy for Public Administration Reform 2018-2022 (SPARAR), the Agency is the carrier of the 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, i.e. 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 aimed at strengthening of the mechanisms for the availability of public information.

The measured values for the passport indicators 47, 48 and 49 for the year 2022 according to the Action Plan of the SPAR 2018-2022, which pertain to the APRFAPI, have the following values:

- PASSPORT INDICATOR 47 -2022 (5%)

% of rejected requests for access to public information by the institutions

From the category of state institutions at the central level of holders of information, 143 submitted an annual report, while 3 holders did not submit a report on the implementation of LFAPI, which is 2.1%. To these institutions, information requesters submitted a total of 2087 requests, of which 103 were rejected, i.e. 4.9% for 2022.

- PASSPORT INDICATOR 48 – 2022 (62.3%)

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

In accordance with the List of Holders, as every year, the Agency conducted monitoring of the websites of holders from the State Institutions category.

The monitoring of proactive transparency is carried out in accordance with the established Methodology for monitoring the web pages of the information holders for fulfilling the legal obligation for mandatory publication of 22 categories of documents in accordance with Article 10 of the LFAPI.

In 2022, out of a total of 144, 116 information holders who have websites were monitored. In the Report from the monitoring of state institutions for 2022, which contains a comparative list of the monitoring carried out in 2021 and 2022, out of a total of 120 monitored institutions at the state level for 2022, the Ministry of Agriculture, Forestry and Water Management was scored with the highest transparency on its website, in accordance with Article 10 of the Law on Free Access to Public Information.

Last year, this Ministry was among the institutions with a low level of transparency, which shows that by publishing information in a proactive manner, the holders can increase their proactivity and accountability, above all for the citizens, and in this way, access to public information will be available to applicants in an easy and accessible way.

The following are other analyzes within the framework of the monitoring:

- It has been established that most of the web pages of the information holders haven't published a banner for accessing information on the home page. Most often, the institutions move the link to to the Public Relations, Contact, or similar sections of their web pages. Out of a total of 120 monitored owners, 49 have published a link to the List of Information on the home page, while 70 do not have a banner/link.
- Only 54 holders have published the form for Request for free access to public information, the rest have either not published it or still have the old form according to the Law of 2006 and the amendments of 2010/15.
- Strategic plans and strategies have been published by 85 owners. Annual plans and work programs have been published by 60 holders, while 69 holders have published their proposal documents (program proposals, programs, studies, etc.) on their web pages.
- Biography or data about the official or responsible person on the web pages have been published by 87 owners, while 33 have not published any biography or data about the official or responsible person for information.
- All holders have published data on their competence and basic contact data with the holder of the information.
- The annual report on access to public information (for 2021 and 2020) has been uploaded by 58 holders to their websites, of which 58 count for 2021 and 2020 respectively, while 62 have not published it in accordance with Article 36 of the Civil Code.
- For the last three years, 81 holders have published their annual budgets, while 86 holders have published information on final accounts. Quarterly financial reports for the current year have been published by only 3 holders, while 59 institutions have published their audit reports.

The conclusions that emerged from the conducted monitoring are as follows:

- Holders of state institutions on their websites should regularly publish their information in accordance with their competences and Article 10 of the Law.

- Holders of state institutions should improve and strengthen their proactivity towards citizens as much as possible, and the information they publish should be placed in a separate banner/link under the title LIST OF INFORMATION/FREE ACCESS TO INFORMATION, which will make it available to applicants. This way, they will reduce the number of requests for free access to public information.

The access to public information should be quick and available with three clicks the most to the requester of the information, i.e. the list of information should be accessible through a unified banner that will contain all the necessary information listed as per the recommendation and the legal obligation to continuously update information sections and publish new content.

Hence, we appeal to state institutions to make the information easily available for use by citizens. "Informed citizens, satisfied citizens" is the maxim for transparent state government.

- PASSPORT INDICATOR 49 - 2022 (92.7%)

% of decisions of ALFAPI in relation to access to public information hat have been carried out by the institutions

According to the calculation methodology for this indicator, it follows that 92.7% of the institutions acted in accordance with the Agency's decisions.

5.1.3. Preparations of the new PAR Strategy and Action Plan for 2023-2030

In the fourth quarter of 2022, representatives from APRFAPI, as an active member of the PAR working group, were present at all preparatory meetings supported by SIGMA and ReSPA intended for the preparation of the narrative part of the PAR 2023-2030, as well as the Measures and Activities for the Action Plan and Passport Indicators.

A novelty this year is that in the process of planning and preparation, detailed calculations are required for the necessary financial resources for the realization of the specified activities in the Action Plan of the SPAR 2023-2030.

5.1.4. Inter-institutional cooperation and the right of free access to the holders' websites

The Agency gave directions to the Government of Republic of North Macedonia, MISA, as well as to the SCPC and mutually edited the websites of these information holders in accordance with Article 9 and 10 of the Law on Free Access to Public Information.

The given directions were primarily regarding the placement of a banner on the home page labeled as "Public Information", which contains documents from the holders of the 22

categories of information according to the LFAPI in an open format, including video materials and manuals for educating and informing the public about the constitutionally guaranteed right of access to public information, as well as about the obligations of the officials with the holder of the information.

The activity started at the initiative of the employees of the Agency, but the effect of the cooperation initiates the need for such an activity to be part of the activities in the Action Plan of SPAR 2023-2030, that is, an activity that the Agency needs to expand with the support of donors.

5.2. INTERNATIONAL COOPERATION AND PROJECTS OF APRFAPI IN 2022

5.2.1. Agency for the Protection of the Right to Free Access to Public Information's Membership in the International Conference of Information Commissioners (ICIC)

Since 2022, the Agency is a full member of the International Conference of Information Commissioners (ICIC).

The Chair and Secretariat of the International Conference of Information Commissioners, chaired by Mexico's National Institute for Transparency, Access to Information and Protection of Personal Data (INAI), informed the Agency of the conclusion reached by the ICIC Executive Committee that the Agency meets all the criteria for eligibility under the Charter of the International Conference of Information Commissioners. As a result, the Agency has been successfully accredited as a new ICIC member.

Furthermore, the agency made an active contribution to the ICIC thematic report of the Special Rapporteur on Freedom of Opinion and Expression, Irene Khan, for the 53rd session of the UN Human Rights Council: "Freedom of Opinion and Expression and Sustainable Development – Why is voice important?"

Building on the previous work of this mandate by Special Rapporteur Khan on gender justice, digital technology and media freedom, the report focuses on the right to information online (*online*) and locally (*offline*) as a means of strengthening the transparency and accountability of governments and institutions; equal and full participation of poor and marginalized communities in sustainable development, and the role of media in promoting sustainable development.

5.2.2. IPA 2 EU funded project

The following are activities that were carried out during 2022 within the IPA 2 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.

I. Social media campaign for the promotion of the right to free access to public information

Within this activity, two questionnaires were conducted - one in 2020, while the other in December 2021, for researching public opinion and assessing public knowledge about the right to free access to public information on a representative number of people at the local and central level in Albanian and Macedonian language.

The research is contained in the **Report of the conducted measurement of public opinion** which was published in January 2022. From the report, we single out 3 parameters as indicators of the effects of the implemented campaign:

- Increase of 57% (compared to 42% in 2020) of those who believe that the right to access public information is guaranteed by the Constitution;

- Increase of 44% (compared to 33% in 2020) of those who know that there is a Law on Access to Public Information;

- Increase of 56% (compared to 43% in 2020) of those who know they have the right to request information from state institutions.

The abovementioned results confirm the fact that the campaign carried out within the project produced excellent effects, as well as the need to continue this or similar activity to further maintain the acquired familiarity of the public with the right to free access to public information.

Within the Campaign for Integrity, a hybrid public debate was held on January 31, 2022, on the topic: "*Efficient use of the right of free access to public information in the process of strengthening the integrity of public institutions with a special emphasis on young people*". This public debate was part of a series of online thematic debates organized within the framework of the IPA2 project.

The purpose of the debate was to raise awareness of the importance of ethical behavior and integrity, of the rights and obligations of citizens and institutions in accordance with the Law on Free Access to Public Information, with special reference to informing and educating young students.

Alongside Ms. Plamenka Bojcheva, the director of the Agency, that took part in the discussion, Vlado Georgiev (SCPC) and Aleksandar Kashumov (key expert from the IPA2 project), and numerous experts from the non-governmental sector, partners and collaborators of the Agency, including Danche D. Bajdevska from FOOM, German Filkov from CGK, Marija Sazdevski from IRI, Maja Markovska from Aarhus Center Skopje, Miso Dokmanovich from ISIE and Petar Barlakovski from Youth Education Forum participated as speakers.

II. The following activities were carried out within the framework of training activities for employees of the Agency, for holders and requesters of information:

In **January**, a series of online trainings for the holders of information on the use of the two electronic portals was completed. More than 1300 listeners were covered by these trainings. In the same period, a video instruction and a written Instruction Manual for using the two E-portals intended for information requesters and holders were finalized and published.[1]

In **February and March**, part of the employees of the Agency and the SCPC attended two trainings within the framework of the IPA2 project "Promoting Transparency and Accountability in Public Administration", financed by the EU. One of the training pertained to the preparation of projects for grant support from the EU, while the other training aimed to improve the training skills of the trainers.

In **April**, a two-day online workshop was held with the European Ombudsman within the framework of the Agency's capacity building activity, at which Fergal Anthony O'Regan and Honor Mahoney took part as speaker, supported by Teresa Mandzukova.

On the first day of the event, practical and procedural work activities of the European Ombudsman for free access to public information, inspection powers, decision-making (proposals for solutions, recommendations, etc.) and exceptions to access to information were clarified and exchanged.

On the second day of the hybrid workshop with the European Ombudsman, concrete practical examples and cases were discussed, as well as the treatment of personal data and classified documents, the communication channels, and skills that the European Ombudsman uses in order to communicate with the general public, the media, and the other stakeholders.

In **May**, series of several one-day educational workshops/meetings were conducted with the participation of the hired guest expert German Filkov and citizens and representatives from institutions in Veles, Strumica, Prilep, Tetovo, and Skopje. The purpose of these meetings was to acquaint the citizens and mediation officials with the right of access to public information, by

clarifying the meaning of access to public information, as well as with the procedure for submitting and responding to requests for access to information in accordance with the Law on Free Access to Public Information.

In **July**, there were two online debates organized under the title "Experiences from the implementation of the new Law on free access to public information and opportunities for advancing the exercise of the right to free access to public information". The holders of information participated in the first debate on July 5th. In the second debate, the information requesters took part. Needless to say, the employees of the Agency for the Protection of the Right to Free Access to Public Information contributed to both debates.

With the promotion of the "Analysis of the Application of the Law on Free Access to Public Information with Recommendations for the Improvement of the System for Free Access to Information" which resulted from these debates, we observed **September 28, the International Day of Universal Access to Public Information**. There was also a Conference on the topic "On the Situation Related to the Implementation of the Law on Free Access to Public Information in the Republic of North Macedonia".

Ms. Plamenka Bojcheva, director of the Agency; Agim Nuhiu, Deputy Minister of Justice; Aleksandar Kashumov, a key expert on free access to public information of a project financed by IPA 2; Danche Danilovska-Bajdevska, author of "The analysis of the application of the Law on free access to public information with recommendations for improving the system for free access to information"; and German Filkov, president of the Center for Civic Communications, IPA2 expert the project, participated as speakers at the Conference.

At the end of the conference, a fruitful discussion developed in which the participating officials shared their experiences stemming from the implementation of the Law, gave recommendations on how to advance the realization of the right to free access to public information as one of the ways to build open, transparent, and accountable institutions, but also as a tool to fight corruption.

III. In October, within the framework of the IPA2 project, a study visit to Portugal was carried out

Representatives of APRFAPI within the project "Transparency and Accountability of Public Administration" financed by the European Union, made a three-day working visit to the Commission for Access to Administrative Documents (CADA) from Lisbon, Portugal.

During the visit to the related institution, the President of the Commission, Alberto Augusto Oliveira and the member, Thiago Fidelgo De Freigas, and representatives from the

Agency, exchanged experiences from their work practices, as well as proposals for further joint cooperation.

Also, a meeting was held with the executive director of Transparency International, Carina Carvalho, where the experiences that this organization has in terms of implementing the right to free access to public information as applicants were discussed. The possibility of future cooperation between the three institutions was also discussed at the meeting.

The representatives of the Agency attended a plenary session of CADA, and held working meetings with the President of the Commission for the Protection of Personal Data (CNPD) Maria Filipa Pires de Costa Calvao and members of the Commission for State Secrets (EFSE).

The visit ended with a meeting of the guests and representatives from the civil organization Geota, which works in the field of environmental protection and whose president is also a member of the Commission for access to administrative documents.

The final conference of the IPA 2 project, funded by the European Union, and implemented by a consortium led by PwC, together with the Foundation Program for Access to Information was held on November 8, 2022. The project was implemented in the period from November 2019 to November 2022. The Agency for the Protection of the Right to Free Access to Public Information and the State Commission for the Prevention of Corruption were beneficiaries of the project, with the aim of improving their operational functioning, contributing to increasing the integrity and ethics of public institutions, as well as improving the transparency and the responsibility of the public administration.

5.2.3. Twining Lite application

In December 2022, a Twining Light application was prepared, which the Agency submitted to the Secretariat for European Affairs on the subject *“Effective harmonization of legislation and development of the institutional framework and implementation of EU best practices in the field of proactive publication and transparency of state institutions in the Republic of North Macedonia”*.

The purpose of this application is to improve the proactive publication of information, which will increase the transparency and accountability of state institutions at the central and local level.

SEP/NIPAK aims to release details and implement the application sometime in 2023.

5.3. Cooperation with non-governmental organizations and project activities

As previously noted, the Agency's existing budget is insufficient for efficient and successful functioning. As a result, the Agency's management was encouraged to seek additional support from other sources, such as collaborations and partnerships with numerous non-governmental organizations.

The concluded partnerships yielded excellent results from the implemented activities:

I. APRFAPI, together with the Association for Democratic Initiatives (ADI), developed and implemented a series of activities within the Civic Engagement Project (CEP) for civic engagement funded by USAID. These activities were a continuation of the mission of the Agency, through a simplified educational and informative approach to the citizens with special emphasis on the target group of applicants - young people, as well as to explain the access to information to the holders of information. Here are the results obtained within this cooperation:

- Guide for appointing an official to mediate public information;
- Trainings held by the Agency representatives for a more effective communication with the public and the media;
- Guide for educating young people about the right to free access to public information;
- Analysis of the reasons for institutional silence when responding to requests for access to public information;
- Production of an animated informative video for the general public with an educational message about their right to free access to public information,
- Informative sessions with young people and students in Gostivar, Kumanovo, Bitola, Shtip and Struga (*a total of 113 young people attended these sessions*),
- Workshops with officials for mediating public information employed in the public sector in municipalities and local institutions, local civic organizations, journalists, citizens (*which was attended by a total of 122 participants*).
- The final event of the USAID Citizen Participation Project held on August 29, at which the representatives from ADI particularly emphasized the exceptionally good cooperation with the Agency.

II. There was a joint activity entitled "Design, Development and Implementation of an E-Learning Course on the Democratic Government Principle of Transparency and Openness" within the framework of the partnership between APRFAPI and DKSK in 2022, supported by the OSCE Mission in Skopje.

The overall objective of the activity is to develop an e-learning course that will be available on the existing e-learning platform on the websites of both institutions.

The Agency and the SCPC will use the transparency and openness e-learning course as a capacity building tool for the nominated integrity officers, public information brokers in state institutions at the central and local levels. In the spirit of that cooperation, on May 12, 2022, within the framework of the *2022 Training Program: Policy for the Integrity of Local Self-Government Units, Modules: Transparency, Accountability and Participation/Efficient, Economical and Effective Operation*, organized by the OSCE and SCPC, a representative from the Agency participated in a lecture on the topic "Free Access to Public Information".

III. In 2021, the cooperation between the Agency and the International Republican Institute (IRI) began, which is still ongoing. From March 26 to April 2, 2022, at the invitation and in the organization of the International Republican Institute (IRI) from the USA, and in cooperation with the Organization PAI - Public Administration International from the United Kingdom, the Agency, through its representative, carried out a study visit to London, the United Kingdom of Great Britain and Northern Ireland, together with representatives of political parties from the Republic of North Macedonia.

Furthermore, in a joint organization, a round table on the topic "*Active transparency of political parties - fulfillment of legal obligations for free access to public information and positive practices*" was held on May 25, 2022.

The purpose of the round table was to exchange experiences, practices and challenges related to the application of the Law on Free Access to Public Information from the perspective of political parties as information holders, as well as to improve the understanding and practice of political parties for active transparency. The event was attended by representatives from political parties, state bodies and civil society organizations.

IV. In accordance with the Memorandum of Cooperation signed between the Agency and the Aarhus Center, several educational trainings were held in 2022 on the topic: "*Access to public information and public participation in decision-making processes on environmental issues*".

The trainings were organized within the framework of cooperation, with the organization and support of ZELS and the OSCE Mission in Skopje. A representative from the Agency participated in training on the topic "Free access to public information - with a special reference to proactive transparency".

V. The agency has been actively involved in the pilot project *Early Warning System for Missing Children* of the Journalists for Human Rights (HRJ) since the very beginning of

implementation by participating in various round tables and a study visit in Vienna, Austria, realized in the month of July 2022.

Encouraged by the excellent cooperation, APRFAPI and NCP signed a Memorandum of Cooperation on December 26, 2022. The memorandum of cooperation envisages that the Agency and the NCP Association, as well as other state institutions, will cooperate in the next cycle of the above-mentioned project on access to public information as a tool for faster acquisition of institutional information related to the protection of children from disappearance.

VI. The third Regional Conference of the Initiative 2020 entitled "Proactive Transparency and the Troms Convention" was held in Struga, hosted this year by APRFAPI.

The realization of this Conference was supported by the Council of Europe within the framework of the joint project between the European Union and the Council of Europe "Horizontal instrument for the Western Balkans and Turkey 2019-2022" and the project "Freedom of expression and freedom of the media in North Macedonia (JUFREX)".

The conference was attended by representatives from the management structures of the independent bodies for access to information, members of the "Initiative 2020", such as Bosnia and Herzegovina, Croatia, Kosovo, Montenegro, Serbia, and Slovenia, and the host-country North Macedonia.

Slavica Grkovska, deputy Prime Minister in charge of good governance policies, experts from the Council of Europe and a delegation from the Office of the Commissioner for Information and Data Protection from Albania, attended the Conference as guests. At the conference, experiences and information were exchanged in the field of proactive transparency, sharing tools and lessons learned, as well as the importance of applying European standards and the Troms Convention of the Council of Europe.

The cooperation with the Council of Europe within the project "Freedom of expression and freedom of the media in North Macedonia (JUFREKS)" continues in the third cycle of the project itself, as well as in 2023.

VII. In accordance with the instructions for the Agency contained in the draft minutes of the 63rd session of the Government of the Republic of North Macedonia held on July 20, 2022, the Agency was tasked to make a sublimation of data received from all information holders by September 1, 2022, i.e. a list of the most frequently requested data in the period from 11.2020 to 30.06.2022. To this end, all holders of information contained in the List of Holders of

Information were requested to submit a list of information that was the subject of submitted requests in the specified period.

The agency processed the received data, systematized them into categories and submitted them to the Office of the Deputy President of the Government in charge of policies for good governance. On September 23, 2022, a conference was held on the topic "What are the citizens interested in?" - Improvement of the system for free access to public information", organized by the Center for Change Management, with the support of the Cabinet of the Deputy Prime Minister in charge of good governance policies, in which Agency representatives took part.

In the first panel, a draft of the Guidelines for improving the transparency of institutions from the public sector was presented, while the second panel was dedicated to a discussion on the topic "Proactive approach to the publication of public information".

The conference was organized within the framework of the project "Encouraging good governance and reforms in public administration" implemented by CCM and supported by the National Endowment for Democracy. The cooperation of the Agency with the CCM and the Cabinet of the Vice Prime Minister in charge of good governance policies continues in 2023.

5.4. Other realized activities

5.4.1. At the invitation of UNESCO on March 9, 2022, the Agency participated in a hybrid session entitled "Draft version of the annual survey on public access to information for 2022 (SDG Indicator 16.10.2)."

Namely, UNESCO is conducting this research in accordance with its role assigned by the United Nations. Through the measurement of SDG indicator 16.10.2, UNESCO monitors progress in the adoption and implementation of "constitutional, statutory and/or political guarantees for public access to information".

In 2022, UNESCO, through its International Program for the Development of Communications (IPDC), was further mandated to monitor and report on the progress of this indicator worldwide.

The agency has been a part of this research since the very beginning of an invitation from the UNESCO SDG 16.10.2 team from the Sector for Universal Access to Information, Sector for Communications and Information. Therefore, like the previous year practice, the Agency also submitted its answers to the provided Questionnaire to the UNESCO team on March 28, 2022.

5.4.2. Preparation of Reports and Preparation of materials for the contribution of North Macedonia to the Report of the European Commission

I. About the Contribution of the Republic of North Macedonia to the Annual Report of the European Commission.

Based on the established practice and the letter from the Commissioner for Enlargement and Neighborhood Policy, Oliver Varhey, submitted to the Secretariat for European Affairs, the Agency prepared and submitted a Report for the period from October 2021 to March 2022, which contained statistical data covering the period January - December 2021.

II. According to the conclusion reached at the 132nd Session of the Government, held on January 11, 2022, which makes the Ministry of Justice in charge of monitoring the implementation of the Action Plan for updating the data that are key to the observations made in the Report of the review carried out by Crna Gora and the Republic of Moldova for the implementation of Articles 5-14 and 51-59 of the United Nations Convention against Corruption for the review cycle 2016-2021 and for overcoming the challenges identified within the second review cycle of the implementation of the Convention, 2021- 2024 year.

On July 15, 2022, APRFAPI prepared and submitted a Report on the status of the implementation of the aforementioned Plan, as well as on the measures:

II.8.D. Notice on the conducted monitoring of the websites of the holders of public information, with an assessment of the implementation of Article 10 of the Law on Free Access to Public Information (LFAPI), i.e. 22 categories of information and recommendations for improving the LFAPI and its application.

II.8.F.2. Annual analysis of the training needs for Agency's employees.

5.4.3. Preparation of materials, reports and attendance at work meetings:

I. The Agency took an active part in the plenary meeting of the Sectorial Working Group for the Reform of Public Administration at the invitation of the Cabinet of the Vice President for European Affairs in coordination with the Minister for Information Society and Administration, and organized by the Office of NIPAK on April 19, 2022.

The meeting was held with the aim of presentation and discussion of the strategic priorities of the PAR sector, the relevant strategies, the areas of intervention defined within the framework of the Strategic Response for IPA3 and the indicators for monitoring their realization.

II. At the invitation of Secretariat for European Affairs (SEA), representatives from the Agency in the role of a member of the Monitoring Board of the IPA II sector took part in the 4th Sectorial Monitoring Committee for Democracy and Good Governance (focus on PAR and PFM in 2022). The meeting was held online on May 26, 2022.

III. At the invitation of the IPA2 Technical Secretariat, APRFAPI as a member of the Monitoring Board of the IPA2 sector, attended the 5th Sector Monitoring Committee for Democracy and Governance (focus on PAR and PFM). The meeting was held online on November 28, 2022. The topic of discussion at this meeting was monitoring and the state of implementation and implementation of IPA2 projects, as well as operational conclusions and recommendations.

IV. On July 14, 2022, the 19th meeting of the Stabilization and Association Committee was held. A report was prepared with a brief overview of achieved results and more significant planned reforms for the areas of the PAR subcommittee.

V. A representative from the Agency participated actively in the project "Advisory services for the inclusion of the gender perspective in the administration of North Macedonia at the central level" - Gender Equality Facility (GEF), supported by the UN Women office, by filling out the provided Questionnaire for assessing the needs of trainings for including the gender perspective in the planning and revision processes of the National Program for the Adoption of the Gender Equality Framework (NPAGEF).

Part of the recommendations conveyed by the members who visited the training have been consistently introduced in the current operation of APRFAPI.

6. Budget, final account, and financing

The Agency for the Protection of the Right to Free Access to Public Information funds its work from the Budget of the Republic of North Macedonia, under Section 19302 Program 20 - Free Access to Information, to the following accounts:

- Basic budget account 193026288063710;
- Donations budget account 193026288078511;
- Donations budget account 193026288078526;

6.1. Brief financial report

By adopting the Budget of the Republic of North Macedonia for 2022, the Agency started the year with a budget in the amount of MKD 17,438,000.00. Following the adopted Amendments and Supplements to the Budget of the Republic of North Macedonia ("Official Gazette of Republic of North Macedonia" No. 164/2022) and the Decision on the redistribution of funds between budget users of the central government and between funds ("Official Gazette of Republic of North Macedonia" No. 272/2022), the Agency was given a budget in the total amount of MKD 22,334,000.00 for 2022.

The allocation and realization of funds per item for the above-mentioned accounts is displayed tabularly and graphically in connection to the budget structure with all approved reallocations of funds during 2022.

All finances were planned and allocated in line with the Agency's competencies, rights, and authorizations, with the goal of making them lawful, efficient, and cost-effective.

Account 193026288063710

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

Chart 8: Budget and realization of the budget by account items 193026288063710

Account 193026288078511

| Rate | Budget 2022 | Final account 2022 | Percentage of realization |
|---------------------------------------|-------------|--------------------|---------------------------|
| 424 - Repairs and ongoing maintenance | 60.000,00 | 59.118,00 | 98,53% |
| 426 - Other current expenses | 75.000,00 | 72.209,00 | 96,28% |

| | | | |
|--|---------------------|---------------------|---------------|
| 480 - Purchase of equipment and machinery | 700.000,00 | 0,00 | 0,00% |
| 481- Construction facilities | 4.100.200,00 | 4.034.133,00 | 98,39% |
| 482 - Other construction facilities | 70.800,00 | 70.800,00 | 100,00% |
| 483 - Purchase of furniture | 400.000,00 | 0,00 | 0,00% |
| 485 - Investments and non-financial assets | 525.000,00 | 0,00 | 0,00% |
| In total | 5.931.000,00 | 4.236.260,00 | 71,43% |

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

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

Account 193026288078526

Table no. 3: Budget and realization of the budget by item, account 193026288078526

Analyzing the budget by type reveals that the following expenditure categories contributed to the total realized expenses for the reporting period:

Account 193026288063710

- Item 401 – Basic salaries, expenditures in the amount of MKD 7,691,297.00 or 88.69% of the planned MKD 8,672,000.00 were realized;
- Item 402 – Contributions for social insurance, expenditures in the amount of MKD 2,984,759.00 or 89.28% of the planned MKD 3,343,000.00 were realized;
- Item 404 – Compensations, expenditures in the amount of MKD 144,000.00 or 100.00% of the planned MKD 144,000.00 were realized;

- Item 420 – Travel and daily expenses, MKD 107,471.00 or 99.51% of the planned MKD 108,000.00 were realized;
- Item 421 – Communal services, heating, communication, and transport, MKD 1,750,775.00 were realized or 89.19% of the planned MKD 1,963,000.00;
- Item 423 – Materials and small inventory, MKD 177,000.00 or 100.00% of the planned MKD 177,000.00 were realized;
- Item 424 – Repairs and current maintenance, MKD 208,500.00 or 98.35% of the planned MKD 212,000.00 were realized;
- Item 425 – Contractual services, 351,270.00 MKD or 98.95% of the planned 355,000.00 MKD were realized;
- Item 426 – Other current expenses, realized MKD 215,566.00 or 99.93% of the planned MKD 215,726.00;
- Item 464 – Various transfers, expenses in the amount of MKD 229,960 or 99.98% of the planned MKD 230,000.00 were realized;
- Item 480 – Purchase of equipment and machines, expenditures in the amount of MKD 87,136.00 or 99.84% of the planned MKD 87,274.00 were realized;

Account 193026288078511

- Item 424 – Repairs and ongoing maintenance, expenses in the amount of MKD 59,118.00 or 98.53% of the planned MKD 60,000.00 were realized;
- Item 426 – Other current expenses, expenses in the amount of MKD 72,209.00 or 96.28% of the planned MKD 75,000.00 were realized;
- Item 480 – Purchase of equipment and machines, expenditures in the amount of MKD 0.00 or 0.00% of the planned MKD 700,000.00 were realized;
- Item 481 – Construction facilities, expenditures in the amount of MKD 4,034,133.00 or 98.39% of the planned MKD 4,100,200.00 were realized;
- Item 482 – Other construction facilities, expenditures in the amount of MKD 70,800.00 or 100.00% of the planned MKD 70,800.00 were realized;
- Item 483 – Purchase of furniture, expenses in the amount of MKD 0.00 or 0.00% of the planned MKD 400,000.00 were realized;
- Item 485 – Investments and non-financial assets, expenditures in the amount of 0.00 MKD or 0.00% of the planned MKD 525,000.00 were realized;

Account 193026288078526

- Item 480 – Purchase of equipment and machines, expenditures in the amount of MKD 788,800.00 or 88.04% of the planned MKD 896,000.00 were realized;

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

The following provides a tabular and graphical comparative summary of the Agency's budget and realized expenditures from its final accounts for the previous three years.

Table no. 4: Budget and realized expenditures in the last three years

Chart 9: Budget and realization of the budget in the last three years

6.3. Final accounts for 2022

Copies of final accounts for the accounting period 01.01.2022 to 31.12.2022, for accounts 193026288063710, 193026288078511 and 193026288078526, are enclosed as an attachment to the report.

7. CONCLUSIONS:

1. The Agency will continue to update the list of information holders in accordance with the legal solution, as well as with the education of the officials among the information holders and the cooperation with the information holders, by informing the public and international cooperation.

More importantly, the Agency will work on the plan of education of the general public with the aim of familiarizing citizens with the right of free access to public information of and the method and procedure for using this constitutionally guaranteed right of man and citizen.

2. To achieve even better results in operations and raise awareness and public opinion and knowledge about access to public information, an increase in the Agency's budget is necessary, to create opportunities for its more active and independent operation based on its own funds.

8. RECOMMENDATIONS:

1. Undertaking activities for the education of the responsible/management persons among the information holders in the direction of increasing transparency and accountability, thus emphasizing the benefits of proactive transparency, as well as for faster and more efficient handling of received requests for free access and avoidance of the "silence of the administration".

9. APPENDICES

INFORMATION HOLDERS WHO HAVE NOT SUBMITTED ANNUAL REPORTS:

JUDICIAL AUTHORITY: 1 HOLDER

1. Radovish Basic Court

LEGAL AND NATURAL PERSONS PERFORMING PUBLIC AUTHORITIES AND ACTIVITIES OF PUBLIC INTEREST: 2 HOLDERS

1. Ski Federation of Macedonia
2. Olympic Committee of North Macedonia

POLITICAL PARTIES: 12 HOLDERS

1. Civil Democratic Union - GDU
2. Democratic Party of the Serbs in Macedonia - DPSM
3. Labor-Agricultural Party of Macedonia - RZP
4. Serbian Advanced Party in Macedonia - SNSM
5. Party for the European Future - PEI
6. Union of Tito's Left Forces - STLS
7. United for Macedonia - OM
8. New Alternative - NA
9. Party of Democratic Action of Macedonia
10. Voice for Macedonia - VOICE
11. Movement for State and Justice - DDP
12. POPULI party

EDUCATIONAL INSTITUTIONS: 15 HOLDERS

1. Faculty of Fine Arts - Skopje
2. Private higher education institution - Vocational School - Faculty of Business Economics - Skopje
3. Private higher education institution - MIT University - Skopje
4. "Mirche Acev" High School - Prilep
5. "Risto Krle" Elementary school - Kadino village
6. "Liman Kaba" Elementary school - Ljuboten village
7. "7 Marsi" Elementary school - Chelopek village
8. "Manchu Matak" Elementary school - Krivogashtani village
9. "Vasil Glavinov" Elementary School - Veles
10. "Goce Delchev" Elementary school - Bosilovo village
11. "Goce Delchev" Elementary school - Veljusa village
12. "Vladimir Polezhinoski" Elementary school - Kicevo
13. "Kuzman Josifovski-Pitu" Elementary school - Kichevo

14. "Mihail Grameno" Elementary school - Brest village, Skopje area
15. "Prerodba-Rilindija" High school - Zhitoshe village, municipality of Dolneni

**PUBLIC ENTERPRISES AND PUBLIC INSTITUTIONS IN THE REPUBLIC OF
NORTH MACEDONIA: 9 HOLDERS**

1. Public utility company "Sopishte" - Sopishte village
2. Public utility company "Standard" - Debar
3. Private Scientific Institute for Business Economics-Skopje
4. NI "Trajko Prokopiev" - Kumanovo
5. "Aco Karamanov" Culture Center - Radovish
6. "Boro Menkov" Student Dormitory, Kriva Palanka
7. LI Library "Svetlina-Drita", S. Preljubishte, Municipality of Jegunovce
8. PE "Plackovica" - Karbintsi
9. NI Tetovo Theater - Tetovo

HEALTHCARE INSTITUTIONS: 3 OWNERS

1. PHI University Clinic for Rheumatology - Skopje
2. PHI University Clinic for Radiology - Skopje
3. "Sante Plus Group" - Skopje

STATE INSTITUTIONS: 3 HOLDERS

1. Bureau of Metrology
2. Office for Management of Registers
3. Republic Council for Road Traffic Safety

**LIST OF INFORMATION HOLDERS WHOSE OFFICIALS ATTENDED THE
TRAINING:**

1. Municipality of Bosilovo
2. Municipality of Struga
3. PE Intermunicipal Center for Social Work - Gevgelija
4. "Dame Gruev" Elementary School, Erzhelija village, Sveti Nikole
5. Handball Federation of Macedonia

6. Cinematheque of Republic of North Macedonia
7. Macedonian Academic Research Network - MARnet
8. PECA Komunalec-Strumica
9. Airports of Republic of North Macedonia DOO
10. Court of Appeal - Bitola
11. GTC Skopje
12. Chamber of executors of Republic of North Macedonia
13. "Krstev Misirkov" Elementary School -Gevgelija
14. PHI Zdraven dom - Negotino
15. EVN Macedonia
16. PE Center for Social Work - Demir Hisar
17. Medical Chamber of Republic of North Macedonia
18. State student dormitory - Pelagonija - Skopje
19. Municipality of Želino
20. Agency for foreign investments and export promotion of Republic of North Macedonia
21. Ministry of culture
22. Personal Data Protection Agency
23. Municipality of Makedonska Kamenica
24. Department of Agriculture and Rural Development
25. NSA
26. PMF "Tane Georgievski" Library - Kumanovo

27. Electronic Communications Agency
28. PECA Lakavica - Konche
29. PMF Kalinka- Valandovo
30. "Rampo Levkata" Elementary School - Prilep
31. Center for the Development of the Vardar Planning Region - Veles
32. "Partenij Zografski" Elementary School, Kisela Voda Municipality - Skopje
33. Municipality of Strumica
34. "11th October" Elementary School
35. Tennis Federation of North Macedonia
36. Center for Development of Eastern Planning Region
37. Agency for promoting the development of agriculture
38. Municipality of Prilep
39. AD for managing business premises in state ownership - Skopje
40. Krivogastani Municipality
41. PE Center for social work - Vinica
42. State Commission for the Prevention of Corruption
43. PMF Goce Delchev - Probishtip
44. PE Intermunicipal Center for Social Work-Veles
45. LF "Blagoj Jankov Mucheto" Library - Strumica
46. "Andreja Savevski-Kjikjish" Elementary school - Tetovo
47. AD Butel - Skopje

48. Municipality of Veles
49. "St. Cyril and Methodius" Elementary School - Bitola
50. National Agency for European Educational Programs and Mobility
51. PE Drisla - Skopje
52. "Krume Kepeski" Elementary School - Skopje
53. Republic of North Macedonia's Entrepreneurship Support Agency
54. Agency for Administration
55. PTE Skopje
56. "Ljupcho Santov" Municipal High School - Kochani
57. PHI Health Center, Kriva Palanka
58. "Bratstvo-Migjeni" Municipal Elementary School - Tetovo
59. PE Center for Social Affairs - Kavadarci
60. Basic Court – Kumanovo
61. Judicial Council of Republic of North Macedonia
62. Pharmaceutical Chamber of Macedonia
63. Municipal cultural institution "Youth Center" - Shtip
64. Center for professional education and training
65. Basic Court – Kichevo
66. "Goce Delchev" Elementary School - Sveti Nikole
67. "Blaze Koneski" Elementary School, Skudrinje - Mavrovo and Rostushe region
68. "Nikola Karev" Municipal Elementary School - Kochani

69. "Dimitar Miladinov" Elementary School, Centar Municipality, Skopje
70. State Student Dormitory "Kocho Racin" - Bitola
71. Real estate cadastre agency
72. PF Center for Culture - Kriva Palanka
73. PHI Zhelezara Polyclinic - Skopje
74. "Braka Miladinovci" Municipal Elementary School - Probishtip
75. PE Parkovi and Zelenilo - Skopje
76. PHI UI PET
77. Municipality of Tetovo
78. Regulatory Commission for Energy and Water Services of Republic of North Macedonia
79. PHI Health Center Strumica
80. Agency for audio and audiovisual media services
81. PHI Institute for Rehabilitation of Children and Youth - Skopje
82. PI Ohrid Summer
83. Smilevski Business Academy - BAS
84. "Veseli Cvetovi" Kindergarten - Delchevo
85. "Magdalena Antova" Elementary School
86. IACA Institute of Accountants and Chartered Accountants
87. "Krume Volnaroski" Elementary School, Topolchani village
88. "Brakja Miladinovci" Municipal Elementary School, Carev Dvor, Resen
89. PE - Municipal Center for Social Affairs of the City of Skopje (MCSACS)

90. PE Debrca
91. UKIM-Institute for Sociological and Political Legal Research
92. Faculty of Economics - Skopje
93. “St. Kliment Ohridski” University - Bitola
94. Municipality of Makedonski Brod
95. NI Natural Science Museum - Skopje
96. Handball Federation of Macedonia
97. PE City Parking - Strumica
98. PI Gostivar Theater
99. Municipality of Veles
100. PE Communal Hygiene - Skopje
101. The City of Skopje
102. PHI Clinical Hospital - Bitola
103. “St. Kliment Ohridski” University, Faculty of Pedagogy, Bitola
104. PE Intermunicipal Center for Social Work - Negotino
105. “Braka Ribar” Municipal Elementary School - Tabanovce
106. PE City Parking - Tetovo
107. Municipality of Gostivar
108. Municipality of Butel, Skopje
109. PHI University Clinic of Urology
110. PE “Parks and greenery” - Skopje

111. PE for Communal activities and infrastructure “Kratovo” - Kratovo
112. PE “Water and sewerage” - Prilep
113. PHI Health Center “Dr. Ruse Boskovski” - Rostushe
114. ICR Berovo
115. PE City Cemetery - Ohrid
116. PHI University Clinic for Neurosurgery
117. “Risto Yurukov” Municipal Music School
118. PHI University Clinic of Dermatology
119. “Vinozhito” Kindergarten - Sopishte, Skopje
120. Administrative Court
121. “Goce Delchev” Kindergarten - Marino
122. Pioneer Home “Josip Broz Tito” - Gevgelija
123. Agricultural Institute at UKIM - Skopje
124. APIPC Municipality of Valandovo
125. Municipality of Debarca
126. Municipality of Gostivar
127. Culture Center "Makedonski Brod" - Makedonski Brod.
128. Municipality of Delchevo
129. Municipality of Jegunovce
130. Municipality of Veles
131. Municipality of Vinica

132. Municipality of Gazi Baba
133. Administrative Court of the Republic of North Macedonia.
134. Municipality of Lozovo
135. Municipality of Kriva Palanka
136. PHI General Hospital - Gostivar
137. PE Pazarishta - Kumanovo
138. Municipality of Bogovinje
139. Municipality of Bitola
140. Municipality of Tetovo
141. Basic Court Prilep
142. Basic Court Kratovo
143. "St. Cyril and Methodius" Elementary School, Dabilje village - Strumica
144. "Gjorgija Pulevski" Municipal Elementary School, Aerodrom Municipality - Skopje
145. "Blaze Koneski" Municipal Elementary School - Veles
146. Basic Court Negotino
147. "Dimitar Makedonski" Municipal Elementary School
148. "Vancho Prke" Municipal Elementary School - Delchevo
149. Municipality of Sveti Nikola
150. "Detelinka" Kindergarten, Kriva Palanka
151. Vinica Basic Court
152. Basic Court Ohrid

153. Municipality of Resen
154. PHI University Clinic for Dermatology-Skopje
155. Municipality of Novaci
156. Municipality of Centar-Skopje
157. “Prparimi” Municipal Elementary School - Golema Recica
158. “Krst P.Misirkov” Municipal Elementary School - Orizari, Kochani
159. “Kosta Racin” Municipal Elementary School, Brvenica
160. MF Acibadem Sistina
161. “Kiril i Metodij” Municipal Elementary School - Stajkovci
162. “Brakja Miladinovci” Municipal Elementary School - Kumanovo
163. “Mustafa Kemal Ataturk” Municipal Elementary School, Plasnica
164. “Rajko Jinzifov” Municipal Elementary School, G. Orizari - Veles
165. “Nikola Karev” Municipal Elementary School - Kochani
166. “Eqrem Chabey” Municipal Elementary School, Slatino village – Tearce
167. “Goce Delchev” Elementary School - Podgorci
168. “St. Cyril and Methodius” Municipal Elementary School - M. Kamenica
169. “Dituria” Municipal Elementary School, Lipkovo village
170. “Goce Delchev” Municipal Elementary School
171. OOU "Kocho Racin" Kratovo
172. “Kiril Pejchinovikj” Municipal Elementary School, Skopje
173. “Vlado Kantardjiev” Municipal Elementary School, Gevgelija

174. PHI Zdraven dom Radovish
175. PHI Specialized Hospital for Lung Diseases and Tuberculosis - Jasenovo, Veles
176. PHI General Hospital Kumanovo - Kumanovo
177. PHI University Clinic for Traumatology, Orthopedic Diseases, Anesthesia, Resuscitation, Intensive Treatment and Emergency Center - Skopje
178. PHI University Clinic for Nephrology - Skopje
179. PHI Zdravstven dom Resen
180. PHI General Hospital-Struga
181. Ministry of Foreign Affairs
182. PHI Health Center - Krushevo
183. PHI University Dental Clinical Center "St. Panteleimon" - Skopje
184. PHI Zdravstven dom - Struga
185. "Kiro Gligorov" Municipal Elementary School - Skopje
186. "Dame Gruev" Municipal Elementary School, Erzheia village, Sveti Nikole
187. SMS "Todor Skalovski-Tetoec" -Tetovo
188. SSF for Rehabilitation and Education "St. Naum Ohridski" - Skopje
189. "7 Marsi" High School – Tetovo
190. "Goce Delchev" Municipal Elementary School - Shtip
191. "September 8" Municipal Highschool -Tetovo
192. "Vladimir Arsovski" Municipal Elementary School - Negotino
193. "Blaze Koneski" Municipal Elementary School, Skudrinje, Mavrovo and Rostushe
194. "Koco Racin" Municipal Elementary School - Skopje
195. "Nikola Petrov - Rusinski", Municipal Elementary School - Rusinovo

196. "Bratstvo-Edinstvo" Municipal Elementary School - Ohrid
197. "Dedo Iljo Maleshevski" Municipal Elementary School - Berovo
198. "Atanas Nivichanski" Municipal Elementary School, Nova Maala village, Vasilevo
199. "Dimitar Vlahov" - Skopje
200. "Metodi Mitevski Brico", Lozovo
201. "Kiril and Metodij" Elementary School, Kumanovao
202. "Tosho Velkov-Pepeto" Municipal Elementary School, Kavadarci
203. "Dimitar Makedonski" Municipal Elementary School, Aerodrom Municipality, Skopje
204. "Kosta Racin" Municipal Elementary School, Brvenica
205. "Brakja Ribar" Municipal Elementary School, Tabanovce village, Kumanovo
206. "Gjon Buzuku" Municipal Elementary School - Srbinovo village
207. "Kiril i Metodij" Municipal Elementary School, Stajkovci
208. "8 September" - Tetovo
209. "Vojdan Chernodrinski" Municipal Elementary School - Skopje
210. "Eqrem Chabey" Municipal Elementary School, Slatino - Tearce
211. "Kocho Racin" Municipal Elementary School, Ivanjevci - Mogila
212. "Congresses and Monastery" Municipal Elementary School, Skopje
213. "Krstev Misirkov" Municipal Elementary School, Gevgelija
214. "Kocho Racin" Municipal Elementary School, Blatec - Vinica
215. "Braka Miladinovci" Municipal Elementary School, Probishtip
216. "Braka Miladinovci" Municipal Elementary School - Kumanovo
217. "Kocho Racin" Municipal Elementary School, Kratovo
218. "Kiril Pejcinovikj" Municipal Elementary School

219. "Rampo Levkata" Municipal Elementary School - Prilep
220. "Mehmet Derala" Gradec, Municipality of Vrapchiste
221. "St. Kliment Ohridski" Municipal Elementary School, Drachevo village
222. "Hasan Pristina" Municipal Elementary School, Chair, Skopje
223. "Strasho Pindjur" Municipal Elementary School, Vevcani
224. "Lirija" Municipal Elementary School, Zherovjane, Municipality of Bogovinje
225. "Krume Volnaroski" Municipal Elementary School, Topolchani - Prilep
226. "Strasho Pindzur" Municipal Elementary School, Malo Konjari - Prilep
227. Municipality of Vinica
228. "Pashko Vasa" Municipal Elementary School, Grupcin village
229. "Kocho Racin" High School, Veles
230. Economy High School, Gostivar
231. "St. Cyril and Methodius" Municipal Elementary School - M. Kamenica
232. "Kiro Spandzov" High School, Brko, Kavadarci
233. SI Regional Center for Vocational Education and Training "Mosha Piade" - Tetovo
234. "Mile Janevski-Djingar" High School, M. Kamenica
235. "Jane Sandanski" High School, Shtip
236. "Mitko Penjukliski" High School, Kratovo
237. "Riste Risteski-Ricko" High School - Prilep
238. "Kuzman Josifoski-Pitu" - Prilep
239. "Georgi Dimitrov" High School - Skopje
240. "Kole Nehtenin" Municipal High School - Shtip
241. "Maria Curie-Sklodovska" High School - Skopje

242. “Naum Naumovski-Borce” Municipal High School - Probishtip
243. Medical High School “Dr. Pance Karagjozov” - Skopje
244. “Lazar Tanev” High School - Skopje
245. “Vasil Antevski-Dren” High School - Skopje
246. “Kocho Racin” High School - Sveti Nikole
247. “Slavcho Stojmenski” High School - Shtip
248. “St. Kliment Ohridski” Municipal Elementary School - Bitola
249. “St. Kliment Ohridski” Municipal Elementary School - Bitola
250. “Prerodba-Rilindja” High School, Zhitoshe - Dolneni
251. “Vancho Prke” High School - Vinica
252. Student dormitory “Dr. Panche Karagjozov”
253. “Jan Amos Komenski” Municipal Elementary School - Skopje
254. “Jane Sandanski” High School - Strumica
255. “Dimitar Miraschiev” High School - Shtip
256. “Ilinden” High School - Ilinden Municipality
257. “Krstev Misirkov” Municipal Elementary School - Skopje

ATTACHMENT: COPY OF FINAL ACCOUNT FOR 2022

[1] **E-PORTAL FOR HOLDERS**

Manual for the Information Holders

<https://drive.google.com/file/d/1r9qXYI8fMowQG7NvzJqmh-vyfNlGZOvj/view?usp=sharing>

Video Tutorial for the Information Holders

https://drive.google.com/file/d/1BcY0vpbL2Oz1zxxPwDhWJEIXX_QDXjHg/view?usp=sharing

E-PORTAL FOR REQUESTERS (FREE ACCESS PORTAL)

Manual for the Requesters

<https://drive.google.com/file/d/1ZDcxSganD97m9lwUdljQLPqp0KYG2pEe/view?usp=sharing>

Video Tutorial for the Requesters

<https://drive.google.com/file/d/11R9mqDwM6QlvGYW7IIMrZTQBw98L9OZA/view?usp=sharing>