



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

ANNUAL REPORT

Reporting period: 2020 Total budget: MKD 15,363,000.00 Number of employees: 17 www.aspi.mk	<u>Responsible person:</u> Name and Surname: Plamenka Bojcheva Title: Director of the Agency E-mail: aspi@aspi.mk Phone: 02/3118-038
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1. SUMMARY

The annual report of the Agency for the Protection of the Right to Free Access to Public Information (hereinafter - the Agency) derives from the legal obligation to submit an annual report to the Assembly of the Republic of North Macedonia, and reflects the competences established in Article 30 of the Law for free access to public information, the implementation of which is the responsibility of the Agency, which since the beginning of 2020 appears as the legal successor of the former Commission for the Protection of the Right to Free Access to Public Information (hereinafter - the Commission).

The Commission, as an independent state body that took care of realizing the constitutionally and legally guaranteed right of man and citizen to free access to public information, existed from 2006 to 2019 and worked in accordance with the Law

on Free Access to Public Information ("Official Gazette of the Republic of Macedonia" no. 13/2006, 86/2008, 6/2010, 42/2014, 148/2015, 55/2016 and 64/2018) as a collegial body consisting of a president, a vice president and three members. After the adoption of the Law on free access to public information in May 2019 ("Official Gazette of the Republic of North Macedonia No. 101 of 22.05.2019" - hereinafter referred to as LFAPI) the Commission was transformed into an Agency, which as an independent and state body continued the mission of the Commission as an external body, led by the director and deputy director of the Agency. They, as in the case of the members of the Commission, are appointed and dismissed by the Assembly of the Republic of North Macedonia.

Considering the fact that the Commission worked and made decisions in accordance with the powers established in the Law on Free Access to Public Information with a majority of the votes of its members, and due to more than one year of legal impossibility to make decisions due to lack of quorum (the Assembly did not appoint new members), **741** cases that were not acted upon during 2019 were left in the "inheritance" of the Agency. **The Agency, after the election of its director and deputy director, acted in the first months of the year** for all transferred cases from the Commission, as well as for more **752** newly arrived appeals during 2020, i.e. **after a total of 1,493** cases.

Also, in the same period, the Agency prepared Guidelines for the implementation of the new LFAPI ("Official Gazette of the Republic of North Macedonia" no. 60/20) and adopted by-laws, which it published on its website.

Regardless of its modest budget, the Agency during 2020 (period September - December) managed to organize and realize **15** trainings for the officials who mediate the public information with the Information appeal. The first ones **5** took place in the premises of the Agency, and then, in accordance with the security procedures due to the circumstances caused by Covid 19, **10** were held online, through the ZOOM platform.

The analysis of the Agency's one-year work in the field of the protection of the right to free access to public information, in brief (according to the number of appeals received and supporting documents for the same), shows the following results:

The right of free access to public information is mostly used (about 80%) by non-governmental organizations and citizens' associations, as a tool for achieving goals related to the realization of their own work programs. Citizens, on the other hand, i.e. natural persons, most often appear as complainants in situations in which they have resorted to the legal provisions in order to exercise some of their rights in pre-/procedures according to another material law that regulates the relevant matter, i.e. in the inability to exercise their rights and come to information and documents that are the responsibility of the information appeal.

The summarized results show that the largest number of appeals submitted to the Agency for the period we are reporting on, percentage exceeds **80%, for cases of failure of information appeal to act upon submitted requests** within the legally prescribed deadlines (20 days after a request is submitted, or 30 days if the request requires extensive information), **that is, because of the "silence of the administration"**.

The Agency tries to adapt to the new conditions and strives to become a leader in terms of realizing the protection of the right to free access to public information. At the same time, it encourages other institutions to raise the right of access to information to a higher social level.

To this end, the Agency will continue to be professional, as well as solve problems

and questions in direct contact with the appeal and requesters of information (it does this continuously through its officials whose phones are available daily to provide free legal and other assistance to officials and information requesters). In that direction, he will tirelessly continue with the implementation of trainings for both stake appeal.

The Agency also takes continuous measures to **favoring proactive transparency** among the appeal of information, combining it with the drafting of additional by-laws.

The agency is aware that many of the officials (for now there are over 1,440 on the list) do not know enough about LFAPI and that it should actively work in that field, through trainings and participation in building the capacities of information appeal at the central and local level.

2. INTRODUCTION

The annual report for 2020 covers the operation of the Agency for the Protection of the Right to Free Access to Information of a Public Character in the exercise of its basic competences.

Regardless of the circumstances in which the Agency found itself, due to the still current situation with the virus, which are stated in the Summary of this Annual Report, it continued with its Mission, with the sole purpose of protecting the realization of the constitutionally guaranteed right to free access to public information, through efficient and independent implementation of the appeal procedure, through continuous information to the public and education of the appeal of information.

Initially, acting on transferred cases from **2019**, inherited by the Commission, the Agency acted on all of them **741 appeals**, bringing a total of **735 final and 26 meritorious** administrative acts. We hope that the figures presented will not lead to confusion because the Agency, taking into account the provisions of the Law on the General Administrative Procedure, in addition to the initial decisions with which it instructed the first-level authorities to act in accordance with the LFAPI, or returned cases to them for re-processing, also adopted meritorious ones decisions in cases where the appeal did not act on its previous decisions. It has been established that this legal procedure proved to be productive, given that almost all appeal of information acted in accordance with the decisions of the Agency. Against those who did not do so, misdemeanor proceedings were initiated by the Agency's Misdemeanor Commission.

It is also worth noting that precisely in this period of special unforeseen and unfavorable circumstances both for the Agency and for all appeal of information, in the month of July/August, appeals were submitted to the Agency **328 appeals from the same information seeker**, years ago a known appellant - The Association for Emancipation, Solidarity and Equality of Women ESE-Skopje, as well as other associations of citizens and foundations that implement their program and project activities through requests for free access to public information, influence the fact that a large number of appeals are submitted to the Agency.

Which refers to **2020 year**, there are hardly any significant shifts in the parameters. More specifically, during this year, they were submitted to the Agency **752** appeals filed against administrative and real acts of the first instance authorities, or against the silence of the administration. Precisely because of the last mentioned, that is, against the non-action of the first instance authority on requests for access to

information of a public nature, even **611** appeals, which does not speak of a positive step forward for the appeal of information after the 14-year implementation of the Law on Free Access to Public Information.

Unlike the last reporting year, out of total **1.440** appeal of information, submitted an Annual Report on the application of the law to the Agency **1.132** appeal, that is **78,61%** percent of them, until the legal obligation is fulfilled by **299** institutions and **9** with a long delay Due to the above, the Agency plans, through an authorized person, before its Offenses Commission (new in LFAPI since 2019) to initiate a misdemeanor procedure against all appeal of information who have not fulfilled the legal obligation to submit an annual report to the Agency.

As it has already been emphasized, in the inability to fulfill all its legal competences through its own modest budgetary financial resources, with the support of international organizations in the Republic of North Macedonia, in several segments, and mostly in the part of the legal obligation to undertake activities for the education of the appeal of information, the Agency continued to fulfill it by holding physical and on-line trainings within the framework of its established cooperation with domestic and international actors in the field of access to public information.

It is nothing new if it is emphasized once again that it was ascertained, as before by the Commission, that in order to more successfully fulfill its role in accordance with the legal competences, the Agency has an urgent need for qualitative personnel re-equipment, as well as much stronger budgetary support.

3. STATUS, MANAGEMENT, COMPETENCE AND ORGANIZATIONAL STRUCTURE:

The Agency for the Protection of the Right to Free Access to Public Information in accordance with the Law on Free Access to Public Information ("Official Gazette of the Republic of North Macedonia" No. 101/2019), is the legal successor of the Commission with the same name. The Agency started working on the day of the appointment of the director and deputy director, namely on 26.12.2019.

According to Article 30 of the Law, the Agency performs the following tasks:

- conducts administrative proceedings and decides on appeals against the decision by which the owner of the information refused or rejected the request for access to information of the applicants,
- takes care of the implementation of the provisions of this law,
- prepares and publishes a list of information appeal,
- gives opinions on proposals for laws regulating free access to information,
- develops policies and provides guidelines regarding the exercise of the right to free access to information,
- conducts misdemeanor proceedings through the Misdemeanor Commission, which decides on misdemeanors in accordance with the law,
- undertakes activities related to the education of the appeal of information about the right of free access to the information they have, - cooperates with the appeal of information regarding the realization of the right of access to information,
- prepares an annual report on its work and submits it to the Assembly of the Republic of Macedonia,
- carries out works of international cooperation related to the execution of the

international obligations of the Republic of Macedonia, participation 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 information of a public nature,

- promotes the right to free access to public information and
- performs other tasks determined by this and other laws.

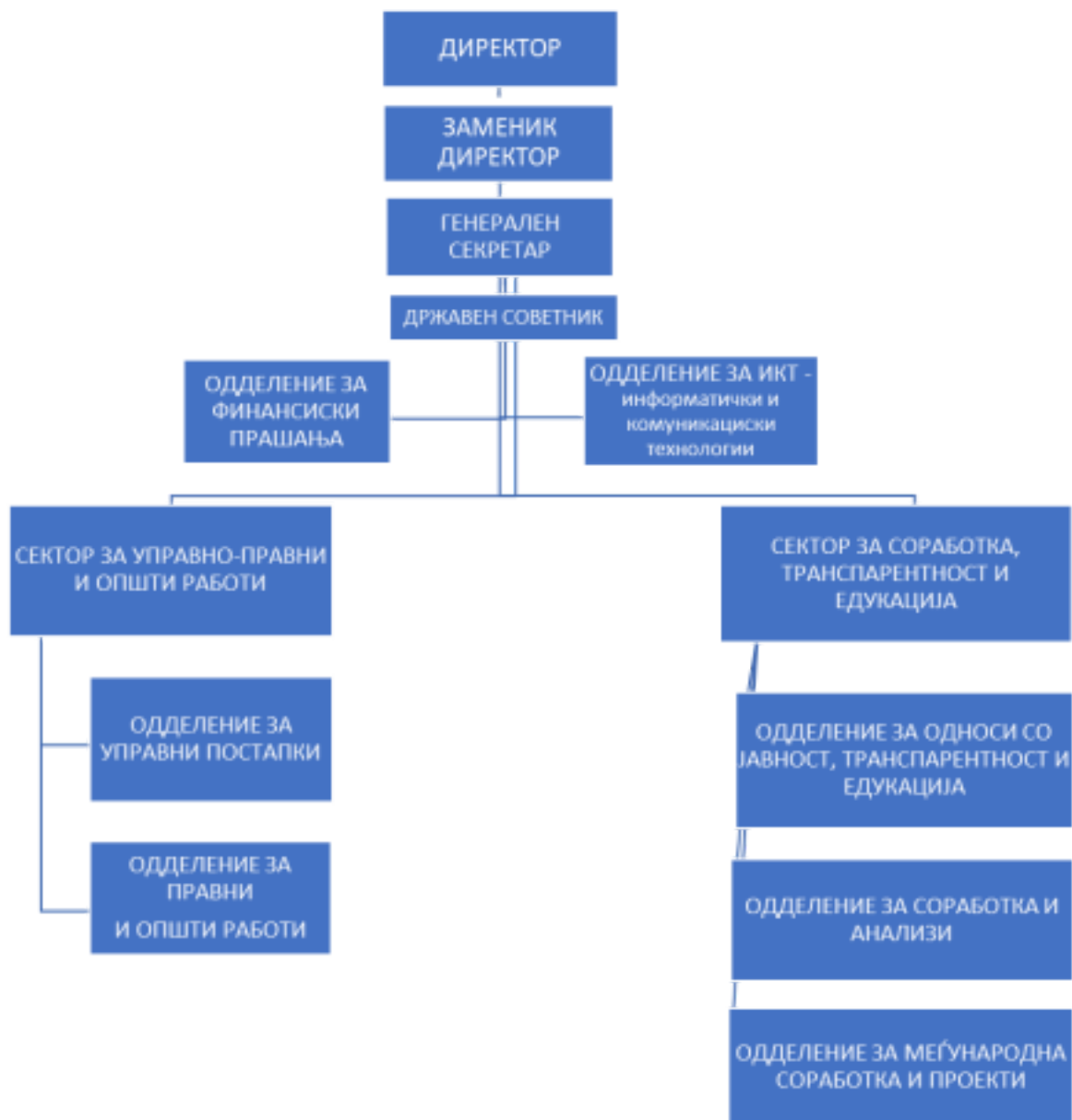
As a new legal entity, the Agency, in cooperation with external experts, engaged within the framework of the IPA 2 project, prepared a Functional Analysis, on the basis of which Rules for internal organization and Rules for the systematization of jobs in the Agency for the Protection of the Right to Free Access were drawn up. to public information. On these

acts, on 13.10.2020, Consent was received from the Ministry of Information Society and Administration.

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 accordance with the Regulations, the following organizational units are formed in the Agency:

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

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



Organogram

With the new systematization, which is applied from 13.10.2020, job positions for a total of 49 executors have been determined and described, distributed according to organizational units. A total of seventeen (17) jobs were filled, of which fifteen (15) are open-ended and two (2) are open-ended. Out of the total number, thirteen (13) employees have a higher education, and four (4) have a secondary education.

The qualification structure of employees with higher education is as follows: five (5) are law graduates, three of whom have master's degrees, two (2) are from the Faculty of Philology, one has a master's degree, (1) is a graduate journalist, one (1) has a Faculty of Philosophy, two (2) are graduate economists, one (1) is a graduate manager in marketing and one (1) is a graduate manager in human resource management.

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

According to categories of administrative officers, the situation is as follows: -
Head of Department: none (0)

- Assistant head of department: none (0)

Heads of Department: two (2) advisors; two (2) - eight (8) junior associates; - One (1) independent referee; - one (1) senior referent and three (3) junior referents.

Of the total number of employees, seven (7) are of Macedonian nationality (41.18%), four (4) are of Albanian nationality (23.53%), four (4) are of Vlach nationality (23.53 .%) and two (2) are of Roma nationality (11.76%).

The percentage of the total number by nationality of the Agency's employees is as follows:

	Systematized jobs	Completed working places	Percentage of total number of employees	High	Average
Macedonians		7	41,18 %	(5)	2
Albanians		4	23,53 %	(4)	
Aromanians		4	23,53 %	(4)	
Roma		2	11,76 %		2
In total	(49)	17	100%	13	4

Of the total number of employees in the Agency by nationality, the situation is as follows: seven (7) are of Macedonian nationality, of which four (4) are male and three (3) are female, four (4) are of Albanian nationality of which three (3) are female and one (1) male, four (4) are of Aromanian nationality, of which two (2) are male and two (2) are female and two (2) are of Romani nationality nationality one (1) male and one (1) female. The employees are aged from twenty-eight (28) to sixty-three (63) years of age.

The Agency for the Protection of the Right to Free Access to Public Information, after previously obtained consent for provided financial resources, on 01.02. 2020 in the daily newspapers "Nova Makedonija" and "Koha" published a public announcement for the employment of 3 (three) executors on fixed working hours for the period until 31.12.2020, for the following positions: Head of Department, Junior associate and senior officer, of which in September 2020, at the employee's request, the post of Head of Department was again vacated.

During this reporting period, the employment of three (3) executors was terminated, and on January 31, 2020, one junior employee left at his request to another institution. On February 28, 2020 and April 24, 2020, he retired. Head of Department and Head of Sector left.

In accordance with the Annual Employment Plan of the Agency for 2020, for which the consent of the competent institutions was obtained in October 2020, an internal announcement was published for the promotion of the following jobs:

1. From the position Counselor for appeals procedure to the position Head of Department for Administrative Procedures and
2. From the position Junior Associate for Budget Control to the position Advisor

for Budget Control, thus these positions are vacant.

On December 26, 2020, a public announcement was published on the website of the Agency for Administration and in the daily newspapers "Nova Makedonija", "Sloboden Pечат" and "Koha", to fill the following jobs:

1. Assistant Head of the Department for Legal, General Affairs and Administrative Procedures in the Department for Administrative-Legal and General Affairs – 1 (one) executor; 2. Head of the Department for International Cooperation and Projects, in the Department for Cooperation, Transparency and Education - 1 (one) executor and 3. Junior associate for cooperation with the appeal of information in the Department for Cooperation and Analysis, Department for Cooperation, Transparency and Education – 1 (one) executor.

The procedure for realizing the mentioned employments will be completed in the current year 2021.

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

4.1. Adjudication of appeals

The most significant competence of the Agency, as a secondary authority in the process of implementation of the exercise of the right of access to public information, is to lead an administrative procedure and to decide on appeals from information requesters submitted against the appeal of information, regardless of whether the latter are not acted according to LFAPI, or brought administrative acts by which they refused or dismissed their requests for access to public information.

LFAPI provides for the right to Appeal for all applicants who have submitted an oral, written or electronic Request for access to public information to any of the appeal of the information. The second-level authority in the procedure, i.e. the Agency, forwards the appeals electronically to the first-level authorities (the appeal of the information), with a request within seven days to receive a ruling on the same and an attachment from a set of documents, in order to act immediately within the legally stipulated period of 15 days.

Depending on the failure/proceeding of the first instance authority, i.e. on the part of the information appeal, the Agency, taking into account the provisions of the Law on the general administrative procedure, LFAPI and other law valid for the specific procedure, built a new approach in the administrative procedure, putting the educational approach in the foreground before the repressive. More specifically, the Agency delivers to the appeal of information who have not responded at all to requests for access to public information, decisions to order them to act in accordance with the LFAPI within a legally established deadline (with an additional obligation to notify the Agency of their action within that deadline). To those appeal of information who have acted in accordance with the provisions of the Law, that is, they have not passed an administrative act with which they responded to the requests, the Agency delivers decisions for them to act again, with instructions on how to do the same. If such initial decisions do not result in the achievement of the goal of LFAPI, and after a re-submitted appeal by the applicant, the Agency prepares and delivers to the appeal of information meritorious decisions, which in most cases represent

obligations for the appeal to deliver the requested information to the applicant.

As we explained in the Introduction of this report, after its establishment on 26.12.2019 and the completed formalities regarding the same, the Agency from 10.01.2020 put an emphasis on acting on the backlog of 741 cases taken over by the Commission. The procedure for the same was completed in the month of February 2020.

At the same time, under the circumstances of Covid 19, with restricted presence of employees in accordance with security regulations, the Agency managed to fully respond to the new challenge and, during the same year, to act on the newly submitted 752 appeals, observing the legal deadline.

The processed data show that in the reporting year 2020, a total of **752** appeals, which represents approximately the same number of submitted appeals as in the previous year.

The status of appeals submitted by information requesters by month is as follows: in the month of January, **22** appeals, February-**33**, March-**45**, April- **43**, May-**14**, June-**64**, July-**30**, August-**327**, September-**41**, October **62**, November-**33** and in the month of December-**38** appeals. (in **Appendices: Chart 1**)

In a similar context, as in previous reporting periods, the structure of complainants to the Agency can be commented on. Namely, the majority of appeals were submitted by legal entities, i.e. by citizens' associations and foundations (**558**), and they are submitted by natural persons **194** appeals. It is interesting that this time too the largest number of appeals (**443**) were submitted by the Association for Emancipation, Solidarity and equality of women ESE-Skopje (**328** appeals) and from the Center for Civil Communications CGK - Skopje (**115** appeals), which represent almost 2/3 (two thirds) of the total number of appeals submitted to the Agency, and refer to the requests of these two associations for the realization of their program goals.

The above-mentioned number of appeals from the two mentioned and from other associations of citizens, exclusively submitted due to the silence of the administration, raises the number of reported appeals against the silence of the administration to a total of **611**, which represents a large percentage (81%) in relation to the total **752**- the appeals filed during the reporting year. This indicates the fact of non-action by the appeal of information on requests for free access to public information within the legally stipulated period.

Dissatisfied with the response received from the information appeal, the information requesters submitted to the Commission **84** appeals, and against Decisions made by the owners have been submitted **57** appeals.

4.2. Solved cases and their structure

During 2020, the agency acted on a total of **741** items transferred from 2019 and after **752** cases from the reporting year 2020. From the procedure carried out after the transferred appeals from 2019, they emerged **735** final and **26** meritorious solutions.

Acting, on the other hand, on the appeals received during 2020, the Agency adopted **719** final and **19** meritorious decisions, and after **27** was done at the beginning of 2021.

In terms of the resolved cases and their structure, the situation is as follows:

- **229** decisions by which the appeal is respected and the first-instance authority

- is ordered to act on the request of the applicant;
- **10** decisions by which the appeal is respected and obliges the holder to provide the requested information;
 - **46** decisions rejecting the Appeal as unfounded;
 - **91** decisions rejecting the Appeal as untimely/inadmissible/premature;
 - **81** decisions by which the appeal is respected and the case is returned to the first-instance authority;
 - **287** decisions that stop the procedure following a appeal due to its withdrawal, or due to an answer received in the meantime. **(in Attachments: Chart 2)**

4.3. Appeals filed against information holders

Regarding the appeals filed against the information holders, the data shows the following:

- the largest number of appeals (**231**) are declared against state institutions; - have been filed against educational institutions **14** appeals;
- **109** appeals against municipalities;
- against public enterprises and institutions - **60** appeals;
- **35** appeals against the judiciary;
- **42** against legal or natural persons exercising public powers and
- against health facilities **261** appeal, all submitted by the same public information requester. **(in attachments: Chart 3)**

4.4. Nature of submitted appeals

The Agency has data from which it can be determined that in the reporting year 2020 the most appeals were filed against: state institutions, municipalities, public enterprises, health facilities and judicial authorities (the latter are usually not requests for access to public information, but requests from the competence of the courts, for which the courts decide according to their competences and accordingly another law, and not according to the LFAPI).

Unfortunately, we can once again state that the organized trainings and workshops intended for officials with information appeal did not have an adequate effect in removing the most common reason for submitting appeals to the Agency - the silence of the administration. A large number of the officials did not actually respond to the invitation to attend the trainings, that is, the turnout was insufficient, although all the appeal of information were informed that the trainings were free.

On this occasion, we would like to point out that the Agency, in cooperation with NDI and the "Vidi Vaka" team, with financial assistance from USAID, produced an educational video intended for the appeal of information, which briefly explains the procedure following a request for free access to public information.

appeals have been filed due to the requesters' dissatisfaction with the answers received from the information appeal and against the received decisions for denying access to the requested information.

The most frequently mentioned dissatisfaction of the complainants with the actions of the appeal of information is in relation to requests that related to:

- records and reports on conducted public procurements;
- information on received and spent budget funds under programs that treat

specific diseases, treatments of certain categories of persons, etc.; - biographies of members of supervisory and management boards and the amount of their fees;

- information on announcements and employment procedures;
- copies of necessary evidence in court proceedings;
- documentation from the field of urbanism;
- documents for the total costs incurred by the information appeal; - information on environmental protection (especially on Lake Ohrid) and more.

4.4.1. Status of cases after lawsuits

In 2020, according to the Agency's records, against its previously adopted decisions, a total of **9** lawsuits.

Administrative disputes are initiated by **4** legal entities and **5** by natural persons.

The Agency acted on all the submitted lawsuits and submitted a response to the Administrative Court.

Acting on the aforementioned lawsuits in 2020, as well as lawsuits that were previously filed against the Commission, and then against the Agency, the Administrative Court passed:

- **7** judgments rejecting the lawsuit as unfounded,
- **4** judgments dismissing the lawsuit as inadmissible or improper and
- **6** judgments upholding the lawsuit.

4.4.2. Misdemeanor procedure

A significant novelty in LFAPI from 2019 is that, for the first time, for the offenses established in this Law, a misdemeanor procedure is conducted and misdemeanor sanctions are imposed by the Misdemeanor Commission in the Agency.

Fulfilling the above-mentioned legal obligation, with full commitment to the Law on Misdemeanors, the Misdemeanor Commission started in 2020 with the implementation of **10** misdemeanor proceedings. The outcome of the same is the following:

- **2** procedures resulted in the imposition of a misdemeanor sanction - warning,
- **5** procedures ended with the release from responsibility of officials against whom procedures were initiated by an authorized person in the Agency, and at the request of the complainants,
- **1** procedure is with an epilogue for imposing a misdemeanor sanction - a fine, and
- **2** procedures are still ongoing and their outcome will be presented in the annual report for the following year.

4.4.3. Implementation and experiences from the application of the Law

The law on free access to public information adopted in May 2019 brought several novelties, of which we highlight the following:

- The Commission has been transformed into an Agency, which means from a

collegial body, it has become an independent body;

- the appeal of information are more precisely defined;
- political parties have been added as appeal in the income and expenditure

section;

- the deadline for acting on received requests has been shortened;
- the public interest in exercising the right of access to public information has

been clarified and

- the establishment of a Misdemeanor Commission with the task of conducting misdemeanor proceedings and imposing misdemeanor sanctions was established.

But the legal changes did not bring any significant response from the appeal, or from the information requesters. Information requesters do not stop seeking the most information from state institutions as appeal of information, and the latter have not reduced the administration's silence. It points to the conclusion that the most common reason for submitting appeals to the Agency is the non-implementation of the Law by the appeal of information of a public nature, or rather the failure to act on the Requests by the first-level authority within the legally stipulated period.

There are numerous cases when the appeal reacted even after the expiration of the term stipulated in the Law and after submitting the appeals, but this is due to the Agency's mediation and is not in the spirit of achieving its main goal - quickly and efficiently providing access to public information .

Also, in this reporting period, the largest transfer of officials who mediate the information of the information appeal has been recorded, i.e. new employees have been hired, mostly younger associates (rarely among them are appointed lawyers) who have problems with acting in accordance with the LFAPI , the Law on General Administrative Procedure, other laws, and even with its own lex specialis. They don't even recognize the dispositives in the Agency's decisions, whether they are for ordering, or for obliging to act, etc.

Information requesters, on the other hand, mostly use the right of free access to public information to achieve goals related to the realization of their own work programs (non-governmental organizations and associations), and even submit questionnaires and survey sheets through LFAPI and from the appeal of information request to act within the deadlines stipulated in this Law, in order to then submit appeals in accordance with it.

The citizens, on the other hand, most likely need a new, broad campaign and education, because they have not yet understood the purpose of the existence of the LFAPI and most of the time they ask the appeal of information for information that is within their legal competence, and in order to exercise some of their rights. in judicial or other civil or administrative proceedings, which are carried out according to another material law. For this purpose, the Agency, in cooperation with NDI and the "Vidi Vaka" team, with financial assistance from USAID, produced an educational video intended for information requesters, but apart from national television, no other media showed interest in broadcasting it without compensation, although it was delivered to them several times.

Following the practical application of the Law, the Agency determined that for better implementation, new amendments and additions to it are needed, especially in the parts of:

- the exceptions from the Law, which are not absolute, but are numerically minimized, and not fully defined,
- the misdemeanor provisions that are "intended" only for officials, but not

intended for managers, who actually appear as creators of the impossibility of free access to public information,

- normalizing the abuse of free access to public information by submitting a large number of requests at one time, etc. Otherwise, the Agency for the Protection of the Right to Free Access to Public Information remains on its original vision - to be recognized and respected by appeal, applicants and the general public as a basic institution responsible for exercising the right to free access to public information, which contributes to increased accountability and transparency in society.

4.4.4. List of information appeals

After the entry into force of the Law at the beginning of 2020, there was a need for further expansion, modification, but also redefinition of the List of appeal of public information maintained by the Agency. With the registration as owners primarily of legal and natural persons who perform activities of public interest, of political parties in the area of income and expenses (new in the law), but also of other (some of which are new) public enterprises, health institutions, and educational institutions, the total number of registered entities on the List reached **1.440**, what about **183** appears more compared to their number in the previous reporting period.

The largest number of new appeal have been inserted in the newly created eighth section, i.e. a link to the List entitled "political parties", which contains the legally required data for **57** political parties registered in the single court register of political parties.

Contrary to this data, the only part of the List in which a drastic reduction in the number of appeal is noticeable is the link with the institutions of the judicial authority, which of the existing **83** is reduced to **67**. This is primarily due to the redeployment of the State Attorney's Office of the Republic of North Macedonia together with the regional units, (recorded as separate appeal) in the link with the state institutions, but also to the removal from the List of the Public Prosecutor's Office for the prosecution of crimes related to and arising from the content of the illegal monitoring of communications, which no longer exists.

The part of the List with state institutions has also been expanded with the Committee for the Investigation of Aviation Accidents and Serious Incidents, the Republic Council for Road Traffic Safety, as well as with the National Security Agency, after which the total number of appeal from **126** climbed to **144**.

Compared to the reporting year 2019, the part of the list with the municipalities, including ZELS and the city of Skopje, has been supplemented with six more newly registered appeal, which brings the total number in this link to **88**.

A trend of increasing the number of appeal from the previous ones **108** on **111** is also recorded in the health institutions, as a result of the entry in the List of PHI Zdravstven dom-Lipkovo, PHI Zdravje Home-Valandovo, as well as PHI University Clinic, State Cardiac Surgery Skopje.

As a result of the novelties contained in Article 3 of the LFAPI and the return of the public interest as a basis for registering new appeal, a significant increase is also visible in the Link with Legal and natural persons exercising public powers and activities of public interest, which has been extended to **43** newly registered appeal and in comparison with last year's **28**, now count **71** appeals.

Drastically expanded with **46** new appeals (a part with municipal public enterprises or institutions from more recent times) is also the part of the List with

public enterprises and institutions and it now counts **324**. After a previously carried out transformation, the "Proaqua" private enterprise from Struga was deleted.

In the reporting year 2020, the link with educational institutions in all degrees was expanded by **27** new appeals, and the total number of appeal contained in it is **578**. (in attachments: **Chart 4**)

4.4.5. Contents of Annual Reports

The analysis of the reports from which a conclusion can be drawn about the nature of the requests that were submitted to individual appeal, points to several general findings regarding the Implementation of the Law in 2020.

According to the first, the applicants, to a greater or lesser extent, showed interest in issues from all spheres of social life. The fact that **4.478** requirements or **62,51%** of total submitted **7.163** claims were recorded by the bodies of the state administration, that is, the local self-government, says that by far the most provocative for the claimants in the period that is the subject of the Report was the functioning of these two categories of appeal.

In contrast to this, the remaining **2.685** requests were submitted to the persons in charge of mediating information and applying the Law to all other categories of appeal, who, in turn, in almost half of the reports submitted to the Agency, did not present a single request that they would act on in the reporting period. Such are mainly the reports from most kindergartens and institutions in the lower levels of education and workers' universities, as well as from a large number of public enterprises and institutions, from legal and natural persons exercising public powers established by law and activities of public interest, but also from the largest number of political parties that received all 4 requests.

According to the reports that contain a description, the applicants were mostly interested in implemented public procurements and implemented procedures for the implementation of public announcements for employment, number of employees in the institutions and institutions segregated according to gender and ethnicity, the methods of payment of salaries. In the focus of the applicants were also information of a statistical nature on the number of employees and persons who terminated the employment relationship, decisions on the selection and appointment of members of management and supervisory boards and information on the (non) possession of an electronic document storage system.

Decisions on the procurement of equipment and devices for the replacement of non-ecological heating systems in public buildings, information about small hydro-electric power plants, data on the total number of newly established legal entities as a result of the support measure for self-employment-entrepreneurship in 2018 were requested from the state institutions. and 2019 and a list of newly established businesses in the mentioned years, data regarding the use of funds from the central budget (Covid 19), but also data on the stability of the banking and financial system, as well as information on the movement of population deposits and depositors' rights in compensation. Interest was also expressed by the applicants for shorthand notes and minutes of Government sessions and minutes of sessions of the Main Coordinating Crisis Staff on the basis of which measures were adopted against the introduction and spread of the corona virus, and data on the number of people was also requested in separate institutions that are on the list of possible transfers

acquisitions, number of employees terminated due to negative evaluations, about the fate of facilities and buildings that are used or that are abandoned and not used by certain state authorities, but also data on the activities and measures taken for preservation of the world heritage status of the Ohrid region in UNESCO.

According to the requirements, the local self-government units were asked to show transparency for information, acts, operational and planning documents produced by the work of the municipal administrations, for annual transfers of funds to non-governmental organizations, and requests were submitted for the total value of issued tax decisions of property, in connection with forms of direct participation of citizens in decision-making processes, information from the field of urban planning, traffic, reconstruction and construction of communal infrastructure. The municipalities had the obligation to respond to requests for released harmful substances in the territory they cover, requests for concluded agreements with twinned municipalities, for the number of green area permits issued, and they were also asked for information on the construction of roundabouts or mini roundabouts. as well as information on zones and real estate prices.

Some of the requests addressed to the judicial authorities refer to the number of held and postponed hearings during Covid-19, action plans for the work of judges in domestic conditions, decisions on executive selection of jury judges in separate courts, number of dismissed judges (taxative) due to unprofessional and negligent behavior and due to committed crimes, the number of appellate judges who have undergone training in the application of the law on criminal procedure, as well as the number of selected judges from the candidates who completed initial training at the Academy for Judges and Prosecutors, as well as minutes of the Commission for ranking candidates for the selection of judges in higher courts. Information was requested from the judicial authorities on the total number of criminal cases in which a higher court overturned, i.e. confirmed judgments of basic courts, the number of active cases based on a request for confiscation of property, as well as the number of employed persons with disabilities, i.e. disability and number of hired sign language interpreters in separate institutions from the judicial sphere.

Conducted activities in connection with a declared limited epidemic of measles in the territory of a specific municipality, number of systematic examinations of pupils and students carried out in accordance with the program for 2019, Information on epidemiological surveys carried out as a result of food poisoning, requests for the number of members of the Roma community infected with Covid 19, requests for the number of surgeries, number of doctors from general medicine, occupational medicine, pediatrics and number of dentists in the territory of the municipality of Tetovo, are some of the requests initiated by the operation of health facilities. The applicants were also interested in the number of people suffering from diabetes mellitus and asthma, in the number of patients cared for in the covid centers of individual medical centers, as well as in the list of activities that are carried out to monitor the sanitary and hygienic condition of surface water quality.

The applicants used the Law from public enterprises and institutions to request documentation for forestry services for felling and delivery of firewood by stages, data on procedures carried out for the financial audit service, as well as for services from an author's agency, a copy of the Procurement Agreement on 33 buses, information on the assessment of the risks of corruption in state and local enterprises, a decision to issue a permit for the use of drinking water and irrigation, a decision to service and maintain computers for buses and repair other sensitive parts for them, as well as decisions on total purchased quantities of electricity with the value of the signed

contracts.

In the focus of the applicants were also requests for the total number of certificates issued for exemption from work obligations (of parents) for the care of a minor child, in accordance with the measures to prevent the spread of the corona virus, data on the number of enrolled children with disabilities in the educational process, Information on the number of students who graduated, master's degree and doctorate in the direction (group) of the Albanian language from 2001 to the present, number of enrolled students at the department of Turkish language and literature at the Skopje State University in the period from 1991 to the present.

4.4.6. Annual reports of appeals

They respected the obligation to submit an annual report **1.132** had or **78,61%** out of total **1.440** appeals registered at the end of 2020. Due to ascertained inconsistent data, inaccuracies and other inconsistencies, from the total number of due reports, **3** were qualified as incomplete or invalid, which is why the statistical data contained in them are not part of this Report. **Nine** reports were submitted to the Agency with great delay, which is why they were not taken into account during the analysis, processing and preparation of the Report.

The obligation arising from Article 36 of the Law was not respected by the officials in total **299** institutions, which did not submit an Annual Report at all, which is why it was not possible to determine whether requests were submitted to these entities.

In 2020, the trend of submitting a larger number of reports continued, which, compared to the previous reporting year, is higher by **94**, but this did not result in an increase in the total percentage of submitted reports, taking into account the number of newly registered appeal, which is higher by **183** in relation to the previous report. **(in Attachments: Chart 5)**

The analysis of the obtained data showed that **138** out of total **144** state institutions submitted a report (**1** one of them did so with great delay), until they submitted a report **6** bodies of the state administration. Out of total **88** appeal registered in the link with local self-government units, including the city of Skopje, the Community of Local Self-Government Units (ZELS) and the six centers for the development of planning regions, the officials of **80** appeal submitted a report, while the **8** they did not act according to the Law.

Completed reports in accordance with the law were also submitted to the Agency **62** out of total **67**- the registered bodies of the judicial authority, while **5** appeal from the judicial sphere did not submit a report on the implementation of the Law. The officials of the educational institutions that are represented on the List with a total of **578** cases in all degrees, submitted **463** completed reports, (in **1**

case a late report was found), while they did not submit annual reports **115** cases.

Of those recorded **111** health facilities, arrived at the Agency **88** reports (including **1** overdue), and they did not pronounce on the implementation of the Law **23** health organizations. Among the reporting documents submitted by **233** public enterprises and institutions are (**5** reports that arrived far after the prescribed deadline), a **91** out of total **324**-the registered entities in this link did not submit a

report in accordance with the Law. The Agency also noted **53** reports (**1** overdue), submitted by legal and natural persons exercising public powers and activities of public interest, but also data on failure to perform the legal obligation of **18** appeals, also recorded in that link. Out of total **57** political parties included in the List, submitted a report **24**, while the persons for mediating the information did not do so **33** parties.

From the processing of received reports (total **1.132**), it turned out that in the calendar year 2020 **7.163** appeals were submitted, of which **6.790** had a positive answer. According to the reasons contained in the reports of the appeals, the exceptions to the free access prescribed in Article 6, or in accordance with other legal regulations, were the reason for refusing or rejecting the access to **225** requests. The reports contain data about **120** unanswered requests, i.e. for **27** transferred requests for action in the current year 2021, received before the end of the calendar year 2020. **(in Attachments: Chart 6)**

The reports also contain data, according to which, as a sign of dissatisfaction with the reaction of the officials, the claimants invested **325** appeals against the first instance decisions of the appeal, and of which, after consideration by decision by the Agency, they were adopted **221**. The owners also inform **for 74** amended first instance decisions after the Agency's action, for **42** rejected appeals by the Agency, as well as for **63** rejected appeals on its part. The officials at the state institutions recorded **2.658** requests, which after the performed analysis turned out to be quite sufficient to conclude that the activity of this category of appeal in the calendar year 2020 was the most provocative for the requesters. With **268** received requests among the bodies of the state administration, this time the Employment Agency of the Republic of North Macedonia leads, followed by the General Secretariat of the Government with **219** submissions received from applicants.

Local self-government units and planning regions inform about **1.820** received requests, or for **179** less in relation to the requests submitted to the address of the appeal of this link in the previous reporting period. The interest of the applicants was also less for the functioning of the health facilities to which even in the conditions of the corona crisis they were submitted **546** requirements, or for **350** less compared to 2019. Educational institutions of all degrees had the obligation to act according to **296** requests, which compared to the previous reporting period, indicates a reduced interest of the applicants in the operation of these institutions.

In contrast to these examples, judicial authorities report on **1.010** requests, which indicates an increased interest of the claimants in the judicial activity. An upward trend is also visible among public companies and institutions that have listed **683** requirements, as well as in relation to the actions of legal and natural persons who exercise public powers and activities of public interest, and whose officials recorded **146** requests. Political parties in their capacity as appeal had the obligation to respond to **4** requests. **(in Attachments: Chart 7)**. **18** requests were submitted to the Agency for the Protection of the Right to Free Access to Public Information, which were answered within the legal term.

4.4.7. Incomplete reports and recorded irregularities

The reports of three educational institutions are incomplete and as such were not taken into account during the preparation of the Annual Report of the Agency.

The reports of the primary schools "Vidoe Podgorec" from Strumica and "Tosho

Arsov" from Shtip contain data on **143**, that is, for **33** received requests, which were not submitted in accordance with the Law on Free Access to Public Information, but are primarily requests from their primary activity and official correspondence and correspondence with other competent institutions and the relevant Ministry.

The report of the Elementary School "Krste Misirkov" from Kumanovo has a formal, but at the same time, essential deficiency, as it is without the signature of the official and responsible person, but also without an archive number, i.e. the seal of the institution. Despite the instruction to act in accordance with the Law, the owner did not submit a corrected report.

4.4.8. Cooperation with officials at the appeal

The application of the new Law on Free Access to Public Information ("Official Gazette of RSM" No. 101/2019), which practically began at the very beginning of 2020, in itself imposed the need for more intensive cooperation with officials, as one of the the basic prerequisites for its most successful implementation. In order to achieve this goal, in the conditions of the current pandemic, compliance with numerous prescribed protocols for preventing the spread of the Covid 19 and carrying out the work process according to the principle of rotation, as the only safe for health, but at the same time the most practical solutions proved to be telephone and e-mail communication, that is, online contacts with the appeal. And in such aggravating circumstances, the employees of the department of cooperation and analysis, as well as the officials of the Agency and on the days when they worked from home, were constantly available on their official phone numbers and e-mail addresses, helping the persons to mediate with public information to more easily adapt to the provisions of the new Law and respond more successfully to the newly assigned delegated competences.

Most often, these contacts were used to clarify the meaning, role and benefits for applicants of the return of the public interest in the Law, the shortened deadlines for responding to the requests of the appeal, the detailed indication of the way in which a new official is authorized or appointed, whether specific data is information of a public nature or falls into the exception category, the role of the criminal commission, as well as for the correct filling and certification of the annual report form with the signature of the officials. At the same time, with advice, educational instructions and suggestions in dealing with specific cases, an effort was made to overcome possible dilemmas and omissions in the implementation of legal solutions as a result of the insufficient guidance of officials.

In order to collect original and reliable data on the implementation of the Law in the first six months of the Agency's work, the already acquired experience and knowledge of the provisions and application of the Law, at the end of June, the Agency prepared electronically to the officials of a randomly selected focus group (consisting of **194** appeal), distributed a short survey questionnaire. Answered questionnaires were submitted by the officials of **104** appeals or of **53,6%** from the cases who were asked to present their experience from the application of the Law in the first half of 2020, which was supposed to help in detecting the future steps of the Agency. The obtained results were used for internal analysis in the Agency. Bearing in mind that among the appeal who did not submit the requested data were also a

significant number of state institutions and units of local self-government, the Agency took a stand even more committed to continue proclaiming and explaining its mission and vision and the meaning of LFAPI, above all among the managers of the state institutions and local self-government units, who, despite the delegated competences of the officials, still have the last word on the mediation of information.

As an obligation that arose from the broad scope determined by the legislator, with the return of the public interest and political parties in the Law, the Department for Cooperation with appeal and Analyzes, in the second half of the year focused its efforts primarily on recording, but also on faster and more efficient updating of the numerous new appeal. The effect was achieved after an Urgency was delivered to a part of these appeal in which these appeal were warned of the penal provisions prescribed for non-compliance with the mentioned legal obligation, i.e. for non-delivery of the necessary data and non-determination of an official who will mediate with the public information which they created or with which they dispose.

Submission of similar individual emergencies also preceded the addition of the List of more **17** appeal from other links, whose management people initially bypassed the legal obligation.

Against such cases, in a positive direction, the gesture of the managers of PHI Zdravstven dom Lipkovo-s. Lipkovo, PHI Zdravje dom "Zdravje"- Valandovo and NU Albanian Theater for Children and Youth-Skopje should be highlighted, who submitted all of them on their own initiative. required data, and then the Annual Report, which made them an integral part of the List of Appeals.

The Agency prepared a Reminder for the submission of the Annual Report, which together with the prescribed Form before the end of the calendar year, was submitted electronically to the record appeal. The Agency reminded of the same legal obligation through its website, pointing to the appeal, apart from the submission of the Report on the application of LFAPI, to promptly submit information about each change that has occurred. Until the end of the deadline provided for the submission of the reports, an open telephone line was functioning where the officials could consult about possible ambiguities when filling out the Report.

In total **372** appeal in the reporting year submitted Decisions for the appointment of new officials, and in addition to the Reports, Decisions for **52** new officials.

4.4.9. Training and education

The Agency for the Protection of the Right to Free Access to Public Information, in accordance with Article 30, Paragraph 1, Paragraph 7 of the Law on Free Access to Public Information, as one of its responsibilities, undertakes activities related to the education of the appeal of public information for the right of free access to the information they have.

Fulfilling its legal responsibilities, the Agency, even in the new circumstances caused by the COVID-19 pandemic, adapted to them and continued with the education of officials among the appeal of information of a public nature at the central and local level, as well as the other appeal of information, held a total of 15 trainings, of which 5 with physical presence, and 10 trainings were held online. For this purpose, the Agency has prepared and published a training program for officials to

mediate public information for 2020 and published it on its website.

Through the trainings, the Agency aimed primarily to put in focus the action under the Law on FAPI adopted in May 2019, the implementation of which began at the beginning of 2020. For that reason, the training included officials for mediating information of information appeal who appear for the first time on the List of appeal and officials who are newly appointed in the institutions of already existing information appeal, as well as officials who, despite the fact that they have attended trainings, that is, officials from institutions that the Agency has determined were not successful enough or had difficulty handling requests for access to information of a public nature.

In 2020, in accordance with the situation with the COVID-19 pandemic, the agency held a total of 15 trainings for officials with public information appeal. The trainings were carried out in the period September-December 2020 and were conducted under a common general title: "PROCEEDING UPON REQUESTS FOR FREE ACCESS TO INFORMATION, IN ACCORDANCE WITH THE 2019 LFAPI".

The main goal of the trainings was to train the officials with the appeal of information, how to properly and promptly respond to the requests for free access to information of a public nature, in accordance with the Law on FAPI.

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 law, for the proactive publication of public information, familiarization with the goals and activities of the Agency and the establishment of mutual cooperation, preparation and handling of requests for free access to public information through experiential exercises, simulations of the implementation of the harm test, as part of the process of handling requests for free access to information, getting to know and learning the procedures for dealing with appeals, according to LFAPI, as well as exercises with practical examples (cases) from the experience of the employees of the Agency.

Five of the total of 15 trainings were held with physical presence and in strict compliance with the recommendations of the Ministry of Health, in the premises of the Agency, and the remaining ten trainings were carried out through the ZOOM platform.

Officials from all categories of information appeal were invited to the trainings: state institutions, judicial authorities, municipalities and centers for the development of planning regions, public enterprises and institutions, health institutions, educational institutions, legal and natural persons exercising public powers and activities from public interest, as well as officials from political parties. A total of 71 officials attended, while 56 officials, although properly invited to the trainings, showed an ignorant attitude towards the law that protects the constitutional right of citizens to be informed about the work of the institutions, and is also one of the pillars for preventing corruption. In the end, we want to emphasize that the trainings organized and shared by the Agency are free of charge, and therefore we appeal to the officials, and above all the responsible persons among the appeal of information, in the period in which new trainings will follow, to register for them at the electronic address: obuki@aspi.mk, which the Agency opened in order for officials to self-initiatively apply for participation in the trainings, for reasons that through them they will become familiar with the procedure for better implementation of the Law on the Public Prosecutor's Office, and are in the interest of the citizens and their right to KNOW WHAT THE INSTITUTIONS DO!

4.5. Trainings for employees

The Agency, in cooperation with the National Democratic Institute (NDI), and with the expert assistance of CEFE Macedonia, realized online training for trainers, intended for the employees of the Agency. Through the training, which was carried out through the Zoom platform, adapting to the COVID-19 situation, the participants acquired new presentation and communication skills and were enabled to familiarize themselves with tools for conducting online training. Also, from this training, the employees of the Agency acquired technical skills that are needed in their further work in organizing and holding trainings intended primarily for the appeal of information, but also for the applicants as active stakeholder in the implementation of the Law on Free Access to public information. This activity was made possible by financial support from USAID in North Macedonia. The realization of this training is an important step to strengthen the work performance of the employees of the Agency through whose work the transparency of the work of the state authorities and consistent implementation of the provisions of the Law on free access to information of a public nature by the appeal will be successfully promoted. Further support from NDI North Macedonia is an annual subscription to Zoom Room for the Agency in order to organize and implement online trainings for information appeal.

In April 2020, the Agency, in cooperation with Pravomatica, organized an online consultation session for the Agency's employees, specifically the members of the Agency's Offense Commission with external experts, with the aim of strengthening the Commission's expertise in the implementation of the offense procedure.

The employees of the Agency visited online trainings and webinars organized by civil society organizations, consulting companies and the OSCE Mission in Skopje, namely: training on "Application of the human rights-based approach in the policies and program processes of the institutions", "Methodology of institutional self-assessment of corruption risks", "Guidelines, recommendations and setting for the preparation and adoption of the Annual Employment Plan for 2021", "Guidelines, recommendations and benchmarks for implementing the procedure for evaluating administrative officials during a pandemic of Covid-19, during the state of emergency as well as after their completion in focus of the half-yearly interview which preparations are recommended to start on 15.05.2020 and must be carried out no later than 31.05.2020 (specifics, challenges, dilemmas and difficulties)", "Aarhus Center Needs Assessment" and the online webinar on Bonding and Public Procurement on "Addressing Legal Challenges with a Focus on Contractual Relationships in Conditions of State of Emergency and Force Majeure".

4.5.1. Website of the Agency

The website www.komspi.mk in the reporting period, it was updated and supplemented with new necessary documents in accordance with the competences of the Agency. The Law on Free Access to Public Information, the Rulebook on the Form and Content of the Request for Access to Public Information Form, the Rulebook on the Form and Content of Misdemeanour Payment Order Forms, the Rulebook on the procedure of the Misdemeanour Commission in the Agency for the Protection of the Right to Free Access to Public Information after a settlement

procedure has been carried out with the issuance of an infraction payment order. The guidelines for the implementation of the Law on FAPI, the 2020 training program for officials to mediate information of a public nature, as well as the analysis of the trainings held for officials in 2020. The list of appeal, in accordance with the legal competences, includes political parties, legal and natural persons who exercise public powers and activities of public interest, as well as appeal of all other links. The updating of new owners took place on a daily basis by changing the address and contact data of individual owners, that is, with data on newly appointed officials. In the Documents link, the Annual Report on the work of the Commission in 2019 was uploaded, but data was also updated in relation to the Agency's budget operations, as well as the public procurements carried out, with that the website presented the Agency's work in 2020 in a proactive and transparent way.

Accordingly, the EU-funded Project "Promotion of Transparency and Accountability in Public Administration", in which the Agency is a direct beneficiary of activities contained in Component 2: Support to the Agency for the Protection of the Right to Free Access to Public Information, is in its final phase. the development of the Agency's new website. All the necessary information will be moved to it, but it will also be enriched with two new portals: an e-portal for appeal, which will raise the Agency's cooperation with the appeal of information to a higher level, and the e-portal for applicants, where they can to submit a request electronically to the appeal and a appeal, if they do not receive an answer to their request within the legally stipulated period.

4.5.2. Public at work

In the reporting year, the agency carried out a large number of activities and collaborations with civil society organizations, journalists and institutions, thus raising its public profile in its work in a transparent manner, as well as its recognition in the public. At the very beginning of its operation, the Agency, with financial support from the Center for Civil Communications, held a workshop where issues and dilemmas arising from the new Law on Free Access to Public Information were discussed. The purpose of the workshop was to overcome certain perceived dilemmas and ambiguities, in function of consistent application and implementation of the Law, with the participation of members of the working group that drafted the text of the new Law, representatives from state institutions, as officials of appeal of information and representatives from the non-governmental sector as direct beneficiaries of this right.

In June, Director Bojcheva had an interview with the news agency "Meta.mk", in which she talked about the challenges in the operation, the penalties for not acting upon the request for information, the openness of the institutions, as well as the role of the Agency in the education of the officials who have to provide information.

Upon receiving a meeting invitation, a working meeting was held in the Agency's premises with the senior executive management of ZELS, where potential joint activities related to the implementation of trainings for information appeal were discussed and presented. The cooperation was mutually accepted, but due to the negative consequences caused by the COVID-19 pandemic, the cooperation for the implementation of the agreed activities will continue to take place during 2021.

On September 28, the Agency marked the International Day of Free Access to Information under the motto "You have the right to know". At the event, the Agency informed about the importance of the timely availability of information and the

activities it undertakes in the direction of ensuring greater transparency of institutions and greater awareness of citizens.

"Transparency and accountability of institutions and the right of citizens to access information of a public nature are the basis of democratic processes in society and one of the basic European values. Those are the values and rights that our society also stands for. The Agency for the Protection of the Right to Free Access to Public Information has a key role in protecting and realizing the constitutionally guaranteed right to free access to information of citizens, as well as promoting and encouraging the transparency and openness of information appeal for comprehensive information on the citizens", said Bojcheva.

With the law of 2019, the provisions for the execution of criminal sanctions against the appeal of information who did not act upon a request for access to the same have been specified, which is a significant tool for improving the results of the Agency.

"Thus, we finally have a tool through which, as an agency, we can influence greater transparency and justify the trust of applicants. In the first two months of this year 2020, the Agency acted on more than 750 backlogged cases from the period of the Commission, and it is also currently acting, within the legal deadlines, on the newly received appeals, which to date are more than 600", said Blerim Iseni, Deputy Director of the Agency.

An educational video aimed at information requesters was also promoted at the event. The educational video covers the entire legal procedure for implementing the constitutionally guaranteed right of access to public information. The Agency prepared the same in cooperation with the National Democratic Institute and SEE THIS, with financial support from USAID.

On the occasion of September 28, the director and deputy director of the Agency, Plamenka Bojcheva and Blerim Iseni, had a working meeting with the Minister of Justice of the Republic of North Macedonia, Bojan Maricic. At the same time, several topics related to the operation of the Agency and the implementation of the Law on Free Access to Public Information were discussed, and there was also talk of overcoming certain challenges that the Agency faces, in the interest of its more efficient functioning.

In the organization of the Information Commissioner of Slovenia, an online conference was held, in which the director and deputy director of the Agency took part. Representatives of regulatory bodies for access to public information from Bosnia and Herzegovina, Croatia, Kosovo, Montenegro, Serbia and Slovenia also participated in the conference. The director of the Agency, Mrs. Bojcheva, also made her presentation at the conference, who introduced the attendees to the new Law on Free Access to Public Information, as well as the activities undertaken by the Agency in the period after the implementation of the law began. Also, the representatives of related institutions were introduced to the new IT tools that the Agency is preparing for applicants and appeal, i.e. the portals slobodenpristap.mk and the portal for appeal, so that they will be able to use the right of access to information in a quick and simplified way. of a public nature, and the appeal will use modern technologies for faster implementation of legal obligations, as well as for the two videos intended for information requesters and appeal. At the end of the conference, the 2020 Declaration of Cooperation of Secondary Authorities on Access to Information and its logo was unanimously adopted and signed.

The director of the Agency, Bojcheva, participated in an online debate on the topic "Free access to information of a public nature in the time of Covid 19". The

debate was organized by the Independent Union of Journalists and Media Workers in partnership with the Macedonian Media Institute, the Institute for Communication Studies and the Media Diversity Institute from London within the project "News Literacy and Digital Literacy Dealing with Fake News", supported by the European Union. Addressing the participants, Bojcheva, among other things, emphasized that there are upcoming activities aimed at improving and specifying certain legal provisions with the aim of faster, simpler and more efficient implementation of the Law, and in the function of further affirmation of the constitutionally guaranteed right to free access to information.

The Agency, in cooperation with the National Democratic Institute and SEE THIS, and with financial support from USAID, produced an educational video intended for officials with public information appeal. The educational video covers the entire legal procedure for implementing the constitutionally guaranteed right of access to public information.

An online debate on the implementation of the new legal solution was organized by the Center for Citizen Communications. The debate was held exactly on the day that marked one year since the start of the application of the 2019 Law. The director of the Agency, Mrs. Plamenka Bojcheva, also gave her presentation on the one-year implementation of the Law, who introduced the participants to the experience that the Agency has from the implementation of the new Law. The deputy director Blerim Iseni and some of the employees of the Agency took part in the debate. The purpose of the debate was, through analysis and discussion, to convey the initial experiences from the application of the Law, all with the aim of pointing out some inconsistencies that arise in the one-year application of the new legal solution and to derive recommendations for the advancement of this legal right in the future.

Director Bojcheva participated in the online conference within the project "Human Rights for All", organized by the Institute for Human Rights. This conference resulted in the signing of a Memorandum of Cooperation with the Institute, which will be implemented in 2021 with more activities.

Director Bojcheva and deputy director Iseni had a joint interview with journalist Shenjul Osmani-Lodja, regarding the application of the Law and its implementation in the period January-October 2020.

For the needs of the Institute for Communication Studies, director Bojcheva also recorded educational videos regarding the implementation of free access to public information.

Also, the director answered journalistic questions about the show "360 degrees" on Al-sat television, and they related to the implementation of the Law and the activities undertaken by the Agency.

In October, director Bojcheva had a guest appearance on TV Alfa, where she answered journalistic questions regarding the Law, its application, but also introduced viewers to access to public information as their constitutionally guaranteed right.

The agency deepened its activity for bringing the right of access to information to the general public by opening its own youtube.com channel, as well as a page on the social network facebook.com, all with the aim of approaching the younger population, introducing them to the right of access to information.

5. INTER-INSTITUTIONAL AND INTERNATIONAL COOPERATION OF THE AGENCY FOR THE

PROTECTION OF THE RIGHT OF FREE ACCESS TO PUBLIC INFORMATION IN 2020

From the aspect of inter-institutional and international cooperation, in 2020 the main focus of the work of the Department for International Cooperation in the Agency was the IPA activities from the project application, as well as the continuous maintenance of relations with its international collaborators and related institutions

In a direction of **realization of project activities within the IPA EU funded project, preparation of reports, participation in trainings and participation in working groups**, the Agency for the Protection of the Right to Free Access to Public Information for the period January 1 to December 31, 2020, implemented the following activities:

5.1. IPA EU funded project

Within the framework of the IPAll 2014-2020 project European support for "Transparency and Accountability of the Public Administration", the following activities were carried out during 2020 under Component 2:

1. One of the activities in this project is related to strengthening the capacities of AZPFAPI. In that direction, in the period from the end of March to June 2020, within the framework of the IPA2 project, the Agency started preparing a functional analysis and systematization. Due to the state of emergency in the country caused by the epidemic Covid-19, this activity reached its final stage in June 2020. In parallel with this, the Agency prepared the Rules for internal organization and the Rules for systematization, which were approved by MIOA in October 2020.
2. In October 2020, the Agency with the IPA project team prepared a Questionnaire for measuring public awareness regarding free access to public information. The research and processing of the obtained data were conducted and presented by external experts. The purpose of this research was to detect public opinion as well as to build a starting point from which the next IPA activity should start, which was a Communication Strategy.
3. The communication strategy, also with the support of external experts, was completed in December 2020, the content of which in 2021 foresees the implementation of a PR campaign to raise public awareness.
4. In November 2020, within the framework of IPA 2, the project began with the preparation of the Agency's Strategy for 2021-2025 and an Action Plan. This activity is expected to be completed by the end of the first quarter of 2021.
5. From May 2020, the process of development and introduction of IT tools - such as a new website, DMS system and electronic archive - started. Within the new website of the Agency, www.aspi.mk, the integration of two new electronic portals is expected in 2021, the first of which is an e-portal for applicants. The main purpose of this portal is to enable the electronic delivery of Requests for free access to the appeal of information, whereby the same will be transparently visible to everyone, for the requesters and the appeal, as well as for the Agency. With the introduction of this novelty,

the Agency hopes to simplify the electronic delivery of Requests for claimants and citizens, at the same time it will encourage consistent action on the same by the appeal, thereby reducing the use of the so-called "silence of the administration" ". This portal has been taken over by Mysociety, to be exact www.slobodenpristap.mk, which until now was in the possession of Metamorphosis, and from 2021 it is in the possession of the Agency. The Agency, in cooperation with Metamorosis, did the same in order for this activity to be noted as successfully implemented within the Open Government Partnership.

6. The second electronic portal is for the holders of information, in which it is planned to "build a network of information holders" created according to the current List of information holders of the Agency, which contains 1440 holders. It will enable electronic access, with a username and password for each holder, who is obliged to use it at each login. In addition to the basic data of the holder, name, address, telephone, mobile contact, email address, the obligation of all holders will be to use this portal for the delivery of annual reports to the Agency, to enter all websites (URL links) of the published documents from their websites in accordance with Article 10 of the LFAPL. The Agency will have the opportunity to deliver announcements and notifications through the same portal to the electronic addresses of the appeal, upon which they will have the obligation to act. Through the introduction of this tool, the Agency hopes to simplify the electronic delivery of Annual Reports and to facilitate and improve communication with information holder. During the last update of the List of Holders, it was noted that a total of 72 appeal have not provided complete basic contact information with the appointed official, that is, they have not provided the Agency with an electronic contact address. Also, a larger number of appeal are noted as institutions without a website, and these are mostly appeal from the following categories: education (secondary, primary schools and kindergartens), health facilities, public services for legal and natural persons, etc.). Email is an important factor for communication with the Agency, while websites are an important factor for conducting monitoring of websites according to Article 10 of the Law. The fact that a large number of holders are without websites, as well as without email addresses submitted to the Agency, is a problem that is beyond the competence of the Agency, but it is a noted problem and risk that needs to be taken into account, because the same are the necessary factors that it is necessary to be fulfilled in order to fully use this portal by all holders.

The main purpose of these e-portals is to improve the transparency of information appeal and to raise public awareness, all with the aim of increasing the use of the law by the general public as applicants and to strengthen the Agency's communication with officials. that is the appeal of information for whose further operation it is necessary to hire an expert IT person, to maintain and work with these tools.

Due to the covid pandemic, many of the planned IPA project activities from the ToR (tender documentation) have been redirected for implementation during 2021, such as the complete completion of the IT tools and their implementation for use in the Agency, training of the appeal for use of the IT tools, training of the Agency's employees, upgrading the capacities of the information appeal, for officials as well as

for the managers of the institutions, instructions for the harm test and public interest, instructions for applying the provisions of the law for the officials as well as for managers, raising public awareness by conducting a campaign, preparing standards for transparency with a methodology and index for monitoring the proactive publication of categories of documents on the websites of the holders, etc.

At the invitation of the SEP, the Agency participated in the 5th meeting of the IPA 2 Monitoring Committee where the status and extent of the currently implemented project activities and monitoring of the indicators were discussed.

5.2. IPA 3 application (IPA 2021 and IPA 2022)

On May 14, 2020, the Department received a notification forwarded by the Secretariat for European Affairs, as the National IPA Coordinator, that through the Delegation of the European Union, DG NEAR provided information on starting the programming process within the framework of IPA 3. The program framework for IPA 3 prepared by DG NEAR applies to all countries of the Western Balkans.

The document follows a similar sectoral division as IPA 2 and lists the EU's priorities in all sectors, which are now called Windows. According to this, the priorities are divided into 5 windows. The right to free access to public information belongs in the first window: Rule of law, fundamental rights and democracy.

For this purpose, the Department for International Cooperation prepared the following materials:

- Strategic response**) together with **action fiche** (Deadline: June 2020)
- Evaluation of **the relevance** of the action files by the Commission and definition of a list of Actions that could be further developed into Action Documents
 - Development of Action Document(s) (Deadline: October 2020)

The Agency, in cooperation with SEP and MISA and other relevant stakeholders, met at several working meetings of the Technical Special Working Group regarding the finalization of the strategic response for the Good Governance window (Governance”), which was then presented to the Sectoral Working Group for PAR.

The Agency, as an active member of the Sector Working Group, at a meeting held on 30.6.2020, presented and elaborated its Strategic response together with the action sheet, which were accepted for implementation in 2022, namely for the first phase of the IPA 3 funding.

The implementation of the Strategic Response was prepared for the period 2021 and 2022, and the basic criteria by which the proposals within the framework of the strategic response were evaluated by the EC/Directorate General for Enlargement and Good Neighborhood Policy (DG NEAR) were based on: relevance with national strategic documents and the strategic documents of the EU and maturity of the projects – readiness for the preparation and implementation of the agreements.

At the invitation of the Ministry of Information Society and Administration and the Ministry of Local and Regional Development, the Agency participated in a working meeting organized by the SEP/NIPAK Secretariat, on **27.11.2020**. At this meeting the main focus was the key **thematic priority**: Reform of the public administration and strengthening of the decentralization process. They presented themselves at the meeting **IPA III Strategic Response for Window II**. Good governance,

harmonization of legislation, good neighborly relations and strategic communications,
Thematic priority 1: Good management.

5.3. The TAIEX Instrument

In June 2020, the Agency received approval for the realization of a Taiex workshop, an application for free access to public information, as a tool for investigative journalism and media. The Agency's application was approved, but due to the state of emergency in the country caused by the Covid-19 epidemic, almost all planned activities for this period are subject to re-planning for appropriate implementation in the next period.

5.4. Strategy for Public Administration Reform 2018-2022

In 2020, the Agency as an active member participated in the 10th meeting of the Special Group for Public Administration Reform in within the Stabilization and Association Committee, who are held on 08.10.2020, as well as at the 2nd meeting of the Departmental Monitoring Committee for Democracy and Good Governance for FRY, which was held on 24.11.2020. The main focus of both meetings was the presentation of taken activities following the conclusions of last year's meeting as well as ongoing ones activities. The dynamics of the PAR working group, unlike the previous ones years, it was with a lower intensity of activity, but the Agency consistently prepared Reports on the status and realization of the noted Activities from PAR Action Plan, especially in the period from October to the end of November 2020.

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

According to the prepared material specified in the Passport Indicators, the Agency, as the leading institution of three activities foreseen in the Action Plan of the SFRY (2018 – 2022), had the obligation to prepare and submit information to the MIOA on the status of the implementation of the activities foreseen for the points for 2020. Given the fact that for the past two years, the notification referred to the old law on free access to public information, the Agency submitted a letter on changes to the indicator for monitoring the websites of the institutions, which for 2020 was implemented based on a new methodology from the previous two years.

According to the Passport Indicator 47 of **Activity 3.4.1.5**, the percentages of rejected requests for access to information of a public nature by the institutions are processed, more precisely for the needs of this indicator by the bodies of state administration, agencies and inspection services from the central government.

Data are collected and processed once a year, and are published in the second quarter of the current year for the previous year. The holder of the information is obliged to fill out the form for the Annual Report on the Implementation of the Law and submit it to the Agency by January 31 in the current year for the previous year,

which indicates the number of submitted requests, the number of positively answered requests and the number of rejected requests.

The data obtained from the Annual Reports of the holder are in the form of the total amount of requests, so the Agency processes them and presents them as a total (raw) number in the Annual Report on the work of the Agency in the current year for the previous year.

Passport Indicator 47 for 2020:

Out of a total of 134 bodies of state administration, agencies and inspection services from the central government to which this indicator applies, 124 institutions are appeal of information according to the List of appeal of the Agency.

Of these institutions, 117 submitted an annual report, while 7 appeal did not submit a report on the implementation of the LFAPI, i.e. 5.9%. To these institutions, information requesters submitted a total of 2321 requests, of which 107 were rejected, i.e. 4.6% for 2020.

According to Passport Indicator 48, for **Activity 6.1.5** Monitoring of web sites of information appeal regarding enforcement article 10, paragraph 1, paragraphs (paragraphs 1, 2, 3, 4, 7, 8, 9, 12, 13, 17 and 18) of the Law on Free Access to Public Information (2019):

According to the Action Plan for the implementation of the Public Administration Reform Strategy 2018-2020, in the special objective 3.4., it is foreseen **Measure 3.4.1.6** Strengthening the mechanisms for the availability of public information.

For the purposes of this indicator in 2020, the web pages of 121 state administration bodies, which according to the Law on FAPI are holders of information, were analyzed. According to the established methodology, a review/monitoring was made of 11 categories of documents that the institutions are competent to publish in accordance with Article 10, paragraph 1 (paragraphs 1,2,3,4,7,8,9,12,13,17 and 18) from the new Law on Free Access to Public Information, specifically a total of 11 categories of documents for monitoring, as well as raised criteria for scoring.

According to paragraphs 1 of article 10 of the Law, a total of 11 categories of documents were monitored from each website and were scored with:

- a. 1 point for institutions that had published complete category of documents from the above 11;
- b. 0.5 points for institutions that had published partial category of documents from the above 11;
- c. 0 points for the institutions that had published no category of documents from the above 11.

For each website, that is, for each holder, a sum was made of all the points expressed in percentages of the above 11 categories of documents.

The results of scoring the three groups for 121 information appeal/institutions of state administration bodies, agencies and inspection services for 2020 are as follows:

Results for the year 2020 of the monitoring for PAR Indicator 48

The results of the scoring of the three groups for **121 institutions** of state

administration bodies, agencies and inspection services are as follows:

1. **66** Institutions that have published 8 to 11 categories of documents from the above 11
2. **43** Institutions that have published from 5 to 7.5 categories of documents from the above 11
3. **7** Institutions that have published from 1 to 4.5 categories of documents from the above 11
4. **5** Institutions that have published from 0.5 to 0 categories of documents from the above 11

The above-mentioned 5 authorities, one authority is scored with 0.5 Administration for Affirmation and Promotion of the Culture of the Members of the Communities in RSM, while 4 authorities are scored with 0 points are: Operational-Technical Agency-Skopje, Agency for the Application of the Language that it is spoken by at least 20% of the citizens in the Republic of North Macedonia, the Commission for Protection against Discrimination and the State Educational Inspectorate, which in the previous years 2018 and 2019 was scored with a high 8.5 points.

The remaining 20 authorities, of which 13 are constituent authorities and do not have their own websites, and 7 authorities are holders (taken from the Catalog of Institutions of MIOA).

Further more, **13 organs in composition are without a website, nor are separated as organs within the website of the parent authority**: Bureau of Public Security, State Foreign Exchange Inspectorate, State Inspectorate of Forestry and Hunting, Captaincy of Ports, Pedagogical Service, Service for General and Common Affairs, Administration for Security and Counterintelligence, Administration for the Environment, Administration for Property and Legal Affairs , Directorate for dedicated production, Directorate for development and promotion of education in the languages of the members of the communities, Directorate for seeds and planting material and Phytosanitary Directorate.

The calculation of indicator 48 for 2020

For the purposes of this Passport Indicator, the basic target values are shown only for the institutions that have published from 8 to 11 categories of documents in one calendar year, or **$66/121 * 100 = 54.5\%$ for 2020.**

Conclusion:

Unlike 2018 and 2019, this year there is a significant decrease in the total number of institutions that published from 8 to 11 categories of documents, i.e. a total of 66 institutions, or 54.5% for 2020 compared to 85 in 2018 and 83 in 2019

Consequently, as a conclusion, it can be stated that with the application of the new law and thus increased criteria during the monitoring itself, unlike in 2018 and 2019, it can be concluded that the appeal satisfy the minimum criteria for transparency and accountability of their websites in in relation to LFAPL.

In 2021, within the framework of the IPA 2 project, it is planned to prepare Transparency Standards with a methodology and an index for monitoring the proactive publication of categories of documents on the websites of appeal, as well as guidelines and instructions for appeal on how to consistently publish public information on its web pages. Of course, they will depend on the degree of implementation and operational functionality of the IT tools built and implemented by

the IPA2 project, as well as the consistent respect for them by the owners and institutions.

According to PI 49 which reads "% of decisions of ALFAPI in relation to access to public information that have been carried out by the institutions". In 2020, the Agency registered a total of 19 cases for re-handling, while the total number of decisions made by the Agency is 719.

In 2021, within the IPA 2 Transparency and Accountability project, the electronic DMS program is expected to be installed during the first half of 2021, which is expected to electronically produce data and reports related to this indicator. Therefore, in 2020, the methodology and calculation of this indicator will be calculated based on the total cases and the data available to the Agency, i.e. $19 / 719 * 100 = 2.6\%$.

5.4.1. Preparation of NPAA Reports and Preparation of materials for Macedonia's contribution to the European Commission Report

The Department for International Cooperation and Projects during 2020 prepared Reports on NPAA and Preparation of materials for Macedonia's contribution to the Report of the European Commission.

In addition to the preparation of Reports on undertaken obligations with elaboration of undertaken actions related to the Agency's activities for the Special Group for Public Administration Reform (PAR), the Agency prepared and submitted material for the Annual Audit by SEP and other institutions for the update of NPAA 2020-2025:

- NPAA 2020-2023 Anti-corruption policy for 2020 to SEP,
- NPAA for 2020 for RJA to MIOA
- NPAA Revision 2021- Judiciary, Anti-Corruption Policy and Fundamental Rights.

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

- In Chapter 3.23.3 Fundamental rights, under the area of Promotion and implementation of human rights submitted to the Ministry of Justice - In RJA in subsection 4. Accountability of the administration, the question from the domain of free access to public information submitted to MIOA.

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

5.4.2. Held meetings with partners and related institutions

At the beginning of 2020, the Department for International Cooperation sent a letter to all previous collaborators and partners of the Commission, informing them that the Agency for the Protection of the Right to Free Access to Public Information was established with the appointment of new management. The first to respond to this notification was the Information Commissioner of the Republic of Slovenia and colleagues who shared the initiative to organize a regional conference. Due to the

situation with Covid 19, it was not held on the scheduled day and destination, but it took place on October 20 under the title Initiative 2020 - Access to public information for appellate authorities of the former Republic of Yugoslavia, in which the managements of all the bodies took an active part are responsible for protecting the right to free access to public information from Slovenia as the organizer, Croatia, Serbia, North Macedonia, Montenegro, Bosnia and Herzegovina, Republika Srpska and Kosovo. At this conference the terms and conditions of work were unanimously adopted through the adoption of the Initiative 2020 Declaration.

In February 2020, a meeting was held with representatives from the EU Delegation in Skopje, with Mr. Frik Janmat, Head of Operations for Economic Development, Rule of Law, Public Administration, and Ms Ruzhica Andronikova, Advisor and Program Manager of IPA 2 the Agency's project. In addition to getting to know the new management, the meeting discussed the IPA 2 project as well as the future and current work activities that the Agency plans to implement in 2020.

Also, in February 2020, a meeting was held with the Head of the OSCE Mission in Skopje, Ambassador Clemens Koja, where last year's implemented project and donor activities were discussed, as well as new potential opportunities for cooperation between the OSCE Mission and the Agency.

During 2020, at the invitation and organization of the OSCE Secretariat, Vienna, Austria, the Department for International Cooperation and the Director of the Agency, participated in several online conferences and meetings: in May - Open data and their reuse, November 9 - Follow-up, analysis, use and reuse of data to strengthen government transparency and decision-making processes, 9 December - Open data in action: beneficial ownership and public procurement, etc.

In 2020, two working onaljan meetings were held a working group for drafting the Integrity Policy at the central level and in local self-government units, an activity that the State Commission for prevention of corruption - DCSK implements it in cooperation with the Mission of OSCE in Skopje and with support from the EU through the IPA II project "Transparency and accountability". The main focus of this activity is representation of the right to free access to public information as one of the strongest anti-corruption tools that will serve for effective implementation and implementation of integrity standards in central institutions and regional level.

On June 15, the Agency participated in the UNESCO survey, which was conducted on behalf of the United Nations, and related to the delivery of Questionnaires for Indicator 16.10.2. The purpose of this National Questionnaire (with data for the reference year 2018) was to obtain data and information to be used to monitor Sustainable Development Goal (SDG) indicator 16.10.2 on the number of countries adopting and implementing constitutional, statutory and / or policy guarantees for public access to public information globally. The results of it will be presented by UNESCO to the UN General Assembly at the beginning of 2021. NATIONAL QUESTIONNAIRE Data for the reference year 2018.

In June, a meeting was also held with a representative from the East-West Management Institute, regarding potential cooperation with the Agency within the framework of the USAID Civic Engagement Project (CEP). Due to Covid 19, all activities will be implemented in 2021.

In December 2020, a meeting was held with representatives of the Institute for Human Rights, where possible cooperation was discussed in the field of raising public awareness at the regional level about the right to free access to public information. The development of the application and the Memorandum of Cooperation are activities that the Institute and the Agency will devote themselves

intensively in 2021.

6. Budget, final account and financing

The Agency for the Protection of the Right to Free Access to Public Information, as a budget user, provides the funds for its work from the Budget of the Republic of North Macedonia, on section 19302 program 20 - Free Access to Information, basic budget account 193026288063710.

6.1. Brief financial report

By adopting the Budget of the Republic of North Macedonia for 2020, the Agency started the year with a budget in the amount of MKD 17,080,000.00. During the year 2020, after the two rebalancing of the Budget of the Republic of North Macedonia, the Agency was given a budget in the amount of MKD 15,363,000.00.

Of the total approved budget of the Agency in the amount of 15,363,000.00 denars, 74.43%, ie 11,434,360.00 denars, were realized. All funds were planned and executed in accordance with the competences, rights and authorizations of the Agency, with the aim of their legal, efficient and economical use.

In relation to the structure of the budget with all approved transfers of funds during 2020, the allocation and realization of funds by item is shown tabularly and graphically.

Ставка	Буџет 2020	Завршна сметка 2020	Процент на реализаци
401 - Основни плати	9.133.000,00	6.515.237,00	71,34%
402 - Придонеси за социјално осигурување	3.548.000,00	2.533.696,00	71,41%
420 - Патни и дневни расходи	40.000,00	0,00	0,00%
421 - Комунални услуги, греење, комуникација и транспорт	1.483.000,00	1.295.507,00	87,36%
Комунални услуги, греење		836.155,00	56,38%
Комуникација		451.047,00	30,41%
Транспорт		8.305,00	0,56%
423 - Материјали и ситен инвентар	120.000,00	119.989,00	99,99%
424 - Поправки и тековно одржување	340.000,00	339.636,00	99,89%
425 - Договорни услуги	351.000,00	288.656,00	82,24%
426 - Други тековни расходи	70.000,00	69.940,00	99,91%
464 - Разни трансфери	111.000,00	105.688,00	95,21%
480 - Купување на опрема и машини	107.000,00	106.066,00	99,13%
481 - Градежни објекти	0,00	0,00	0,00%
485- Вложувања и нефинансиски средства	60.000,00	59.945,00	99,91%
Вкупно	15.363.000,00	11.434.360,00	74,43%

Table no. 1: Budget and realization of the budget

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

- Item 401 – Basic salaries, expenditures in the amount of MKD 6,515,237.00

or 71.34% of the planned MKD 9,133,000.00 were realized;

- Item 402 – Contributions for social insurance, expenditures in the amount of MKD 2,533,696.00 or 71.41% of the planned MKD 3,548,000.00 were realized;

- Item 420 – Travel and daily expenses, 0.00 denars or 0.00% of the planned 40,000.00 denars were realized;

- Item 421 – Communal services, heating, communication and transport, 1,295,507.00 denars were realized or 87.36% of the planned 1,483,000.00 denars;

- Item 423 – Materials and small inventory, 119,989.00 denars or 99.99% of the planned 120,000.00 denars were realized;

- Item 424 – Repairs and ongoing maintenance, 339,636.00 denars or 99.89% of the planned 340,000.00 denars were realized;

- Item 425 – Contractual services, 288,656.00 denars or 82.24% of the planned 351,000.00 denars were realized;

- Item 426 – Other current expenses, realized 69,940.00 denars or 99.91% of the planned 70,000.00 denars;

- Item 464 – Miscellaneous transfers, expenditures in the amount of MKD 105,688.00 or 95.21% of the planned MKD 111,000.00 were realized;

- Item 480 – Purchase of equipment and machines, expenditures in the amount of MKD 106,066.00 or 99.13% of the planned MKD 107,000.00 were realized;

- Item 481 – Construction facilities, expenditures in the amount of MKD 0.00 or 0.00% of the planned MKD 0.00 were realized;

- Item 485 – Investments and non-financial assets, expenditures in the amount of MKD 59,945.00 or 99.91% of the planned MKD 60,000.00 were realized;

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

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

Ставка	Завршна		Завршна		Завршна	
	Буџет 2020	сметка 2020	Буџет 2019	сметка 2019	Буџет 2018	сметка 2018
401 - Основни плати	9 133 000,00	6 515 237,00	8 833 000,00	7 538 448,00	9 782 000,00	8 061 030,00
402 - Придоноси за социјално осигурување	3 548 000,00	2 533 698,00	3 267 000,00	2 852 932,00	3 618 000,00	2 984 976,00
420 - Патни и дневни расходи	40 000,00	0,00	200 000,00	0,00	100 000,00	24 911,00
421 - Комунални услуги, греење, комуникација и транспорт	1 483 000,00	1 295 507,00	1 698 000,00	1 199 985,00	1 800 000,00	1 141 600,00
423 - Материјали и ситен инвентар	120 000,00	119 989,00	100 000,00	87 206,00	100 000,00	69 798,00
424 - Поправки и тековно одржување	340 000,00	339 638,00	400 000,00	399 708,00	200 000,00	182 572,00
425 - Договорни услуги	351 000,00	288 656,00	395 000,00	94 277,00	560 000,00	285 408,00
426 - Други тековни расходи	70 000,00	69 940,00	70 000,00	21 316,00	70 000,00	21 559,00
464 - Разни трансфери	111 000,00	105 688,00	50 000,00	50 000,00	50 000,00	15 000,00
465 - Исплати по извршени исправи	0,00	0,00	67 000,00	66 442,00	0,00	0,00
480 - Купување на опрема и машини	107 000,00	106 066,00	100 000,00	48 864,00	100 000,00	21 651,00
481 - Градежни објекти	0,00	0,00	100 000,00	0,00	100 000,00	0,00
485 - Вложувања и нефинансиски средства	60 000,00	59 945,00	0,00	0,00	0,00	0,00
Вкупно	15.363.000,00	11.434.360,00	15.280.000,00	12.359.178,00	16.480.000,00	12.808.505,00

Table no. 2: Budget and realized expenses in the last three years

6.3. Final account for 2020

A copy of the final account for the accounting period 01.01.2020 to 31.12.2020, for account 193026288063710, has been submitted as an attachment to the report.

7. CONCLUSIONS:

1. The Agency will continue with activities to update the list of information appeal in accordance with the legal solution, then it will continue with the education of the officials among the information appeal, it will continue the cooperation with the information appeal, by informing the public and international cooperation.

2. The Agency will specifically work on the plan of educating the general public with the aim of familiarizing citizens with the right of free access to information of a public nature and the method and procedure for using this constitutionally guaranteed right of man and citizen.

8. RECOMMENDATIONS:

1. The Agency should get involved and take an active part in all activities in the field of transparency and accountability, and above all in the field of proactive transparency.

2. Undertaking activities with the aim of raising the awareness of the responsible/management persons and the officials among the appeal of information for faster and more efficient action on received requests for free access and avoiding the use of the institute "silence of the administration".

3. Increasing the Agency's budget in order to create opportunities for improving working conditions, as well as for its more active and independent operation based on its own funds, primarily in the area of education.

9. APPENDICES:

NEW INFORMATION HOLDERS:

State institutions:

- Aviation Accident and Serious Incident Investigation Committee
- Republic Council for Road Traffic Safety - National Security Agency

Municipalities with Centers for the Development of Planning Regions in RSM

- Center for Development of the South-Eastern Planning Region
- Strumica - Center for Development of Eastern Planning Region-Stip
- Center for Development of the South-West Planning Region - Struga
- Center for Development of the Vardar Planning Region - Veles
- Center for the Development of the Skopje Planning Region-Skopje
- Center for Development of the North-Eastern Planning

Region-Kumanovo Health facilities

- PHI Zdravstven dom - Lipkovo
- PHI Health Center "Zdravje"-Valandovo
- PHI University Clinic of State Cardiac Surgery-Skopje.

Legal and natural persons exercising public powers and activities of public interest:

- A.D. for electricity production "TEC Negotino", in state ownership
- State-owned joint-stock company for performing energy activities National Energy Resources-NER AD-Skopje
- Thermal Energy Distribution Company Distribution of Heat Balkan Energy DOOEL-BEG-Skopje
- Production of Heat Balkan Energy DOOEL-BEG-Skopje, Supply of heat BALKAN ENERGY DOOEL Skopje
- Joint-stock company for energy activities City Energy Systems-Skopje J.D. Skopje
- Joint-stock company in state ownership for performing the activity of providing services in air navigation M-NAV AD. Skopje,
- Skopje Sever AD-Skopje.
- City shopping center A.D. Skopje
- State Video Lottery of Macedonia-Casinos Austria DOO Skopje
- Development Bank of North Macedonia AD-Skopje
- Institute of Chartered Accountants
- Company for communication services A1 Makedonija DOOEL Skopje,

- Makedonski Telekom AD-Skopje
- Institute of Authorized Auditors of RSM
- Federation of School Sports of Macedonia
- Tennis Federation of North Macedonia
- Macedonian Fishing Federation, Basketball Federation of North Macedonia
- Macedonian Traditional Karate Federation, Macedonian Sports Climbing Federation
- Football Federation of Macedonia
- Handball Federation of Macedonia
- National Sports Federation of the Blind of Macedonia - National Federation SPORTS FOR ALL of the Republic of North Macedonia
- Mountaineering Federation of North Macedonia
- Federation for Skating Sports of North Macedonia - Macedonian Archery Federation
- Kickbox Maitai Federation of Macedonia
- Wrestling Federation of the Republic of North Macedonia
- Badminton Federation of Macedonia
- Athletic Federation of Macedonia
- Bowling Federation of the Republic of North Macedonia - Boxing Federation of Macedonia
- Swimming Federation of North Macedonia
- Cycling Federation of Macedonia
- National Federation for Sports and Recreation of the Disabled of North Macedonia - Paralympic Committee of North Macedonia
- Karate Federation of Macedonia
- Kendo-Iaido Federation of Macedonia
- Judo Federation of North Macedonia
- Rowing Federation of Macedonia
- Pingpong Federation of North Macedonia
- Ski Federation of Macedonia.

Public enterprises and institutions:

- LU Library "Svetlina-Drita", S. Preljubishte, Municipality of Jegunovce
- Public enterprise for public parking lots PARKING KAVADARCI, Kavadarci
- Public enterprise for public parking lots City Parking Tetovo
- PE "City Parking and Greenery" - Gostivar
- Public enterprise for the construction and maintenance of public space for parking and arrangement and organization of public local transport of passengers in the Municipality of Bitola - JPPJLP Bitola
- NU Museum of the Macedonian struggle for independence - Skopje - NU "Memorial House of Mother Teresa" - Skopje
- PUC "Clean Den"-Rankovce
- Local archaeological and historical museum "Terracotta"-Vinica - Municipal public institution Partizanski dom Sandevo - Public enterprise for communal activities "Communal Hygiene" - Novaci
- National Institution "Museum of the Albanian Alphabet" - Bitola
- Public institution Children's Home "11 October" - Skopje

- National Institution Library "Kocho Racin" - Tetovo - JU
- Special Institute Demir Kapija
- JP "Komunalec"-Plasnica
- PE "Collector System" - Skopje
- Scientific and cultural meetings "Ten Days of Krusevo Republic" - Krusevo
- National institution "Ohrid Summer" - Ohrid
- JP "Plackovica" - Karbintsi
- Macedonian Academic Research Network MARnet - Local
- Museum Gallery - Kavadarci
- Public enterprise for spatial and urban plans "Kumanovo Plan"-Kumanovo
- Public enterprise for communal activity "Debrca"-Debrca - PUK
- "Pela Higijena"-Mogila
- NU "Todor Proeski Memorial House" - Krushevo
- Public municipal institution Home for the elderly "Zafir Saito" - Kumanovo
- NU "Gostivar Theater" - Gostivar
- PUK "Klepa" - Gradsko
- Public enterprise for spatial and urban planning Prilep - JPKD
- "Oktisi"-S. Oktisi, Struga
- Public enterprise for public parking lots "Veles Parking" Veles - PUC
- "GAZI BABA-2007"-Skopje
- PUC "Petrovec"-Petrovec
- PHI University Institute for Positron Emission Tomography of RSM
- Public institution Reception Center for asylum requesters - Skopje -
- JU Center for Traditional Chinese Medicine-Stip - PUC
- "Vrapchiste"-Vrapchiste
- Public enterprise for managing sports facilities owned by the Republic of North Macedonia
- JP "Shkupi Vjeter"-Skopje
- JNU Institute for Spiritual and Cultural Heritage of Albanians Skopje
- N.U. Tetovo Theater - Tetovo
- NU Ensemble of Albanian folk dances and songs in the Republic of North Macedonia-Skopje
- PE for welfare of stray animals "Lajka"-Skopje
- Center for early childhood development "Gyunesh"-Zhupa Center
- NU Albanian Theater for Children and Youth - Skopje

Educational institutions in RSM:

- OOU "Bedri Tairi"-s. Dolno Svilare, Saraj
- OOU "Ismail Qemali", Chair-Skopje
- "Prerodba-Rilindija" secondary school - village of Zhitoshe, municipality of Dolneni
- JOUDG "Filizi"-Saraj, Skopje
- Secondary Municipal Vocational School "Ilinden" - Ilinden -
- JOUDG "Kokičinja"-s. Tarinci, Karbinci
- OOU "Kiril i Metodij" - Oraovica village, Radovish
- Secondary school "Negotino" - village of Negotino Poloshko
- "11 October" Elementary School, Urvich village

- JOUDG "Pearls"-village Zrnovci
- OOU "Hristian Todorovski Karposh", Rankovce
- OOU "Bajram Shabani", village of Grushino
- OOU "Rexhep Voka" - Shipkovica, Tetovo
- OOU "Nikola Petrov Rusinski" - Rusinovo
- YOUJDG "RAINBOW" - Sopiste
- Special elementary school for students with special educational needs
"St. Kliment Ohridski" - Novo Selo
- OOU "Orce Nikolov"-.s. Injevo
- OOU "Dame Gruev" - Erzhelia village
- OOU "Kiro Gligorov" - Skopje
- JOUDG "Veselo Strkche" - Krivogastani
- Center for early childhood development "Gyunesh"-Zhupa Center
- OOU "EDINSTVO"- "BASHKIMI" v. Oktisi
- JOUDG "July 12"-Conche
- Orthodox Theological Faculty
- Faculty of Islamic Sciences
- SOSU "St. Cyril and Methodius" - Ohrid
- OOU "Rilindia" village of Selce
- Elementary school "Sabedin Bajrami" - Kamenjane village

Political parties registered in the single court register:

- Democratic Union-DS
- New Social Democratic Party-NSDP
- Civil Democratic Union-GDU
- National Democratic Revival-NDP
- Democratic Reconstruction of Macedonia-DOM
- Democratic Party of the Serbs in Macedonia DPSM
- Political party ALTERNATIVE
- Single Macedonia - EM
- United Party for Roma Equality-OPER - "Left"
- Political party Democrats-DEM
- Party for Democratic Prosperity of Roma PDPR - Party for the Movement of Turks in Macedonia - PDT - Permanent Macedonian Radical Unification
- TMRO - Macedonian Unifying Reform Organization-Workers Party-MORO-RP
- Serbian Party in Macedonia - SSM
- Social Democratic Union of Macedonia
- Macedonian Alliance
- Liberal-Democratic Party-LDP
- Union of Roma from Macedonia
- Labor-Agricultural Party of Macedonia-RZP - Party of the Vlachs from Macedonia
- Serbian advanced party in Macedonia - SNSM
- Democratic Union of Vlachs from Macedonia - DSVM - Democratic Union for Integration-DUI
- Democratic Forces of the Roma - DSR
- VMRO-People's Party-VMRO-NP
- Party for the European Future-PEI

- Union of Tito's Left Forces-STLS
- Democratic Party of Albanians-DPA
- Social Democratic Union-SDU
- Party of United Democrats of Macedonia-PODEM - United for Macedonia-OM
- New Liberal Party-NLP
- Movement for National Unity of Turks-DNET - Political party Dignity-PPD
- Democratic Party of the Roma - DPR
- Party of Pensioners-PP
- Party for Economic Change 21-PEP 21
- New Alternative-NA
- Democratic Party of the Turks of Macedonia
- VMRO-DPMNE, (VMRO-Democratic Party for Macedonian National Unity)-VMRO-DPMNE
- Socialist Party of Macedonia
- Party of Democratic Action of Macedonia
- Civic option for Macedonia - GROM
- Party for Social and Economic Progress-POEN - Roma united from Macedonia-ROM
- Political party BESA Movement
- Alliance of Albanians-AA
- Macedonian Action - MAAK
- Voice for Macedonia - VOICE
- Bosniak Democratic Union-BDS
- Movement for State and Justice-DDP
- POPULI party
- INTEGRA-Macedonian Conservative Party
- Party for the complete emancipation of the Roma from the Republic of North Macedonia - PCER from RSM
- Your party-Skopje

appeal WHO SUBMITTED A LONG LATE REPORT:

- Administration for the execution of sanctions
- Strumica General Hospital
- Public utility company "Komunalec" Gevgelija - Institute for Spiritual and Cultural Heritage of Albanians - Children's cultural center "Karposh"-Skopje
- Public enterprise "Strezevo"-Bitola
- JLUB Svetlina Preljubishte, Jegunovce
- "Ljupcho Santov" Secondary School - Kochani
- Bar Association of the Republic of Moldova

THE INFORMATION HOLDERS WHO HAVE NOT SUBMITTED AN ANNUAL REPORT:

- Medical Faculty-Skopje
- Faculty of Law "Justinian the First" - Skopje
- Faculty of Information Sciences and Computer Engineering - Skopje • Faculty of Tourism and Hospitality - Ohrid

- Faculty of Biotechnical Sciences-Bitola
- Private higher education institution-MIT University-Skopje • Private Higher Education Professional Institution for Business Studies "Euro College" - Kumanovo
- High School of Journalism and Public Relations
- International Balkan University
- Open civil university for lifelong learning "Gostivar"-Gostivar • State music school-Bitola
- Secondary school "Gostivar" - Gostivar
- OSTU "Gostivar" - Gostivar
- Secondary school "Krste P. Misirkov" - Demir Hisar
- Secondary school "Naum Naumovski Borche" Krusevo
- Secondary school "Pero Nakov" - Kumanovo
- OSU "St. Kliment Ohridski" - Ohrid
- High School "Mirche Acev" - Prilep
- SUGS Gymnasium "Zef Ljush Marku-Skopje
- SUGS "Kocho Racin" - Skopje
- DSULUD "Lazar Lichenoski"-Skopje
- DUFK "Metodi Mitevski Brico" - Skopje - Sports Gymnasium • DSU for rehabilitation and education "St. Naum Ohridski" - Skopje • SETU "Mihajlo Pupin" - Skopje
- SUGS High School "Pance Arsovski" - Skopje
- Secondary school of the City of Skopje "September 8" - Skopje • "Dimitar Vlahov" SOUD - Strumica
- "Kiril Pejcinović" High School - Tetovo
- OSMU "Nikola Stein"-Tetovo
- State High School-Sports Academy
- "Brotherhood" Primary School - Skopje
- "Vasil Glavinov" Primary School - Skopje
- Primary school "Liria" - Skopje
- Elementary school "Ljuben Lape" - Airport - Skopje
- Elementary school "Christian Todorovski-Karposh" - Skopje • Primary school "G.K-Skenderbeu" - village Arachinovo
- Elementary school "Naim Frasheri" - village of Studenicani
- "Bratstvo Edinstvo" Elementary School, Konjari Secondary School • Elementary school "Bajram Shabani" - Kondovo village
- Primary school "Goce Delchev" - nas. Ilinden
- Elementary school "Emin Duraku" - village Buković
- Elementary school "Ibe Palikuća" - Bojane village
- Primary school "Liman Kaba" - Ljuboten village
- Elementary school "Faik Konitsa" - Radusha village
- Elementary school "11th of October" - Kumanovo
- Primary school "Naim Frasheri" - Kumanovo
- Elementary school "Bajram Shabani" - Kumanovo
- Elementary school "Vuk Karadzic"-Kumanovo
- Primary school "Christian Karposh" - Dragomance village • "Christian Todorovski-Karposh" elementary school, Mlado Nagoricane village • Elementary school "Culture" - village Matejche

- Elementary school "Congresses and Monastery" - Lopate village • Elementary school "Jeronim De Rada" - Cherkezi village
- Primary school "Brothers Ribar" - Tabanovce village
- Elementary school "Ismail Qemali" - Gostivar
- Elementary school "Mustafa K. Atatürk"-Gostivar
- Elementary school "Enver Stafai" - Gostivar
- Primary school "Vrapchiste" - Vrapchiste village
- Primary school "Blaje Koneski" - village of Skudrinje
- Primary school "Sally Lisi" - Dobridol village
- "Faik Konitsa" elementary school - Debreshe village
- Elementary school "Andreja Saveski-Qicicish" - Tetovo
- Primary school "Bratstvo Mijjeni" - Tetovo
- Primary school "Naim Frasheri" - Tetovo
- Elementary school "Istikbal" - Tetovo
- Elementary school "Sami Frasheri" - village of Pirok
- Elementary school "Shemshevo" - village of Shemshevo
- Elementary school "Dame Gruev" - Bitola
- Elementary school "Steve Naumov" - Bitola
- Elementary school "Rajko Jinzifov" - Orizari village
- "Todor Janev" elementary school - Chaska village
- "Manchu Matak" elementary school - Krivogashtani village
- Elementary school "Kire Gavriloski-Jane" - Prilep
- OOMU "Ordan Mihajlovski-Otska" - Prilep
- Elementary school "Liria" - village of Zhitoshe
- "Mirce Acev" elementary school in Lažani, Dolneni municipality • Primary school "Vancho Prke" - Shtip
- OU "Riste Ristevski" village Dolno Kosovrasti
- Elementary school "Goce Delchev" - with Bosilovo
- Elementary school "Goce Delchev" - Vasilevo village
- OO school "Yunus Emre" - village Lisicani
- Elementary school "Malina Popivanova" - Kochani
- Elementary school "Nikola Karev"-Kochani
- OU "Strasho Pindzur" - village of Sokolartsi
- Elementary school "Strasho Pindzur" - Kavadarci
- Elementary school "Pere Toshev" Rosoman
- Primary school "Kosta Racin" - Podares village
- OU "Slavejko Arsov" - Podmochani village, Resen
- OU Brača Miladinovci - village of Tsarev Dvor, Resen
- OU "Dimitar Vlahov" - village Ljubojno, Resen
- "Nikola Parapunov" school was established in the village of Dragobrashte • "Nejati Zekeria" elementary school, village of Kodzadzik
- Primary school "Goce Delchev" - Konche village
- OU "Kliment Ohridski" - village of Obleshevo
- OOU "Alexandar Makedonski"-Skopje
- Municipal elementary school "Gjorche Petrov" village of Ropotovo, Dolneni • Public institution for children - Kindergarten "11 Oktomvri" - Skopje • Public

institution for children - Kindergarten "Buba Mara" - Skopje • Municipal public institution for children - Kindergarten "Dimche Mirchev" - Veles

- Public institution for children - Kindergarten "Detska Radost" - Gostivar • Public municipal institution for children - Kindergarten "Aco Karamanov" - Radovish
- Public institution for children - Municipal Kindergarten "Vera Tsiriviri Trena" - Shtip
- Municipal public institution - Kindergarten "Majski Cvet" - Skopje • OU "Rejo Rushit Zayazi" village of Zayas
- Secondary school "Ismet Jashari" - Lipkovo
- JOUDG "Filizi"-Saraj, Skopje
- OOU "Kiril i Metodij" - Oraovica village, Radovish
- Secondary school "Negotino" - village of Negotino Poloshko
- OOU "Hristian Todorovski Karposh", Rankovce
- OOU "Nikola Petrov Rusinski" - Rusinovo
- OOU "Orce Nikolov" .s. Injevo
- OOU "EDINSTVO"- "BASHKIMI" v. Oktisi
- JOUDG "July 12"-Conche
- Orthodox Theological Faculty
- Faculty of Islamic Sciences
- Municipality of Saraj
- Municipality of Ilinden
- Municipality of Petrovec
- Municipality of Zelenikovo
- Municipality of Novo Selo
- Municipality of Konche
- Municipality of Lipkovo
- Center for Development of the Vardar Planning Region - Veles
- Chamber of Certified Architects and Certified Engineers of Macedonia • Chamber of the Republic of North Macedonia for private security • Medical Chamber of Macedonia
- Economic Chamber of Macedonia
- Veterinary Chamber of the Republic of Macedonia
- Skopje Sever AD-Skopje
- Makedonski Telecom AD-Skopje
- Federation of School Sports of Macedonia
- Basketball Federation of North Macedonia
- Football Federation of Macedonia
- National Sports Federation of the Blind of Macedonia • Wrestling Federation of the Republic of North Macedonia
- Badminton Federation of Macedonia
- Boxing Federation of Macedonia
- Kendo-Iaido Federation of Macedonia
- Company for communication services A1 Macedonia DOOEL Skopje
- Rowing Federation of Macedonia
- Ski Federation of Macedonia
- Higher Public Prosecutor's Office-Skopje
- Basic Public Prosecutor's Office - Gostivar
- Basic Public Prosecutor's Office – Struga

- Basic public prosecutor's office for prosecuting organized crime and corruption
- Basic Court Ohrid
- State Foreign Exchange Inspectorate
- State Inspectorate for Agriculture
- Bureau of Metrology
- Directorate for Dedicated Production
- Commission for Protection against Discrimination
- Center for Crisis Management
- Public utility company "Saraj"-Skopje
- Public utility company "Kozjak" - Staro Nagoricane
- Public enterprise for communal activities "Komunalec"-Kicevo
- Public enterprise for communal activities "Bregalnica" - Delchevo •
- Public utility company "Proleter"-Resen
- Public utility company "Komunalec"-Kavadarci • JP "Komunalec" - Kriva Palanka
- Public enterprise Communal Service-Valandovo
- Public enterprise for communal activities and arrangement of construction land Lozovo
- Company for services "Cistota Jegunovce" LLC
- Public enterprise for communal service works "Komunalec"-Negotino • Public enterprise for communal activities "Rosoman"-Rosoman
- Public utility company "Shari" - village. Godliness
- Public utility company "Standard"-Debar
- J. K. P "Water and sewerage" - Prilep
- PUC "Tetovo"-Tetovo
- Municipal public enterprise "Vardar"-Brvenica
- Public enterprise "Cleanliness and Greenery" - Kumanovo
- Public enterprise for management of sports hall "Rinia" Gostivar • Public enterprise for management of sports facilities "Park - sport" - Veles • Public enterprise "Kamena Reka" - Makedonska Kamenica
- MJP "Proakva" - R.E. Vodovod- Ohrid PART OF THE OHRID WATER SUPPLY • Public business enterprise with Zhabeni industrial zone • Public institution Intermunicipal Center for Social Work-Delcevo • Public institution Intermunicipal Center for Social Work-Vinica • Public health institution - Institute for Transfusion Medicine of the Republic of Macedonia - Skopje • Institute of Occupational Medicine-Skopje
- Institute of Animal Husbandry-Skopje
- Public municipal institution - House of Culture "Lazar Sofianov" - Kratovo • Public municipal institution House of Culture "Macedonia"-Gevgelija • Municipal institution House of Culture "Jane Sandanski" - village of Novo Selo • House of culture "Dimitar Berovski" - Berovo
- House of culture "Naum Naumovski Borche"-Krushevo
- Center for culture "Aco Karamanov" - Radovish
- NU Center for Culture "Iljo Anteski-Smok" - Tetovo
- Home of youth-Shtip
- NU Institute for the Protection of Cultural Monuments and Museum-Ohrid • NU Institute and Museum-Bitola
- National Institution Center for Culture "Nikola Jonkov Vaptsarov" - Delchevo •

Public municipal institution Library "Vancho Prke"-Vinica

- "Kocho Racin" Primary School Library - Pehchevo
- NU National Theater-Bitola
- NU National Gallery of Macedonia-Skopje
- NU Archaeological Museum of Macedonia
- Museum of the City of Kratovo-Kratovo
- YOU. Institute for Rehabilitation of Children and Youth - Skopje
- Public institution Institute for Protection and Rehabilitation "Banja BANSKO"-Strumica • Macedonian Academy of Sciences and Arts-Skopje
- National institution "Kinotheca of Macedonia" - Skopje
- Public scientific institution Hydrobiological Institute-Ohrid
- Public municipal institution Home for the elderly "SUE RYDER"-Bitola
- Municipal public institution Zoo-Bitola
- Public municipal institution Home for the elderly "Kiro Krsteski-Platnik" - Prilep • Public institution Zoo of the city of Skopje
- Public institution National Park "Galičica"-Ohrid
- JOU Pioneer Home "Josip Broz Tito"-Gevgelija
- National Conservation Center-Skopje
- NU Conservation Center - Gostivar
- Branko Stanoevic Primary School, Gostivar
- Public institution Student House of the City of Skopje, Zdravko Cvetkovski, Skopje •Student's home, Brača Miladinovci, Struga
- State school dormitory "Mirka Ginova"-Bitola
- Student dormitory at "Mitko Pendzukliski" Secondary School - Kratovo
- Student dormitory at DUCOR "Partenija Zografski" - Skopje
- PE "City Parking and Greenery" - Gostivar
- PUC "Clean Den"-Rankovce
- Municipal public institution Partizanski dom Sandevo
- National Institution "Museum of the Albanian Alphabet" - Bitola
- Public institution Children's Home "11 October" - Skopje
- JU Special Institute Demir Kapija
- Scientific and cultural meetings "Ten Days of Krusevo Republic" - Krusevo
- Macedonian Academic Research Network MARnet
- Local Museum Gallery - Kavadarci
- PUK "Pela Higiena"-Mogila
- NU "Todor Proeski Memorial House" - Krushevo
- Public municipal institution Home for the elderly "Zafir Saito"-Kumanovo
- NU "Gostivar Theater" - Gostivar
- PUK "Klepa" - Gradsko
- JPKD "Oktisi"-S. Oktisi, Struga
- Public enterprise for public parking lots "Veles Parking" Veles • PUC "Petrovec"-Petrovec
- PHI University Institute for Positron Emission Tomography of RSM • Public institution Reception Center for asylum requesters - Skopje • PUC "Vrapchiste"-Vrapchiste
- JP "Shkupi Vjeter"-Skopje

- N.U. Tetovo Theater - Tetovo
- NU Ensemble of Albanian folk dances and songs in the Republic of North Macedonia Skopje
- Public health facility Specialized hospital for prevention, treatment and rehabilitation of respiratory diseases - Oteshevo • PHI Specialized Hospital for Geriatric and Palliative Medicine "13 Noemvri"-Skopje
- PHI General Hospital "Ferid Murad" - Gostivar
- PHI General Hospital "Borka Taleski"-Prilep
- Public health institution Zdravstven dom Ohrid
- Public health institution Zdravstven dom Tetovo
- Public health institution – Prilep Health Center
- Public health institution - Health Center - Kicevo
- PHI Zdravstven dom "Dr. Ruse Boskovski" - Rostushe village
- Public health facility - Public Health Center - Veles • PHI Clinical Hospital "Dr. Trifun Panovski" - Bitola
- PHI University Clinic for Traumatology, Orthopedic Diseases, Anesthesia, Reanimation, Intensive Care and Emergency Center • PHI University Clinic for Rheumatology - Skopje
- PHI – University Clinic for Surgical Diseases "St. Naum Ohridski" - Skopje
- Public health institution University Dental Clinical Center "Saint Panteleimon"-Skopje
- PHI University Clinic for Neurosurgery-Skopje
- PHI University Clinic for Radiotherapy and Oncology-Skopje • PHI University Clinic for Radiology-Skopje
- PHI Special Hospital for Lung Diseases and Tuberculosis - "Jasenovo" - Veles
- PHI Special Hospital for Lung Diseases and Tuberculosis "Leshok" - village of Leshok
- Health institution-Polyclinic of the University "St. Cyril and Methodius" •PZU "My Hospital" - Skopje
- PHI University Clinic of State Cardiac Surgery-Skopje
- Democratic Union-DS
- New Social Democratic Party-NSDP
- Single Macedonia - EM
- Party for the Movement of Turks in Macedonia - PDT
- Macedonian Unifying Reform Organization - Labor Party MORO-RP
- Serbian Party in Macedonia - SSM
- Macedonian Alliance
- Union of Roma from Macedonia
- Labor-Agricultural Party of Macedonia-RZP
- Party of the Vlachs from Macedonia
- Serbian advanced party in Macedonia - SNSM
- Democratic Union of Vlachs from Macedonia - DSVM
- Union of Tito's Left Forces-STLS
- Democratic Party of Albanians-DPA
- Social Democratic Union-SDU

- United for Macedonia-OM
- Movement for National Unity of Turks-DNET
- Political party Dignity-PPD
- Democratic Party of the Roma - DPR
- Party of Pensioners-PP
- Party for Economic Change 21-PEP 21
- New Alternative-NA
- Democratic Party of the Turks of Macedonia
- VMRO-DPMNE (VMRO-Democratic Party for Macedonian National Unity)-VMRO-DPMNE
- Party of Democratic Action of Macedonia
- Roma united from Macedonia-ROM
- Alliance of Albanians-AA
- Voice for Macedonia - VOICE
- Bosniak Democratic Union-BDS
- Movement for State and Justice-DDP
- POPULI party
- INTEGRA-Macedonian Conservative Party
- Your party-Skopje

LIST OF INFORMATION appeal WHOSE OFFICIALS ATTENDED THE TRAININGS:

1. State-owned joint-stock company for performing energy activities National Energy Resources-NER AD-Skopje
2. Development Bank of North Macedonia AD-Skopje
3. Joint-stock company for energy activities City Energy Systems-Skopje AD-Skopje
4. Thermal energy distribution company Distribution of Heat Balkan Energy DOOEL-BEG Skopje
5. ZAN MITREV CLINIC-Legal Affairs and Human Resources Specialist
6. Institute for Authorized Auditors of RSM
7. Faculty of Islamic Sciences - Skopje
8. City Shopping Center - AD Skopje
9. Ministry of Culture
10. Institute of accountants and certified accountants
11. Office of the President of the Government of RSM
12. State Video Lottery of Macedonia - Cassions Austria DOO Skopje
13. JNU Institute for Spiritual and Cultural Heritage of Albanians - Skopje
14. Republic Council for Road Traffic Safety
15. Municipality Center
16. PE for public parking lots Parking lots of the Municipality of Centar
17. JPCommunal hygiene Skopje
18. Center for the development of the Skopje planning region Skopje
19. JSP-Skopje
20. Basic Civil Court Skopje
21. Faculty of Business Economics FBE
22. Institute for Business Economics IBE
23. City of Skopje

24. Food and Veterinary Agency AHV
25. Directorate for protection and rescue
26. Fund for Health Insurance Skopje
27. Operational-technical agency Skopje
28. Joint-stock company in state ownership for performing the activity of providing services in air navigation M-NAV AD Skopje
29. City shopping center AD Skopje
30. Public enterprise for managing sports facilities owned by RSM
31. Municipality of Chucher Sandevo
32. Administration for public revenues
33. Ministry of Environment and Spatial Planning
34. Ministry of Agriculture, Forestry and Water Management
35. Municipality of Delčevo
36. NU Memorial hook of Mother Teresa-Skopje
37. Agency for Financial Support in Agriculture and Rural Development
38. Ministry of Finance
39. Želino municipality
40. Municipality of Probishtip
41. National Security Agency
42. General Secretariat of the RSM Government
43. Ministry of Internal Affairs
44. Ministry of Information Society and Administration
45. State Archive of the Republic of North Macedonia
46. Municipality of Gorce Petrov
47. NU Museum of the Macedonian Struggle for Independence - Skopje
48. Chamber of Commerce of Macedonia
49. Agency for foreign investments and export promotion of the Republic of North Macedonia
50. Agency for supporting entrepreneurship of the Republic of North Macedonia
51. Agency for promotion and support of tourism
52. Agency for the application of the language spoken by at least 20% of the citizens in the Republic of North Macedonia
53. AD for construction and management with residential space and business space of importance for the Republic-Skopje
54. State-owned Water Company of the Republic of North Macedonia-Skopje
55. Shuto Orizari municipality
56. Administration for keeping registers
57. Political party-Left
58. JP-National Forests
59. Political Party-Social Democratic Union of Macedonia
60. Insurance Supervision Agency
61. Municipality of Ohrid

LIST OF INVITED INFORMATION appeal WHOSE OFFICIALS DID NOT ATTEND THE TRAININGS:

1. Ministry of Foreign Affairs
2. Directorate for technological industrial development zones
3. Ministry of Health

4. Ministry of Political System and Inter-Community Relations
5. Ministry of Labor and Social Policy
6. Municipality of Saraj
7. Municipality of Sopishte
8. RSM Wrestling Federation
9. Municipality of Zelenikovo
10. Public Institution Reception Center for Asylum requesters-Skopje
11. Macedonian Academic Research Network MARnet
12. PHI University Institute for Positron Emission Tomography of RSM
13. PHI University Clinic of State Cardiac Surgery-Skopje
14. Orthodox Faculty of Theology
15. Party of United Democrats of Macedonia-PODEM
16. Municipality of Kratovo
17. Skopje Sever-AD Skopje
18. Municipality of Debarca, village of Belchishta
19. Municipality of Strumica
20. Agency for youth and sports
21. Municipality of Mavrovo and Rostushe
22. Public enterprise-Communal-Struga
23. JP ISAR-Stip
24. PUC Tetovo-Tetovo
25. Company for the disposal of municipal waste - Drisla - Skopje
26. Chamber of RSM for private security
27. Dental Chamber of Macedonia
28. Democratic Party of Albanians-DPA
29. Regulatory Commission for Energy and Water Services of RSM
30. Ministry of Transport and Communications
31. State Communal Inspectorate
32. State Inspectorate for Construction and Urbanism
33. Agency for realization of the rights of communities
34. RSM Film Agency
35. J.P. "Parks and Greenery" - Skopje
36. Chair Municipality
37. National Bank of RSM
38. Municipality of Karposh
39. Democratic reconstruction of Macedonia-DOM
40. PE for protection and maintenance of main and regional roads Skopje
41. Agency for commodity reserves
42. KJP Low Construction Ohrid
43. KJP Low Construction - Bitola
44. Public institution National Park-Galičica-Ohrid
45. Intelligence Agency
46. Forfeited Property Management Agency
47. Agency for Administration
48. VMRO-DPMNE (VMRO-Democratic Party for Macedonian National Unity) - VMRO-DPMNE
49. Democratic Union for Integration-DUI
50. Political party ALTERNATIVE
51. Political party BESA Movement
52. Democratic Union-DS

- 53. New Social Democratic Party-NSDP
- 54. Liberal-Democratic Party-LDP
- 55. Socialist Party of Macedonia
- 56. Civic option for Macedonia-GROM

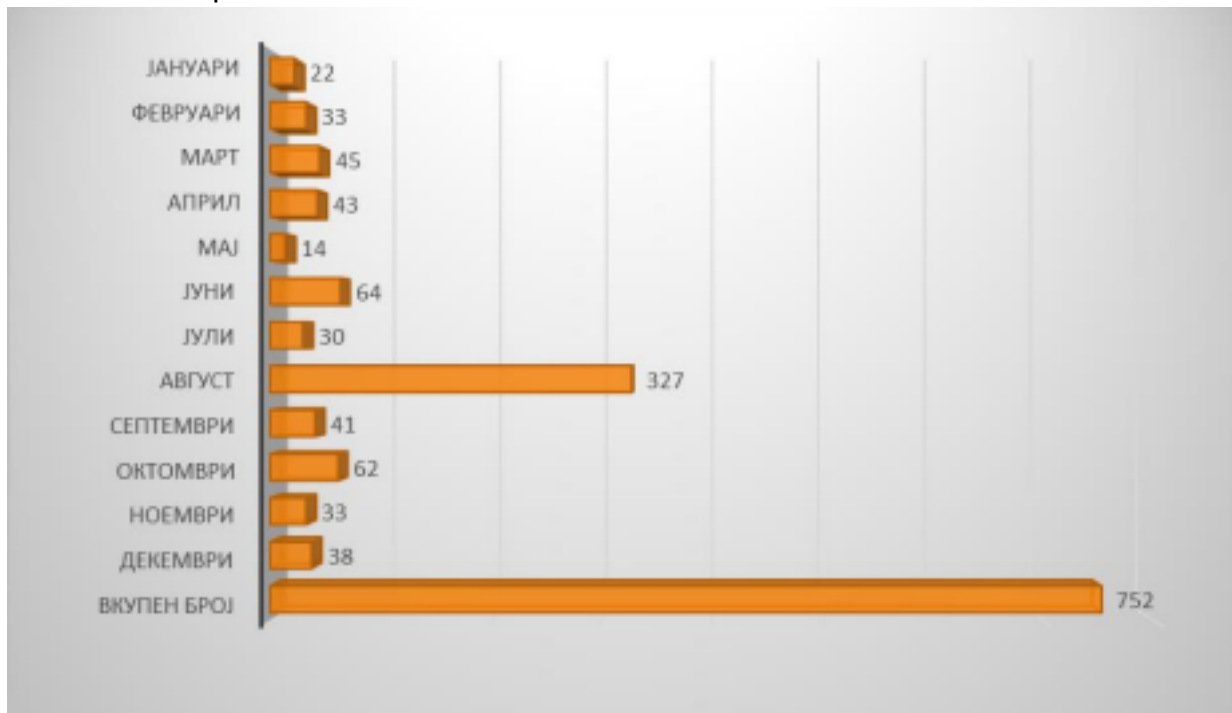


Chart 1: Number of submitted appeals by month



Chart 2: Solved cases and their structure

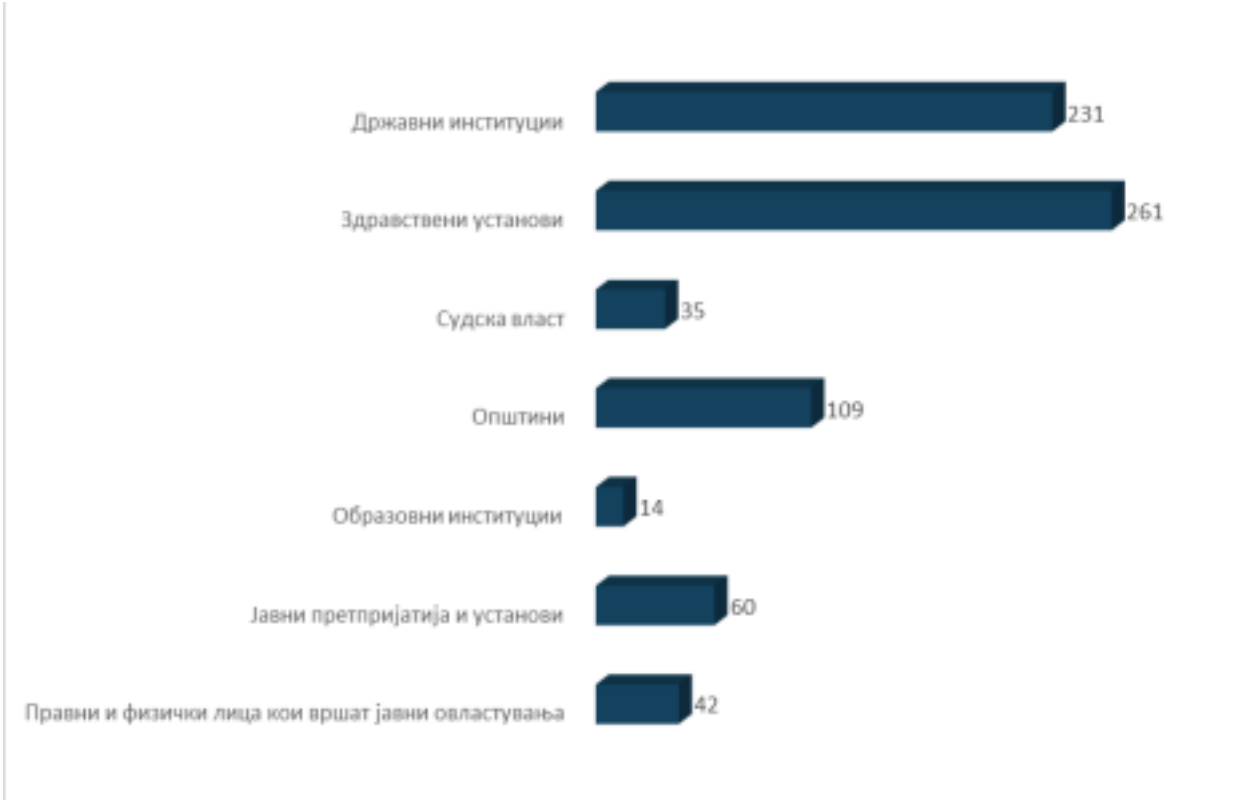


Chart 3: Appeals filed against information holder

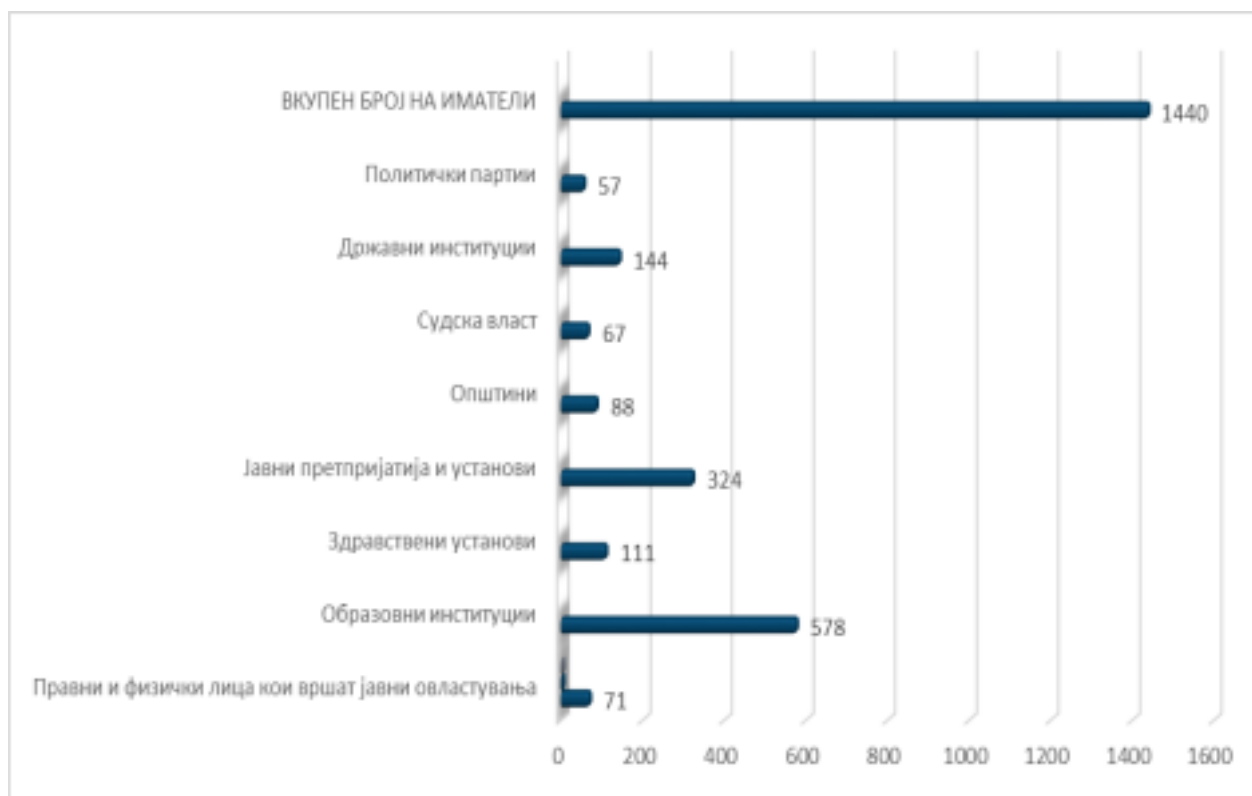


Chart 4: List of public information holders

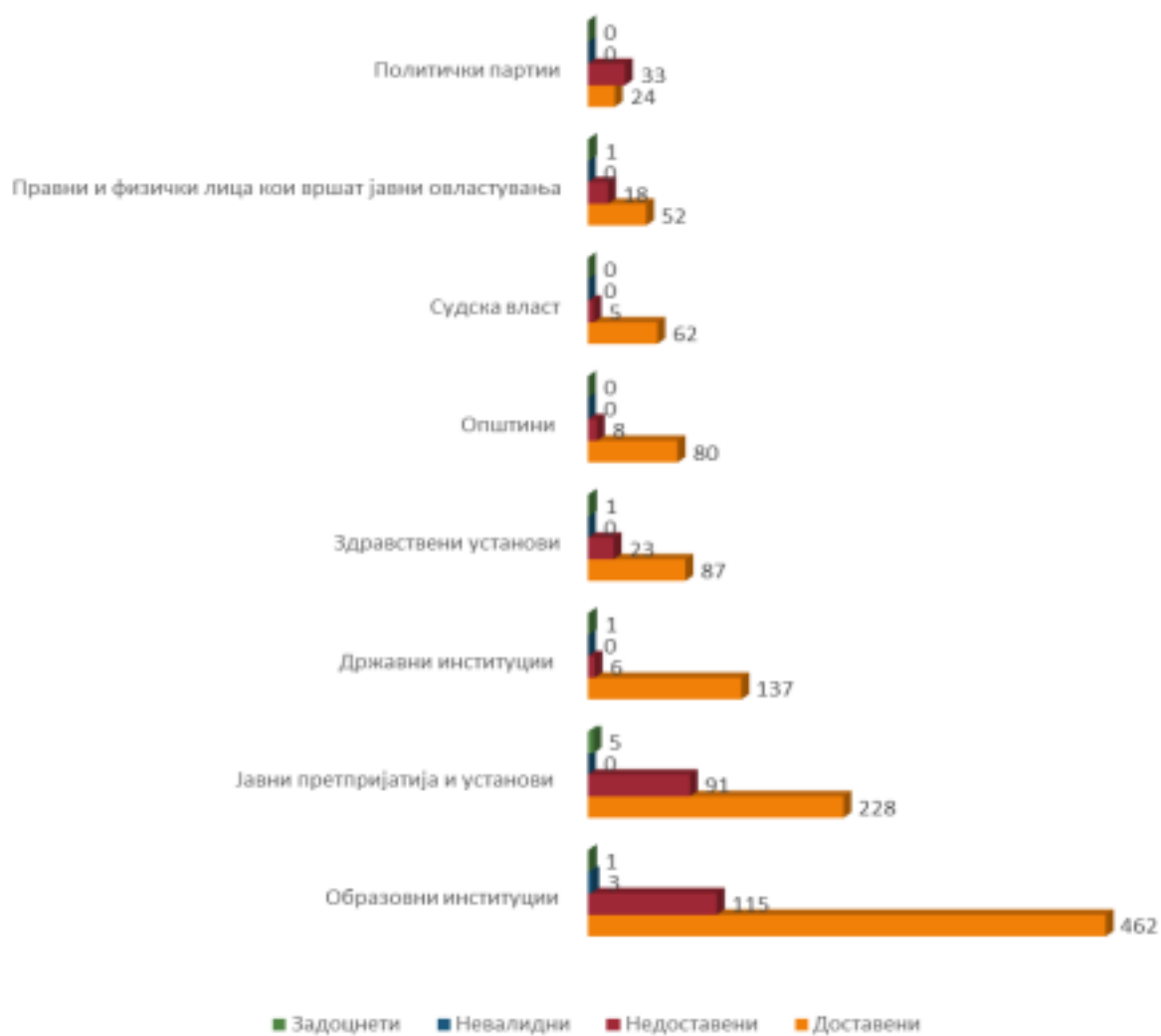


Chart 5: Number of Annual Reports

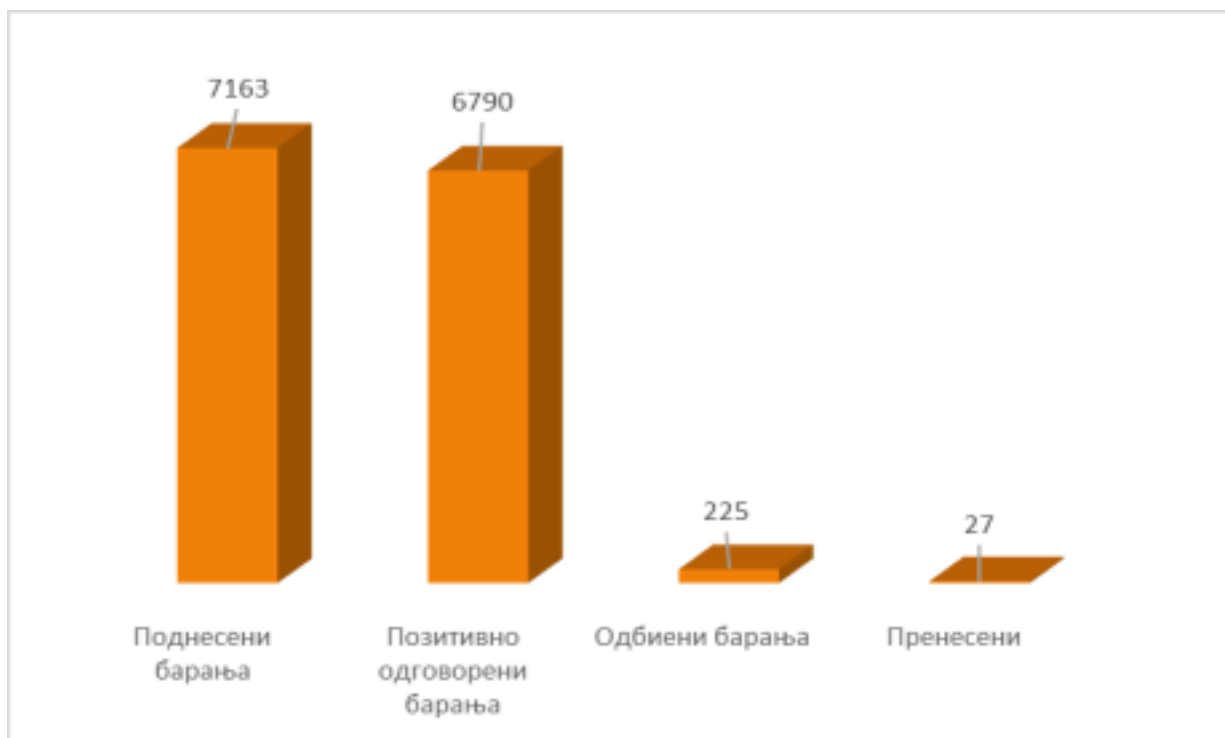


Chart 6: Procedures by request



Chart 7: Number of requests submitted to information holders

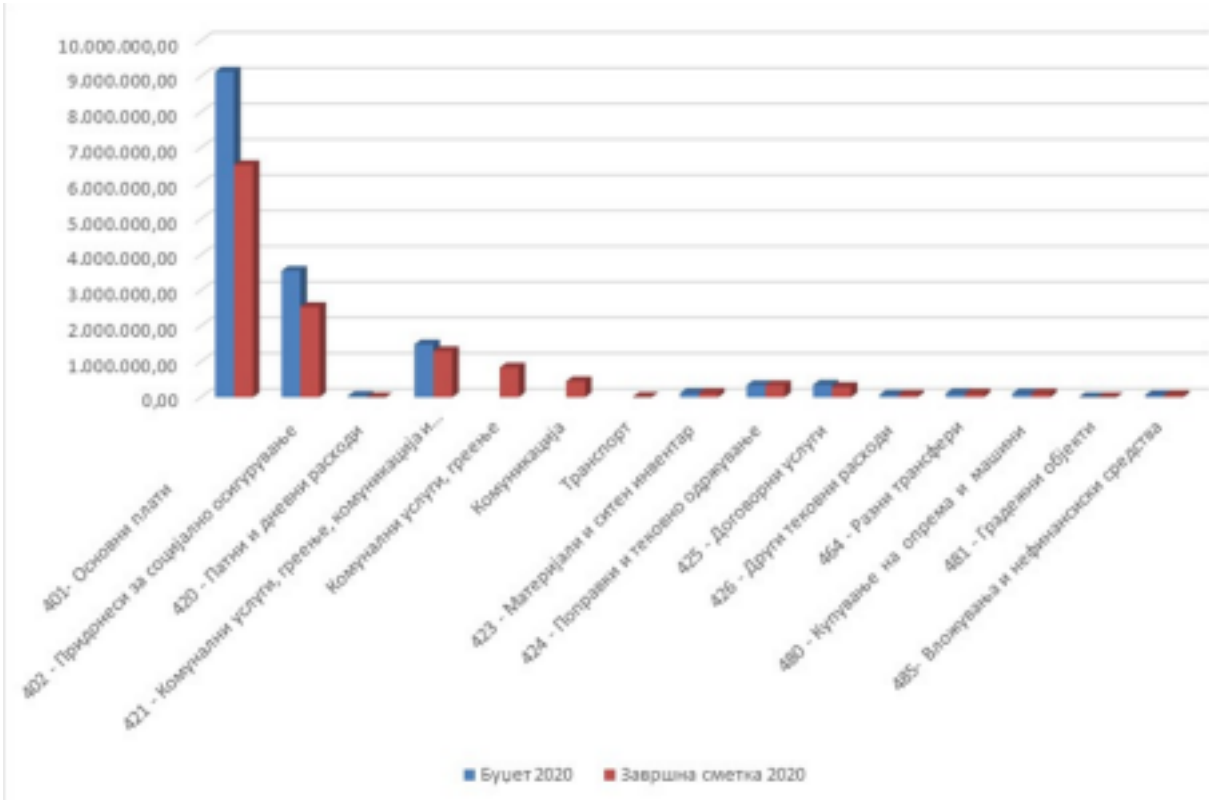


Chart 8: Budget and realization of the budget by items

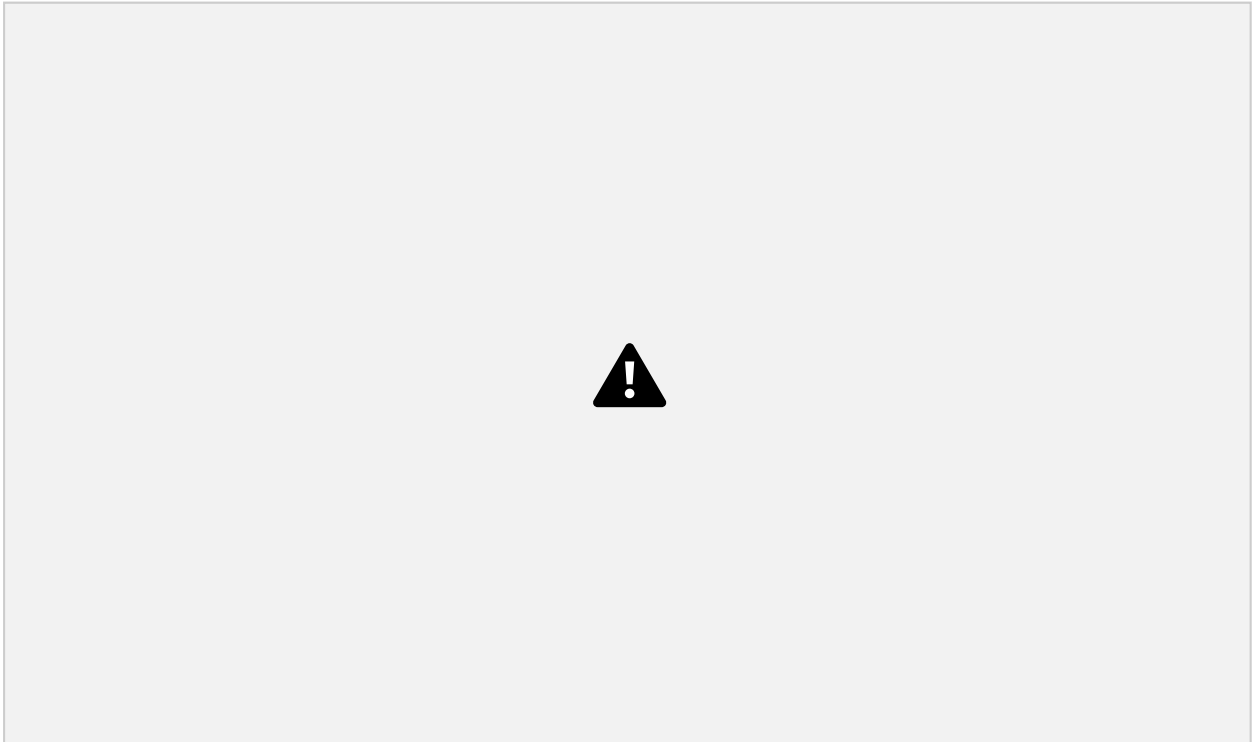


Chart 9: Budget and realization of the budget in the last three years

ATTACHMENT: COPY OF FINAL ACCOUNT FOR 2020