

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

REPORT ON THE EXAMINATION OF THE PUBLISHED DOCUMENTS AND INFORMATION THAT THE HOLDERS OF STATE INSTITUTIONS IN THE REPUBLIC OF NORTH MACEDONIA ARE OBLIGED TO PUBLISH THEM ON THEIR WEBSITES

Skopje, December 2022

INTRODUCTION:

Public information is available to citizens in two ways - by proactivity of the institutions themselves and by reactive means - that is, by submitting a request for information from certain public institutions. Proactive transparency implies the timely publication of public information by institutions that do so on their own initiative before they are requested orally, in writing or electronically, through clear and transparent websites that contain all relevant information. for the citizens. Such proactive publication of information contributes to the strengthening of law and enables the public to become familiar with the regulations, decisions and other actions that are of interest and affect them.

All obligations of institutions to make their work transparent also apply to state institutions. Central government institutions must protect the freedoms and rights of citizens, the rights and interests of legal entities established by law and ensure constitutionality and legality. For that reason, it is important that the citizens are promptly and clearly informed about all information of importance to the public, and the Government, the Parliament, the ministries, the bodies in the composition, as well as the independent institutions are obliged to provide the citizens with access to that information.

The general goal of the monitoring was to see the level of proactive transparency of state institutions. In this report, we present the findings of the monitoring that examined the extent to which the President of the Republic of North Macedonia, the Assembly, the Government, the ministries, the constituent bodies, the Agencies, the Bureaus, the Institutes, the Directorates, the Archive of the Republic of North Macedonia, Commissions, Institutes, Administrations, Funds, Centers, The State Attorney's Office of the Republic of North Macedonia, the Inspection Council, the National Bank of the Republic of North Macedonia, the Committee for the Investigation of Aviation Accidents and Serious Incidents, the Auditing Body for the Audit of the Instrument for Pre-Accession Assistance, the Republic Council for Road Traffic Safety, the Council for the Advancement and Supervision of the Audit of The Republic of North Macedonia and the Central Register of the Republic of North Macedonia publish the information relevant to the citizens, about the annual reports on their work, whether they provide correct, precise and complete data to the information requesters, whether there is a designated official person to mediate with the public information, such as and numerous other issues on the basis of which the application of proactive transparency standards is evaluated.

WHAT IS PROACTIVE TRANSPARENCY?

When the holders of public information are open to the public, citizens find out what and how the state government bodies and other establishments and institutions work. This enables them to participate equally in public life and continuously control the work of the authorities.

The proactive publication of public information is a legal obligation of all holders, on their initiative and continuously on their websites to

publish information about their work and actions, about decision-making, finances and about the services they provide to citizens.

The goal of fulfilling the obligation to proactively publish information is reflected in the opportunity for citizens/information requesters to exercise their constitutionally guaranteed right of access to information, by providing services to information holders in a simple and fast way. At the same time, the holders of information receive the necessary legitimacy, because they demonstrate responsibility in their work, and thus restore the trust of the citizens in the institutions.

With the proactive publication of public information, the legal obligation is clearly established for the holders not only to respond to the submitted requests in relation to the Law on Free Access to public information but also to publish public information on their websites, such as those that are not requested. Proactive publication of public information is an integral part of the right of access to information, ensuring that key information is available on time. As stated by the European Court of Human Rights, which recognizes it as a fundamental human right, "information is changeable and any delay in its publication, even for a short time, may reduce its overall value and interest in it."

Proactively published information of the holders should be easily accessible and understandable, usable, relevant to citizens and regularly updated. Information is a prerequisite for responsible government and a basis for democratic processes - information about the work of the holders enables citizens to adequately draw conclusions and participate in decision-making on issues that are of interest. Transparency and access to public information are inseparable instruments in the fight against corruption.

A major advantage of proactively releasing public information, especially when it is done immediately, is that it makes it more difficult for information holders to deny the existence of the information or manipulate it. This means that all citizens/requesters of public information are saved time, money and effort. The principle of equality enables the realization of this right, fulfilment of obligations, as well as participation in political, social and economic processes, all intending to strengthen trust in institutions. The low proactivity of publishing information makes it impossible for the public to monitor and control the work of information holders.

SUBJECT OF MONITORING:

The monitoring is focused on checking the categories of information that should be regularly and updated published on the websites of the holders of public information following the provisions of Article 9 and Article 10 of the Law on Free Access to Public Information (LFAPI).

PURPOSE OF MONITORING:

The purpose of the monitoring is to detect the conditions in the implementation of the obligation of the holders of public information to proactively publish the 22 categories of information on their websites. It helps in realizing the competence of the Agency for the protection of the right of free access to public information for the implementation of the provisions of LFAPI and increasing the capacities of the holders of public information in relation to their greater transparency and openness. Also, the monitoring will contribute to a better identification of the training needs of the officials among the information holders.

FOLLOW-UP FREQUENCY:

The monitoring frequency can be once a year, on an annual basis or over a longer period. To ensure the comparability of the results and to use them for problem identification, training needs and strategy development, it is worth monitoring to be carried out often enough.

For a priority group, such as state administration bodies, it is recommended to maintain a monitoring frequency on an annual basis.

The monitoring of the municipalities can be done once a year or on a two-year basis. Monitoring of public enterprises can be on an annual basis or a biennial basis.

Tracking other categories such as courts, schools and universities, hospitals and other medical bodies etc. groups, it can only be done with a special task and with secured financial resources and/or in cooperation with the civil sector. The monitoring can also be carried out as a thematic monitoring of the website holders (eg publication of procedures for public procurement, budget, employment, environment and other contents) and also with provided financial resources and/or in cooperation with the civil sector.

FRAME OF REFERENCE:

The reference framework for monitoring should be the questionnaire developed specifically for that purpose based on the categories listed in Article 10 of the LFAPI. The questionnaire differentiates relevant questions for the groups of state authorities and the group of municipalities. The questionnaire will differ in several segments, namely in the part of granting concessions and public-private partnerships for the reasons that a large part of the holders do not have such legal obligations. These questions will remain as questions in the section for municipalities.

RESULTS OF THE MONITORING:

The agency, in accordance with its competencies and in accordance with the Public Administration Reform Strategy, the passport Indicator 48: Percentage of institutions that regularly publish and update on their websites the documents that they are obliged to publish and update according to the Law on Public Administration for Measure 3.4.1 Strengthening the mechanisms for the availability of public information, for this purpose in 2022, it carried out monitoring of the websites of the holders from the central government.

The Agency carried out monitoring of 120 holders, that is, on the web pages of holders from state institutions published on the List of holders of information on the Agency's website. The monitoring was carried out in the period from November 1 to December 15, 2022. The

Department of Cooperation and Analysis was in charge of monitoring websites for the full publication of documents and information that the holders of information are obliged to publish according to Article 10 of the Law.

We should mention that the Monitoring does not analyze the contents, that is, the quality of the published information.

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

Out of a total of 146 state institutions recorded in the List as holders, the websites of 120 holders were monitored. Eleven holders were not covered by the monitoring, because they do not have their websites. The website of one owner (Agency for Quality and Accreditation of Healthcare Institutions) could not be analyzed because while the website was being monitored it was inactive, i.e. it could not be accessed, while 13 regional units of the State Attorney's Office of Republic of North Macedonia are an integral part of the State Attorney's Office and they are not monitored.

The monitoring was carried out according to the methodology implemented in cooperation with external experts, hired by the IPA II Project "Transparency and Accountability of Public Administration", whose beneficiary is the Agency. The prepared questionnaire contains a total of 30 questions arising from Article 10 of the Law. Some of them contain one or more sub-questions, and the maximum number of possible points is 52. Holders of the published data received 0, 0.5 and 1 points, depending on the number and update of the published documents. The questionnaire was distributed to the holders, who were asked to carry out a self-evaluation of their transparency.

Within the deadline for submitting the answers to the Agency, the holders submitted 68 questionnaires, of which 11 did not contain links to the specific documents as requested and were not taken into account during the monitoring of the web pages. Part of the questions contained in Article 10 were not taken into account in the questionnaires because the holders have no legal obligation to conclude such contracts.

The web pages of the monitored holders from the state institutions are not unified, that is, they are different both in appearance and in terms of their contents and the information that is published. They are updated according to their activities and have their function as the first informant for the citizens and the services they provide. But we should emphasize that what is intended for easy access to public information, i.e. the list of information on most of the web pages of the holders is not published on the home page, so that access to it will be quick and with a maximum of three clicks for the requester of the information. Most often, public information, and the link to it, are moved by the institutions to the Public Relations, Contact and similar sections of the web pages. We also want to emphasize that unsystematized information creates confusion among citizens, that is, information is more difficult to access. This means that web pages should be easily accessible, and thus the information needed by the applicants, and is in accordance with the legal obligation for transparency of the holders of public information. Hence, we appeal to the state institutions to make the information easily available for citizens to use. "Informed citizens, satisfied citizens", is the maxim for transparent state government.

Depending on the total number of points that the monitored holders received in relation to the published necessary documents and information in accordance with Article 10 of the Law, a gradation was made of the degree of fulfilment of the legal obligation for their active transparency, as follows: holders with many low levels of transparency who have between 0 and 20 points, with a low level between 20 and 30 points, medium level holders between 30 and 40 points, and with a high level of transparency between 40 and 52 points. In doing so, it was determined that 25 holders have a high degree of transparency, 29 have a low level and 9 have a very low level of fulfilment in relation to active transparency.

Of the monitored 120 state institutions, out of a total of 52 possible points according to the monitoring methodology, the mean value of proactive transparency of the holders is 32 points. It represents an intermediate level of active transparency of the web pages of the holders.

According to the results of the monitoring, the most transparent are the Ministry of Agriculture, Forestry and Water Management and the Ministry of Defense with 49.5 and 48.5 respectively, followed by the Ministry of Finance and the Pension and Disability Insurance Fund of the Republic of North Macedonia with 45.5 points. This year, the Ministry of Agriculture, Forestry and Water Management showed the greatest transparency on its website, that is, on the information published following Article 10 of the Law on SPIJK. Last year, the Ministry of Public Administration was among the institutions with a low level of transparency, which shows that by proactively publishing information, the holders can increase their proactivity and accountability, above all for the citizens, and in this way, access to information from the public character will be available to applicants in an easy and accessible way.

Based on the monitored web pages according to the methodology and the Questionnaire, the following results and indicators for the proactive transparency of the holders were obtained: out of a total of 120 monitored holders, 49 have published a link to the List of information on the homepage, and 70 have no banner/link. All holders have published information about their competence, and they have also published basic contact information with the holder of the information. Data on the official or responsible person of the holder of the information: 87 holders have published a biography on the web pages, and 33 have not published a biography of the responsible person.

From the monitoring, we can conclude that in the free access to information link, 105 holders have published the basic contact data for officials who mediate public information, while 15 holders have not published the data. 92 holders have uploaded data on persons for authorized protected internal reporting, and 28 have not fulfilled this obligation. 88 institutions have published a list of persons employed by the holder of the information with a position, and 32 do not have data on employees in their institutions. In the section clarifying the way of submitting the request for access to information (way of submitting oral, written request and electronically), 36 holders clarify how the request form for free access to public information. Only 54 holders have moved the request form for free access to the Law

of 2006 and the amendments of 2010/15. We should mention that a large part of the holders have not moved the form. The annual report on access to public information (2021 and 2020) has been uploaded on their websites by 58 holders, of which 58 for 2021 and 58 for 2020, while 62 have not published it following Article 36 of the Civil Code.

The laws that refer to the authority of the holder of information have moved all the holders so that the citizens, that is, the applicants, can get acquainted with the basic information about the basis on which the holders from the state institutions work. In the section in which the holders inform about the Regulations within their competence in the form of a by-law, which refers to: the rules for internal organization, this document has been published by 89 holders, the rules for the systematization of jobs on the web pages have 88 subjects moved. Some of the holders do not publish these documents, which according to the law are classified information. The rulebook for protected internal reporting by monitored holders has been published by 63. In the section of decrees, 36 holders publish these documents, and instructions are published by 63 holders of information. An organogram for internal organization has been published on the website by 99 holders of state institutions.

Strategic plans and strategies have been published by 85 holders. Annual plans and work programs have been published by 60 holders, while proposals for documents (proposals of programs, programs, views, opinions, and studies) have been published by 69 holders on the web pages. On the web pages in the section where the holders publish the work reports that they submit to the supervisory authorities, 61 holders have published the reports, and some of the holders publish the reports as six-monthly reports or on a quarterly level, as well as statistical data that affect life and the health of citizens, the monitoring showed that this type of information has been moved by the largest number of monitored subjects through the publication of data on their websites.

Information about the published acts and measures resulting from the authority and work of the holder, the monitoring showed that the holders publish this type of information on their webpages. Through links and access to them, citizens can access information that is of interest to them. In the section on published services provided by the holders of information and fee schedules for the issuance of real acts, the monitoring showed that the holders who have legal competencies publish this information on their websites.

For the last three years, 81 holders have published their annual budgets, and 86 holders have published the information on the final accounts. Quarterly financial reports for the current year have been published by three holders, and 59 institutions have published audit reports.

Holders of state institutions should improve and strengthen as much as possible their proactivity towards citizens and the information they publish should be placed in a separate banner/link under the title **LIST OF INFORMATION/FREE ACCESS TO INFORMATION**, which will make them available to applicants and thus reduce the number of requests for free access to public information. The holders of their web pages have sub-links titled free access, public information, and transparency, but they are in links that are not transparent and easily accessible to citizens, that is, information requesters. Holders from state institutions of their websites should monitor and regularly publish their information in accordance with Article 10 of the Law and their competencies. Through a unified banner,

they will highlight the necessary information that they have published in separate links on the web pages, but they will have to constantly update and publish the information. In that way, information requesters will be able to access information that is of interest to them quickly and simply.

In the future, in the training that the Agency continuously organizes for officials with information holders, it will emphasize active transparency and consistent application of Article 10 of the Law on SPIJK, because in this way holders help citizens to better understand the functioning of institutions, their rights and obligations, how they can influence the making of decisions that are reflected on their daily living and work, as well as to make it easier for them to access the services that state institutions offer them with their competence.

RB	INSTITUTION	POINTS	LEGEND
1	Ministry of agriculture, forestry and water management	<mark>49,5</mark>	HIGH LEVEL INSTITUTIONS OF TRANSPARENCY
2	Ministry of Defense	48,5	
3	Ministry of Finance	45,5	
4	Pension and disability insurance fund of the Republic of North Macedonia	45,5	
5	State Market Inspectorate	45,0	
6	Ministry of Labor and Social Policy	45,0	
7	Real estate cadastre agency	45,0	
8	Republic of North Macedonia Government - General Secretariat	45,0	
9	State Administrative Inspectorate	44,5	
10	Ministry of Environment and Spatial Planning	44,5	

ANNEX 1: Table with monitoring results for 2022

11Government of Republic of North Macedonia-Office of The President of the Government of the Republic of North Macedonia44,512Ministry of Information society and administration44,013State Audit Office44,014Agency for audio and audiovisual media services44,015Ministry of Economy43,016Security Directorate of classified information43,0	
society and administration13State Audit Office14Agency for audio and audiovisual media services15Ministry of Economy16Security Directorate of	
14 Agency for audio and audiovisual media services 15 Ministry of Economy 16 Security Directorate of	
media services 15 Ministry of Economy 16 Security Directorate of	
16 Security Directorate of 43,0	
17Administration for Public42,5Revenues-GeneralDirectorate-Skopje	
18 Agency for financial support in agriculture and rural development 42,0	
19 Ministry of Internal Affairs 42,0	
20 Food and Veterinary Agency of the Republic of North Macedonia 42,0	
21National Bank of the Republic of North Macedonia42,0	
22 State Commission for Prevention of Corruption 41,5	
23 Accreditation Institute of the Republic 41,0 of North Macedonia	
24 Regional Development Bureau 40,5	
25Securities Commission of the Republic of North Macedonia40,5	
26 Ministry of Justice 40,0 INTERMEDIATE LE INSTITUTIONS O TRANSPARENC	OF
27 State archive of the Republic of North 40,0 Macedonia 40,0	
28 Agency for promotion and support of tourism	
29 Auditing body for the audit of the instrument for pre-accession assistance 40,0	
30 Bureau of Public Procurement 40,0	

31	Agency for encouraging the	40,0	
	development of agriculture - Bitola		

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32 Ministry of Education and Science 39,5

	inistry of Education and Science 39,5	
33	State Examination Center	39,5
34	Ministry of Health	39,5
35	Inspection Council	39,5
36	Institute for Standardization of Republic of North Macedonia	39,0
37	State Statistical Office	39,0
38	Legislation Secretariat	39,0
39	Agency for Supervision of Capital Funded Pension Insurance MAPAS	39,0
40	Customs Administration of the Republic of North Macedonia	38,5
41	Assembly of the Northern Republic Macedonia	38,5
42	State Inspectorate for Construction and Urbanism	38,0
43	Energy Agency of the Republic of North Macedonia	38,0
44	Administration Agency	38,0
45	State Commission for Public Procurement Complaints	37,5
46	Commission on relations with religious communities and religious groups	37,0
47	Ministry of Transport and Communications	36,5
48	Ministry of Foreign Affairs	36,5
49	Radiation Safety Directorate	36,0
50	Postal Agency	36,0
51	Directorate for Protection and Rescue	35,5
52	Commission for the Protection of Competition	35,5
53	Agency for regulation of the railway sector	35,0

Geological Institute of the Republic of North Macedonia	34,5
State Commission for decision-making in administrative proceedings and employment proceedings in the second degree	34,0
Film Agency of the Republic of North Macedonia	34,0
Center for Crisis Management	34,0
Regulatory Commission for Energy and Water Services of the Republic of North Macedonia	34,0
Bureau of Educational Development	34,0
State Educational Inspectorate	34,0
Bureau of Forensic Expertise	34,0
Innovation and Technological Development Fund	33,5
Employment Agency of the Republic of North Macedonia	33,5
Electronic Communications Agency	33,0
Civil Aviation Agency	33,0
President of the Republic of North Macedonia	33,0
Ministry of Local Self-Government	32,5
	North MacedoniaState Commission for decision-making in administrative proceedings and employment proceedings in the second degreeFilm Agency of the Republic of North MacedoniaCenter for Crisis ManagementRegulatory Commission for Energy and Water Services of the Republic of North MacedoniaBureau of Educational DevelopmentState Educational InspectorateBureau of Forensic ExpertiseInnovation and Technological Development FundEmployment Agency of the Republic of North MacedoniaElectronic Communications AgencyCivil Aviation AgencyPresident of the Republic of North Macedonia

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68 State Inspectorate for Agriculture 32,5			Court of Human Rights	
69	Ministry of culture	75	Administration for the Protection of	3
70	Personal Data Protection Agency		Cultural Heritage	
71	Agency for foreign investments and export promotion of the Republic of North Macedonia	76	Agency for realization of the rights of communities	3
72		77	Financial Intelligence Authority	3
73		78	Central Registry of the Republic of North Macedonia	e
	the entrepreneurship of the Republic of North Macedonia	79	Commodity Reserve Agency	(
74	Office for representation of the Republic of North Macedonia before the European	80	Agency for Medicines and Medical Devices	

		92 State Communal Inspectorate			
·	93	State Transport Inspectorate	28		
State Labor Inspectorate	94	Secretariat for European Affairs	2		
Council for the promotion and supervision of the audit of the	95 State Election Commission		2		
Republic of North Macedonia	96	Directorate for Mandatory Reserves of	2		
State Sanitary and Health		Oil and Oil Derivatives			
Inspectorate	97	State Industrial Institute	2		
85 National Agency for European Education Programs and Mobility		property			
	98	Administration for enforcement of sanctions	20		
Financial Police Authority	99	Directorate of Technological Industrial	20		
Administration for keeping the registry		•			
books	100	State Environmental Inspectorate	2		
Insurance Supervision Agency	101	Agency for quality of higher	2:		
Center for Vocational Education and Training		education in Republic of North Macedonia			
Inspectorate for use of languages					
Deposit Insurance Fund	INSTITUTIONS WITH A LOW LEVEL OF TRANSPARENCY				
	Republic of North Macedonia State Labor Inspectorate Council for the promotion and supervision of the audit of the Republic of North Macedonia State Sanitary and Health Inspectorate National Agency for European Education Programs and Mobility Financial Police Authority Administration for keeping the registry books Insurance Supervision Agency Center for Vocational Education and Training Inspectorate for use of languages	Republic of North Macedonia93State Labor Inspectorate94Council for the promotion and supervision of the audit of the Republic of North Macedonia95State Sanitary and Health Inspectorate96State Sanitary and Health Inspectorate97National Agency for European Education Programs and Mobility98Financial Police Authority books99Administration for keeping the registry books99Insurance Supervision Agency100Insurance for Vocational Education and Training101	Republic of North Macedonia 93 State Transport Inspectorate State Labor Inspectorate 94 Secretariat for European Affairs Council for the promotion and supervision of the audit of the Republic of North Macedonia 95 State Election Commission 96 Directorate for Mandatory Reserves of Oil and Oil Derivatives 97 State Industrial Institute property National Agency for European Education Programs and Mobility 98 Administration for enforcement of sanctions Financial Police Authority 99 Directorate of Technological Industrial Development Zones Mokinistration for keeping the registry books 100 State Environmental Inspectorate Insurance Supervision Agency 101 Agency for quality of higher education in Republic of North Macedonia Inspectorate for use of languages National Education and Training 101		

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102 National Security Agency 25,0

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103	Operational-technical agency-Skopje	24,5	
104	Agency for emigration of the Republic of North Macedonia	24,5	
105	Spatial Planning Agency	24,0	
106	Health Insurance Fund of the Republic of North Macedonia	24,0	
107	State Inspectorate for Local self-government	<mark>23,0</mark>	
108	Administration for Hydrometeorological Affairs	<mark>23,0</mark>	
109	Foreclosed Property Management Agency	21,5	
110	Housing Regulatory Commission	20,0	
111	Intelligence agency	<mark>19,0</mark>	VERY LOW INSTITUTIONS LEVEL OF TRANSPARENCY
112	Commission for Prevention and Protection from Discrimination	19,0	

113	Republic Council for Road Traffic Safety	<mark>18,0</mark>
114	State commission for decision-making in the second degree in the field of inspection supervision and misdemeanor procedure	<mark>18,0</mark>
115	Agency for Youth and Sports	18,0
116	Bureau of Metrology	17,0
117	Ministry of Political System and Community Relations	16,0
118	Aviation Accident and Serious Incident Investigation Committee	<mark>11,0</mark>
119	Agency for the application of the language spoken by at least 20% of the citizens in the Republic of North Macedonia	1,0
120	Agency for Quality and Accreditation of Healthcare Institutions	0,0

ANNEX 2: Comparative table of monitoring results of state institutions for 2021-2022

RB	INSTITUTION	POINTS 2021	POINTS 2022	LEGEND
1	Ministry of agriculture, forestry and water management	28,5	49,5	INSTITUTIONS WITH A HIGH LEVEL OF TRANSPARENCY
2	Ministry of Defense	45,5	48,5	
3	Ministry of Finance	42,5	45,5	
4	The pension fund and the disability insurance of the Northern Republic Macedonia	42,0	45,5	
5	State Market Inspectorate	42,0	45,0	
6	Ministry of Labor and social policy	<mark>46,5</mark>	<mark>45,0</mark>	
7	Cadastre Agency of real estate	40,5	<mark>45,0</mark>	
8	Republic of North Macedonia Government - General Secretariat	48,0	45,0	

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10	Ministry of Environment and Spatial planning	48,0	44,5	
11	Republic of North Macedonia Government - Office of the President of the Government of the Northern Republic Macedonia	42,0	44,5	
12	Ministry of information society and administration	46,0	44,0	
13	State Audit Office	44,0	44,0	
14	Audio Agency and audiovisual media services	40,0	44,0	
15	Ministry of Economy	47,0	43,0	
16	Directorate for Security of Classified Information	37,0	43,0	
17	Administration for Public Revenue- General Directorate-Skopje	38,5	42,5	
18	Financial Agency support in agriculture and rural development	44,5	42,0	
19	Ministry of Internal Affairs	36,0	42,0	
20	Food Agency and veterinary medicine of the Republic of North Macedonia	45,5	42,0	
21	National Bank of the Republic of North Macedonia	38,0	42,0	
22	State Commission for prevention of corruption	40,5	41,5	
23	Accreditation Institute of the Northern Republic Macedonia	<mark>41,0</mark>	41,0	
24	Regional Development Bureau	42,5	40,5	
25	Securities Commission of value of the Republic North Macedonia	42,0	40,5	

26	Ministry of Justice	45,0	40,0	INTERMEDIATE LEVEL INSTITUTIONS OF
27	State archive of the Republic of North Macedonia	38,5	40,0	TRANSPARENCY
28	Agency for promotion and supporting tourism	34,0	40,0	
29	Auditing body for auditing the instrument for pre-accession assistance	32,0	40,0	
30	Bureau of Public Procurement	46,0	40,0	
31	Agency for encouraging the development of agriculture - Bitola	34,5	40,0	
32	Ministry of Education and Science	38,0	39,5	
33	State Examination Center	36,5	39,5	
34	Ministry of Health	38,0	39,5	
35	Inspection Council	36,0	39,5	

Standardization of the36Republic of North36Macedonia

37	State Statistical Office	39,5	39,0	
38	Legislation Secretariat	35,5	39,0	
39	Capital Funded Supervision Agency pension insurance MAPAS	40,0	<mark>39,0</mark>	
40	Customs Administration of the Republic of North Macedonia	46,0	38,5	
41	Assembly of the Republic North Macedonia	28,5	38,5	
42	State Inspectorate for construction and urban planning	38,5	38,0	
43	Energy Agency of the Northern Republic Macedonia	37,0	38,0	

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44	Administration Agency	37,0	38,0	
45	State Commission for Public Procurement Complaints	32,0	37,5	
46	Committee on relations with religious communities and religious groups	36,5	37,0	
47	Ministry of Transport and Communications	34,5	36,5	
48	Ministry of Foreign Affairs	30,5	36,5	
49	Radiation Safety Directorate	45,0	36,0	
50	Postal Agency	33,5	36,0	
51	Directorate for Protection and rescue	33,5	35,5	
52	Commission for the Protection of the competition	18,0	35,5	
53	Agency for regulation of the railway sector	30,0	35,0	
54	Geological Institute of the Republic of North Macedonia	37,0	34,5	
55	State Commission for administrative decision-making procedure and procedure of employment relationship in the second degree	34,5	34,0	
56	Film Agency of Northern Republic Macedonia	34,0	34,0	
57	Center for Crisis Management	34,0	34,0	
58	Regulatory Commission for energy and water services of the Northern Republic Macedonia	31,0	34,0	
59	Development Bureau of the education	27,0	34,0	
60	State education inspectorate	<u> </u>	<mark>34,0</mark>	
61	Bureau of Forensic Expertise	25,0	34,0	

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62 "	novation Fund and technological development 40,0 3	3,5		
63	Employment Agency of the Northern Republic Macedonia	34,0	33,5	
64	Electronic Agency communications	35,0	33,0	
65	Agency for Civil aviation	33,0	33,0	
66	President of the Republic of North Macedonia	22,0	33,0	
67	Ministry of Local Self-Government	34,0	32,5	
68	State Inspectorate for agriculture	34,5	32,5	
69	Ministry of culture	37,0	32,0	
70	Personal Data Protection Agency	35,0	32,0	
71	Agency for foreign investments and export promotion of the Republic of North Macedonia	34,0	32,0	
72	State Inspectorate for technical inspection	30,5	32,0	
73	Agency for support of the entrepreneurship of Northern Republic Macedonia	29,5	32,0	
74	Office for representation of Northern Republic Macedonia before the European Court of Human Rights	29,0	32,0	
75	Administration for the Protection of the cultural heritage	31,0	31,0	
76	Agency for realization of the rights of communities	30,5	31,0	
77	Financial Administration intelligence	26,0	31,0	

78	Central register of Northern Republic Macedonia	31,0	31,0	
79	Commodity Reserve Agency	24,0	31,0	
80	Medicines Agency and medical supplies	30,0	30,5	INSTITUTIONS WITH A LOW LEVEL OF TRANSPARENCY
81	State Attorney's Office of the Northern Republic Macedonia	34,0	30,5	
82	State Labor Inspectorate	35,0	30,0	
83	Council for the promotion and supervision of the audit of Northern Republic Macedonia	27,5	<mark>30,0</mark>	
84	State sanitary and health inspectorate	31,5	29,5	
85	National agency for European educational programs and mobility	29,0	29,5	

86 Financial Administration

Police	27,5	29,5	

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87	Management of the the registry books	24,0	29,5	
88	Insurance Supervision Agency	34,0	29,0	
89	Center for professional education and training	28,5	28,5	
90	Inspectorate for use of languages	26,5	28,5	
91	Insurance fund of deposits	32,0	28,5	
92	State utility inspectorate	30,0	28,0	
93	State Inspectorate for transport	32,0	28,0	
94	Secretariat for European Affairs	30,0	27,0	

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95	State Election Commission	27,0	27,0	
96	Directorate for Mandatory Reserves of Oil and Oil Derivatives	34,5	27,0	
97	State Industrial Property Office	25,5	27,0	
98	Enforcement Directorate sanctions	25,0	26,0	
99	Directorate of Technological Industrial Development Zones	16,0	26,0	
100	State Inspectorate for Environment	24,0	<mark>25,0</mark>	
101	Quality Agency of higher education in Republic of North Macedonia	<u>///</u>	25,0	
102	Agency for National security	<mark>15,0</mark>	<mark>25,0</mark>	
103	Operational-technical agency - Skopje	<mark>18,0</mark>	<mark>24,5</mark>	
104	Agency for Emigration of the Northern Republic Macedonia	14,0	24,5	
105	Spatial Planning Agency	24,5	24,0	
106	Health fund insurance of the Republic of North Macedonia	23,5	24,0	
107	State Inspectorate for Local Government	26,0	<mark>23,0</mark>	
108	Administration for Hydrometeorological Affairs	25,5	23,0	
109	Foreclosed Property Management Agency	23,0	21,5	
110	Regulatory Commission for housing	20,0	20,0	
111	Intelligence agency	<mark>15,5</mark>	19,0	VERY LOW LEVEL INSTITUTIONS OF TRANSPARENCY
112	Commission for Prevention and Protection from Discrimination	<u>///</u>	19,0	

Republican Council for	
road traffic safety	14,0 18,0

114	State Commission for decision-making in the second degree in the field of inspection supervision and misdemeanor procedure	12,5	18,0	
115	Agency for youth and sports	21,5	18,0	
116	Bureau of Metrology	///	17,0	
117	Ministry of Political System and Relations between the communities	7,5	<mark>16,0</mark>	
118	Committee to Investigate the aviation accidents and serious incidents	10,0	11,0	
119	Agency for the application of the language spoken by at least 20% of the citizens in the Republic of North Macedonia	31,5	1,0	
120	Quality Agency and accreditation of healthcare facilities	<mark>24,0</mark>	It's the country inactive	

ANNEX 3: Table of holders who do not have web pages

Directorate for Dedicated Production
State Forestry and Hunting Inspectorate
Seed and Planting Authority
Phytosanitary Administration
Pedagogical service
Port Authority-Ohrid
Administration for property and legal affairs
State Foreign Exchange Inspectorate
Service for general and common affairs of the Government
Administration for affirming and promoting the culture of the members of the communities
Administration for the development and promotion of education in the languages of the members of

the communities

ANNEX 4: List of information categories for proactive transparency: State institutions

• FIRST GROUP: ACCESS TO INFORMATION

1. DO YOU HAVE THE LIST OF INFORMATION PUBLISHED ON THE HOME PAGE?

YES NOT LINK

2. DATA FROM HIS COMPETENCES?

YES IN PART NOT LINK

3. THE BASIC DATA FOR CONTACT WITH THE HOLDER OF THE INFORMATION AND THAT:

3.1. NAME, YES NOT LINK 3.2. ADDRESS, YES NOT LINK 3.3. TELEPHONE NUMBER, YES NOT LINK 3.4. FAX NUMBER, YES NOT LINK 3.5. EMAIL ADDRESS YES NOT LINK 3.6. THE WEBSITE ADDRESS 17

4. DETAILS OF THE OFFICER OR PERSON RESPONSIBLE FOR THE HOLDER OF THE INFORMATION

18

4.1 BIOGRAPHY

YES NOT LINK

4.2. CONTACT INFORMATION

YES NOT

LINK

5. THE PRINCIPAL CONTACT DETAILS OF THE OFFICIAL PERSON TO PROVIDE INFORMATION AND THAT:

5.1. FIRST AND SURNAME,

YES NOT

LINK

5.2 EMAIL ADDRESS

YES NOT LINK

5.3. PHONE NUMBER

YES NOT

LINK

6. THE PRINCIPAL CONTACT DATA FOR THE PERSON AUTHORIZED FOR PROTECTED INTERNAL REPORTING AND THAT:

6.1 FIRST AND SURNAME,

YES NOT LINK

6.2. EMAIL ADDRESS

YES NOT LINK

6.3. TELEPHONE NUMBER

7. LIST OF PERSONS EMPLOYED BY THE HOLDER OF THE INFORMATION WITH POSITION:

19

7.1. OFFICIAL EMAIL

YES NOT LINK

7.2. OFFICIAL TELEPHONE

YES NOT LINK

8. CLARIFICATION OF THE WAY OF SUBMITTING THE REQUEST FOR ACCESS TO INFORMATION (WAY OF SUBMITTING ORAL, WRITTEN REQUEST AND ELECTRONIC WAY)?

YES NOT

LINK

- 9. POSTED FORM FOR REQUEST FOR FREE ACCESS TO public information
 - YES NOT

LINK

10. SINCE WHICH YEAR HAVE YOU POSTED THE ANNUAL REPORT ON ACCESS TO public information

2021 year. 2020 year.

• SECOND GROUP: ORGANIZATIONAL STABILITY

11. LAWS RELATING TO INFORMATION HOLDER JURISDICTION

YES NOT LINK

12. THE REGULATIONS WHICH THE HOLDER OF THE INFORMATION ENACTS IN THE FORM OF SUB-LEGAL ACT WITHIN THEIR JURISDICTION:

12.1 RULES FOR INTERNAL ORGANIZATION

YES NOT LINK

12.2 RULES FOR SYSTEMATIZATION OF WORKPLACES

YES

12.3. PROTECTED INTERNAL REPORTING RULE

20

NOT LINK 12.4 REGULATIONS YES NOT LINK 12.5. ORDERS YES

NOT LINK

12.6 INSTRUCTIONS

YES NOT LINK

13. ORGANIZATION CHART FOR INTERNAL ORGANIZATION

YES NOT LINK

• THIRD GROUP: OPERATIONAL

14. STRATEGIC PLANS FOR WORK OF INFORMATION HOLDERS

YES NOT LINK

15. STRATEGIES FOR WORK OF INFORMATION HOLDERS

YES NOT LINK

16. ANNUAL PLANS AND WORK PROGRAMS

YES NOT LINK

17. ARE PROPOSAL DOCUMENTS POSTED ON THE WEBSITE (PROPOSAL OF PROGRAMS, PROGRAMS, VIEWS, OPINIONS, STUDIES)

18. ARE THE WORK REPORTS YOU SUBMIT TO THE SUPERVISORY AUTHORITIES PUBLISHED?

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- YES NOT LINK
- 19. DO YOU PUBLISH STATISTICAL DATA THAT INFLUENCE THE LIFE AND HEALTH OF CITIZENS

YES NOT LINK

20. PUBLISHED ACTS AND MEASURES ARISING FROM THE COMPETENCE AND WORK OF THE INFORMATION HOLDER

YES NOT LINK

- 21. INDICATE LINKS WHERE YOU PUBLISH THE SPECIFIC INFORMATION (VERDICTS) ABOUT YOUR INSTITUTION
 - YES NOT LINK
- 22. ARE THE TYPES OF SERVICES PROVIDED BY THE HOLDERS OF THE INFORMATION DISCLOSED TO YOU

YES NOT LINK

23. TARIFFS FOR FEES FOR ISSUING REAL DEEDS

YES NOT LINK

• FOURTH GROUP: BUDGET, FINANCIAL OPERATION AND PUBLIC

PROCUREMENT 24. ANNUAL BUDGET FOR THE LAST THREE YEARS

2022 yes/no 2021 yes/no 2020 yes/no LINK FOR EACH YEAR

25. FINAL ACCOUNT FOR THE LAST THREE YEARS

2021 yes/no

2020 yes/no 2019 yes/no LINK FOR EACH YEAR

26. QUARTERLY FINANCIAL REPORTS FOR THE CURRENT YEAR

YES NOT LINK

27. HAS YOUR INSTITUTION BEEN AUDITED?

YES NOT

27.1. HAS THE AUDITOR'S REPORT BEEN PUBLISHED

YES NOT LINK

28. IS THE ANNUAL PUBLIC PROCUREMENT PLAN PUBLISHED?

YES NOT LINK

29. ARE PUBLIC PROCUREMENT ADS PUBLISHED

YES NOT LINK

30. WHETHER THE NOTICE OF CONTRACT IS PUBLISHED

YES NOT LINK Prepared by: Oliver Serafimovski

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