



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

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



Skopje, December 2024

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INTRODUCTION:

Information of public importance 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. It enables the public to become familiar with the regulations, decisions, and other actions that are of their interest and affect them.

All institutions' obligations to make their work transparent also apply to state institutions. Central government institutions must protect the freedoms and rights of citizens, as well as 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. 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 this monitoring is to see state institutions' proactive transparency level. 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, the Commissions, the Institutes, the Administrations, the Funds, the 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 Audit the body for revision 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, for the annual reports on their work, whether the applicants for information provide them with accurate, precise and complete data, whether the holders have a designated official person to mediate with the public information, as well as numerous other questions based on which the application of the standards for proactive transparency.

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 authorities' work.

The proactive publication of public information is a legal obligation of all holders, on their initiative and continuously, to publish information about their work and actions, about decision-making, finances, and the services they provide to citizens on their web pages.

The goal of fulfilling the obligation to publish information proactively is reflected in the opportunity for citizens/information seekers 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 concerning the Law on Free Access to public information but also to publish public information on their websites, as and 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 in a timely manner. 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 period of time, may reduce its overall value and interest in it."

Proactively published holders' information 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 holders' work enables citizens to adequately draw conclusions and participate in decision-making on issues of their 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 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/seekers of public information save time, money, and effort. The principle of equality enables the realization of this right, fulfillment of obligations, and participation in political, social, and economic processes, all 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 updated and 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 publish the 22 categories of information on their websites proactively. 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 on 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 thematic monitoring of the web pages of the holders (e.g., 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 is the questionnaire explicitly developed 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 because a large number of the holders do not have such legal obligations. These questions will remain as part of the questionnaire intended for the municipalities.

RESULTS OF THE MONITORING:

The Agency, in accordance with its competencies and in accordance with the Action Plan (2023-2026) for the implementation of the Strategy for the reform of the public administration 2023-2030, in the special objective foreseen is Measure 3.4.1. Improvement of tools for the availability of public information. The Indicator provides the measurability of this measure: "Percentage of state institutions that regularly publish and update documents in accordance with the LFAPI on their websites". For this purpose, in 2024, the Agency monitored the web pages of the holders of state institutions.

The Agency carried out monitoring of 113 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 10 to December 20, 2024. The the Department of Cooperation and Analysis monitored 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 133 state institutions recorded in the List as holders, the websites of 113 holders were monitored. The monitoring did not cover eleven holders, because they do not have their websites. Monitoring was not carried out on the four new ministries: the Ministry of Public Administration, the Ministry of Digital Transformation, the Ministry of Energy, Mining and Mineral Resources, and the Ministry of Sports, for reasons that the first two ministries still use the website of www.mioa.gov.mk it also contains information, that is, documents from the Ministry of Information Society and Administration. The Ministry of Energy, Mining and Mineral Resources has its website, but because this entity is new and its website is filled with information every day, during the monitoring period, it did not have all the information that is in accordance with Article 10 and the monitoring methodology. The Ministry of Sports website is still under construction, and for those reasons, this owner was not subject to this monitoring. The web pages of the National Security Agency, the Operational-Technical Agency, the Intelligence Agency, the Financial Police Authority, and the Financial Intelligence Authority are not monitored due to their specific competencies and the degree of classification of certain acts and documents. The website of one owner (State Inspectorate for Construction and Urbanism) could not be analyzed because while the website was being monitored, it was inactive; that is, it could not be accessed.

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 28 questions arising from Article 10 of the Law. Some contain one or more sub-questions, and the maximum number of possible points is 50. The 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 evaluate their own transparency, that is, to indicate in the questionnaire with a link where the information is published on their web pages.

Within the deadline for submitting the questionnaires to the Agency, the holders submitted 57 questionnaires from a total of 113 monitored web pages.

The websites of the monitored holders are not unified; that is, they differ in design, the structure of the contents, and the type of information they publish. The updating of the websites takes place following the activities of the institutions, whereby they fulfill the role of a primary source of information for citizens and the services they offer.

However, it should be emphasized that this year the monitoring showed that most of the institutions had placed a banner/link titled List of Information, Public Information, and Free Access to Information on their home pages, thus providing easy and quick access to public information, and in this way, the applicants get to the information that is of their interest faster. Still, some holders post public information in sections such as Public Relations, Contact, or other categories, which can confuse users.

In addition, the unsystematized placement of information creates confusion among citizens and significantly complicates access to the necessary data. This indicates the need for web pages to be visually and structurally arranged and functionally designed for easy navigation. The information that citizens need, which is part of the legal obligations for transparency of institutions, must be available quickly, intuitively, and without unnecessary obstacles. Thus, more efficient fulfillment of the right to access to public information will be enabled and citizens' confidence in the transparency of the institutions will be strengthened.

Hence, we appeal to the state institutions to make the information readily 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 following Article 10 of the Law, a gradation was made of the degree of fulfillment of the legal obligation for their active transparency, as follows: holders with many low levels of transparency having between 0 and 12.5 points, with low level between 13 and 25 points, medium level holders between 25.5 and 38 points, and with a high level of transparency from 38.5 to 50 points. In doing so, it was determined that 40 holders have a very good level of transparency to published information, 53 have a good level of transparency, and 19

have an average level. This year, not a single monitored institution was evaluated with a very low level of performance in terms of active transparency.

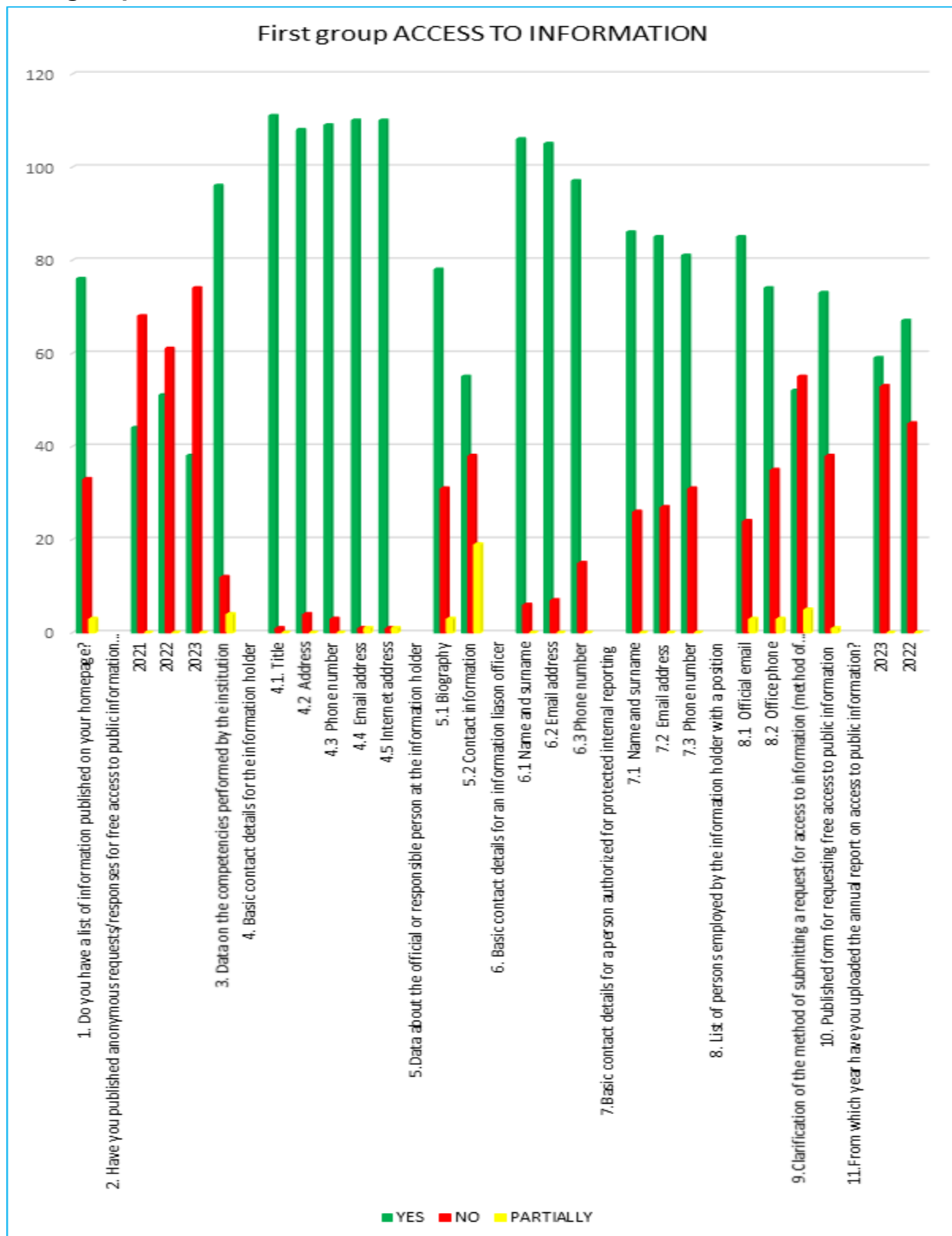
Of the monitored 112 state institutions, out of a possible total of 50 points according to the monitoring methodology, the mean value of proactive transparency of the holders is 34.5 points. It represents an average level of active transparency on the web pages of the holders, or 69% of published public information.

According to the monitoring results, the most transparent are the Ministry of Agriculture, Forestry and Water Management, the Food and Veterinary Agency, and the Ministry of Defense with 49 points, followed by the State Commission for the Prevention of Corruption with 48.5 and the Ministry of Social Policy, Demography and youth with 48 points. This year, the Ministry of Agriculture, Forestry and Water Management has shown the most excellent transparency on its website, that is, on the information published by Article 10 of the Law on FAPI. This year's monitoring showed that the holders of the agencies and commissions have improved their transparency, showing that by proactively publishing information, they can increase their proactivity and accountability for citizens and, in this way, access to public information. will be available to applicants quickly and efficiently.

This year, the lowest proactive transparency was shown by the Administration for Hydrometeorological Affairs with 14 points, the Directorate for Technological Industrial Development Zones with 15.5 points, the Aviation Accident and Serious Incident Investigation Committee with 16.5 points, the Housing Regulatory Commission and the Bureau of metrology with 17 points. In the future, these institutions will have to publish on their websites the information they create and have at their disposal following Article 10 of the Law, thus raising the level of proactive transparency in their operations.

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:

First group: ACCESS TO INFORMATION



Out of a total of 112 monitored holders, 76 have posted a link to the Information List on the homepage, and 33 have no banner/link. As an added value to the access to public

information, the holders should publish anonymized requests/responses for free access on their websites for the last three years (2021, 2022 and 2023). 44 holders practice this practice for 2021, while 68 holders do not publish them, which makes it impossible for the claimants to familiarize themselves with the requests that were submitted to them based on the Law on FAPI. For 2022, 51 holders have published the requested information, and 61 have not moved it on their websites, while for 2023, only 38 holders have moved the requests/answers, and as many as 74 institutions have not published this information. 96 holders have published information about their jurisdiction, while 12 do not post it on their website. Four holders partially publish the data on their jurisdiction. All holders have published the basic contact information with the information holder. The information about the official or the person in charge of the information holder: 78 holders have published their biography on the websites, and 31 have not. Regarding the official contact data, 55 holders have published a contact phone number and official email address, while 38 institutions have not published this data on the website. 19 holders have partially moved the contact information; the web pages are missing either the contact numbers or information about the official email addresses.

From the monitoring, we can conclude that in the free access to information link, 106 holders have published the name and surname of the official for mediating the public information. In contrast, only 6 have not published this obligation. Hence, the applicants of these institutions remain without data and information on whom to submit their request and thereby exercise their right of access to information. 105 holders have published official email addresses, and seven have not published this contact form. 97 holders published the official contact number of the persons for mediating the information, while 15 did not comply with this legal obligation.

Data on persons authorized for protected internal reporting, that is, their first and last names, have been published by 86 holders, and 26 of them have not changed this information. 85 holders have published their official email addresses, and 27 have not fulfilled this obligation. 81 holders published their contact phone numbers, while 31 did not change this information. 85 institutions have published a list of persons employed by the information holder with a position, and 32 do not have data on the official email addresses. The official contact numbers have been published 74, while 35 institutions do not have this data on their websites.

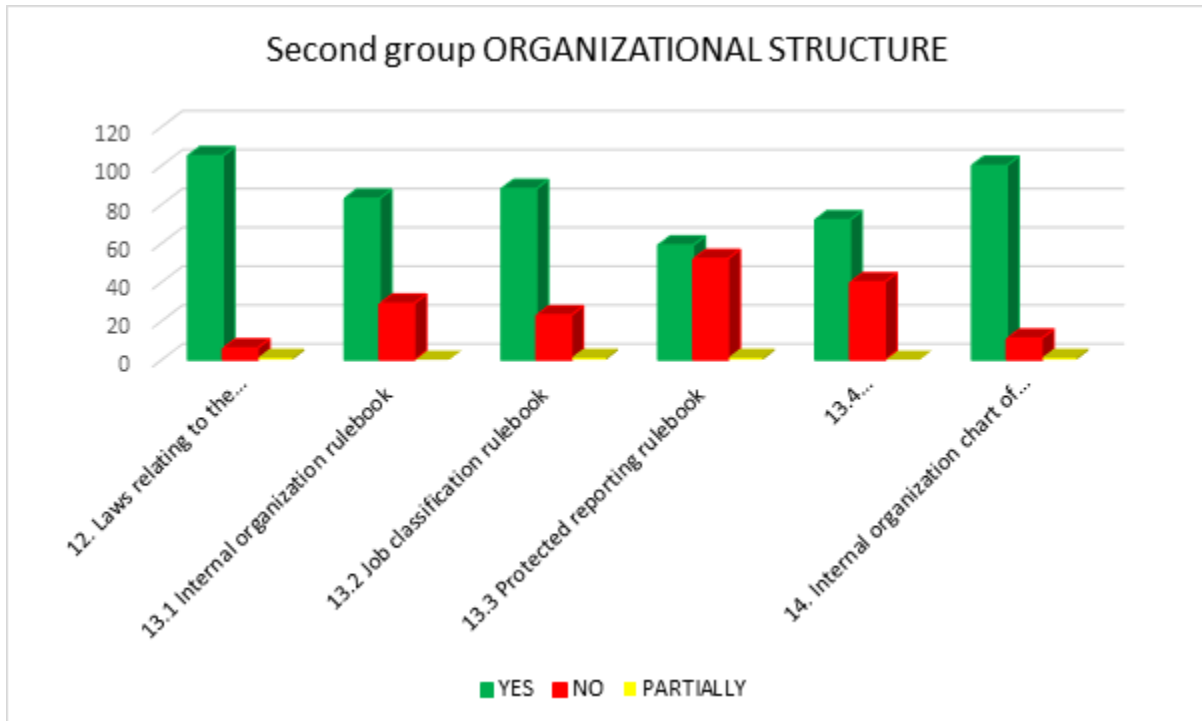
In the section clarifying the method of submitting the request for access to information (the method of submitting oral, written request, and electronically), 52 holders have complied with this legal provision. At the same time, 55 have not clarified access to public information. In part, 5 holders only have a short segment of this clarification, which is not helpful to information seekers.

73 holders have moved the request form for free access to public information, and 38 have not published it on their websites. Most of the monitored institutions still have the

form according to the Law from 2006 and the amendments from 2010/15, which directs the applicants to seek information through a law that is no longer in force. The annual report on access to public information for 2023 has been uploaded on their websites by 59 holders and 67 for 2022, while 53 have not published it for 2023 and 45 for 2022, following Article 36 of LFAPI.

Second group: ORGANIZATIONAL STABILITY

From the second group of questions, ORGANIZATIONAL STABILITY, the monitored 112 holders show very good transparency, and this can be seen from the table:



The laws that apply 105 holders have been transferred to the authority of the holder of information so that the citizens, that is, the applicants, can familiarize themselves with the basic information about the basis on which the holders from the state institutions work. One institution, in the link of the law, has moved only part of the law; that is, it has been published as part of the institution's requirements. Only six holders have not published on their websites the laws relating to their jurisdiction.

In the section in which the holders inform about the Regulations within their jurisdiction, in the form of a by-law, which refers to: the rules for internal organization, 83 holders have published them, and 29 have not moved this document. The rulebook for the systematization of workplaces has been published on the web pages by 88 entities, and in 23 institutions, it cannot be found on the web pages. Only one holder has published this document in the form of a report. 59 institutions have published the rules for

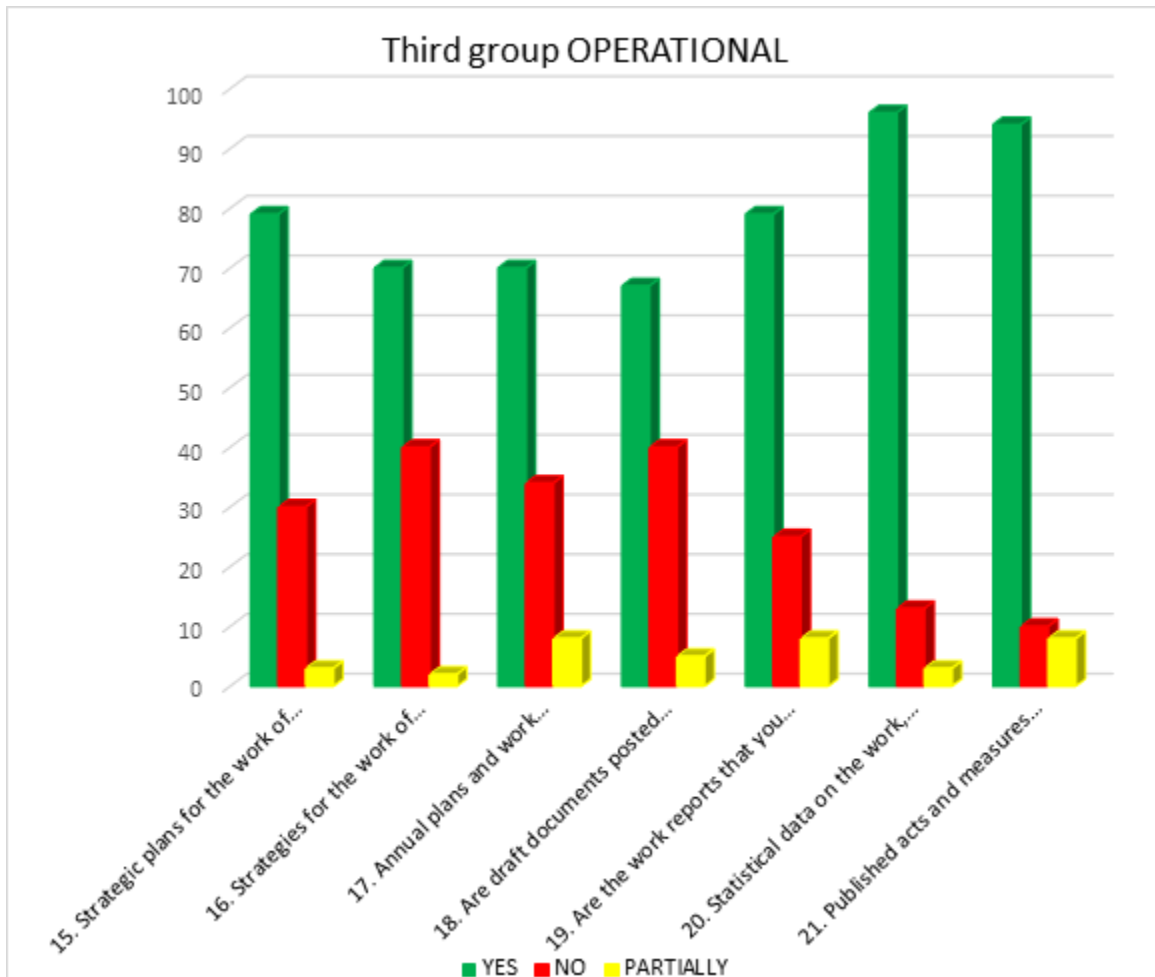
protected internal reporting by monitored holders, and 52 holders have not set it. One owner has published the rulebook as a report.

In the section of decrees, orders, and instructions, 72 holders publish these documents, and 40 holders of information have not published any information related to this type of document.

101 holders from state institutions have published the organogram for internal organization on the web pages, and 11 holders have not published this information.

Third group: OPERATIONAL

In the third OPERATIONAL group of questions, which refers to information from the scope of their work and contains 7 questions, the monitored holders have very good proactive transparency.



Strategic plans have been published by 82 holders, in contrast to 30 holders who have not posted this information on their web pages. Work strategies have been moved to their pages by 72 holders, and 40 of them do not have these documents, or they are still published on the web pages as documents, but they have long been completed and implemented.

70 holders have published annual plans and work programs, while 34 have not published this type of document. Eight holders have partially published this information.

Proposal of documents (proposal of programs, programs, views, opinions, studies) on the web pages have 67 holders, and 40 have not published the documents. Of these, 5 holders have partial information regarding this category of information.

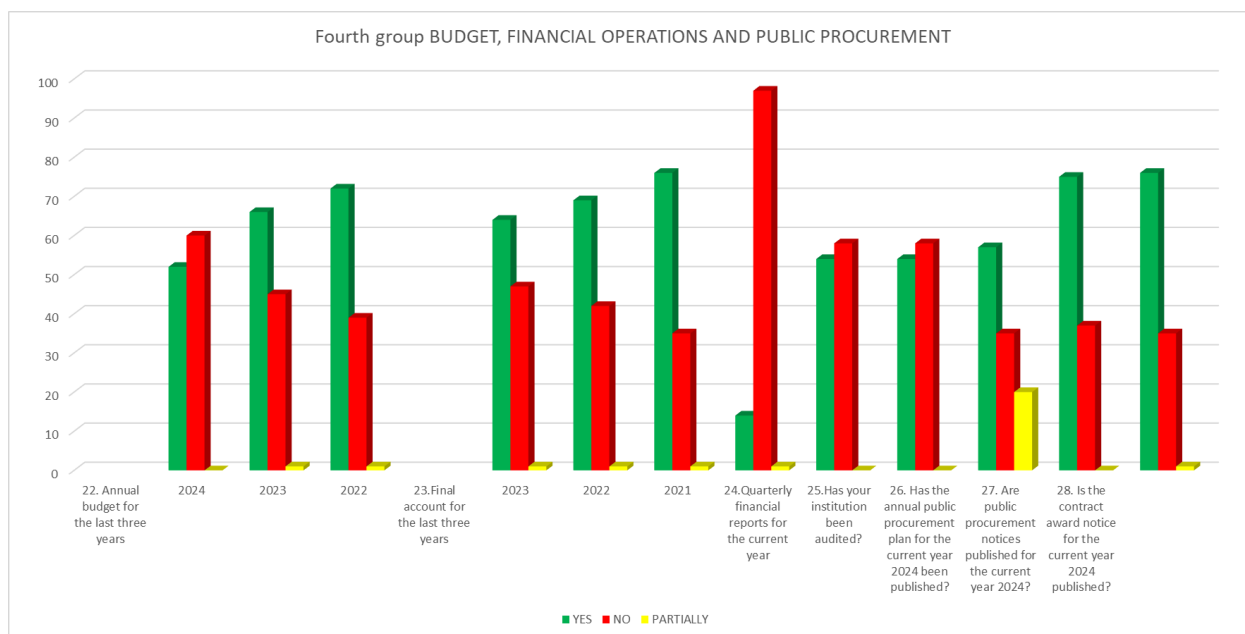
On the web pages, in the section where the holders publish the work reports that they submit to the supervisory authorities, 79 holders have published the reports, and 25 institutions have not posted this information that interests the information seekers. Some of the holders, or eight holders, publish reports as six-monthly or quarterly reports.

Information such as statistical data about the work, as well as other information, monitoring showed that 96 holders have moved this type of information, 13 institutions do not publish it, and three holders partially publish such data on their websites.

The information about the published acts and measures resulting from the competence and work of the holder, the monitoring showed that the holders publish this type of information on their web pages. Through links and access to them, citizens can access information that interests them, and 94 holders publish this information on their websites. On the other hand, at 10 institutions, this information has not been published. Eight holders publish this information partially on their pages.

Fourth group BUDGET, FINANCIAL OPERATION AND PUBLIC PROCUREMENT

According to the monitoring, the holders should improve their proactive transparency mainly in the fourth group of issues: BUDGET, FINANCIAL OPERATION, AND PUBLIC PROCUREMENT, for the reasons that the interest of the citizens is directed mainly with the financial operation of the institutions, and especially in the part of the published budgets, financial reports, audit reports and the publication of information and documents related to public procurement.



The last three years (2022, 2023, and 2024) were monitored in the part that refers to budget transparency. Information about the budget for 2022, 72 holders have published the information and data, and from 40 institutions, this information has not been placed on the pages. For 2023, 66 holders have published their budgets, while 46 have no information regarding this legal obligation. 52 holders have published the budget for 2024, and even 60 have not posted this information on their websites.

Regarding the information related to the publication of the final accounts for the last three years (2021, 2022, and 2023), the institutions show a trend of decreasing proactive transparency. For 2021, 76 holders have published the information, while this data is missing on the pages of 36 holders. For 2022, 69 institutions have moved data, and 43 institutions have not uploaded this information. There is a decrease in the trend of publishing the final accounts for 2023 as well, where 64 holders have fulfilled the legal obligation, and 48 holders do not report the information related to fiscal transparency at all. Only 14 holders have published quarterly financial reports for the current year, and 98 institutions do not publish these reports.

We would like to point out to the monitored holders that they should not publish the budgets in PDF but in Excel format, so they are viewable and usable for citizens and public information seekers. With this way of publishing, the holders will follow the world trend of publishing this type of information in an open format. With that, the information becomes usable for the work of applicants who do analyses and other types of information, which will make the finances more accessible to the citizens. Also, each institution should publish its budget, and not as a complete Republic of North Macedonia Budget, because the same document will be unusable for information seekers interested in obtaining the requested information from a specific institution.

Through the publication of this key financial document, citizens will be informed about the plans of the institutions in which financial resources will be spent and distributed for their work. We would like to emphasize that the publication of this information prevents potential corruption, and the reportable publication reduces the risk and suspicion of possible corrupt acts.

Regarding the information about the audits performed, 54 institutions publish the audit reports, while 58 holders do not publish the reports on the web pages. The audit report is an essential document for the citizens/applicants, through which they can inspect the operation of the institutions and see the remarks made in these reports, as well as see if the institution acted on the findings in them.

The monitoring results showed that also in the section on public procurement, the holders should be much more proactive, that is, publish these documents. So, only 57 institutions published the annual public procurement plan out of 112 institutions, while 35 holders do not have the plan posted on their websites. By not publishing the plan, citizens cannot see what and how the institutions have foreseen that they need for their current operations. The non-disclosure of the annual plan creates suspicion of possible corrupt actions among the holders. By proactively publishing the annual plan for public procurement, institutions show their accountability with public procurement. Partially, 20 holders have published the annual plan as planned purchases on the website <https://e-nabavki.gov.mk/>.

Public procurement notices for 2024 have been published by 75 holders, while 37 institutions have not linked the information on their websites.

76 holders fulfilled the notifications about the concluded contracts, and 35 institutions did not publish the notification. Also, one holder has partially published this information; that is, he has only moved the advertisement (link) as information, but it does not contain the specific information. The publication of information in the public procurement section is one of the basic parameters in the anti-corruption work of the institutions, but also for increasing the citizens' trust in their work.

CONCLUSIONS AND RECOMMENDATIONS:

This year, the level of transparency and accountability in the operation of the state administration bodies was assessed as "good" or with an "average level" of openness. However, there is a trend of stagnation, especially about the proactive publication of public information. The monitoring showed that the majority of institutions show "good" transparency, but to maintain and improve this level, it is necessary to respect the standards of transparency and accountability consistently. Through this approach, institutions will become more accessible to citizens as end users of public information.

For institutions with an "average" level of transparency, a significantly more significant investment is needed to promote their proactivity towards citizens. One of the recommendations is to establish a unified and visible banner on their web pages with the title "**public information**," where all relevant information will be published. This will not only facilitate access for citizens but also reduce the number of submitted requests for free access to information.

Current practice shows that sub-links such as "Free access," "Transparency," or "Public information" are often placed on obscure and hard-to-reach parts of websites. Therefore, institutions should regularly update and structure this information and publish following **Article 10 of the Law on Free Access to Public Information** and their competencies, on the home pages.

Placing a unified banner with a clear structure and regularly updated data will ensure greater availability of information. This will allow citizens quick and straightforward access to relevant data, which is key to strengthening their trust in institutions and their active participation in decision-making processes. In addition, this will enable transparent monitoring of the institutions' activities and services.

The Agency for the Protection of the Right to Free Access to Public Information will continue with continuous training for officials in the institutions, emphasizing active transparency and the consistent application of Article 10 of the Law. These trainings will help officials not only to understand the legal obligations but also to improve the availability of information that is of public interest.

Active transparency plays a key role in:

- Improving citizens' understanding of the functioning of institutions.
- Enabling citizens to use their rights and obligations.
- Encouraging participation in decision-making that affects their lives.
- Easy access to public services offered by institutions.

Only through continuous improvement of transparency and accountability will the institutions strengthen the trust among citizens and increase the quality of services.

Through visibility, proactivity, and constant updating of information, state administration bodies can become an example of effective and accountable management.

ATTACHMENTS:

Annex 1

Table with monitoring results for 2024

R. N O.	INSTITUTION	RESULTS	
1	Ministry of Agriculture, Forestry and Water Management	49	VERY GOOD TRANSPARENCY
1	Food and Veterinary Agency	49	
1	Ministry of Defense	49	
2	State Commission for Prevention of Corruption	48,5	
3	Ministry of Social Policy, Demography and Youth	48	
4	State Administrative Inspectorate	47,5	
5	Agency for audio and audiovisual media services	47	
6	Ministry of Finance	46	
6	Bureau of Public Procurement	46	
7	Regional Development Bureau	45,5	
7	Inspection Council	45,5	
8	MIA	45	
8	Agency for Supervision of Capital Funded Pension Insurance MAPAS	45	
8	State Audit Office	45	
8	Auditing body for the audit of the accessibility aid instrument	45	
9	Republic of North Macedonia Securities Commission	44,5	
10	Agency for financial support of agriculture and rural development	44	
11	Republic of North Macedonia National Bank	43,5	
12	KPVRepublic of North Macedonia	43	
12	Legislation Secretariat	43	
13	Real estate cadastre agency	42,5	
13	State Statistics Office	42,5	

14	State Commission for Public Procurement Complaints	42		
15	State Examination Center	41,5		
16	Agency for the promotion and support of tourism	41		
16	Civil Aviation Agency	41		
16	Directorate for Security of Classified Information	41		
17	Ministry of Justice	40,5		
17	Assembly of Republic of North Macedonia	40,5		
18	Agency for encouraging the development of agriculture - Bitola	40		
18	Agency for foreign investments and export promotion of Republic of North Macedonia	40		
18	Administration for Public Revenues - Skopje	40		
18	Crisis Management Center	40		
19	State Educational Inspectorate	39,5		
20	General Secretariat of the Government	39		
20	Ministry of Health	39		
21	Inspectorate for the use of languages	38,5		
21	Administration Agency	38,5		
21	Republic of North Macedonia employment agency	38,5		
21	Personal Data Protection Agency	38,5		
22	Ministry of Local Self-Government	38		OK TRANSPARENCY
22	Agency for regulation of the railway sector	38		
22	Republic of North Macedonia pension and disability insurance fund	38		
23	Republic of North Macedonia Ombudsman	37,5		
23	Central registry of the Republic of North Macedonia	37,5		
24	State Labor Inspectorate	37		
24	Customs Administration of the Republic of North Macedonia	37		
24	State Industrial Property Office	37		
24	Republic of North Macedonia Energy and Water Services Regulatory Commission	37		
25	Ministry of Environment and Spatial Planning	36,5		
25	Republic of North Macedonia State Archive	36,5		
26	State Inspectorate for Agriculture	36		
26	Ministry of Education and Science	36		
26	State Communal Inspectorate	36		
26	Republic of North Macedonia Entrepreneurship Support Agency	36		
26	Postal Agency	36		
26	Commission on relations with religious communities and religious groups	36		

26	Deposit Insurance Fund	36
27	Republic of North Macedonia Accreditation Institute	35,5
27	President of Republic of North Macedonia	35,5
28	Commission for Prevention and Protection from Discrimination	35
29	Republic of North Macedonia Geological Institute	34,5
29	Republic of North Macedonia State Attorney's Office	34,5
30	State Market Inspectorate	34
30	Ministry of Culture and Tourism	34
30	Center for Vocational Education and Training	34
30	Office for representation of Republic of North Macedonia before the European Court of Human Rights	34
30	National Agency for European Education Programs and Mobility	34
31	Administration for the Protection of Cultural Heritage	33,5
31	Republic of North Macedonia Standardization Institute	33,5
32	Ministry of Economy and Labor	33
32	Bureau of Educational Development	33
33	State Sanitary and Health Inspectorate	32,5
34	State Election Commission	31,5
34	State Commission for decision-making in administrative proceedings and employment proceedings in the second degree	31,5
35	State Inspectorate for Energy, Mining and Minerals	31
35	Ministry of Foreign Affairs and Foreign Trade	31
35	Assessment Bureau	31
36	Commission for the Protection of Competition	30,5
37	Ministry of European Affairs	30
37	Agency for Quality and Accreditation of Healthcare Institutions	30
37	Republic of North Macedonia Film Agency	30
37	Radiation Safety Directorate	30
38	Insurance Supervision Agency	29
39	Protection and Rescue Directorate	28,5
40	Administration for keeping the registry books	27,5
41	State Transport Inspectorate	27
41	Agency for Compulsory Oil Reserves - MAKORA	27
42	Ministry of Transport	26
42	Republic of North Macedonia Emigration Agency	26
43	Agency for the realization of the rights of communities	25,5

43	State Commission for Decision-making in the second degree in the field of inspection supervision and misdemeanor procedure	25,5	AVERAGE TRANSPARENCY
43	Innovation and Technological Development Fund	25,5	
44	Agency for Medicines and Medical Devices	25	
44	Administration for the execution of sanctions	25	
45	Agency for quality in higher education of the Republic of North Macedonia	24,5	
45	Republic of North Macedonia health insurance fund	24,5	
46	Spatial Planning Agency	24	
46	Agency for the application of the language spoken by at least 20% of the citizens in the Republic of North Macedonia	24	
47	State Environmental Inspectorate	23,5	
47	Council for the promotion and supervision of the revision of the Republic of North Macedonia	23,5	
48	Commodity Reserve Agency	23	
49	Ministry of Community Relations	22	
50	State Inspectorate for Local Self-Government	19,5	
50	Electronic Communications Agency	19,5	
51	Foreclosed Property Management Agency	19	
52	Republic Council for Road Traffic Safety	18	
53	Bureau of Metrology	17	
53	Housing Regulatory Commission	17	
54	Aviation Accident and Serious Incident Investigation Committee	16,5	
55	Directorate of Technological Industrial Development Zones	15,5	
56	Administration for Hydrometeorological Affairs	14	
57	State Inspectorate for Construction and Urbanism		the site is inactive during monitoring

Annex 2

Comparative table of monitoring results of state institutions for 2022-2024

R. No.	INSTITUTION	2024	2022	Comparison	%
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1	Ministry of Agriculture, Forestry and Water Management	49	49,5	-0,5	-1,01
2	Food and Veterinary Agency	49	42	7	16,67
3	Ministry of Defense	49	48,5	0,5	1,03
4	State Commission for Prevention of Corruption	48,5	41,5	7	16,87
5	Ministry of Social Policy, Demography and Youth	48	45	3	6,67
6	State Administrative Inspectorate	47,5	44,5	3	6,74
7	Agency for audio and audiovisual media services	47	44	3	6,82
8	Ministry of Finance	46	45,5	0,5	1,10
9	Bureau of Public Procurement	46	40	6	15,00
10	Regional Development Bureau	45,5	40,5	5	12,35
11	Inspection Council	45,5	39,5	6	15,19
12	MIA	45	42	3	7,14
13	Agency for Supervision of Capital Funded Pension Insurance MAPAS	45	39	6	15,38
14	State Audit Office	45	44	1	2,27
15	Auditing body for the audit of the accessibility aid instrument	45	40	5	12,50
16	Republic of North Macedonia Securities Commission	44,5	40,5	4	9,88
17	Agency for financial support of agriculture and rural development	44	42	2	4,76
18	Republic of North Macedonia National Bank	43,5	42	1,5	3,57
19	KPVRepublic of North Macedonia	43	44,5	-1,5	-3,37
20	Legislation Secretariat	43	39	4	10,26
21	Real estate cadastre agency	42,5	45	-2,5	-5,56
22	State Statistics Office	42,5	39	3,5	8,97
23	State Commission for Public Procurement Complaints	42	37,5	4,5	12,00
24	State Examination Center	41,5	39,5	2	5,06
25	Agency for the promotion and support of tourism	41	40	1	2,50
26	Civil Aviation Agency	41	33	8	24,24
27	Directorate for Security of Classified Information	41	43	-2	-4,65
28	Ministry of Justice	40,5	40	0,5	1,25
29	Assembly of Republic of North Macedonia	40,5	38,5	2	5,19

30	Agency for encouraging the development of agriculture - Bitola	40	40	0	0,00
31	Agency for foreign investments and export promotion of Republic of North Macedonia	40	32	8	25,00
32	Administration for Public Revenues - Skopje	40	42,5	-2,5	-5,88
33	Crisis Management Center	40	34	6	17,65
34	State Educational Inspectorate	39,5	34	5,5	16,18
35	General Secretariat of the Government	39	45	-6	-13,33
36	Ministry of Health	39	39,5	-0,5	-1,27
37	Inspectorate for use of languages	38,5	28,5	10	35,09
38	Administration Agency	38,5	38	0,5	1,32
39	Republic of North Macedonia employment agency	38,5	33,5	5	14,93
40	Personal Data Protection Agency	38,5	32	6,5	20,31
41	Ministry of Local Self-Government	38	32,5	5,5	16,92
42	Agency for regulation of the railway sector	38	35	3	8,57
43	Republic of North Macedonia pension and disability insurance fund	38	45,5	-7,5	-16,48
44	Republic of North Macedonia Ombudsman	37,5	/		
45	Central registry of the Republic of North Macedonia	37,5	31	6,5	20,97
46	State Labor Inspectorate	37	30	7	23,33
47	Customs Administration of the Republic of North Macedonia	37	38,5	-1,5	-3,90
48	State Industrial Property Office	37	27	10	37,04
49	Republic of North Macedonia Energy and Water Services Regulatory Commission	37	34	3	8,82
50	Ministry of Environment and Spatial Planning	36,5	44,5	-8	-17,98
51	Republic of North Macedonia State Archive	36,5	40	-3,5	-8,75
52	State Inspectorate for Agriculture	36	32,5	3,5	10,77
53	Ministry of Education and Science	36	39,5	-3,5	-8,86
54	State Communal Inspectorate	36	28	8	28,57
55	Republic of North Macedonia Entrepreneurship Support Agency	36	32	4	12,50
56	Postal Agency	36	36	0	0,00
57	Commission on relations with religious communities and religious groups	36	37	-1	-2,70
58	Deposit Insurance Fund	36	28,5	7,5	26,32

59	Republic of North Macedonia Accreditation Institute	35,5	41	-5,5	-13,4 1
60	President of Republic of North Macedonia	35,5	33	2,5	7,58
61	Commission for Prevention and Protection from Discrimination	35	19	16	84,21
62	Republic of North Macedonia Geological Institute	34,5	34,5	0	0,00
63	Republic of North Macedonia State Attorney's Office	34,5	30,5	4	13,11
64	State Market Inspectorate	34	45	-11	-24,4 4
65	Ministry of Culture and Tourism	34	32	2	6,25
66	Center for Vocational Education and Training	34	28,5	5,5	19,30
67	Office for representation of Republic of North Macedonia before the European Court of Human Rights	34	32	2	6,25
68	National Agency for European Education Programs and Mobility	34	29,5	4,5	15,25
69	Administration for the Protection of Cultural Heritage	33,5	31	2,5	8,06
70	Republic of North Macedonia Standardization Institute	33,5	39	-5,5	-14,1 0
71	Ministry of Economy and Labor	33	43	-10	-23,2 6
72	Bureau of Educational Development	33	34	-1	-2,94
73	State Sanitary and Health Inspectorate	32,5	29,5	3	10,17
74	State Election Commission	31,5	27	4,5	16,67
75	State Commission for decision-making in administrative proceedings and employment proceedings in the second degree	31,5	34	-2,5	-7,35
76	State Inspectorate for Energy, Mining and Minerals	31	32	-1	-3,13
77	Ministry of Foreign Affairs and Foreign Trade	31	36,5	-5,5	-15,0 7
78	Assessment Bureau	31	34	-3	-8,82
79	Commission for the Protection of Competition	30,5	35,5	-5	-14,0 8
80	Ministry of European Affairs	30	27	3	11,11
81	Agency for Quality and Accreditation of Healthcare Institutions	30	/		

82	Republic of North Macedonia Film Agency	30	34	-4	-11,7 6
83	Radiation Safety Directorate	30	36	-6	-16,6 7
84	Insurance Supervision Agency	29	29	0	0,00
85	Protection and Rescue Directorate	28,5	35,5	-7	-19,7 2
86	Administration for keeping the registry books	27,5	29,5	-2	-6,78
87	State Transport Inspectorate	27	28	-1	-3,57
88	Agency for Compulsory Oil Reserves - MAKORA	27	27	0	0,00
89	Ministry of Transport	26	36,5	-10,5	-28,7 7
90	Republic of North Macedonia Emigration Agency	26	24,5	1,5	6,12
91	Agency for the realization of the rights of communities	25,5	31	-5,5	-17,7 4
92	State Commission for decision-making in the second degree in the field of inspection supervision and misdemeanor procedure	25,5	18	7,5	41,67
93	Innovation and Technological Development Fund	25,5	33,5	-8	-23,8 8
94	Agency for Medicines and Medical Devices	25	30,5	-5,5	-18,0 3
95	Administration for the execution of sanctions	25	26	-1	-3,85
96	Agency for quality in higher education of Republic of North Macedonia	24,5	25	-0,5	-2,00
97	Republic of North Macedonia health insurance fund	24,5	24	0,5	2,08
98	Spatial Planning Agency	24	24	0	0,00
99	Agency for the application of the language spoken by at least 20% of the citizens in the Republic of North Macedonia	24	1	23	2300, 00
100	State Environmental Inspectorate	23,5	25	-1,5	-6,00
101	Council for the promotion and supervision of the revision of the Republic of North Macedonia	23,5	30	-6,5	-21,6 7
102	Commodity Reserve Agency	23	31	-8	-25,8 1
103	Ministry of Community Relations	22	16	6	37,50

104	State Inspectorate for Local Self-Government	19,5	23	-3,5	-15,2 2
105	Electronic Communications Agency	19,5	33	-13,5	-40,9 1
106	Foreclosed Property Management Agency	19	21,5	-2,5	-11,6 3
107	Republic Council for Road Traffic Safety	18	18	0	0,00
108	Bureau of Metrology	17	17	0	0,00
109	Housing Regulatory Commission	17	20	-3	-15,0 0
110	Aviation Accident and Serious Incident Investigation Committee	16,5	11	5,5	50,00
111	Directorate of Technological Industrial Development Zones	15,5	26	-10,5	-40,3 8
112	Administration for Hydrometeorological Affairs	14	23	-9	-39,1 3
113	State Inspectorate for Construction and Urbanism	/	38		

*The comparison table for three holders does not show data for comparison: the Ombudsman was not part of the state monitoring bodies in 2022, the Agency for Quality and Accreditation of Healthcare Institutions, which had an inactive website during the 2022 monitoring, and the State Inspectorate for construction and urbanism with an inactive website for monitoring in 2024.

Annex 3

Table of information 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 joint 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

First group ACCESS TO INFORMATION
1. Have you published the list of information on the home page?
2. Have you published anonymized requests/responses for free access to public information on the website?
2021
2022
2023
3. Data on the competencies performed by the institution
4. Basic data for contact with the holder of the information
4.1. name
4.2 addresses
4.3 telephone number
4.4 email address
4.5 addresses on the Internet page

5. Data on the official or responsible person with the holder of the information
5.1 biography
5.2 contact details
6. Basic data for contact with an official person for mediating the information
6.1 name and surname
6.2 email address
6.3 telephone number
7. Basic data for contact with a person authorized for protected internal reporting
7.1 name and surname
7.2 email address
7.3 telephone number
8. List of persons employed by the holder of the information by position
8.1 official email
8.2 business phone
9. Clarification of the method of submitting the request for access to information (method of submitting an oral, written request, and electronically).
10. A form for a request for free access to public information has been set up
11. Since when have you uploaded the annual report on access to public information?
2023
2022
Second group ORGANIZATIONAL STABILITY
12. Laws relating to the jurisdiction of the institution
13. Regulations that the holder of the information adopts within their competence in the form of a by-law

13.1 internal organization rules
13.2 rulebook for the systematization of jobs
13.3 rules for protected reporting
13.4 decrees / orders / instructions
14. Organogram for internal organization of the institution
Third group OPERATIVE
15. Strategic plans for the work of information holders
16. Strategies for the work of information holders
17. Annual plans and work programs
18. Are proposals for documents posted on the website (proposals for programs, programs, views, opinions, studies)
19. Have the work reports you submit to the competent authorities been published?
20. Statistical data about the work, as well as other information
21. Published acts and measures resulting from the competence and work of the holder of information
Fourth group BUDGET, FINANCIAL OPERATION AND PUBLIC PROCUREMENT
22. Annual budget for the last three years
2024
2023
2022
23. Final account for the last three years
2023

2022
2021
24. Quarterly financial reports for the current year
25. Has your institution been audited?
25.1 Is the audit report published?
26. Has the annual public procurement plan for 2024 been published?
27. Are public procurement announcements for the current year 2024 published?
28. Is the notice of concluded contract for the current year 2024 published