

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

ANNUAL REPORT 2024



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1. SUMMARY

The actuality of the digital age undoubtedly, day by day, is becoming an indispensable part of modern communication and information exchange. The proactive publication of information is of exceptional importance for the functioning of all modern, democratic institutions. With the increasing use of digital technologies, institutions - holders of information increasingly publish and manage public information through their websites. It brings certain advantages such as: **Greater availability** - citizens can easily access data without physical request, **Speed and efficiency** - digital tools enable a faster process of information processing and distribution, and **Automation of requests** - some systems offer automatic responses to information requests, reducing red tape. However, the increased digital openness also opens up new challenges regarding the accuracy and updating of data. In this direction, the protection of the public interest should be considered, bearing in mind that access to public information is a fundamental democratic right of citizens, incorporated in the Constitution of the Republic of North Macedonia. In addition, access to information serves as a key mechanism for upholding the rule of law and promoting good governance at all levels of public administration, both central and local.

Free access to public information functions as a preventive tool in the combat against corruption by strengthening institutional transparency and accountability. This dual effect strengthens the openness of public institutions while at the same time limiting the possibilities of abuse of public powers, ensuring legality and procedural regularity. In this context, transparency and accountability of public authorities are essential for the proper functioning of a democratic society and the rule of law.

The implementation of the right of access to public information facilitates the realization of the public interest, enables supervision over the activities of the public sector and contributes to a more informed citizenry, to decision-making and the implementation of policies. It also ensures public control over budget expenditures and strengthens citizens' trust in public institutions.

The Agency for the Protection of the Right to Free Access to public information (hereinafter: "the Agency") presents with this Report its activities that it implemented and realized during the reporting year 2024, before the Assembly of the Republic of North Macedonia.

Based on the Law on Free Access to Public Information (hereinafter "LFAPI"), the Agency is a state authority responsible for protecting the right to free access to public information. As an independent and independent state body, the Agency works under the leadership of a director and his deputy, elected by the Assembly of the Republic of North Macedonia.

As a secondary administrative body, the Agency processed 354 appeal cases in the reporting year 2024, adhering to the legally established deadlines. In addition, the Agency engaged in various legal and administrative activities under its jurisdiction, ensuring timely resolution of all cases during the reporting period.

During 2024, the Agency continued its cooperation with civil society organizations, actively participating in projects aimed at promoting and advancing the right to free access to public information.

In the reporting year 2024, the Agency carried out important activities in the field of international cooperation, contributing to the advancement of the right of access to public information. The agency took part in several regional and international forums dedicated to this topic, including the traditional regional conference "Initiative 2020", which is a platform for cooperation between competent related institutions from Bosnia and Herzegovina, Montenegro, Croatia, Slovenia, Kosovo, North Macedonia and Serbia.

In addition, during 2024, the Agency actively participated in the ICIC International Conference of Information Commissioners (ICIC), thus making an important contribution to strengthening bilateral and multilateral partnerships. Cooperation with related institutions from the region, Europe and the world are essential for the exchange of experiences, the implementation of best practices and the further development of mechanisms for the protection of the right of access to public information, with the ultimate goal of promoting transparency and protecting the public interest.

During the reporting year 2024, the Agency initiated a proposal to the Ministry of Justice to start a procedure for ratification of the Convention of the Council of Europe on access to official documents, the so-called Tromsø Convention. As a result of this, after the procedure carried out, in which the Agency actively participated and helped, on August 13, 2024, the Assembly of the Republic of North Macedonia ratified the Convention, with the Law on Ratification of the Convention of the Council of Europe on Access to Official Documents, signed by the Republic of Macedonia on June 18, 2009 (Official Gazette of the Republic of North Macedonia number 170/2024).

As a result of the ratification of the Convention of the Council of Europe on access to official documents, at the invitation of the Ministry of Justice, the Agency took an active part in a working group for amendments to the Law on Free Access to Public Information. From the previous practice and application of the Law, the Agency determined the need to amend and supplement certain articles in the Law, for which reason it sent an initiative to the Ministry of Justice to establish and start work a working group for amendments and additions to the Law, as well as compliance with the Convention of the Council of Europe on access to official documents, with the aim of improving access to public information in the Republic of North Macedonia.

Within its regular activities, the Agency, as the only state authority in the field of public interest and free access to public information, continuously successfully conducts trainings for public information officials. During 2024, 9 free trainings were organized in the premises of the Agency, divided into two cycles: the first in the period from January to June, and the second from September to December. These trainings were aimed at improving proactive and reactive transparency, as well as at trainings for the use of the e-portal for information holders, which enables digital processing of requests for access to information. However, it must be emphasized that a significant part of the institutions and officials who were invited to the training, despite the importance of this type of education for the efficient management of public information requests, did not show interest in participating.

The assessment of the Agency, based on the files from the first-level administrative procedure, indicates that a significant number of currently registered public information brokers, in 1,465 institutions, do not have sufficient knowledge of the Law on Free Access to Public Information. In addition, frequent personnel changes in institutions lead to the replacement of already trained officials with persons who have not undergone adequate training, which emphasizes the need for continuous professional development. In that context, it is essential to conduct additional trainings and provide advisory support in order to strengthen the institutional capacities at the central and local level.

The reporting period provided additional insight into the key statistical data for the Agency's role as a secondary administrative authority. The analysis of the submitted appeals in 2024 shows that exercising the right to free access to public information was mostly used by natural persons, who submitted a total of 194 appeals (54.80%). They are followed by appeals submitted by non-governmental organizations, associations and foundations, in a total number of 144 cases, as well as 16 appeals submitted by legal entities.

The content of the submitted appeals indicates that citizens often refer to the Law on Free Access to Public Information (LFAPI) in cases where the institutions do not provide the requested information, on which depends the exercise of their rights and interests arising from the parent competences of the institutions - holders of information. In a significant number of cases, the institutions did not comply with the basic legal provisions that regulate their operations, which resulted in the silence of the administration and failure to act on requests for information within the legally established deadlines (20 days for standard requests and 30 days for extensive requests). This administrative inertia is the most common reason for filed appeals, covering a total of 245 cases or 69.2% of all appeals.

Furthermore, a certain number of appeal procedures were initiated by lawyers and law firms that sought to provide evidence for the needs of administrative or judicial proceedings, without respecting the prescribed procedural rules for gathering evidence in accordance with the provisions of the Law on Advocacy and other material laws. This practice represents an inappropriate application of the right to free access to public information, which further emphasizes the need to promote the difference between this right and standard legal mechanisms for obtaining evidence in judicial and administrative processes.

Considering the continued presence of administrative silence, the Agency continues to highlight the necessity of proactive transparency and prompt action by the institutions following requests for access to public information. In that direction, it took continuous measures to promote the proactive publication of information by the information holders and introduced additional by-laws in order to strengthen compliance with legal obligations.

As the only state authority responsible for ensuring the right to free access to public information, the Agency is an example and encourages all institutions, both at the central and local level, to raise this right to a higher social priority level. This implies strengthening proactive transparency within their institutional structures and strategic policies.

To this end, it is necessary to continue efforts to raise awareness, especially among management structures in institutions, in order to build a culture of self-initiated (proactive) publication of public information, without waiting for requests to be submitted by applicants. This is of particular importance, taking into account that LFAPI is a key anti-corruption tool, the consistent application of which plays an important role in the combat against corruption and strengthening institutional integrity.

In accordance with its commitment to professionalism in the field of access to public information, the Agency remains committed to identifying new challenges by proposing new and improved legal solutions. In the future, it will continue to encourage communication between requesters and holders of information, in order to ensure the continuous improvement of access to public information as a fundamental democratic right.

2. INTRODUCTION

The protection and promotion of the constitutionally guaranteed right to free access to public information is the main goal of the Agency. The Agency realizes this goal through timely, efficient and independent implementation of the appeal procedure, as well as through continuous information to the public and education of the applicants and holders of information. Within the framework of the realization of its strategic mission, the Annual Report for 2024 covers the operation of the Agency for the Protection of the Right to Free Access to Public Information in the context of its legal competences. For a clearer and more detailed overview, the key parameters are presented below:

During the reporting year 2024, a total of 354 cases/appeals were submitted to the Agency, submitted against administrative and real acts of the first instance authorities or as a result of the so-called silence of the administration. Of these, 245 appeals or 69.2% refer to non-action of the holders of information following requests for access to public information, which indicates that the institute "silence of the administration" is still present in a high percentage even in the reporting year of 2024. This situation unequivocally indicates the lack of awareness and understanding, especially in part of the management structures of the institutions - holders of information, about the essence and meaning of the right to free access to public information.

Hence, it can be concluded that it is necessary for the Agency to continue with its commitment, active engagement and strengthened synergy between administrative officers and management structures, with the aim of reducing, and in perspective, completely eliminating the silence of the administration.

As for the number of annual reports submitted by the holders of information regarding the application of the right of access to information, it can be concluded that

out of a total of 1,465 holders of information, an annual report on the application of the Law was submitted to the Agency by 1,414 holders, i.e. **96,52%**, while 51 institutions or 3,48 % of the information holders did not fulfill this legal obligation. The continuous trend of increasing the number of submitted annual reports from year to year is obvious.

This positive outcome is the result of the systematic application of the legal mechanisms, whereby the Agency, through its authorized person, regularly initiates misdemeanor proceedings before the Misdemeanor Commission against officials for mediating public information, who have not fulfilled the obligation to submit an annual report on time.

In the context of the reporting year 2024, it is necessary to point out that the Agency was not able to fully exercise its legal powers due to the limited budget funds at its disposal. In response to these challenges, the Agency made significant efforts to advance the fulfillment of the legal obligation to educate information holders, through continuing cooperation with existing partners, as well as establishing new contacts and cooperation with domestic and international actors in the field of access to public information. Despite the limited resources, the realization of these activities was at an enviable level.

In the context of the above, it is justified to point out that for a more efficient and successful realization of its significant role within the framework of legal competences, and in accordance with European values and best practices, the Agency has an urgent need for quality personnel reinforcement, and significantly increased budget support. This is of crucial importance, considering that the Agency's activities as a protector of the right to free access to public information represent an essential element in the combat against corruption, the strengthening of institutional integrity and the protection of the public interest.

Only through joint engagement and consistent implementation of the principles of transparency, accountability, openness, inclusiveness, integrity and proactive publication of public information by all public institutions at the central and local level, can one contribute to the construction of a better and fairer society for all citizens in the Republic of North Macedonia.

3. STATUS, MANAGEMENT, COMPETENCE AND ORGANIZATIONAL STRUCTURE

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

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

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

In accordance with the Rules for internal organization and the Rules for the systematization of workplaces, which acts are applied from 13.10.2020, and based on the type, scope and degree of complexity of the works and tasks performed by the

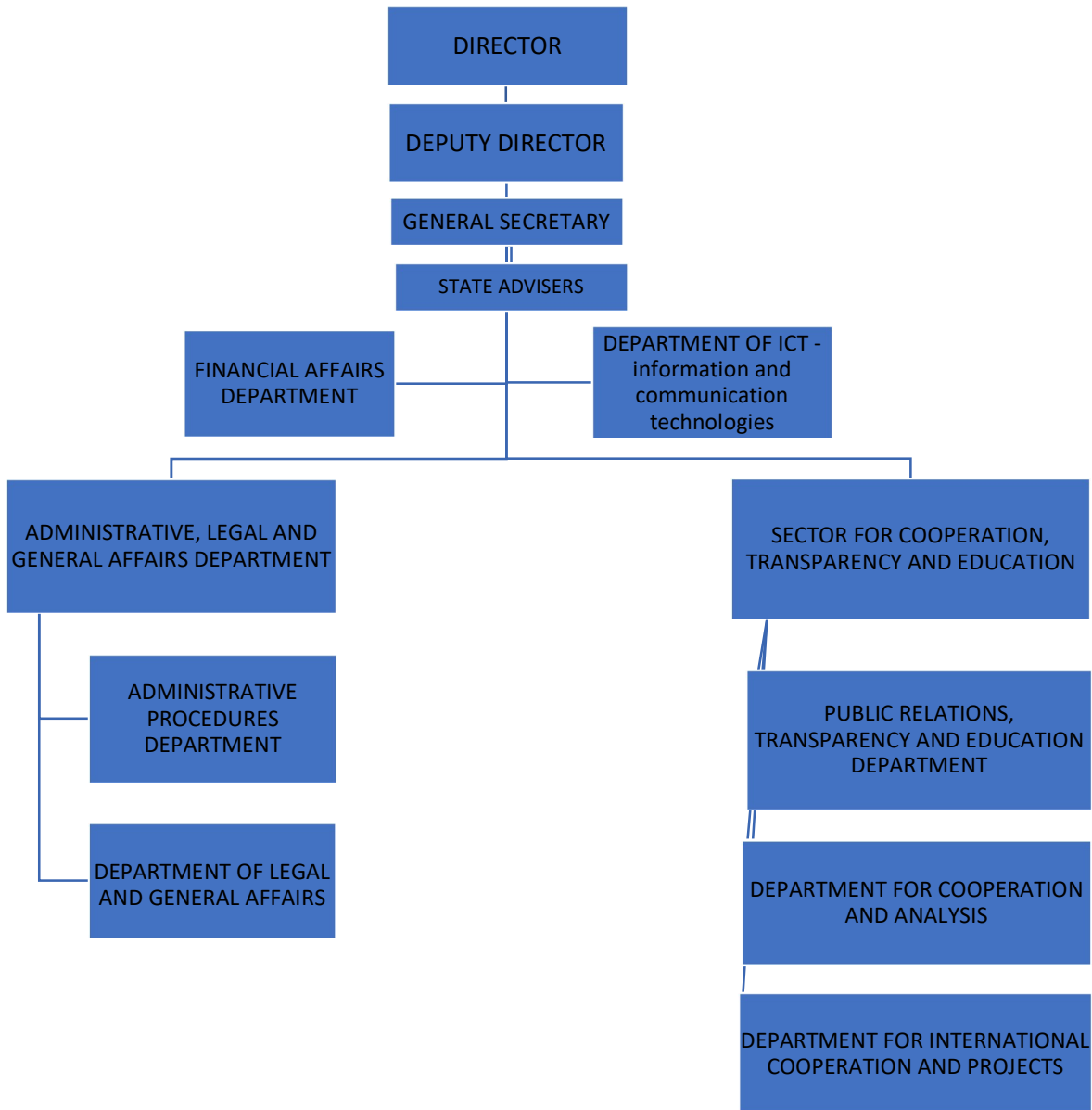
Agency, the interconnection and kinship of those works and tasks and other conditions necessary for their performance, the following organizational units are formed in the Agency:

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

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

ORGANOGRAM

of the Agency for the Protection of the Right to Free Access to Public Information



The systematization act determined and described jobs for a total of 50 executors, distributed across nine organizational units, of which a total of 17 jobs were filled on 12/31/2024, of which all employees are permanent employees. Of the total number of employees, 16 have a higher education, and one (1) has a secondary education.

The qualification structure of the employees with higher education is as follows: seven (7) are law graduates of which three (3) have passed the bar exam, one (1) is a master of law in the field of criminal law, five (5) are economists of which one (1) is a master in organizational sciences-human resource management, one (1) is a graduate economist in the field of management, one (1) is a graduate manager in human resources, and one (1) is a graduate economist in marketing and advertising, three (3) are from the Faculty of Philology of which one (1) is a master of philological sciences in the field of language science-Albanian language, and one (1) English language and literature and one (1) is a mechanical engineer graduate.

There is one (1) employee with secondary education, who is an economic technician.

According to categories of administrative officers, the situation on 31.12.2024 was as follows:

- General Secretary: 1 (one);
- State Adviser: 1 (one);
- Head of Department: 1 (one);
- Assistant Head of Department: 1 (one);
- Head of Department Unit: 2 (two);
- Adviser: 6 (six);
- Junior Associate: 3 (three);
- Independent Referee: 1 (one);
- Senior Referee: 1 (one).

The nationality of the employees is as follows: ten (10) are of Macedonian nationality (58.8%), five (5) are of Albanian nationality (29.4%), one (1) is of Aromanian nationality (5.88%) and one (1) is of Roma nationality (5.88%).

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

	Systematized jobs	Positions filled	Percentage of total number of employees	Higher education	Secondary education
Macedonian		10	58,8%	10	0
Albanians		5	29,4%	5	/
Aromanians		1	5,88%	1	/
Roma		1	5,88%	/	1
In total	50	17	100%	15	1

The total number of employees in the Agency by nationality and gender is as follows: ten (10) are of Macedonian nationality, of which four (4) are male and six (6) are female, five (5) are of Albanian nationality, of which two (2) are male and three (3) are female, one (1) of Aromanian nationality is female and one (1) is of Roma nationality is male. Of the total number of employees, seven (7) employees are male, and ten (10) are female, aged between thirty-two (32) and sixty-two (62).

In accordance with the Agency's Annual Employment Plan for 2023, to which financial consent was received from the competent institution, during this reporting year a procedure was carried out through the publication of a public announcement for the employment of one (1) executor, which procedure ended with the employment and filling of the following position:

1. Junior Associate for Project Work, Department for International Cooperation and Projects, Department for Cooperation, Transparency and Education - one (1) executor.

During this reporting period, the employment of two (2) executors was terminated, and the employment of one (1) executor of Roma nationality with the title of Independent Referee-Archivist, Department for Legal and General Affairs, Sector for Administrative-Legal and General Affairs was terminated at their request on 31.08.2024 year, and the other executor of Aromanian nationality from the Department for Financial Affairs with the title of Advisor for Budget Control, had their employment

terminated as of October 18, 2024. Namely, the employee was permanently taken over by the State Audit Office.

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

4.1. DECISION ON APPEALS

The Agency for the Protection of the Right to Free Access to Public Information has been implementing and guaranteeing the realization of the constitutionally and legally guaranteed right of citizens to obtain public information for 18 years, primarily as a secondary authority in the procedure for requests for access to public information.

Namely, the Agency conducts administrative procedures and decides on appeals from information requesters filed against information holders, due to their non-transparency, due to failure to act in accordance with the LFAPI, or they passed administrative or real acts by which they refused or rejected the requests for access to public information submitted by the requesters.

The right to file an appeal is the right of all natural and legal persons who have submitted an oral, written or electronic request for access to public information to a public authority, at the central or local level, that is, to any of the holders of information, who appear in the procedure as first-level officers who act on requests from information requesters.

The Agency, as a secondary authority in the procedure, electronically forwards the received appeals from the dissatisfied applicants to the holders of information for adjudication, with a request that within seven (7) days they will adjudicate on the appeals and submit to the Agency an answer to them, as well as attach all relevant documents, in order for the Agency to act immediately and make an appropriate decision within the legally stipulated period of 15 days.

When acting in accordance with the provisions of the LFAPI and the Law on the General Administrative Procedure, the Agency initially submits to the holders of information who have not acted on the requests for access to public information orders for action in accordance with the LFAPI within 15 days from the receipt of the decision, with the obligation to inform the Agency about their action within that period. To

those holders of information who tried to act, but did not do so in accordance with the provisions of the Law, i.e. responded or notified, but did not pass an administrative act (decision) with an attached response to the requests, the Agency delivers decisions for re-action on their part, with instructions on how to do the same.

In the event that the stated initial decisions of the Agency do not show a result in the direction of achieving the goal of LFAPI - publicity and openness in the operations of the holders of information and providing an appropriate response to the requesters of information, the Agency, acting on re-submitted appeals, prepares and delivers meritorious decisions to the holders of information, with which the majority of them undertake to provide the requested information to the requesters.

In addition, the Agency provides you with data on its actions during 2024:

Thus, in the reporting year 2024, the Agency received a total of 354 appeals. Compared to the previous year, the number of submitted appeals has decreased. Information requesters submitted appeals throughout the year, at the following rate:

In January, 19 appeals were submitted to the Agency, in February-22, March-41, April-52, May-29, June-31, July-20, August-19, September-14, October-57, November-24 and in December-26.

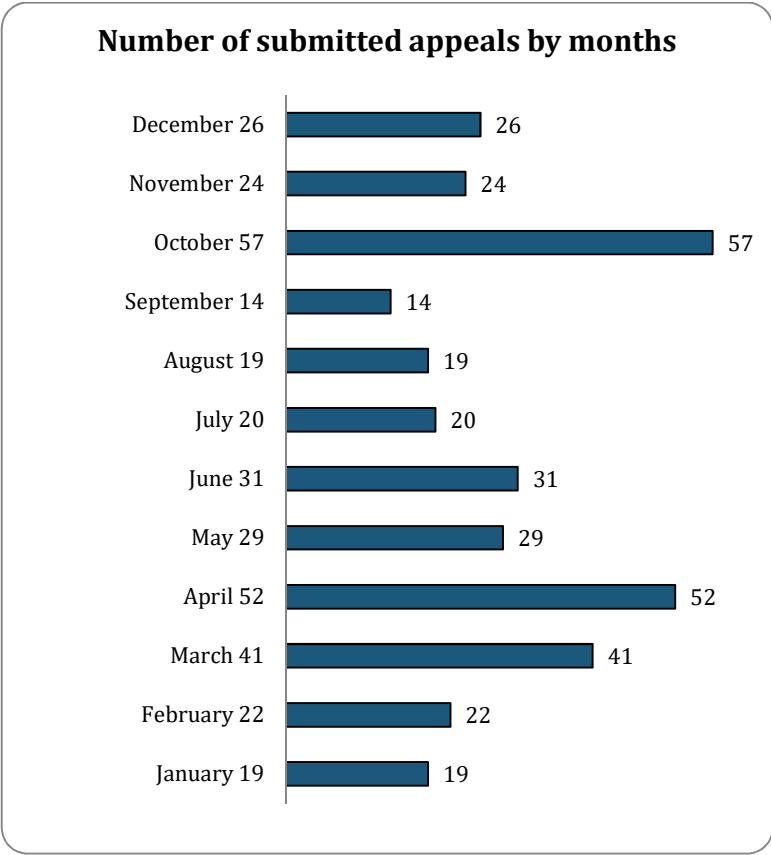


Chart 1: Number of submitted appeals by month

When submitting the above-mentioned appeals to the Agency in this reporting year as well as in the last, for the second time since its existence (including the time of its legal predecessor - the Commission), natural persons lead with a total of 194 appeals, followed by citizens' associations and foundations with 144 and other legal entities with 16 appeals.

Starting from the obligation and responsibility of the state structures and public officials to carry out the integration of the gender perspective and to achieve the goals of the gender equality policies, from this reporting year, the Agency introduces gender-sensitive accountability in its operations, and from that aspect reports on 144 appeals filed by women and 210 appeals filed by men.

4.2. SOLVED CASES AND THEIR STRUCTURE

In the reporting year 2024, the Agency acted on all 354 established cases and made decisions on them.

Deciding on the appeals received in 2024, the Agency made a total of 320 final decisions and 59 meritorious decisions. The figures presented are a sum resulting from the Agency's action in accordance with the provisions of the Law on General Administrative Procedure, according to which, in addition to the initial decisions that order the first-level authorities to act in accordance with the LFAPI, or they were returned for re-action, but due to non-action according to the Agency's final decision, and after a repeated appeal was submitted, meritorious decisions were also made. The holders of information, such as the first-instance authorities, usually acted according to the adopted meritorious decision. Holders who did not act on the decisions of the Agency reached for legal protection before the Administrative Court, filing lawsuits demanding the annulment of the Agency's decisions, but their number has significantly decreased for this reporting year. The Agency initiated misdemeanor proceedings against the officials who did not act on its decisions, at the initiative of the claimants-appellants or on official duty.

The operation of the Agency in conducting administrative procedures during 2024 is statistically shown through the following data:

- 121 decision by which the Appeal is respected and the first-instance authority is ordered to act on the request of the applicant in accordance with the LFAPI,
- 27 decisions by which the Appeal is respected and obliges the holder to provide the requested information,
- 34 decisions rejecting the Appeal as unfounded,
- 10 decisions by which the Appeal is rejected as untimely,
- 19 decisions rejecting the Appeal as inadmissible,
- 89 decisions by which the Appeal is respected and the case is returned to the first-instance authority, and
- 79 decisions that stop the Appeal procedure due to its withdrawal by the applicant, due to the answer received by the holder, during the second instance procedure.

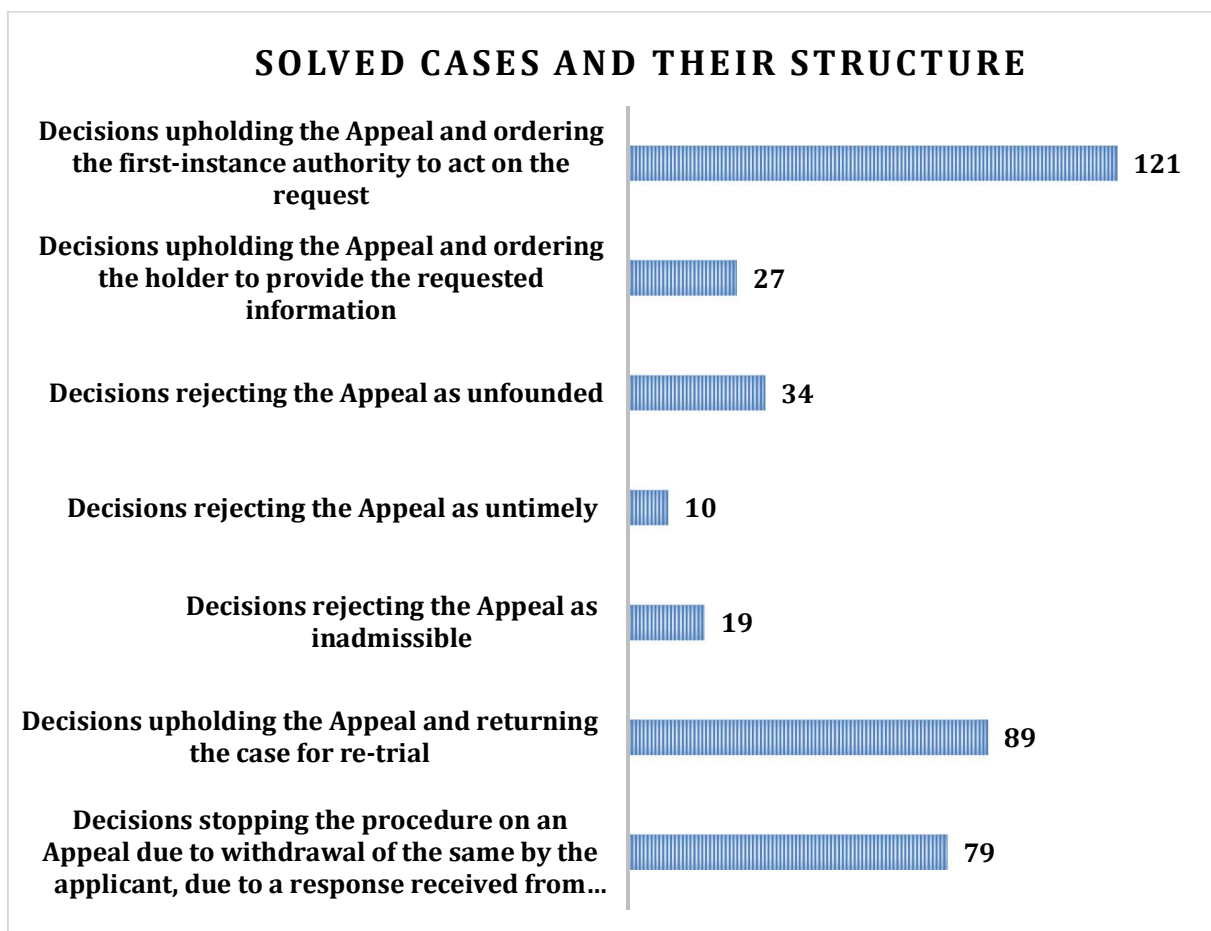


Chart 2: Solved cases and their structure

4.3. APPEALS FILED AGAINST INFORMATION HOLDERS

The analysis of the filed appeals shows that they are mostly filed against:

- 140 state institutions at the central level,
- 93 municipalities,
- 43 public enterprises and public institutions,
- 25 judicial power,
- 25 legal and natural persons exercising public powers,
- 20 educational institutions
- 7 health institutions and
- 1 political party

Compared to the last reporting year, a tendency to decrease the number of appeals against state institutions and against public enterprises and public

institutions can be observed, however, the number of appeals filed against holders of legal and natural persons exercising public powers has increased.

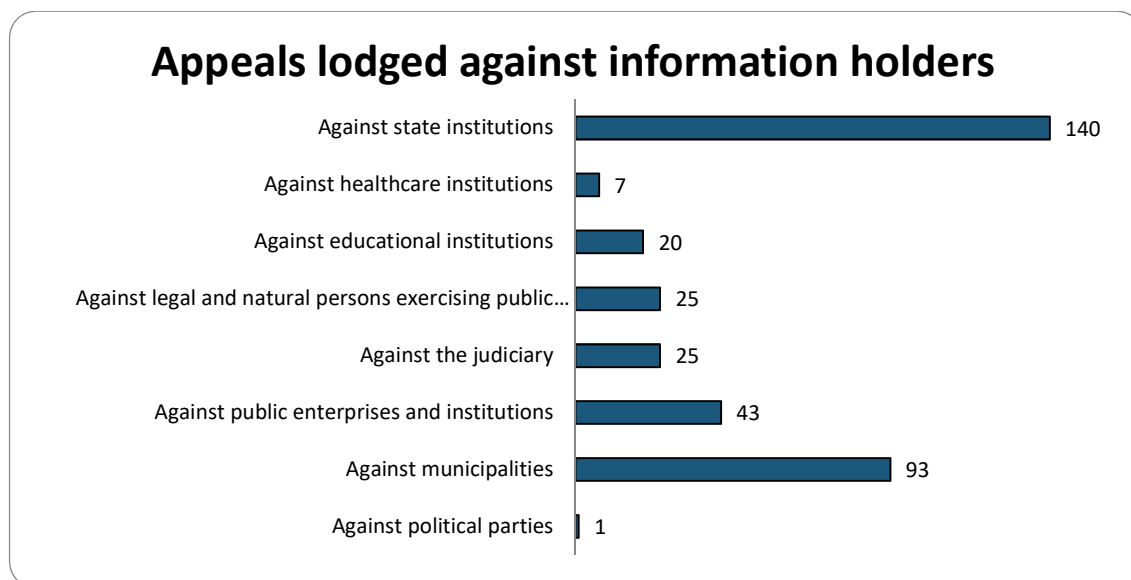


Chart 3: Appeals filed against information holders

4.4. NATURE OF FILED APPEALS

The information requesters submitted their appeals due to:

- 245 due to the silence of the administration (69.2%).
- 66 against decisions by information holders (18.65%),
- 38 against the answer from the information holders (10.73%),
- 5 against reporting by information holders (1.4%)

Notable for this reporting year is the reduced number of appeals, but the challenge with the emergence of the phenomenon of silence on the part of the administration is still current. In 2023, 277 appeals submitted to the Agency were recorded due to the silence of the administration, i.e. 61%, while in 2024, there were a total of 245 appeals, i.e. 69.21%. The data speak of a significant increase in the silence of information holders, in contrast to the previous reporting year. But on the other hand, in 2024, for 64 submitted appeals due to the administration's silence, or for 26%, the procedure was stopped at the request of the applicant, due to the fact that the requested information was obtained through mediation by the Agency.

Despite the numerous trainings held for the officials among the information holders, the percentage of appeals submitted due to non-action of the information holders according to the requests, within the legally provided deadlines, that is, they were submitted due to the silence of the first instance authority, is worrying.

From the processing of the files in question, as well as the regular communication with the officials and managers of the information holders, it can be concluded that the readiness for openness to the public is greater among the officials, in contrast to the management structures, which go in the opposite direction. Therefore, there remains a current need to organize additional trainings, workshops, round tables and similar presentations of the LFAPI to the managers of the information holders.

The most frequently submitted appeals to the Agency come as a result of the expressed dissatisfaction of the information requesters with the lack of action by the information holders, i.e. from received negative decisions and answers from the information holders, as well as due to the non-action of the first instance authority following the decisions of the Agency in relation to requests relating to:

- List of requests for privatization of construction land in state holdership, after which the privatization procedure has not been legally completed;
- Are the above-ground and underground infrastructure facilities marked on the same property sheet or on separate property sheets;
- The procedure for public procurement of the creation of a cadastre of air pollutants in the area of the municipalities of Strumica, Bitola, Probishtip, Kriva Palanka, Delchevo, Debar and Sveti Nikole;
- The overall procedures for public procurement, which public procurement was subject to administrative control and all documents related to administrative control;
- Transcript of the cases for privatization of construction land in state holdership, for which a decision on privatization was made by the Administration for Property and Legal Affairs;
- List of published/completed announcements for the sale of construction land in state holdership in the period from 2019-2023 and where these announcements were published;
- List of concluded contracts for the sale of construction land in 2019-2023, with information on the subject of sale (purpose of the land), size of the land, price of the land, name of the person (physical or legal) with whom the contract was concluded and date of the contract;

- In how many cases have you responded positively, in how many negatively, to requests to change the investor for construction, for purchased construction land before fulfilling the contractual obligations in the period 2019-2023;
- Report from an expert report on the burned Belasica bridge and the agreement with the institution that performed the report;
- Total number of public prosecutors in OJ and total number of cases at work in OJ on 01.03.2020, 01.03.2021, 01.03.2022, 01.03.2023 and 01.03.2024;
- How much property the Forfeited Property Management Agency has confiscated, shown separately for each year, starting from 2016 to 2024 and what is the value of the confiscated property;
- Detailed financial report on financial operations, i.e. income and expenses, as well as the turnover of financial assets in the period from 01.01.2019-31.03.2024;
- How many officials were fined for not reporting property documents starting from 2020 until 2024;
- Annual financial report for 2022 of the Copyright Protection Association - ZAMP (which was postponed for consideration at the Eighty-eighth session of the Government held on January 9, 2024);
- Information about the work of ZAMP and complete documentation from the supervision performed in ZAMP;
- The contracts (bases and annexes) that the Ministry of Internal Affairs has concluded with the economic operator for the procurement of forms for personal documents (passports, ID cards, driver's licenses), ... all contracts for the support and maintenance of the system for personal documents in the period 2005-2024;
- What is the average success achieved in points of candidates for police officers for completing training for each class individually in the period from 2013 to today;
- Number of employed licensed inspectors in the municipality, according to areas, categories and levels of inspectors' jobs (situation in 2019 and 2023);
- Number of planned jobs for inspectors according to the systematization of jobs in the municipality;
- How many total active concluded contracts does the fund have with primary dental healthcare institutions as of March 2024;
- Individually allocated funds through the municipality to the end users of budget item 463 - transfers to non-governmental organizations in 2023;
- Individually allocated funds through the Ministry of Labor and Social Policy to end users of budget item 463 Transfers to non-governmental organizations in 2023;

- Individually allocated funds through the Ministry of Labor and Social Policy to end users, licensed providers of social services for 2023;
- Enabling inspection of all ledgers by the Ministry of Internal Affairs and Communications. Ledger from 2011, 2. Ledger from 2012, 3. Ledger from 2024;
- The measurements of SO₂ and B₅ (smoke) concentrations from the monitoring network for air quality at all measuring points of the UHRM from the beginning of the measurements (1972) to the end of the measurements (2010) or until today;
- Daily reports with a value of every half hour from the continuous monitoring of Cementarnica Usje-AD Skopje for the period 01.01.2023 to 01.01.2024;
- Submission of reports that Cementarnica Usje - AD Skopje submits to the Ministry of Education and Culture;
- The annual environmental report for 2022;
- The latest report on consumption of alternative fuels;
- How is drinking water transported from the Turija dam to the treatment plant in Strumica;
- Are asbestos-cement pipes with a larger diameter still used;
- Description of the water purification process in the station (use of classic filters, ozonators, destructor, aluminum sulfate, chlorine, etc.); Does it have laboratories and professional staff for testing the quality of drinking water and what analyzes are done in them, to provide us with reports for the last three months;
- Delivery of all studies made for the needs of the new GUP of the city of Skopje;
- Complete documentation of the GUP of the city of Skopje 2012-2022 and the studies made for its preparation;
- Complete documentation of the previous GUP of the City of Skopje 2000-2020 and the studies made for its preparation;
- Complete documentation of the GUP or the urban plan of the City of Skopje in force before the GUP since 2000;
- On the basis of which agreement the surveillance cameras that are being installed by the Ministry of Internal Affairs throughout the streets of Skopje during 2024 were procured;
- The decision of a competent authority on the basis of which the procurement of surveillance cameras is carried out?
- What is the purpose of installing surveillance cameras?
- From the budgets of the municipalities, the municipalities in the city of Skopje and the city of Skopje, funds in the amount of at least 0.1% per year are allocated for youth. According to this legal act, does your municipality provide funding for the implementation of the above law in 2024? If yes, state the exact amount. At

the same time, list the activities so far that the municipality has adopted in accordance with its competences from the same law.

4.4.1. Holders of information who did not act on the decisions of the Agency

It is inevitable to mention the holders of information who have the legal duty to submit to the Agency a notice of action on the decisions received by the Agency, whereby they are ordered to respect the LFAPI and act on the subject request, or the subject is returned to them for further processing, or they are obliged to provide the requested information to the requester. Although the legal deadline for such action is 15 days from the receipt of the decision, certain holders of information ignore such decisions of the Agency. Thus, for example, during the year 2024, out of 213 decisions by which the appeal is respected, no action was taken on even 43 decisions made by the Agency.

First-level public authorities that did not act on the Agency's decisions are: City of Skopje did not act on 6 Agency decisions, the following did not act on 2 Agency decisions: Karposh Municipality, Centar Municipality, Ohrid Municipality, Negotino Municipality and the Ministry of Culture.

While one (1) decision of the Agency was not acted upon by the following holders of information: Postal Agency, Office of the President of the Government of RSM, Bar Association of the Republic of North Macedonia, JP Vodovod Kumanovo, State Environmental Inspectorate, State Market Inspectorate, PHI Clinic for Infectious Diseases and Febrile Conditions, JKP Vodna Kula Zrnovci, JP for State Roads, JU National Park Galichica, Ministry for Information Society and Administration, Ministry of Foreign Affairs, Ministry of Transport and Communications, Basic Public Prosecutor's Office Kočani, OOU "Marshal Tito" Strumica, Basic Court Prilep, Judicial Council of the Republic of North Macedonia, Faculty of Veterinary Medicine, Municipality of Dolneni, Municipality of Veles, Municipality of Tetovo, Municipality of Kavadarci, VMRO-DPMNE, JPKD Komunalec Strumica, Basic Civil Court, Public Transport Company "Skopje" and Dental Chamber of Macedonia.

No less noteworthy is the negative "practice" of certain holders of information who, instead of acting on the Agency's decisions, make their own decisions contrary to the Agency's decisions, or file lawsuits against the Agency's decisions. Among them are the City of Skopje, the Postal Agency and the Ministry of Finance. Against some of the officials with the holders of information, the Agency initiated misdemeanor proceedings, against some, since administrative disputes were initiated, no misdemeanor proceedings were initiated. Misdemeanor proceedings were not initiated even against the officials who on their own initiative submitted to the Agency

proof that they had undertaken everything necessary within their scope of work, but the organizational units that actually created or have the requested information, did not submit it to them for it to be published, i.e. mediated/delivered to the requester of information.

4.4.2. Status of cases after lawsuits

During 2024, a total of 15 decisions of the Agency were challenged. Seven (7) administrative disputes have been initiated by information holders, namely: four (4) from the City of Skopje and one (1) each from the Postal Agency, the Ministry of Finance and the Municipality of Struga. The remaining eight (8) lawsuits were filed by information requesters who were dissatisfied with the Agency's decisions, seven (7) by natural persons and one (1) by a legal entity.

The Administrative Court acting on the lawsuits filed before this Court, against the decisions of the Agency made in 2024, acted on twelve (12) cases and made decisions by which seven (7) lawsuits of the plaintiffs/holders of information were rejected as inadmissible, one (1) lawsuit of the plaintiff/requester of information was rejected as irregular and unfounded, four (4) lawsuits of information requesters/plaintiffs, and the decisions of the Agency are confirmed. After the remaining three (3) lawsuits filed by information requesters, the procedure before the Administrative Court is ongoing. Moreover, appeals against the 12 decisions of the Administrative Court were submitted to the Higher Administrative Court by four (4) appellants/holders of information and two (2) appellants/requesters of information.

The Administrative Court dealt with 20 lawsuits filed against the Agency's decisions made in previous years, eleven (11) by plaintiffs/holders of information and nine (9) by plaintiffs/requesters of information, of which seven (7) are natural persons and two (2) legal persons.

With fourteen (14) of the rendered judgments, the Administrative Court rejected as unfounded the claims for annulment of the Agency's decision, confirming the Agency's decisions as correct, with correctly determined factual situation and adopted on the basis of law. With four (4) of the adopted decisions, the lawsuits are rejected. The Administrative Court accepted only two (2) lawsuits, by returning the cases for reconsideration and action by the Agency.

After the appeals filed against the decisions of the Administrative Court, in connection with the exercise of the right to free access to public information, in 2024 the Higher Administrative Court acted as well, to which a total of eleven (11) appeals were submitted by plaintiffs who were dissatisfied with the proceedings of the

Administrative Court, namely: seven (7) from holders and four (4) from information requesters, of which three (3) from natural persons and one (1) from legal entity. For seven (7) cases, the procedure before the Higher Administrative Court is still ongoing, with three (3) decisions of the Higher Administrative Court, the appeals are upheld and the case is returned for retrial before the Administrative Court, which, acting on two (2) of those cases, made decisions by which the plaintiffs' lawsuits are rejected or rejected, and for the third case, the procedure is ongoing. After one complaint of the requester of information regarding the costs, the Higher Administrative Court made a decision respecting the appeals of the appellant in the part about costs in the procedure.

As in previous years, in this reporting year, among the initiated administrative disputes, there were also lawsuits filed by holders of information, seven (7) out of a total of fifteen (15) administrative disputes. The Agency continued to point out to the court that the holders, according to ZOUP and ZUS, do not have active identification, that is, they cannot demonstrate the protection of their legal interest before the Administrative Court because, as a preliminary authority, they are placed in the role of decision-makers regarding the rights, interests and obligations of the information requesters, while neglecting the public interest and nature of the submitted requests for access to information. It is noteworthy that the Administrative Court rejects these lawsuits, which have the sole purpose of limiting and delaying access to the requested public information, as inadmissible. This means that the Agency's appeals to stop the practice of dealing with lawsuits filed by public authorities, as the first-level authorities in the procedure for access to public information, and to make consistent decisions rejecting as impermissible the lawsuits filed by the plaintiffs/holders of information, while protecting the role of the Agency as a second-level authority in dealing with the sphere of free access to public information bore fruit, thus building the transparency of the institutions, as one of the most important conditions for realizing the wishes for building a European future in these areas.

4.4.3. Implementation and experiences from the application of the Law

Free access to public information in the Republic of North Macedonia has been legalized and practiced for eighteen years.

The law on free access to public information, which is current at the moment, dates from May 2019 ("Official Gazette of the Republic of Macedonia) no. 101/19). However, despite the long-term application of the right of access to information and the law itself, no significant changes have been observed in the mentality of

information requesters, and even less on the side of information holders. Namely, the applicants still submit the largest number of their requests to the state institutions as holders of information, and the holders of information, on the other hand, have not reduced the use of the so-called silence of the administration. In 2024, the Ministry of Environment and Spatial Planning, the Ministry of Health, the Ministry of Education and Science and the Ministry of Internal Affairs lead the way in terms of the number of submitted appeals from public authorities at the central level. At the local level, however, most appeals are filed against the City of Skopje, the Municipality of Centar, the Municipality of Negotino and the Municipality of Chair. The figures showed an upward trend in the interest in the information created and available by public enterprises, educational institutions, public prosecutor's offices, the Judicial Council, appellate and basic courts.

On the other hand, the number of adopted decisions of the Agency, which stop the proceedings after 79 of the total of 354 submitted appeals (or 22.31%), suggests that the approach of the holders of information to the requests for access to information is changing. That appearance is actually due to the persistence, promptness and integrity of the officials in the Agency who act on the cases, that is, to their active mediation between the holders and the appellants, with the aim of enabling access to public information as quickly and efficiently as possible.

Furthermore, as an additional complicating circumstance in enabling access to public information, is the large number of changes in officials who mediate the information with the information holders. Therefore, in its educational part, the Agency emphasized the training of all newly appointed officials, as well as those from the institutions that gave the least results in the field of free access last year.

During 2024, as in the previous year, the number of appeals filed by natural persons is greater than the number of appeals filed by associations of citizens and legal entities. However, the total number of 194 appeals from natural persons should not mislead, or lead to the opinion that the awareness of citizens has changed due to the fact that a large number of their appeals (63) have been rejected or refused, due to the fact that they are either untimely or inadmissible, because the holders of information are required to provide information that is not public, but of a personal/private nature, i.e. information arising from the legal competence of institutions, and all in order to exercise some of their personal rights in court or other civil or administrative proceedings, which are conducted in accordance with another material law.

Associations of citizens and legal entities mainly request information that can and should be made available to them by the holders of information proactively (the

holders themselves should place it on their web pages), which should actually be a common practice.

In the reporting year 2024, out of 354 appeals, thirty-seven (37) appeals were submitted by journalists from several media from the Republic of North Macedonia.

Due to the above, the Agency believes that there remains a current need for a wider campaign and education of the citizens, starting with the high school and student youth, the business sector, the legal profession, and all the way to the rest of the citizens, for the reason that the prevailing need is to approach the citizens and explain the purpose of the existence of LFAPI. But unfortunately, the Agency does not have funds available from the budget for this purpose and is forced to find other sources of funding for this type of activities.

We still believe that it is more than necessary to train the managers of the holders of information who, using the circumstance (deficiency in LFAPI) for not sanctioning them for not providing the requested information, simply make it unavailable even to their officials.

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

4.4.4. Misdemeanor procedure

Proceedings in accordance with the misdemeanor provisions of the Law on Offenses and the Law on Free Access to Public Information in the Agency successfully continued in 2024. In this reporting year, a total of 56 settlement procedures were carried out. Following a submitted request for the initiation of misdemeanor proceedings, the Misdemeanor Commission acted on a total of 30 cases. Out of the 51 cases filed for failure to submit the Annual Report within the legal deadline, a

settlement procedure was successfully implemented for one case, where the official for mediating public information accepted to settle and make a payment. After a settlement procedure was carried out for 20 cases, no proposal was made to initiate a misdemeanor procedure, for which the authorized official prepared an Official Note. For the remaining 30 cases, misdemeanor proceedings were initiated, of which 1 (one) case was released from liability, 8 (eight) cases were terminated, and for the remaining 21 cases, criminal sanctions were imposed, 17 cases were reprimanded, and 4 (four) cases were fined. The misdemeanor commission made 1 (one) decision to impose a fine in the amount of 500 Euros in Denar equivalent due to failure to appoint an official to mediate public information. During the year 2024, 4 (four) procedures were initiated at the request of Information Requesters, for non-compliance with the Agency's decisions. In the settlement procedure, the authorized official in the Agency determined, evident from the submitted evidence, that the indicated officials acted in accordance with their legal competences and in these four cases no Request for the initiation of misdemeanor proceedings before the Misdemeanor Commission was submitted. During the year 2024, not a single lawsuit was filed before the Administrative Court against decisions made by the misdemeanor commission that imposed a misdemeanor sanction.

4.4.5. List of information holders

In the List of holders of information this reporting year, the total number of registered entities is **1.465** holders. In the reporting period, the list was revised, with which some of the holders were moved to the appropriate links where their competence is. This reporting year, were recorded **8** new holders, namely at public enterprises and institutions, legal and natural persons exercising public powers and activities of public interest, as well as at political parties.

In the reporting year 2024, the List of organs of the state administration is **133** holders, while in the link with public enterprises and institutions they are recorded **311** holders. The link with Health facilities in the Republic of North Macedonia contains **115** holders, while the number of holders of political parties recorded in the single court register of political parties is **61**, noting that for seven political case, the Agency, despite numerous attempts, failed to provide data for their officials this reporting year, even though the correspondence was delivered to the registered address data in the single court register. The number of holders from the Judicial Authority is **65** holders. The link with legal and natural persons exercising public powers and activities of public interest counts **73** holders, while the number of holders at Municipalities and Centers for the Development of Planning Regions is **90**. The number of Educational Institutions this reporting year amounts to **617** holders. The Agency emphasizes and

clarifies in every report, as well as in its daily operations, that the list of holders is variable and the number of institutions published in it depends on new entities that will be detected as carrying out activities of public interest with their competence and vice versa, and some of the holders will be removed if it is determined that they do not fulfill the legal competences.

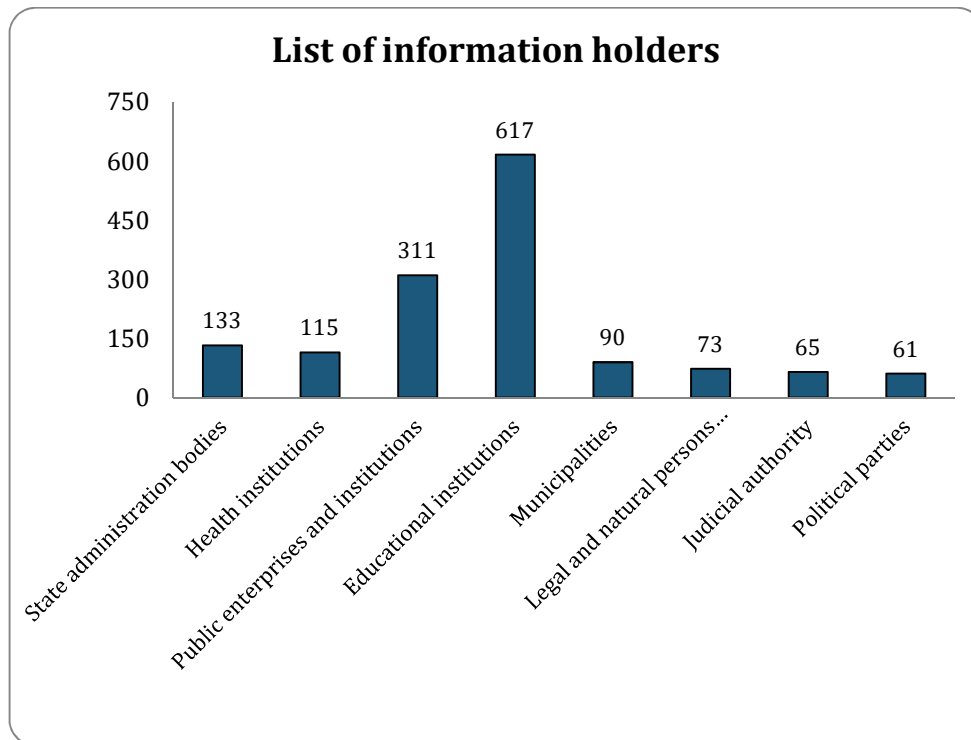


Chart 4: List of information holders

4.4.6. Annual reports of holders

In the reporting year 2024, within the stipulated legal term **1414** holder or **96,52%** submitted annual reports and fulfilled their legal obligation, out of total **1465** holders who are recorded in the List of Holders. The Agency indicates that **8** political parties did not submit reports on the implementation of the Law, for reasons that, despite numerous attempts, they did not provide contact details to which they would submit the Reminder for submission of annual reports, as was done with all other holders from the List.

The officials, that is, the holders of the total **51** institutions, despite two reminders to submit a completed Annual Report Form, which was distributed to them, as well as additional phone calls and e-mail messages sent to their official e-mail

addresses, they did not fulfill the legal obligation arising from Article 36 of the Law. For those reasons, the Agency cannot determine whether claims were submitted to these holders by the claimants. This reporting year, the number of undelivered annual reports is **3,48%** and we can state that from year to year the number of undelivered reports decreases, which is evident from the results of the misdemeanor provisions implemented against officials who are ignorant of the implementation of the Law.

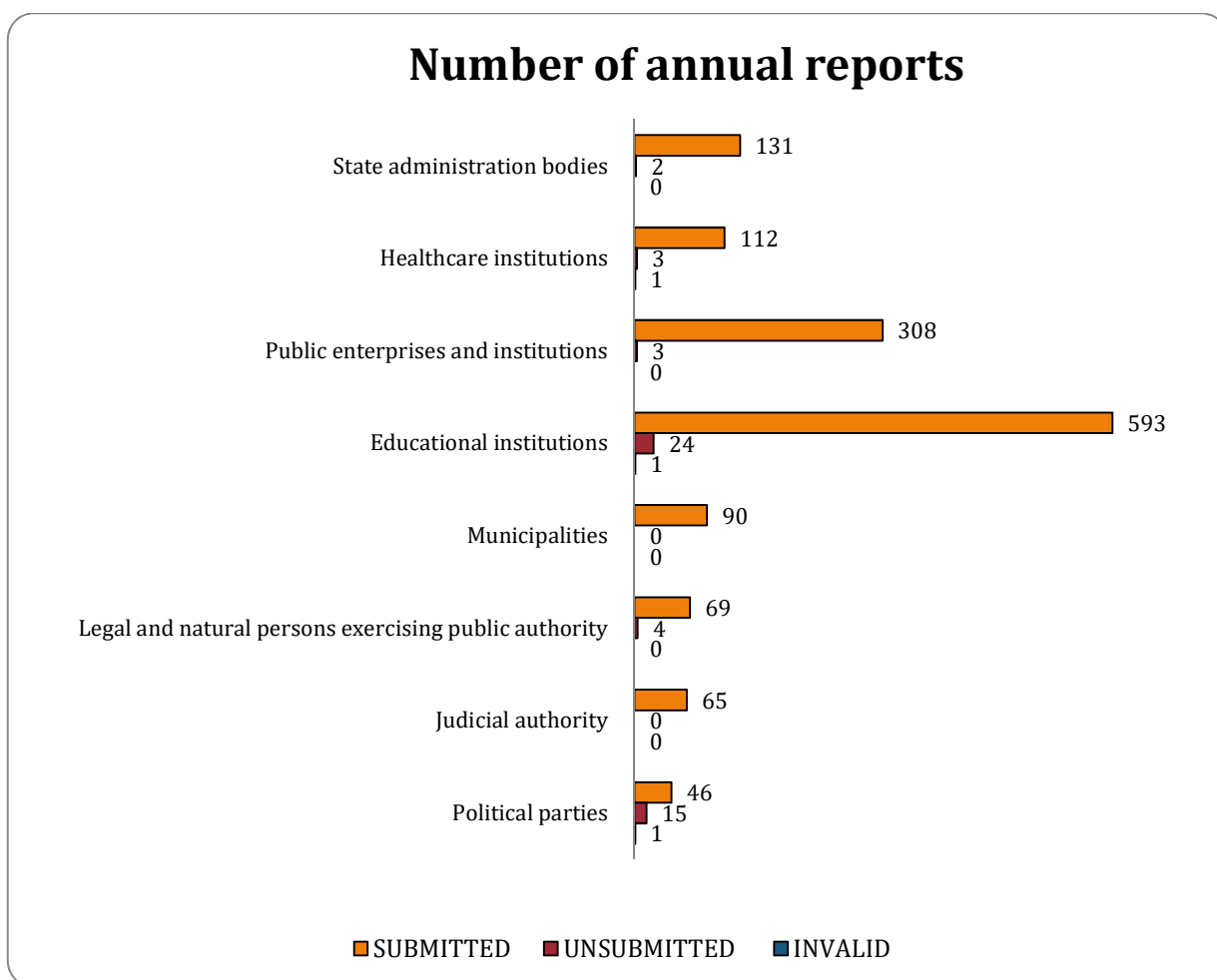


Chart 5: Number of Annual Reports

This reporting year, holders in all **65** registered holders from the judicial authority submitted an annual report, and also **90** holders from local self-government units, including the city of Skopje, the Community of Local Self-Government Units (ZELS) and the Centers for the Development of Planning Regions, fulfilled the legal obligation to submit a report on their implementation of free access to public

information. This group of information holders are the only ones whose officials fully complied with the legal obligation stipulated in the Law on FAPI.

Out of total **133** holders of state administration bodies, only **2** holders did not submit a report within the legal term. And this year, officials at educational institutions from all levels of the educational system and from **617** holders submitted a report **593** holder, while **24** officials did not submit a report to the Agency.

For holders from health institutions, only **3** holders did not submit a report on the implementation of access to public information in relation to their work. Of those recorded **115** health institutions fulfilled the legal obligation to submit reports to the Agency **112** holders.

How public enterprises and public institutions implement the right to free access have shown **308** holders, while **3** from **311** holders did not submit an annual report.

Moreover, out of **73** holders of legal and natural persons exercising public powers and activities of public interest, **69** of them submitted an annual report to the Agency, while **4** holders did not comply with the Law.

Out of the **61** registered political party, submitted a report **46**, while the officials at **15** parties did not submit an annual report. Despite the initiated misdemeanor proceedings against **8** political parties, they have not submitted a report to the Agency, in accordance with Article 36 of the Law.

The reports of three holders from educational institutions, health facilities and political parties are incomplete and as such were not taken into account during the preparation of the Annual Report of the Agency. The reports of the holders from the indicated groups contain data that refer to their current operations, but not about requests submitted in accordance with the Law on FAPI, as well as inconsistencies of a legal and formal nature, which despite numerous suggestions by the Agency to be removed, the same holders did not remove these inconsistencies from their submitted reports until the expiration of the legal term.

In the coming period, the officials will be invited to the trainings that the Agency organizes so that they will be familiar with what information they need to state in their reports in the future and what it should contain in order to comply with the implementation of the law.

Of the received and processed reports (total **1.414**), which were submitted to the Agency by the holders, they show that they, as holders, were submitted to them in total

6.593 requirements, of which the 6.244 it was answered positively within the legal term. This reporting year, the holders show that they have been submitted to them 375 requests less than last year. The reduced number of submitted requests to the holders is certainly the result of the activities that the Agency undertakes to promote the greater application of the institutions' proactive transparency, through the publication of information from their competence, on their web pages. The proactive publication of information contributes to increasing transparency, because it improves access to public information, as well as its quality, and in this way the conditions and opportunities for public participation and influence on the processes of policy-making and public decision-making are improved. All this contributes to the improvement of public accountability, because it improves the rules, regulations and mechanisms for public responsibility of the responsible persons in the institutions.

In this annual report, unlike last year, the holders and officials submitted three annual reports to the Agency that are not in accordance with the legal obligations arising from the Law, that is, they are incomplete and incorrectly filled out.

In the reports that the officials submitted to the Agency, they also show data relating to the exceptions to free access prescribed in Article 6 of the Law on Free Access to Public Information, or with other legal regulations, which were the reason for the refusal or rejection of access, and that for 218 requirements, what about 16 requirements less than the reporting year 2023. In their reports, the holders also report on 120 unanswered, but also for 11 requests that were transferred for processing in 2025, and which were received at the end of the calendar year 2024.

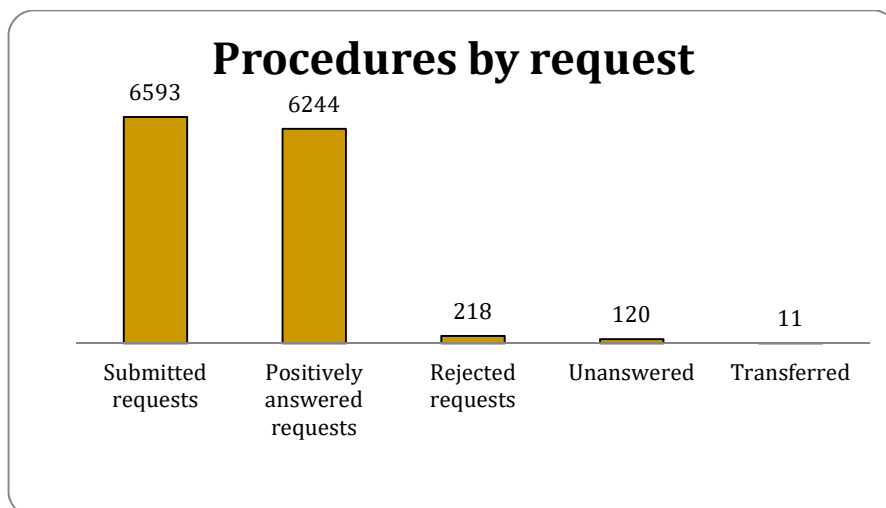


Chart 6: Procedures by request

The officials in the reports submitted to the Agency also present data, according to which, as a sign of dissatisfaction with the actions of the officials, the appellants have filed **199** appeals against first instance decisions of the holders, which is **67** submitted appeals less than the reporting year 2023, and of which, after consideration by decision of the Agency, **139** appeals were adopted. The above does not correspond to the number of **354** appeals reported by the Agency, which leads to the conclusion that the officials of the information holders do not show the appeals in the submitted annual reports.

The annual reports also contain data on **69** modified first-instance decisions, for **38** rejected appeals by the Agency, but also for **16** dismissed appeals.

Among the applicants, there is again the greatest interest in the work of the Local Self-Government Units and planning regions, where the officials report that they have been submitted to them **2.266** requirements, which is about **214** requests less than last reporting year.

There is an increased number of submitted requests with the state administration bodies to which they were delivered **2.115** requirements, which in relation to the reporting year 2023 is a decrease by **200** requirements. This reporting year, the Ministry of Internal Affairs received the most requests, to which they were submitted **199** requirements, which is about **136** requirements less than 2023. 106 appeals have been submitted to the Ministry of Justice, followed by the State Educational Inspectorate with **87** requests, the Ministry of Finance with **84** submitted requests, the Ministry of Education and Science with **76** requests, the State Administrative Inspectorate with **68** requests and the Government of the Republic of North Macedonia-General Secretariat with **63** requests. There were 899 requests submitted to the judicial authorities which is an increase of **126** requirements from last year.

There is also an increased interest in the work of public enterprises and institutions, where they were delivered **614** requests or **108** request more than in 2023.

A slight increase in submitted requests is also shown by the officials of the legal and natural persons who exercise public powers and activities of public interest and **156** requirements were delivered to them or **24** more than last year.

For three reporting years, applicants show a reduced interest in the functioning of political parties, with submitted **20** requirements, that is **36** less than last year.

According to the submitted data from the annual reports, there is an evident reduction in submitted requests at educational institutions of all degrees, and that for

120 requirements. This year, 315 applicants submitted to this group of holders requests for free access to information. Also, the health institutions show a decreased interest in their work and that for 63 requests, that is, they were submitted to them 208 requirements.

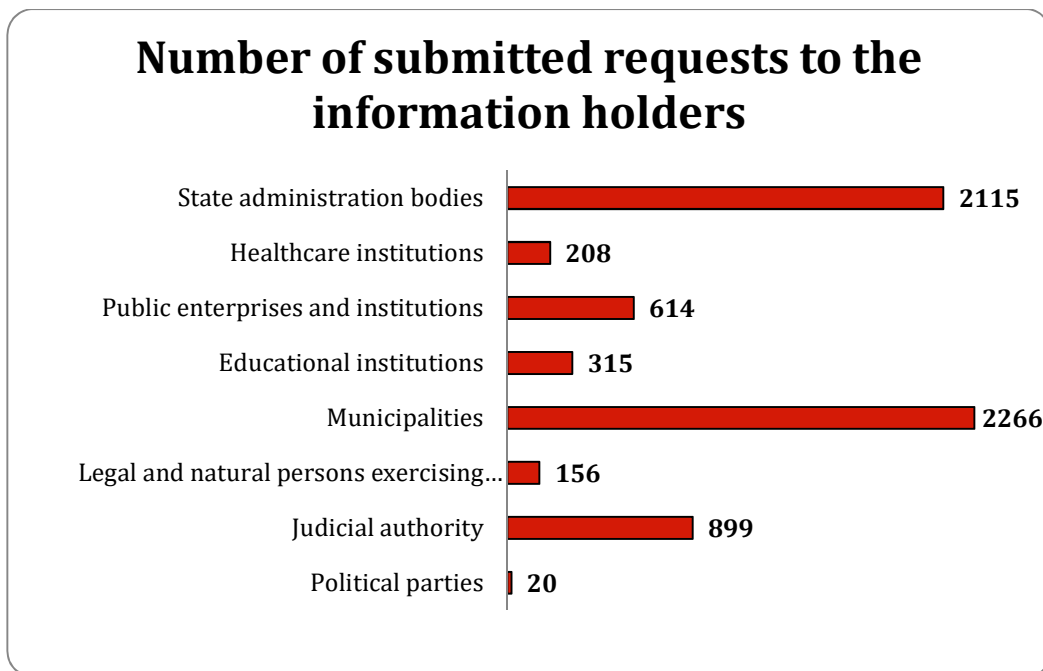


Chart 7: Number of requests submitted to holders

Six (6) requests were submitted to the Agency for the Protection of the Right to Free Access to Public Information as the holder of the information, which were answered positively within the legal term.

4.4.7. Contents of Annual Reports

In their annual reports, the holders, that is, the officials, as in every reporting year, report on the requests that were submitted to the institutions. Highest number of requests (4.381), the applicants submitted to the local self-government units and the state administration bodies. The operation and functioning of these holders in continuity are the most interesting for the citizens, that is, the information requesters and they most often submitted requests for the following: in how many and in which municipalities integrated permits have been adopted, how many urban plans have been adopted, lists of illegally legalized buildings, granted building permits, whether the municipalities have appointed persons for integrity, financial reports for capital

activities, final accounts for the budgets of the municipalities, for the procedures with public procurement. Then, the number of licensed inspectors from several areas, for procedures related to water supply networks in certain local governments, which law firms used the services and represented the local government units and the funds they received.

Reports of environmental inspectors regarding air and its cleanliness, concessions for the use of water for the production of electricity from hydroelectric plants, the expenses of officials for each official trip, categorized by: air tickets, transfer to and from the airport, the hotel, supplements, food and entertainment, telephone expenses and other travel expenses. Agreements have been concluded for spaces of cultural importance, as well as capital investments of state interest. Also subject to requests were the data on hired experts in working groups in connection with the adoption of certain laws, the funds spent by domestic delegations abroad, contracts for capital investments and the financing of marginalized groups and distributed social assistance.

In the reports, the holders show that the work of the management and supervisory boards in public enterprises was also of interest, information on the current price/tariff they charge for water supply (drinking water), separately for households and for other consumers, as well as for legal and natural persons who perform activities of public interest, i.e. detailed financial reports on financial operations, that is, on income and expenses, as well as on the turnover of financial assets in the period 01.01.2019-31.03.2024, as well as Reports on the state of (non)payment of the chamber membership fee.

The applicants requested from the judicial authority information related to the operation of the AKMIS system, how many final judgments have been passed, data on the number of employees in the prosecutor's offices and basic courts by category, that is, titles, as well as data on their activity, which the courts have at their disposal.

The requests to the political parties related to their financial operations, the funds received from donations and how much property they have.

4.4.8. Cooperation with officials at the holders

And in the reporting year 2024, the Agency cooperated intensively with the officials, as one of the basic prerequisites for a more successful implementation of the Law on FAPI. The employees were constantly available to the officials helping them to respond more successfully to their delegated responsibilities. The contacts were used

to clarify the legal obligations relating to the obligations of the officials, for the way in which the new official is authorized, but also for the correct filling and certification of the annual report form with the signature of the officials, that is, with the delegation of the competences that as officials have as a newly appointed legal obligation. This continuous communication eased the dilemmas and omissions that arise among the newly appointed officials for the best possible implementation of the law, and arise from the lack of familiarity of the officials in the new problem for them.

The good implementation of the Law on FAPI and its application in practice is the result of the successful mutual cooperation of the Agency and the officials with the holders of information.

And this reporting year, the Agency highlights the following as positive examples of institutions that submitted requests on their own initiative, as well as the Annual Report, in order to be part of the List of Holders: PE for trapping and treatment of homeless dogs STATIONAR-LANA-Strumica, Public utility company "Shari"-Tetovo, PU "Mirmbaytja"-Želino, Private institution student dormitory "Hyljadnikov"-Shtip, Private student dormitory LOGOS-Shtip, Steam and hot water supply company ENERGY ECOLINK AD-Skopje and the political party Central Democratic Union-Skopje. Through their proactive activity, i.e. the self-initiated request to move in the list of holders, these holders show that their transparent and accountable work is primarily for "informed citizens, satisfied citizens".

The Agency, like every reporting year, although there is no legal obligation, prepared a Reminder for the submission of the Annual Report, which together with the prescribed Form before the end of the calendar year, was submitted electronically to the holders and appointed officials. The official telephone lines were functioning until the deadline for submitting the annual reports, in order for the officials to consult with the holders about the ambiguities that arise when filling out the Report Form, but also about issues that are part of the successful implementation of the Law.

154 were delivered to the Agency in 2024 Decisions on the appointment of new officials by the holders and for them, as well as for other officials, trainings were held where they were introduced to the Law and its practical implementation.

4.4.9. Monitoring of the holders' websites and educational materials

Public information is available to citizens in two ways - with the proactivity of the institutions themselves and with reactive means - that is, by submitting a request for information to certain holders. Proactive transparency implies the timely

publication of public information by the institutions and which do so on their own initiative, before they are requested orally, in writing or electronically, through clear, transparent and easily accessible web pages that contain all the information of importance to citizens. Such proactive publication of information contributes to the strengthening of law and enables the public to become familiar with regulations, decisions, policy-making and other actions that are of their interest and affect them.

The Agency, in the reporting year 2024, conducted three monitorings on the websites of the information holders. The websites of the State Administration Bodies were monitored, in accordance with the Action Plan (2023-2026) for the implementation of the Public Administration Reform Strategy 2023-2030. Measure 3.4.1 is foreseen in the special objective. Improvement of tools for the availability of public information. The measurability of this measure is provided by the Indicator: "Percentage of state institutions that regularly publish and update documents in accordance with the LFAPI on their websites". Monitoring was also carried out on the pages of the Municipalities and Centers for the Development of Planning Regions, as well as on the basic, appeals courts, the Administrative Court, the Higher Administrative Court, the Supreme Court and the Judicial Council.

The Agency, in accordance with its competences, but also as an added value of free access to public information in relation to the proactive publication of information, in accordance with Article 10 of the Law, conducted monitoring of the above-mentioned holders, all with the aim of ascertaining the level of proactive transparency of this group of holders of information, and the reports presented the findings that examined the extent of the published information that is relevant for citizens, for the annual reports on their work, whether the information requesters are provided with correct, precise and complete data, whether the holders have a designated official person to mediate with public information, as well as numerous other questions based on which the application of proactive transparency standards is evaluated. The purpose of the monitoring is to present to the holders the extent to which they implement proactive transparency in their work, but also to indicate to the holders that by placing a unified banner in which they will publish the public information, and at the same time update it, it will be more accessible to the citizens. In that way, information requesters will be able to access the requested information that is of their interest in a quick and simple way.

The obtained results help the Agency in conceptualizing the training for the officials, with the aim of showing the holders that by implementing the active transparency and consistent application of Article 10 of the Law, they help the citizens to better understand the functioning of the institutions, their rights and obligations,

the way in which they can influence the decision-making that is reflected in their daily life and work, as well as to more easily access the services under their authority. They are offered by the monitored institutions as holders of public information.

The Agency for the Protection of the Right to Free Access to public information acting on the Extract from the Draft Minutes of the One Hundred and Twenty-First Session of the Government of the Republic of North Macedonia held on January 24, 2023, prepared Information which was submitted to the Office of the Deputy President of the Government, in charge of good governance policies, for the implementation of the Information for improving the transparency and accountability of institutions from the public sector through the publication of mandatory information in accordance The law on free access to public information on the websites of the institutions, as well as the publication of the most frequently requested information systematized by area.

Acting on the recommendation of the Conclusion, through monitoring of 4 categories of holders, i.e. 224 institutions, in accordance with the Methodology for conducting monitoring for proactive publication of public information, the Agency submitted Questionnaires that were adapted according to the competences of the monitored holders. The purpose of the questionnaires is through the self-evaluation of the holders to see to what extent the holders practice proactive transparency and legal obligations in accordance with Article 10 of the Law on FAPI, and for the purposes of the Information, whether the holders also fulfill the conclusions of the Draft-Minutes of the Government of the Republic of North Macedonia.

The highest transparent self-evaluation by the institutions is with the Republic of North Macedonia's Government, the ministries and the bodies in composition with 73%, while the lowest self-evaluation is with the judiciary with only 20%. The average self-evaluation of all categories of holders is 44.3%, and is within medium transparency.

The holders paid the most attention to systematizing public information by area, that is, 60.85% of them did so, then the availability of the Public Information link/banner is represented by 54.98% on their web pages, while anonymized requests/answers are the least represented by 32%, bearing in mind that requests for public information are not equally represented by all institutions. The total, i.e. the average transparency in the ratio of questions/answers is at an intermediate level with 50%.

Summarizing the results obtained from these holders, we get a picture of the transparency of the institutions in the Republic of North Macedonia, which is 50.2% and it can be concluded that it is at a medium level, i.e. average, and that the holders

should be more focused on improving their transparency, and in this way so that the citizens are promptly and clearly informed about all information of importance to the public.

The level of transparency and accountability in the work of the Republic of North Macedonia Government, the ministries and the bodies within it have an increasing trend of proactive publication of public information and their transparency is assessed as very good. Most of the monitored institutions have very good transparency and the Agency recommends to the holders to consistently respect the standards for transparency and accountability in the future, for reasons that only in this way the institutions and their work will be more accessible to the end users, the requesters of public information, i.e. the citizens.

A set of educational materials/manuals related to Access to information as a basis for environmental protection, Access to information – present and future, (challenges and best practices for its successful implementation), Connection of access to public information with open data and artificial intelligence were also prepared for the holders of information.

In cooperation with the International Republican Institute, a Guide for active transparency of political parties in the Republic of North Macedonia and Transparency of political parties in Germany and Estonia were prepared.

A report was prepared on the activities of the Agency in JANUARY-JUNE 2024, as well as an analysis of the administration's silence in 2024.

The Agency, with an author's text, presented itself in a special edition of the bulletin of the International Conference of Information Commissioners (ICIC), which tries to emphasize the importance of encouraging a global dialogue on access to information.

All the necessary educational materials, which are intended for both officials and citizens, are available on the Agency's website, and officials are introduced to the same at the trainings, with the aim of their implementation in practice.

4.4.10. Trainings and education

During the reporting year 2024, the Agency placed particular emphasis on the educational part, implementing a greater number of activities in the field of training officials to mediate information to the first-level authorities.

Due to the budgetary unsupported opportunity for education of all officials from the 1,465 holders of information, the Agency through 9 workshops included the newly appointed officials for mediating information with information holders, those who felt the need to attend additional training, as well as officials from institutions that the Agency noticed that in the previous period were not sufficiently successful in dealing with requests for access to public information. Despite the fact that the trainings are free, a fact emphasized in the invitations, the low response of the officials for mediation with public information among the holders of information about attendance at the Agency's trainings is overwhelming, so out of the invited 412 officials from 375 institutions, 138 representatives from 129 attended the trainings institutions.

The primary goal of the trainings was to train the officials for correct and timely handling of requests for access to information. At the same time, a special emphasis was placed on the duty of the holders of information for their proactive action, with the aim of fully publishing the public information that they have at their disposal.

The specific goal of the training was practical training for the adoption of correct legal acts based on the law, familiarization with the goals and activities of the Agency as a secondary authority in the procedure, as well as the practical simulations of the implementation of the harm test in cases of denial of access to the requested information in accordance with Article 6 paragraph 1 of the Law on Free Access to Public Information. Also, at the trainings, the method of using the portals for holders and requesters of information, which are placed on the Agency's website, and their benefits were presented.

The Agency can achieve much more in the field of education and in general in the exercise of its competences if it is provided with additional funds from the budget for more than the necessary necessity to achieve the basic goal of this anti-corruption law – one hundred percent openness and transparency in the operation of the institutions.

In this direction, the Agency reminds and appeals to all officials for mediating information, especially to the persons responsible for the holders of information, to respond unreservedly to the invitations from the Agency, as well as to register themselves for more massive participation in the free trainings, due to the correct implementation of the Law on Free Access to public information and at the same time realizing the right of citizens to be fully informed about the operations of public authorities and other holders of information, at the central and local level.

4.4.11. Website of the Agency

The website of the Agency continued to promote proactivity in the operation of the Agency in this reporting year as well. E-portals are becoming more recognizable by users, and in 2024 they were used by holders and claimants who use and implement free access to public information.

Citizens and civil society organizations, as requesters of public information, recognized the Portal for requesters - <http://slobodenpristap.mk> as a tool through which they can quickly obtain the requested information possessed by the information holders. Through the Portal, there are already over 230 online requests from natural persons. All the created requests are publicly available on the portal and the requesters can familiarize themselves with the requests that were submitted to the information holders.

The Agency used the Portal for holders to communicate with the holders, and special sessions were organized at the trainings for officials where it was clarified for them how to use it. The entire process of generating an annual report is presented at the trainings. This is also visible through the portal, where in the legally provided deadline for submitting Annual Reports for 2024, there is an increase of 21% compared to the previous year. The Agency will continue to digitize the processes in its operations and will encourage applicants and holders to use the Portals to create their application in order to obtain the necessary public information, but also to fulfill their legal obligations related to the implementation of the Law in a fast and efficient way.

The Holder Portal - <https://portal.aspi.mk/login>, that is, its database was also used in the support provided by the Agency for improving the operation of state institutions, including employees. The agency was actively involved in the organization / delivery of invitations to trainings for trainers to collect data for measuring discrimination under the auspices of the Association for Democratic Initiatives (ADI) from Gostivar and HOPS - Option for a Healthy Life Skopje, and financially supported by the European Union within the framework of the "Support to Civil Society" grant program, the European Instrument for Democracy and Human Rights.

And in the reporting year 2024, the Agency informed the citizens through its website about its activities, as well as about the prepared analyzes and reports from its scope of work. In the PUBLICATIONS section, monitoring reports were published on the proactive publication of information on the web sites of the holders, as well as educational materials needed for officials and investigative journalists, all with the aim of this group of applicants to use this tool more in their daily work.

The Agency, on its website, continued the practice of publishing information from its current and financial operations. In an open format, data related to the financial statements, as well as from the Annual Report, are published, which means that its proactive operation has added value. Also, the SUBMITTED DECISIONS banner publishes all the Decisions that the Agency acts on, as well as the decisions of the Administrative and Higher Administrative Courts in their proceedings when the Agency for the Protection of the Right to Free Access to Public Information appears as a defendant. In a special E-LEARNING banner, an e-Course has been set up that officials can listen to and finally solve the test, which is a supplement to the regular trainings that the Agency conducts for them.

4.4.12. Public at work

The Public Relations Department represents and promotes the right to free access to public information through strategic media engagement and to promote the importance of the Agency and its work in the eyes of the public. This includes encouraging transparency, accountability and open communication of the Agency with the public and collaborators, as well as strengthened cooperation with the media and other stakeholders in our society.

Therefore, the public relations department actively adapts to the trends in the electronic industry, using digital platforms and innovative communication strategies and tools in order to:

- to improve the involvement of the public in the work of the Agency,
- to increase citizens' awareness of their right to free access to public information,
- to bring closer the method of requesting and providing public information to all interested parties,
- to educate citizens about the meaning and right of free access to public information.

Organization of events

Promotion of the Guide for active transparency of political parties in the Republic of North Macedonia. On the occasion of September 28 – the International Day for Universal Access to Information, the Agency for the Protection of the Right to Free Access to Public Information, in cooperation with the International Republican

Institute (IRI), organized the promotion of the new *Guide for active transparency of political parties in the Republic of North Macedonia*.

Plamenka Bojcheva, director of the Agency, and Ilina Mangova, regional adviser for Europe from the International Republican Institute (IRI), addressed the present representatives from the political parties, i.e. the officials for mediating public information, with their opening speeches, and the author, Dr. Konstantin Bitrakov, assistant at the Department of Administrative Law and Public Administration at the "Justinian First" Faculty of Law, spoke about the Guide.

The purpose of *The Active Transparency Guide* is to help political parties as holders of information to improve their transparency and encourage them to publish as much information as possible of interest to citizens, which gives a complete picture of their actions and goals.

The publication also includes a comparative analysis of positive practices and the way in which political parties in Germany and Estonia publish information about their operations and finances.

The event was also covered by the presence of the most renowned media houses in the Republic of North Macedonia, for which director Bojcheva gave a statement and answered the journalist's questions.

Informing the public

Media statements and interviews

Investigative article by the META News Agency (April 2024): In April 2024, the journalist Meri Jordanovska visited the Agency for the Protection of the Right to Free Access to Public Information in order to get to know the way of functioning, the work processes and the commitment of the institution to promote transparency.

During the visit, the journalist had a conversation with the director of the Agency, Plamenka Bojcheva, in which they referred to the significant steps that the institution is taking in the direction of increasing the proactive transparency and accountability of public institutions. During the conversation, the challenges, achieved results and future plans of the Agency were discussed, as well as the mechanisms through which institutions in the country are encouraged to ensure timely and quality access to public information.

This press visit was an opportunity for a more in-depth analysis of the Agency's key role as a leading institution in the field of free access to information, as well as for

highlighting its contribution to creating a more open and democratic public administration.

Link to the article:

<https://meta.mk/patot-do-slobodniot-pristap-do-informacii-poplochen-so-tuzhbi-netransparentnost-i-molk-na-administracijata/>

Interview for BIRN (October 2024): Five years after the adoption of the Law on Free Access to Public Information in 2019 – a legal instrument that allows journalists, civil society organizations and citizens access to data held by institutions – a working group was formed for its revision and amendment.

The initiative for the changes was initiated by the Agency for the Protection of the Right to Free Access to Public Information. These proposed changes come in the context of growing reactions from journalists and civil society organizations, which indicate that the institutions do not treat their requests with due seriousness and do not provide them with the requested information.

In order for the public to learn more about the proposed legal amendments and their point of view on the limited access to public information, journalist Vasko Magleshev spoke with the director of the Agency, Plamenka Bojcheva, who gave her opinion on the proposed amendments and their significance for advancing the right to free access to public information.

Link to the interview: <https://prizma.mk/bojcheva-predlagame-kazni-za-rakovoditelite-shto-ne-davaat-informatsii/>

Interview for ResPublika (December 2024): In a conversation with the journalist Sonja Kramarska from *The Institute of Communication Studies*, the director of the Agency, Plamenka Bojcheva, spoke about the overall attitude of the institutions towards the most important tool of democracy – providing data about their work that the public has the right to know.

In the conversation, the director emphasized the need for institutions to work proactively in publishing information, instead of citizens and journalists being forced to submit requests and face administrative obstacles. At the same time, she called on the public administration to be more open and committed to transparency, as well as to strengthen mechanisms for supervision and sanctions in cases of unjustified withholding of information.

The conversation was held in the context of ongoing efforts to promote democratic values in the country, where it was pointed out that continuous

communication between institutions, media and citizens is a key element in building trust and accountability.

Link to the interview: <https://respublica.edu.mk/intervju/plamenka-bojcheva-od-1-450-institucii-600-s%#d1%90-ushte-nemaat-veb-stranici/>

Promotional materials

Infographics, brochures and branded promotional material: In the 2024 report, the Public Relations Department was in charge of creating promotional material intended for employees and visitors to trainings in the Agency, as well as for journalists who followed the events organized by the Agency.

In order to promote the *Guide for active transparency of political parties in the Republic of North Macedonia* and to increase the recognition of the messages related to the International Day for Universal Access to Information, the Public Relations Department produced a flyer in Macedonian and Albanian, which contains the key messages from *The Transparency Guide*.

In addition, a QR code was included in the flyer for easy access the *Guide for active transparency of political parties in the Republic of North Macedonia* and *The comparative overview of the transparency of political parties* for easier public information.



Figure 1: Promotional material/flyer in Macedonian and Albanian

Working meetings and trainings

One-day training on the topic "With transparency against corruption". On January 27, 2024, in Hotel "Millennium" - Bitola, a one-day training was held under the title "With transparency against corruption", organized by the Center for Strategic Research and Documentation "Forum" with the support of the European Union.

The event began with introductory speeches by the organizers of the initiative "Youth activism against corruption - involvement and participation", as well as by the project coordinator. As part of the training, a report was presented from a research conducted on the method of distribution and use of the funds received from the compensation for the production of electricity from fossil fuels in the municipalities of Bitola, Novaci and Mogila.

Petar Gajdov, state adviser from the Agency for the Protection of the Right to Free Access to Public Information, made a presentation through which he explained the mechanisms for access to public information. Through concrete examples, he emphasized the importance of public interest and the accessibility of data for citizens.

Journalist Emilia Misirlievski from Telma, who is also a member of the "Council of Honor" at the Association of Journalists, added to the discussion by referring to transparency as an essential tool in the combat against corruption, emphasizing its importance for a democratic society.

Working meeting: Transparency of political parties and coalitions in the pre-election and election period. On February 28, 2024, in the premises of the Agency for the Protection of the Right to Free Access to Public Information, a working meeting was held under the title "Transparency of political parties and coalitions in the pre-election and election period".

The event brought together representatives of political parties and coalitions in the Republic of North Macedonia, who had the opportunity to exchange practical experiences regarding the publication of public information. In addition, the participants discussed the challenges they face in the process of transparent reporting, especially in the pre-election and electoral period, when access to accurate and timely information is crucial for the public.

The main goal of the meeting was to highlight the steps that should be taken to ensure a higher level of transparency among political entities. In that direction, the possible mechanisms for the promotion of public information during the election processes were considered, with an emphasis on open communication and accountability to the citizens.

The meeting represented a significant step towards improving access to public information, which is a key prerequisite for a fair and democratic election process.

Public announcements (PSAs), publications, projects, reports, video materials and social networks:

Project: Inclusivity in access to public information for persons with disabilities (May 2024). Within the project "Inclusiveness in access to public information for persons with disabilities", the Agency for the Protection of the Right to Free Access to Public Information, in cooperation with *The Inclusive Association* and with financial support from *Open Society Foundation - Macedonia*, realizes a significant step towards improving the availability of information for all citizens. As a result of this partnership, a specialized educational video was created, which aims to simplify and make more understandable the process of accessing public information, adapted for people with different types of disabilities.

In the video, young activists from *The Inclusive Association* through clear and practical steps explain the entire process of submitting a request for public information, ensuring that everyone, regardless of the type of disability, can exercise their legal right to access the necessary information.

In addition, the video has been produced with a high level of inclusivity, including sign language interpretation, visual adaptations and audio-narration, thus ensuring its accessibility to as many people with different needs as possible. This initiative represents a significant step towards building a more open, transparent and inclusive society, in which all citizens have an equal opportunity to access information of public interest.

Link to the video material:

https://www.youtube.com/watch?v=LNpacT0VsPo&embeds_referring_euri=https%3A%2F%2Faspi.mk%2F&source_ve_path=MjM4NTE

European Commission Report on the Rule of Law 2024: Assessment and Recommendations. The European Commission's Rule of Law Report 2024 offers a comprehensive analysis of the state of the rule of law in the European Union and its member states, as well as in candidate countries. This year, for the first time, the report includes separate chapters for North Macedonia, Serbia, Montenegro and Albania, allowing for a more in-depth assessment of their progress and challenges.

The report contains recommendations aimed at advancing reforms in member states and identifying areas where further improvements are needed. Regarding North Macedonia, the report highlights the role of the Agency for the Protection of the Right

to Free Access to Public Information, emphasizing that it provides access to information as a constitutionally guaranteed right.

Social networks. During 2024, the Department of Public Relations actively carried out communication activities in order to inform the public about the work and current initiatives of the Agency.

In that direction, digitally adapted and visually illustrated announcements for the public and informative materials were prepared and shared through the Agency's official communication channels, including social networks LinkedIn, Instagram and Facebook. This strategy enabled timely, accurate and detailed reporting of the Agency's activities, which strengthened transparency and increased public engagement.

In addition to an active presence on digital platforms, the Agency's website was continuously updated with new news, relevant content and publications. In order to ensure inclusiveness and availability of information for the general public, all published materials were simultaneously translated and available in three languages: Macedonian, Albanian and English.

This multilingual approach has contributed to more efficient informing of citizens, the media and all stakeholders, enabling a more accessible and transparent transfer of information of public interest.

Future directions

Looking ahead, the Public Relations Department at the Agency for the Protection of the Right to Free Access to Public Information will continue its proactive engagement in the advancement and promotion of this fundamental right. Within its activities, the department plans to expand and modernize the digital approach, enriching it with appropriate content and communication tools.

In addition, efforts will be made to strengthen cooperation with media partners, enabling more efficient and accessible information to the public. At the same time, the department will investigate innovative approaches for involving a wider circle of citizens in the work of the Agency, with the aim of raising public awareness of the meaning and practical application of the right to free access to public information.

4.5. TRAINING OF THE EMPLOYEES

In this reporting year:

On 27.01.2024, a one-day training on the topic "With transparency against corruption" was held at the Hotel "Millennium" – Bitola, organized by the Center for Strategic Research and Documentation "Forum", with the support of the European Union. The implementers of the initiative "Youth activism against corruption - involvement and participation" had an opening address at the training.

On February 29, 2024, two employees attended an International Conference on "Media Literacy in the Age of Artificial Intelligence: expanding the boundaries of the possible" organized by the Institute for Communication Studies (ICS) and IREX.

On March 19, 2024, in SEA in Skopje, two (2) employees from the Agency attended a training session entitled Capacity building on the Performance Assessment Framework (PAF) of North Macedonia.

On March 27, 2024, two employees attended the conference: "How to communicate about the environment in the growing environmental crisis: practical experiences and new perspectives." The conference was organized by the Institute for Communication Studies (ICS) within the project "Promoting environmental communication through online learning and virtual mobility", which is implemented in partnership with the universities of Zagreb, Novi Sad, Sarajevo and Tirana, and is financed by the ERASMUS+ program.

On 04/03 and 07/02/2024, an employee was at the Conference: Equality through the prism of statistics organized by the Association for Democratic Initiatives (ADI) from Gostivar and HOPS - Option for a healthy life from Skopje.

On April 15, 2024, an employee within the Project "EU Support for the Rule of Law" presented the Slovenian Erar/E-investigator system organized by the Training Center of the State Commission for the Prevention of Corruption.

On 06 and 07.05.2024, representatives from the Agency attended the Workshop for analyzing/dealing with cases for free access to information organized by the Council for Transparency and Good Governance of Spain.

On May 20-21, 2024, six (6) employees from the Agency participated in a two-day training on the topic "Increasing environmental transparency for the advancement of environmental justice" which was held in Krushevo, organized by UNDP and in cooperation with the Agency.

From May 31 to June 30, 2024, an employee of the Agency participated in an online training on Organizational Misconduct and its causes, ethical leadership and ethical management within organizations organized by the International Anti-corruption Academy from Austria (INTERNATIONAL ANTI-CORRUPTION ACADEMY - IACA).

On 07/02, two employees attended the Presentation of the project - Equality through the prism of statistics and introductory remarks held in cooperation with the Association for Democratic Initiatives (ADI) from Gostivar and HOPS - Option for a healthy life from Skopje.

On 12.07.2024, an employee attended a training on Instruments for the rule of law in the context of accession, organized by the European Policy Institute (EPI) Skopje.

On 31.07.2024, the Ministry of Public Administration, in cooperation with the Center for Change Management (CMP), organized a public discussion on the key challenges faced by public sector institutions in the Republic of North Macedonia, which was attended by two employees from the Agency.

On the same day, two employees were also present at a one-day workshop: Presentation of Design Thinking for Social Inclusion in the areas of environment, social entrepreneurship and social work The Thinking organized by ECO Logic as part of the Erasmus+ project "Design Thinking for Social Inclusion".

On August 26 and 27, 2024, two employees attended a two-day training for IPA projects and Trainers of Trainers organized by UN Women and SEA, as trained trainers.

On August 30, two employees attended the Second Workshop for discussion of the administration's capacity building program for collecting data to measure discrimination.

From 03.09 to 05.09.2024, five employees attended the "Basic Communication Training" in Veles, and they were issued a certificate for attending the training, which was held within the Rule of Law Project within the component IMPROVING THE PREVENTION AND combat AGAINST CORRUPTION

From 09/04 to 09/06/2024, one employee attended a training within the project "Equality through the prism of statistics", conducted by ADI from Gostivar and HOPS from Skopje, on the topic: Training for trainers to collect data for measuring discrimination.

On September 11 and 12, 2024, a training was held at the Resource Center for gender-responsive policy-making and budgeting, attended by two employees from the Agency. The basic training on gender, gender equality and the introduction of the gender

perspective in public policies was intended to strengthen the capacities of administrative officers for gender-responsive policymaking and budgeting who are involved in the process of creating policies and programs in their institutions. The training was conducted by the Ministry of Social Policy, Demography and Youth.

On 30.09, a one-day workshop on GAP analysis for the Sectoral Working Group for Reforms in Public Administration and presentation of leaders organized by UN Women & SEA, was attended by an employee from the Agency.

On 10.10.2024, one employee attended a one-day training - Activist introduction to GAP organized by UN Women & SEA.

A working group of ten (10) employees from the Agency with the trainers from CAF participated in workshops for CAF Preparation of a Plan for the improvement of conditions based on selected measures from the report on a common assessment framework. All employees from the Agency participated in the final workshop for improving the work of the Agency - CAF 2024, as the final process of CAF on October 7 and 8, 2024.

On October 15 and 16, 2024, two employees attended Basic training on gender-responsive budgeting and its application in sector policies and programs.

On October 16, an employee participated in the "Thematic Forum Inclusive Community for Resistance to Corruption" organized by Metamorfozis.

From 27-29 November, 2024, three representatives from the Agency attended the training held on Basics of gender analysis.

On 3 and 4 December, an employee participated in the Training for Youth Officers on Youth Policies and Youth Participation.

One employee attended the Consultative Debate - Youth Participation Index for 2023, which was held on December 24.

One employee was trained for translators and lecturers at the Republic of North Macedonia Language Application Agency, for which he was issued a certificate.

5. INTER-INSTITUTIONAL AND INTERNATIONAL COOPERATION AND PROJECTS OF THE AGENCY IN 2024

The Agency for the Protection of the Right to Free Access to Public Information for the period January - December 2024, as in the past years in the area of inter-institutional and international cooperation, in addition to the continuous maintenance of already established relations with its associates and related institutions, was also active in the field of the realization of project activities, preparation of reports, as well as numerous participations in working groups, visits to conferences, trainings and workshops.

5.1. INTER-INSTITUTIONAL COOPERATION OF THE AGENCY IN 2024

5.1.1. Public Administration Reform Strategy 2023-2030 and Action Plan 2023-2026

The nominated persons from the Agency, as active members of the working group for public administration reform (PAR), consistently prepared and published the data related to the activities of the electronic system for monitoring the implementation of the Public Administration Reform Strategy of the Ministry of Public Administration. In the reporting period 2024, in accordance with the determined activities contained in the Action Plan, the Agency notified in **Priority area 3: RESPONSIBILITY, ACCOUNTABILITY AND TRANSPARENCY** and special objective 3.4.: Increased transparency of institutions at the state and local level and measure 3.4.1 Improvement of tools for the availability of public information

Activity 3.4.1.1 Strengthening the capacity of the Agency for the Protection of the Right to Free Access to Public Information (APRFAPI) for the performance of its competences. Regarding this activity, we reported that in 2024, the Agency, in cooperation with numerous partners from the non-governmental sector, held numerous working meetings with the aim of securing donor funds for the implementation of project activities related to the strengthening of the Agency's capacities. In that direction, the following was realistic:

- The Agency, in cooperation with the Association for the Promotion and Development of an Inclusive Society INCLUSIVA from Kumanovo, carried out training for the familiarization of the Agency's employees with the subject

matter and institutional preparation for the implementation of the activity within the framework of the National Strategy for the Rights of Persons with Disabilities 2023-2026, a Memorandum of Cooperation was signed and a Manual was prepared and published electronically, as well as an informative video on the realization of the right of access to public information for persons with disabilities.

- After the working meeting for cooperation with the United Nations Development Program (UNDP) in Skopje in 2024, a two-day training was organized on the topic "Increasing environmental transparency for the advancement of environmental justice". The training was attended by the officials of the holders from the state institutions, ministries and municipalities.
- The agency in cooperation with the Council of Europe within the project "Protection of freedom of expression and freedom of the media in North Macedonia (PRO-FREX)", continues in the third cycle of the project itself. In 2024, an Analysis of the case law of the Administrative Court was prepared in connection with the Law on Access to Public Information (2019-2023) in North Macedonia, but its publication will be in 2025 with a special activity for it.
- In cooperation with the International Republican Institute - IRI, in September 2024, the Agency organized a workshop entitled "Transparency of political parties and coalitions in the pre-election and election period" in its premises. The second part of this workshop was a focus group from which the experts acquired information and data needed for the preparation of a Guide for active transparency of Political Parties. The promotion of this Guide, with the support of IRI, was precisely on the occasion of the celebration of the International Day for Universal Access to Information on September 28.
- In 2023, the Agency ensured involvement in the "Partnership against corruption" project, the implementation of which is with financial support from USAID, and in May 2024, the implementation of the first activity within the framework of this project began, that is, with the CAF process in the Agency.
- In September 2024, the European Delegation officially announced the Twining Light application prepared by the Agency on the theme: "Supporting free access to information - We rise together." (Supporting the free access to information - We rise together.)".

Activity 3.4.1.2 Preparation of amendments and additions to the Law on FAPI in order to increase the competences of the Agency and advance the right of free access

to information. Within the IPA2 project "Promoting transparency and accountability in public administration" for the Agency was published "The analysis of the application of the Law on Free Access to Public Information with recommendations for improving the system for free access to information". The recommendations of SIGMA as well as the internal reports prepared by the employees of the Agency, together with this analysis, are initial materials for amendments and additions to the Law on Free Access to Public Information. The Ministry of Justice is the institution responsible for this Law and therefore it leads the process for its amendments and additions. During 2023 and the first half of 2024, there were joint initiatives and collaborations for the realization of this activity, and the amendments to the law were included in the Government's work program for 2024 as an activity of the Ministry of Justice, but due to the election process, the procedure was postponed. In August of this year, the Assembly of the Republic of North Macedonia ratified the Convention of the Council of Europe on access to official documents, the so-called Tromsø Convention, due to which the need to harmonize the domestic legislation with the provisions of the Convention arose.

As a result of this, the Ministry of Justice in September 2024 started the procedure for amendments and additions to the Law on Free Access which resulted in the establishment of the Working Group for Amendments and Additions to the Law on Free Access by holding the first meeting in the Ministry of Justice in November 2024 at which each member of the working group was tasked with giving their proposals for the amendments to the law that would be discussed at the following working meetings that would result in a single proposed text with amendments to the law. By the end of the year, a total of 3 meetings of the working group were held and minutes were prepared for each meeting.

Activity 3.4.1.3 Preparation of procedures for proactive publication of information created or available by institutions, their management and updating. In the direction of advancing the Law on Free Access to Public Information (LFAPI), the Agency needs preparation and support for the Advancement of Proactive Transparency on the part of donors, but independently in the reporting period it has prepared and published a Guide for Proactive Transparency and in 2024 additional informational material in order to provide citizens with quick, simple and easy access to all the information they possess and with which all holders of public information have at their disposal.

Activity 3.4.1.4 Support of state administration bodies and municipalities for unified and complete publication of data in accordance with LFAPI and for encouraging proactive transparency. In the direction of promoting proactive transparency, as an added value in its operations, the Agency every year, in accordance

with the established Methodology, conducts monitoring of the websites of the holders of information and prepares and publishes reports, and in 2024 it conducts monitoring of: municipalities and centers for the development of planning regions, judicial authorities and state institutions.

The Agency publishes the reports from the conducted monitorings on its website, while delivering them to the monitored information holders with the obtained results, for their familiarization, which should serve as a corrective measure in order to improve their websites in terms of active transparency.

Activity 3.4.1. Implementation of trainings and informative - educational sessions to raise awareness in institutions about the importance of access to public information for institutions at the local and central level and raising e-services through the use of the e-portals of APRFAPI. In 2024, the Agency realized a total of 9 trainings, all with the aim of educating newly appointed and current officials on mediating information with information holders. In addition, with the support of the non-governmental sector in 2024, 3 additional trainings were organized, the first of which is organized by the Center for Strategic Research and Documentation "Forum", the second with the support of UNDP for officials from state institutions, ministries and municipalities, and the last with IRI for officials from political parties. One training at the Academy of Judges and Public Prosecutors and one training for high school students.

Activity 3.4.1.6 Raising public awareness among applicants about the way to use the right to free access to public information with a special emphasis on using the e-portal of APRFAPI, in the direction of digitalization of processes. During the reporting period, 231 requests from e-requesters were registered and submitted on the e-portal for applicants Free Access - Submit and browse requests for free access to information (slobodenpristap.mk). The next steps within this activity of the Agency is the search for potential donors for project activities to animate and strengthen the knowledge of applicants about the right to free access to public information.

A novelty in the process of planning and preparation was the filling of risk forms and the detailed budget calculation for the necessary financial resources for the implementation of the activities specified in the Action Plan. In accordance with this document, the Agency submitted a request for funds from the Budget of the Republic of North Macedonia in its budget circular, but these were not approved by the Ministry of Finance in the Agency's Budget for 2025.

The Agency is an active participant in the work of the Special Working Group for PAR. At the end of 2024, for the needs of the 13th Meeting of the special group for

PAR, the Agency prepared a Report with a brief overview of achieved results and more significant planned reforms for the areas of the PAR subcommittee. The meeting of the Special Group for Public Administration Reform was held in December 2024 in the premises of the Government of the Republic of North Macedonia.

According to the action plan, the Agency reports on three indicators in the electronic system for monitoring the implementation of SRYJA, with a previously determined way and dynamics for reporting the same and the appropriate methodology, the report for 2024 is:

- **The percentage of state institutions that regularly publish and update documents on their websites in accordance with the LFAPI** which for 2024 is 69.9% with a brief explanation: The Agency monitored 113 holders, i.e. the websites 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. Out of a total of 133 state institutions recorded in the List as holders, the websites of 113 holders were monitored. 11 holders were not covered by the monitoring, because they do not have their own websites. Monitoring was not carried out on the four new ministries because the entities are new and the establishment of the web and the filling of the pages with information is in progress.
- **Number of realized trainings for LFAPI at local and regional level:** For this indicator, the agency has notified about 14 trainings that were held with physical presence, namely trainings of officials from the institutions in charge of free access.
- **Percentage of unanswered requests for access to public information from state institutions** and in 2024, the total number of appeals submitted to the Agency against state institutions is 140, of which 79 appeals were recorded based on the administration's silence. According to the formula for this indicator, the calculated value for 2024 is 57.3%

5.1.2. PFM Feasibility/Performance Assessment Framework

In the feasibility assessment framework of the Ministry of Finance, i.e. the measurement of work performance whose values for many areas and institutions are contained on the electronic PFM (PAF) platform (pafnorthmacedonia.mk), on an annual basis, the Agency is obliged to report on a total of 5 indicators, that is, 3 indicators located in two areas: Justice and internal affairs and Democracy and governance.

In particular, two identical indicators in the subgroups combat against corruption and one additional one in Responsibility, accountability and transparency under SPAR.

The agency announced the following percentage values for 2024:

- The rate of received appeals due to "silence of the administration" is 245 (69.21)
- The rate of decisions respecting access to public information is 210 (59.32 %) and
- The rate of rejected requests for access to public information from public institutions is 34 (9.6 %).

5.1.3. The national strategy for information-communication and telecommunication development

Under the auspices of the Ministry of Digital Transformation and the National Council for Digital Transformation, the process of developing a national ICT strategy 2025-2030 has begun, and the Agency is taking an active part in this process. The digital transformation and subsequent social development in accordance with the EU standards (Digital Decade of Europe: digital goals for 2030) is the main priority for Macedonia, to which great attention is paid, with professional capacities, knowledge and resources. The process is complex and requires continuous and smooth multi-institutional cooperation and involvement of several stakeholders: academic community, business community, international partners. Such a document is necessary and imposed due to the increasing need for connection in society, enabling the everyday life of citizens and businesses to be technologically facilitated and optimized.

The creation of the national strategy includes several subsequent processes:

1. Analysis of the situation through data collection, determination of problems, causes and consequences, determination of priorities and coverage
2. Strategic framework with definition of vision, priority areas, general and special goals
3. Monitoring framework with indicators, method of data collection, reporting dynamics, risk analysis, assessment dynamics

4. Action plan with taking measures and activities, costs, deadlines and financial plan

All this will be done with constant consultation with stakeholders and their active participation. According to the proposed plan, the Agency has already submitted ideas, experiences, proposals and plans for the national ICT strategy, and the planned deadlines are already in March 2025 for a National ICT strategy to be drawn up and adopted.

5.1.4. The Convention of the Council of Europe on Access to Official Documents (Tromsø Convention) was ratified.

With the joint initiatives of the Agency and the Ministry of Justice, the Assembly of the Republic of North Macedonia, at its 12th session held on August 13, 2024, passed the Law on Ratification of the Council of Europe Convention on Access to Official Documents. With its adoption, the Republic of North Macedonia becomes the 16th country that has ratified this Convention. So far, the Convention has been ratified and entered into force in 15 countries: Albania, Armenia, Bosnia and Herzegovina, Estonia, Finland, Hungary, Iceland, Lithuania, Montenegro, Norway, Republic of Moldova, Slovenia, Spain, Sweden and Ukraine. The Council of Europe Convention on Access to Official Documents (CETS No. 205), also known as the Tromsø Convention, was adopted on 18 June 2009 in Tromsø, Norway, and entered into force on 1 December 2020.

The Tromsø Convention is the first binding international legal instrument that recognizes the right of access to official documents held by public authorities of any legal and natural person, without discrimination and regardless of the status or motives of the requester when requesting access to public information.

It establishes minimum standards for a quick and fair procedure for requests for access to official documents by the public authorities that own the documents, as well as for internal administrative audits and appeals submitted to independent authorities or courts in case of refusal of requests for access to public information.

5.1.5. The national strategy for the combat against corruption 2021-2025

During the reporting year 2024, as part of the activities undertaken in accordance with the National Strategy for the combat against corruption 2021-2025, the Agency regularly, within the stipulated period, submitted reports through the

portal portal.dsk.mk in two areas for which it was indicated by the State Commission for the Prevention of Corruption to provide a report, namely:

1. NS Area: Public Procurement

Notification regarding activity 1.3. Strengthening of supervision regarding the publication of information regarding public procurement in accordance with Article 10 of the Law on Free Access to Public Information:

Pursuant to Article 10 of the Law on Free Access to Public Information, the Agency supervises the published information on public procurements, on the web pages of the holders only with regard to the following data: Annual Plan for Public Procurements, Advertisements for Public Procurements and notices of concluded contracts, without entering into their content. Link to the information and monitoring reports: <https://aspi.mk/izvestai/>. The Agency for the Protection of the Right to Free Access to public information monitors the websites of Information Holders, in accordance with the Methodology prepared in cooperation with external experts. The monitoring of the websites of the information holders is an added value in the work of the Agency. The monitorings are prepared for certain categories of holders and in a certain period. In 2024, the Agency carried out monitoring of the websites of the Municipalities and centers for the development of planning regions, as well as of the judicial authorities. The following results were obtained from the monitoring related to public procurement: Municipalities and centers for the development of planning regions: On the websites of the monitored municipalities and centers for the development of planning regions, 48 holders have moved the annual plans for public procurement to a separate link, and 55 entities publish announcements for public procurement. 54 CASES have published the notices about the concluded contract for public procurement. Judicial authority: 16 holders have moved the annual plans for public procurement to a Separate link on the websites of the monitored holders, and 11 CASES publish announcements for public procurement and 11 holders of information have published notices of concluded contracts for public procurement. Pursuant to Article 10 of the Law on Free Access to Public Information, the Agency supervises the published information on public procurements, on the web pages of the holders only with regard to the following data: Annual Plan for Public Procurements, Advertisements for Public Procurements and notices of concluded contracts, without entering into their content. The Agency points out that there are no criminal provisions for the execution of criminal sanctions specifically for non-disclosure of the above-mentioned data, which are indicated in activity 1.3 of the Action Plan of the National Strategy for the Prevention of Corruption and Conflict of Interest 2021-2025.

2. NS Area: Employment

Notification regarding activity 4.1. Strengthening of supervision in relation to the publication of acts on organization and systematization and employment, in accordance with Article 10 of the Law on Free Access to Public Information:

Strengthening the supervision in relation to the publication of the acts of organization and systematization and employments, in accordance with Article 10 of the Law on Free Access to Public Information according to the submitted report, ASPI informs that in accordance with Article 10 of the Law on Free Access to Public Information, the Agency does not have the authority to perform supervision in relation to the publication of employment acts. Out of 125 monitored institutions, 116 institutions have published documents on internal organization and systematization. Municipalities and Centers for the Development of Planning Regions: 30 holders have published the internal organization regulations, and 43 holders have published the systematization regulations. Organogram for internal organization has been published by 66 holders. Judiciary: The rulebook for internal organization has been published by 18 holders, and the rulebook for systematization has been published by 20 holders. Organogram for internal organization has been published by 15 holders. According to the submitted report, ASPI informs that according to Article 10 of the Law on Free Access to Public Information, the Agency does not have the authority to supervise the publication of employment documents.

5.2. INTERNATIONAL COOPERATION AND PROJECTS OF THE AGENCY IN 2024

5.2.1. Activities of the Agency for the Protection of the Right to Free Access to Public Information as a member of the International Conference of Information Commissioners (ICIC)

● Participation in an International Conference

The Agency for the Protection of the Right to Free Access to public information, as an active member of the International Conference of Information Commissioners (ICIC) and during 2024 continued to achieve continuous cooperation both with the Secretariat of the ICIC and with regional networks within the European continent. The cooperation is based on the exchange of experiences, participation and promotion of the activities of the members, their support, as well as research and sharing of positive examples and best practices.

The International Conference of Information Commissioners (ICIC) is a global annual forum that brings together information commissioners, ombudsmen and other law enforcement bodies for free access to public information from around the world, as a fundamental pillar of social, economic and democratic governance. The mission of the event itself is the sharing of knowledge and best practices, capacity building, global progress and networking, to be able to act as a collective voice in international forums in order to improve people's right to access information of public interest.

The conference was held from 3 to 5 June 2024 in Tirana, Albania, and the XV edition of the International Conference of Information Commissioners ICIC 2024 was hosted by the Office of the Commissioner for Information and Personal Data Protection of Albania. The theme of this year's conference was: "Empowering individuals through access to information: ensuring transparency and inclusiveness in an interconnected world." ICIC's annual conference program consisted of a closed session and a public session. The closed session was attended by accredited (ICIC) members, while the public session, in addition to ICIC members, was attended by representatives of international organizations and partners, non-governmental organizations (NGOs), journalists and other interested and affected parties. The main focus of all discussions was to address common topics related to free access as well as to explore possible solutions, taking into account new technologies and digitization and their effect on legal solutions and the human right to free access to public information.

While at the closed session of the European Network within the ICIC, in addition to colleagues from related institutions from Portugal, Germany, Hungary and Spain and North Macedonia, the Agency was chosen as an active member of the network.

Hence, during 2024, the Agency team actively cooperated with the ICIC Secretariat, as a member of the regional network, actively participated and contributed with its experience in the preparation of the Statute of the European Network within the ICIC. In addition, the Agency intensified its work by participating in numerous hybrid meetings in the established ICIC Working groups from several areas, within this network, which represented and processed important topics in the field of free access to information.

As part of the cooperation with the International Conference of Information Commissioners (ICIC), during 2024, the Agency's team produced several reports and answers to several questionnaires, according to the needs of the ICIC Secretariat, namely:

On 16.04.2024, within the training working group of the International Conference of Information Commissioners (ICIC), the Agency submitted a completed Survey Questionnaire for digital training tools.

Within the framework of the World Press Freedom Day, on April 16, 2024, the Agency submitted a report on the Agency's best practices in promoting access to public information related to the environment. This report was the Agency's contribution to the 31st UNESCO International Conference entitled "Planet Report: Journalism facing the challenges of the environmental crisis".

On 02.05.2024, the Agency submitted a completed Survey within the Working Group for Legal Cases of the ICRC as part of the activities of the International Conference of Information Commissioners (ICIC) for the consideration of case studies.

On 17.05.2024, the Agency submitted a completed Survey within the framework of the Regional Report – Europe as part of the activities of the International Conference of Information Commissioners (ICIC) for the XV ICIC Conference

On 17.07.2024, the Agency submitted a completed Survey on Strategic Priorities 2024-2027, within the regular activities of the International Conference of Information Commissioners (ICIC)

On September 26, 2024, within the framework of the celebration of the International Day of Universal Access to Information, at the invitation of the National Institute for Transparency, Access to Information and Protection of Personal Data of Mexico, a Panel "The Impact of the Inclusion of Information in the Public Sector" was held in a virtual format, in which the Director of the Agency participated as a panelist.

On the occasion of the International Day of Universal Access to Information (IDUAI) 2024, which was held in Ghana on October 1st and 2nd, 2024, at the invitation of the ICIC Secretariat to mark this day with the "ICIC Newsletter Special Edition", the Agency prepared and sent a special material that was part of the published materials in the "ICIC Newsletter Special Edition".

The Agency also contributed to the exchange of experiences and positive practices by regularly responding to questions submitted by the Secretariat of the International Conference of Information Commissioners (ICIC).

5.2.2. Twining Lite application

Twining Light application that the Agency submitted to the European Delegation in Skopje on the topic: "Support of free access to information - We rise

together." ("Supporting the free access to information - We rise together") aims to improve the national policy in the field of transparency and accountability of information holders at the central and local level in North Macedonia in accordance with the best practices and recommendations of the EU. During the month of December 2024, an evaluation of the offers of all EU member states that applied to the call was carried out and the related institution that will be in charge of implementing the project was selected. The implementation of the project is expected to begin in March 2025.

5.3. COLLABORATION WITH NON-GOVERNMENTAL ORGANIZATIONS AND PROJECT ACTIVITIES

As previously pointed out, the Agency's existing budget is insufficient for efficient and successful functioning. As a result, the Agency's management was encouraged to seek additional support from other sources, such as collaborations and partnerships with numerous non-governmental organizations. The concluded partnerships resulted in the realization of numerous activities, the results of which remain in permanent and added value in the further work of the Agency, and they are:

- **The Agency in cooperation with the Association for Promotion and Development of an Inclusive Society INCLUSIVE**

In 2023, the cooperation between the Agency and the Association for the Promotion and Development of an Inclusive Society INCLUSIVA began. In 2024, within the framework of this collaboration, it was prepared and published electronically Manual, as well as informative video for exercising the right of access to public information for persons with disabilities. The implementation of the above activities are within the framework of the "Project for inclusion in access to public information for persons with disabilities", supported by the Open Society Foundation - Macedonia.

- **The Agency in cooperation with the Council of Europe**

Cooperation with the Council of Europe within the project "Protection of freedom of expression and freedom of the media in North Macedonia (PRO-FREX)" continues in the third cycle of the project itself. The agency in cooperation with the Council of Europe within the project "Protection of freedom of expression and freedom of the media in North Macedonia (PRO-FREX)", continues in the third cycle of the project itself. Within those frameworks, during 2024, an Analysis of the case law of the

Administrative Court was prepared in connection with the Law on Access to Public Information (2019-2023) in North Macedonia.

In the third quarter of 2024, a hybrid meeting of the Second Management Board of the project was held. Cooperation with the Office of the Council of Europe in Skopje continues in 2025.

- **The Agency in cooperation with the United Nations Development Program (UNDP) in Skopje**

On May 20 and 21, 2024, in Krushevo, the Agency in cooperation with the United Nations Development Program (UNDP) in Skopje organized a two-day training on the topic "Increasing environmental transparency for the advancement of environmental justice". The training was attended by the officials of the holders from the state institutions, ministries and municipalities in the Republic of North Macedonia. At the invitation of the Agency, speakers and lecturers at the training were representatives from Archurs Center Skopje - Milieukontakt Macedonia. The training was carried out within the project "Advancement of environmental justice in North Macedonia". After the presentations, experiences and examples of positive practice were exchanged with the aim of increasing environmental transparency and promoting environmental justice both at the local and central level. The cooperation continues in 2025.

- **The Agency in cooperation with the International Republican Institute – IRI**

In cooperation with the International Republican Institute - IRI, the Agency organized a workshop in its premises entitled "Transparency of political parties and coalitions in the pre-election and election period". The second part of this workshop was a focus group from which the experts acquired information and data needed for the preparation of Guide for active transparency of Political Parties.

The promotion of this *Guide, with the support of IRI*, it was precisely at the commemoration of the International Day for Universal Access to Information on September 28th. The purpose of the Guide for active transparency is to help political parties as holders of information to improve their transparency and encourage them to publish as much information as possible of interest to citizens, which gives a complete picture of their actions and goals. The publication also covers comparative analysis on positive practices and the way political parties in Germany and Estonia publish information about their operations and finances.

- **The Agency held a meeting for involvement in the "Partnership against corruption" project**

The Agency within the framework of the "Partnership Against Corruption" project, led by the global company MSI from Washington from the United States of America, started the realization of the first activity CAF process in APRFAPI. The project will be implemented with financial support from USAID. The cooperation continues in 2025.

5.4. REMAINING REALIZED ACTIVITIES

5.4.1. At the invitation of UNESCO in May 2024, the Agency participated in the annual survey on public access to information for 2023 on SDG Indicator 16.10.2

In 2022, UNESCO, through its International Program for the Development of Communications (IPDC), was further mandated to monitor and report on the progress of this indicator worldwide. UNESCO, by measuring the indicator SDG 16.10.2, monitors progress in the adoption and implementation of "constitutional, statutory and/or political guarantees for public access to information". The Agency has been a part of this research since the very beginning of an invitation from the UNESCO SDG 16.10.2 Team from the Department for Universal Access to Information, Communications and Information Department, so like last year, as well as this reporting year, it submitted its answers to the Questionnaire to the UNESCO team at the end of the second quarter of 2024.

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

Based on the established practice and the letter from the Commissioner for Enlargement and Neighborhood Policy, submitted to the Secretariat for European Affairs, the Agency prepared and submitted a Report for 2024, for the reporting period from March 2023 to November 2024, while the statistical data covered the period January-December 2023.

5.4.3. Preparation of reports, analyses, attended workshops and attendance at conferences

On July 3, 2024, the Agency for the Protection of the Right to Free Access to public information prepared and published a six-month Report on the implemented activities resulting from the legal competences for the period January-June 2024.

At the invitation of the Cabinet of the Vice President for European Affairs, and in the organization of the Office of NIPAC on 21.05.2024, the Agency takes an active part in the Second Meeting of the Sectoral Committee for Monitoring IPA II for Democracy and Governance (focus on PAR and PFM). This hybrid meeting is realized with the aim of presentation and discussion of the strategic priorities of the sector Reforms in public administration; the relevant strategies, as well as the areas of intervention defined within the framework of the Strategic Response for IPA 3 and the indicators for monitoring their realization, and operational conclusions and recommendations were prepared.

As of 16.08.2024, the Agency prepared and published The analysis of the data from the appeals received due to the silence of the administration that is, failure to act on the requests for public information submitted by the requesters (the administration's silence) continues to be a problem in the application of the Law on Public Information for a certain number of information holders. Analysis of the administration's silence regarding the period from January to June 2024. The analysis refers to the number of appeals submitted due to the silence of the administration and the holders of information who did not act within the legally stipulated period after submitted requests by the information requesters, and the goal is to avoid this unpopular tool by the holders who ignore the submitted requests. It has been determined that the largest number of appeals are against the holders from the local self-government. However, in this period it is noticeable that the number of appeals has increased against the holders of educational institutions and legal and natural persons who exercise public powers and activities of public interest. The conclusion of the conducted analysis led to the conclusion that most of the time the subject of the requests for which appeals are filed, is information that the holders are obliged to publish on their web pages and thus inform the public. We should emphasize that the Agency is making great efforts to reduce this trend of not acting on submitted requests, through trainings and daily communication with officials with information holders.

On September 28, 2024, on the occasion of September 28 – the International Day for Universal Access to Information, the Agency, at the invitation of the International Conference, submitted an author's text on the topic: "Inclusion of access to information and participation in the public sector".

The special issue of the newsletter aims to provide a platform to share best practices, lessons learned and innovative approaches to overcoming barriers to information access. The International Conference of Information Commissioners

seeks to deepen the role of access to information in the governance, development and protection of human rights.

- **Attended workshops and conferences**

On 02.05.2024, at the invitation of the Cooperation Department for Freedom of Expression of the Council of Europe, the Agency participated in the regional conference in Rabat, Morocco, entitled "Euro-Mediterranean Approaches to Free Access to Information, regional exchange of experiences: "Protection of human rights, rule of law and democracy through common standards in the southern Mediterranean (2022-2025)". This event was organized by the Cooperation Department for Freedom of Expression of the Council of Europe, in partnership with the Moroccan Commission for the Right to Access to Information (CDAI). The aim of the workshop was to strengthen transparent governance and protect the right to access to information. Bringing together a large number of institutional representatives for access to information from North Macedonia, Morocco, Tunisia, Lebanon, Ireland, Spain, Portugal, Serbia, and Georgia. The conference aimed to facilitate dialogue by sharing good practices and knowledge on Council of Europe standards, and in particular the Convention on Access to Official Documents (*Tromsø Convention*), as a key step towards strengthening transparent governance and protecting the right to access information. The regional event was held in the context of the project "Freedom of Expression, Media Pluralism and Access to Information (SPV-FREXPLUME)", a component of the Southern Program V, a joint initiative between the European Union and the Council of Europe.

From 06 to 07.05.2024, a thematic workshop on analyzing/handling cases for free access to information, named "Political parties as holders of information - experiences and challenges", was held in Madrid, Spain, organized by the Council for Transparency and Good Governance of Spain. At this workshop, representatives from the institutions of Estonia, Portugal, Germany, North Macedonia, Slovenia, Switzerland, Hungary, Spain, the United Kingdom, Albania, Kosovo, Croatia, Luxembourg, as well as a representative of the European Ombudsman shared their experience. The agency takes an active part through the presentation of examples from practice.

From 03-05.05.2024 in Tirana, a delegation from the Agency led by the Deputy Director, as a member of the International Conference of Information Commissioners (ICIC), takes an active part in the XV edition of the International Conference of Information Commissioners ICIC 2024. This world forum that connects information commissioners, the ombudsman and other bodies responsible for supervising the

implementation of laws on free access to information from public character on a global level. The theme of this year's conference was: "Empowering individuals through access to information: ensuring transparency and inclusiveness in an interconnected world."

On June 12, 2024, the 5th BIRN (Balkan Investigative Reporting Network) Freedom of Information Report for 2023 was presented in Tirana, Albania, in which the Agency also participated. The fact that, in 2023, BIRN Macedonia has the best experience with data access using the right to free access to public information is noteworthy. Namely, out of a total of 63 Requests for access to public information submitted, 54 were fully answered, 4 requests for access to public information were partially processed, 2 requests were rejected, and only 3 requests were not processed at all by the institutions - holders of information.

On September 27, 2024, the International Day of Universal Access to Information 2024 was marked online, organized by the National Institute for Transparency, Access to Information and Protection of Personal Data from Mexico, and as chairman of the International Conference of Information Commissioners (ICIC) on the topic: "Integrity, inclusion and future challenges for access to information in the public sector".

At the invitation of the National Institute for Transparency, Access to Information and Protection of Personal Data from Mexico, at the online conference, in the second panel on the topic: "The impact of information in the public sector", the director of the Agency, Plamenka Bojcheva, gave her address.

On 02.10.2024, the international forum on "Climate change and human rights: The role of ombudsmen and national human rights institutions" was held in Baku. The forum was attended by a total of 200 participants, including over 60 guests from around 30 countries, such as ombudsmen and representatives of NICP, information commissioners, senior state officials, leaders and representatives of civil society organizations and various international organizations and experts on climate change and human rights. The purpose of the forum was to discuss the challenges brought about by global climate change and to explore solutions from a human rights perspective, as well as to share positive experiences in this area. In the panel discussion on the topic "Public access to information about climate change and its effects", the Director of the Agency, Plamenka Bojcheva, had her presentation. In her speech, she referred to the necessity of self-initiated, timely and up-to-date proactive publication of information by government institutions that create policies in the field of climate change, ecology and the environment, in order for the entire public to be

promptly and in detail informed about those policies and included in the processes of creating and making decisions and their implementation. At the end of the conference, the Declaration of the International Forum of Ombudsmen in Baku was announced and unanimously adopted. The declaration aims to improve the role of ombudsmen and NICP in solving environmental issues and increasing public awareness.

From October 1 to October 3, 2024, the fifth consecutive meeting of the countries participating in Initiative 2020 was held in Suto More (Montenegro), which was attended by a delegation from the Agency. The main themes of the meeting were "The affirmation of the right to free access to information in which the public interest prevails", as well as "The influence of international standards and international practice on the decisions of independent institutions". The representatives of Slovenia, Croatia, Macedonia, Serbia, Bosnia and Herzegovina, Kosovo and the host - Montenegro addressed the expert debate on the nerve-wracking issues and challenges from the application of the Law on Free Access to Public Information, with topics arising from the individual experience and work of the countries they come from. The members of Initiative 2020, at the fifth regular annual meeting, adopted conclusions, which primarily referred to the challenging topic - the silence of the authorities and the abuse of the right to access to information, as well as the confirmed judgments of the domestic administrative and supreme courts, the new standards in the area of the right to free access to information, both in administrative procedures and in disputes, as well as in the area of proactive publication of information. Next year, the meeting of Initiative 2020 will be held in Prizren (Kosovo).

On 22.11.2024, at the invitation of the office of the United Nations Development Program - UNDP in the Republic of North Macedonia, representatives of the Agency participated in the two-day International Conference of Ombudsmen and national institutions for human rights and the environment. Environmental justice was in the center of attention at the conference, and representatives from the region and Europe shared their experiences and strategies for the protection of human rights in conditions of environmental threats. The purpose of the conference is to strengthen the environmental justice efforts that began with the 2017 Ljubljana Declaration and the establishment of the Regional Network of Environmental and Human Rights Ombudsman. The director of the Agency, Plamenka Bojcheva, also participated in the conference as a panelist on the topic: "National perspectives for environmental protection and justice in North Macedonia". The conference was organized within the framework of the project "Increasing the role of the Ombudsman of the Republic of North Macedonia in environmental justice" financed by the Norwegian Ministry of Foreign Affairs Norad, and was carried out in cooperation with the United Nations

Development Program - UNDP and the office of the UN High Commissioner for Human Rights in Skopje United Nations Human Rights.

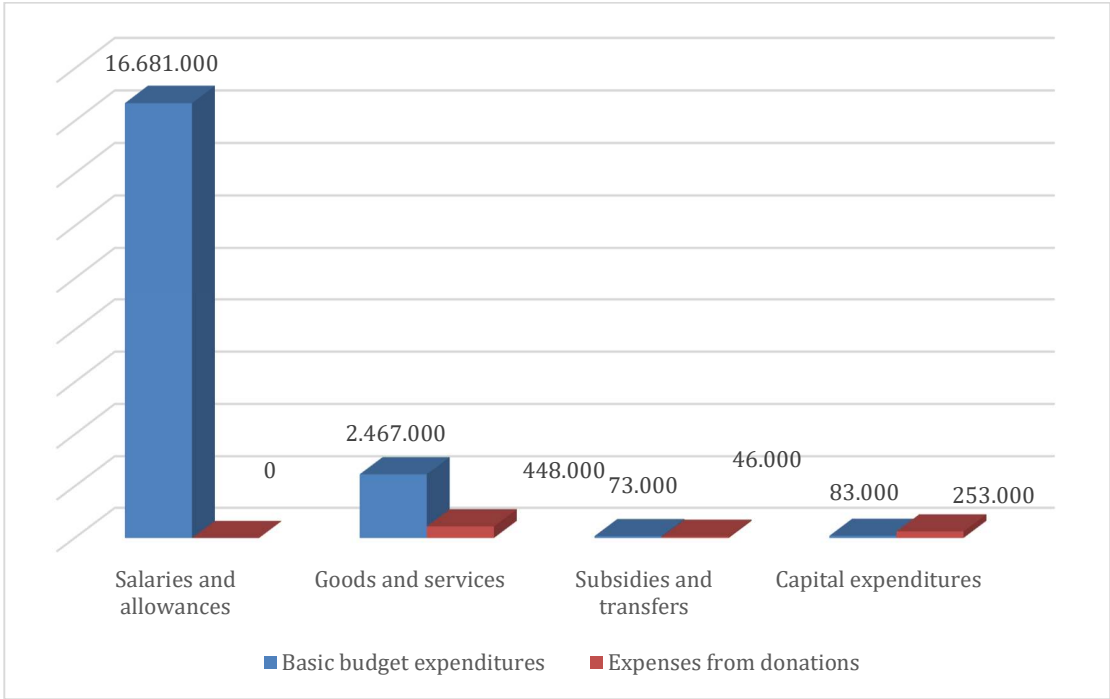
6. BUDGET, FINAL ACCOUNT AND FUNDING

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

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

6.1. BRIEF FINANCIAL STATEMENT

By adopting the Budget of the Republic of North Macedonia for 2024 ("Official Gazette of RSM" No. 283/2023), the Agency started the year with a budget in the total amount of MKD 19,406,100.00. During the year, with the Decision on the redistribution of funds between the budget users of the central government and between the funds for 2024 ("Official Gazette of the Republic of North Macedonia" no. 169/2024), the Agency was set a budget in the total amount of MKD 20,051,000.00.



Graph no. 8: Budget for 2024 by funding sources

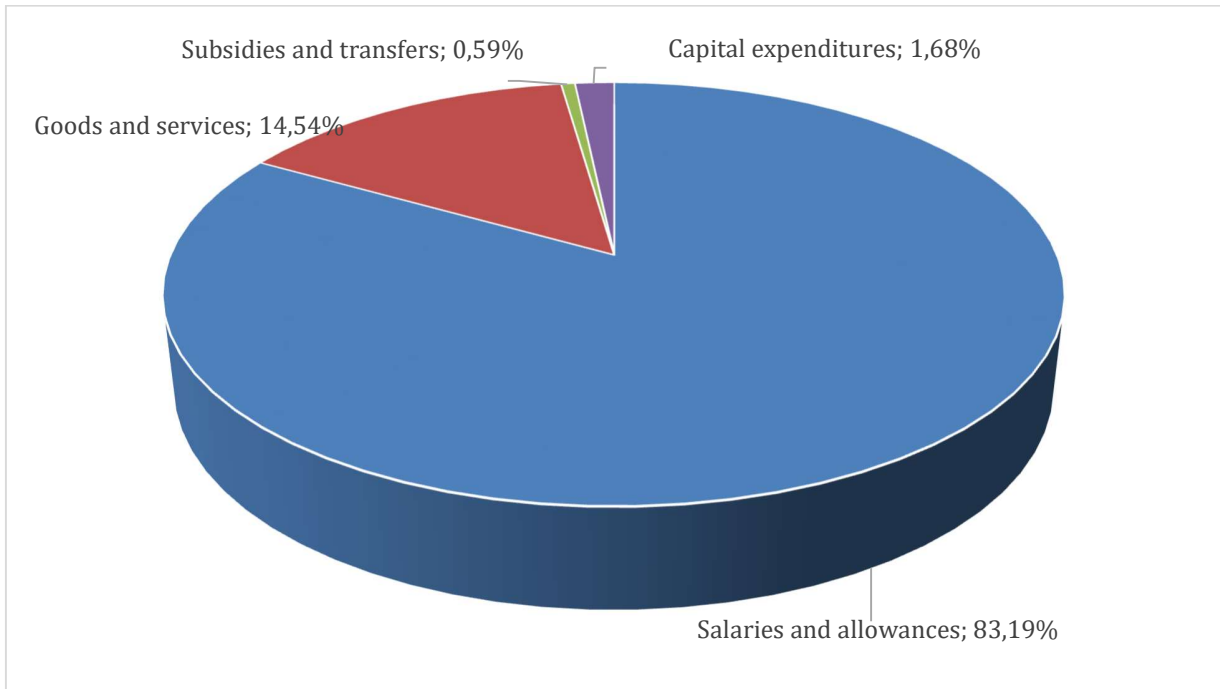


Chart no. 9: Budget for 2024 by economic classification (expenditures)

6.2. IMPLEMENTATION OF THE BUDGET

From the total budget of the Agency for the year 2024 in the amount of 20,051,000.00 denars, the total realization of the budget is 19,643,429.00 denars or expressed as a percentage 97.98%.

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

In relation to the structure of the budget, with all approved redistribution of funds during the year, in the following, the distribution and realization of funds by item is shown in tabular and graphical form, collectively for all accounts and individually by account.

Bid	Budget 2024 (all bills)	Budget realization (all accounts)	Percentage of realization
40 - WAGES AND BENEFITS	16.681.000,00	16.495.365,00	98,89%
401 - Basic pay	11.900.000,00	11.727.637,00	98,55%
402 - Social security contributions	4.561.000,00	4.559.032,00	99,96%
404 - Fees	220.000,00	208.696,00	94,86%
42 - GOODS AND SERVICES	2.915.000,00	2.790.230,00	95,72%
420 - Travel and daily expenses	290.000,00	279.136,00	96,25%
421 - Communal services, heating, communication and transport	1.747.000,00	1.737.002,00	99,43%
423 - Materials and small inventory	150.000,00	149.976,00	99,98%
424 - Repairs and ongoing maintenance	150.000,00	138.421,00	92,28%
425 - Contract services	200.000,00	196.164,00	98,08%
426 - Other current expenses	378.000,00	289.531,00	76,60%
46 - SUBSIDIES AND TRANSFER	119.000,00	105.197,00	88,40%
464 - Miscellaneous transfers	119.000,00	105.197,00	88,40%
48 - CAPITAL EXPENDITURE	336.000,00	252.637,00	75,19%
480 - Purchase of equipment and machinery	160.000,00	81.655,00	51,03%
483 - Buying furniture	176.000,00	170.982,00	97,15%
In total	20.051.000,00	19.643.429,00	97,97%

Table no. 1: Budget realization (total for all accounts)

6.2.1. Account 193026288063710

Bid	Budget 2024	Final Account 2024	Percentage of realization
401 - Basic pay	11.900.000,00	11.727.637,00	98,55%
402 - Social security contributions	4.561.000,00	4.559.032,00	99,96%
404 - Fees	220.000,00	208.696,00	94,86%
420 - Travel and daily expenses	90.000,00	89.544,00	99,49%
421 - Utilities, heating, communication and transport	1.747.000,00	1.737.002,00	99,43%
Utilities, heating		1.218.451,00	69,75%
Communication		502.433,00	28,76 %
Transport		16.118,00	0,92%
423 - Materials and small inventory	150.000,00	149.976,00	99,98%
424 - Repairs and ongoing maintenance	150.500,00	138.421,00	98,08%
425 - Contract services	200.000,00	196.164,00	98,28%

426 – Other current expenses	130.000,00	126.984,00	99,99%
464 – Miscellaneous transfers	73.000,00	60.165,00	82,42%
480 – Purchase of equipment and machinery	83.000,00	81.655,00	98,38%
In total	19.304.000,00	19.078.276,00	98,83%

Table no. 2: Budget realization - account 193026288063710

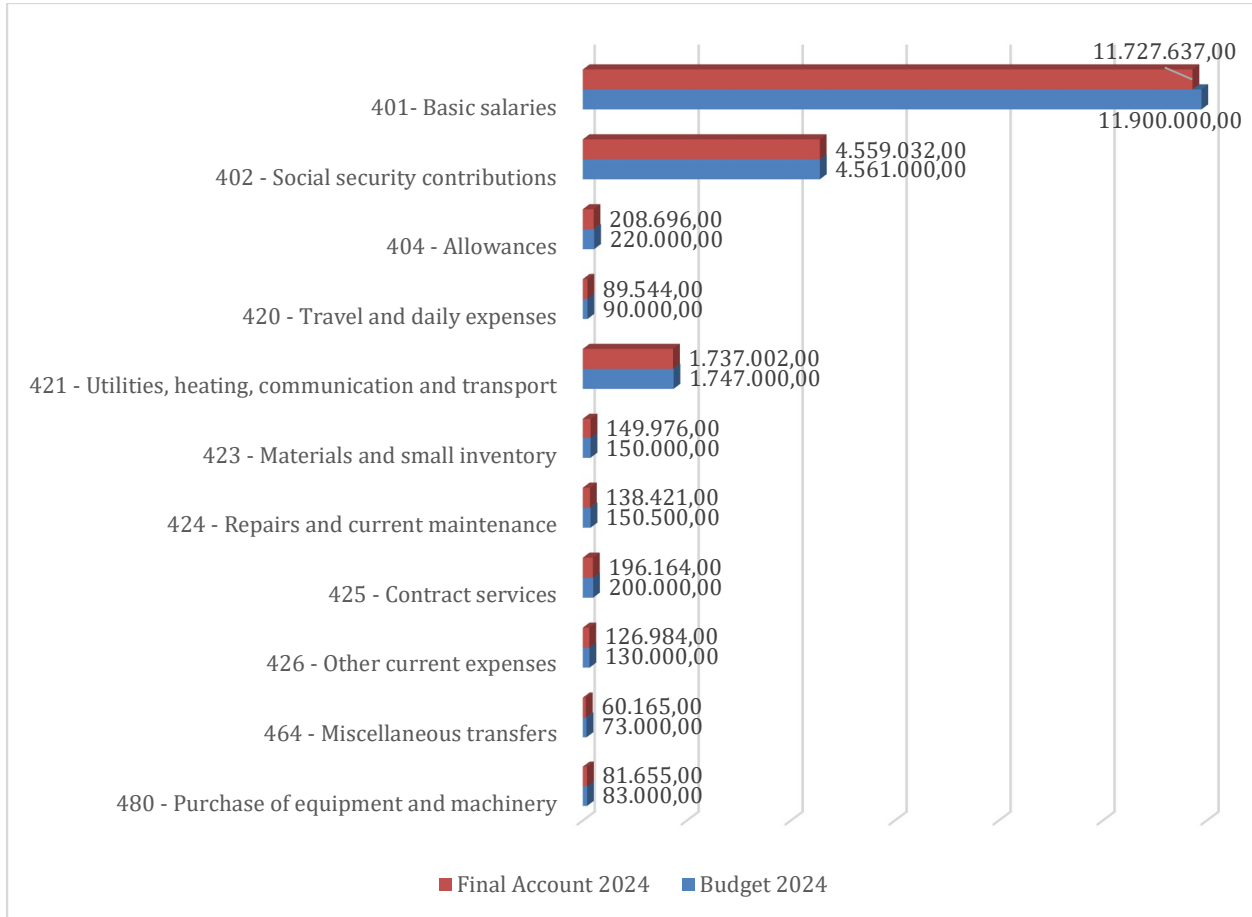


Chart no. 10: Budget realization - account 193026288063710

6.2.2. Account 193026288078511

Bid	Budget 2024	Final Account 2024	Percentage of realization
420 – Travel and daily expenses	200.000,00	189.592,00	94,80%
426 – Other current expenses	248.000,00	159.547,00	64,33%
464 – Miscellaneous transfers	46.000,00	45.032,00	97,9%
483 – Buying furniture	176.000,00	170.982,00	97,15%
In total	670.000,00	565.153,00	84,35%

Table no. 3: Budget realization - account 193026288078511

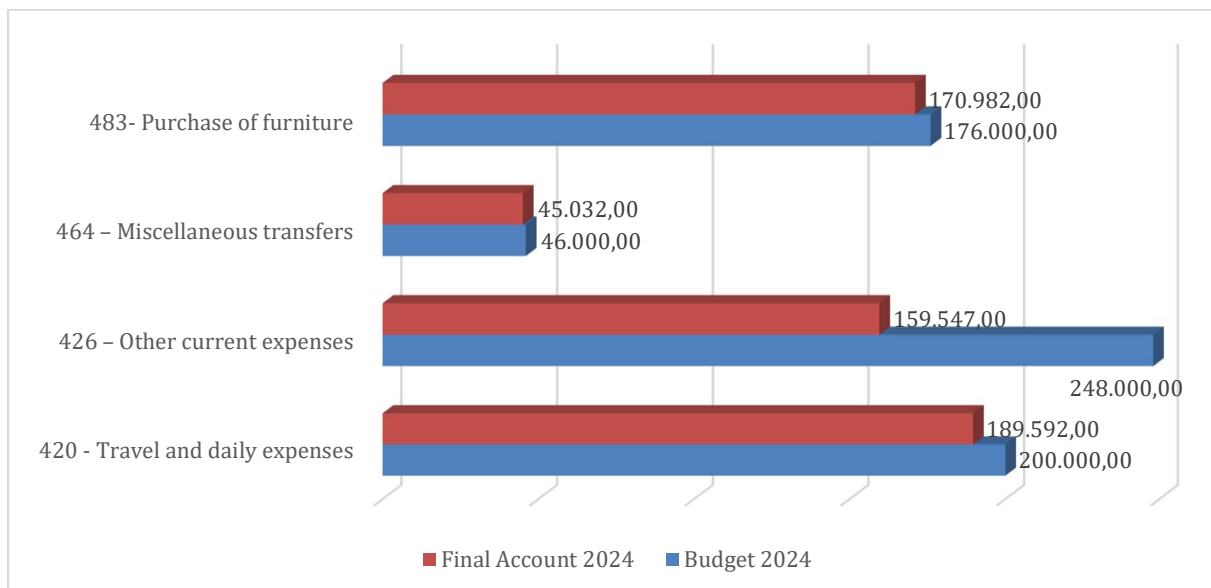


Chart no. 11: Budget realization - account 193026288078511

6.2.3. Account 193026288078526

Bid	Budget 2024	Final Account 2024	Percentage of realization
480 - Purchase of equipment and machinery	77.000,00	0,00	0,0%
In total	77.000,00	0,00	0,0%

Table no. 4: Budget realization - account 193026288078526

6.3. COMPARATIVE TABLE OF BUDGET AND EXPENDITURES IN THE LAST THREE YEARS

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

Bid	Budget 2024	Final account 2024	Budget 2023	Final account 2023	Budget 2022	Final account 2022
401 - Basic Salaries	11.900.000,00	11.727.637,00	10.197.000,00	10.121.406,00	8.672.000,00	7.691.297,00
402 - Social Security Contributions	4.561.000,00	4.559.032,00	3.963.000,00	3.930.615,00	3.343.000,00	2.984.759,00
404 - Allowances	220.000,00	208.696,00	190.000,00	190.000,00	144.000,00	144.000,00
420 - Travel and Daily Expenses	290.000,00	279.136,00	333.000,00	300.033,00	108.000,00	107.471,00
421 - Utilities, Heating, Communication and Transport	1.747.000,00	1.737.002,00	1.930.000,00	1.813.858,00	1.963.000,00	1.750.775,00
423 - Materials and Small Inventory	150.000,00	149.976,00	160.000,00	159.872,00	177.000,00	177.000,00
424 - Repairs and Current Maintenance	150.000,00	138.421,00	672.500,00	171.509,00	272.000,00	267.618,00
425 - Contractual Services	200.000,00	196.164,00	250.000,00	245.694,00	355.000,00	351.270,00
426 - Other Current Expenses	378.000,00	289.531,00	170.000,00	169.178,00	290.726,00	287.775,00
464 - Miscellaneous Transfers	119.000,00	105.197,00	143.500,00	143.137,00	230.000,00	229.960,00
480 - Purchase of Equipment and Machinery	160.000,00	81.655,00	240.000,00	173.104,00	1.683.274,00	875.936,00
481 - Construction Facilities	0,00	0,00	0,00	0,00	4.100.200,00	4.034.133,00
482 - Other Construction Facilities	0,00	0,00	0,00	0,00	70.800,00	70.800,00
483 - Purchase of Furniture	176.000,00	170.982,00	0,00	0,00	400.000,00	0,00
485 - Investments and Non-Financial Assets	0,00	0,00	0,00	0,00	525.000,00	0,00
486 - Purchase of Vehicles	0,00	0,00	1.339.000,00	0,00	0,00	0,00
Total	20.051.000,00	19.643.429,00	19.588.000,00	17.418.406,00	22.334.000,00	18.972.794,00

Table no. 5: Budget and implementation of the budget in the last three years

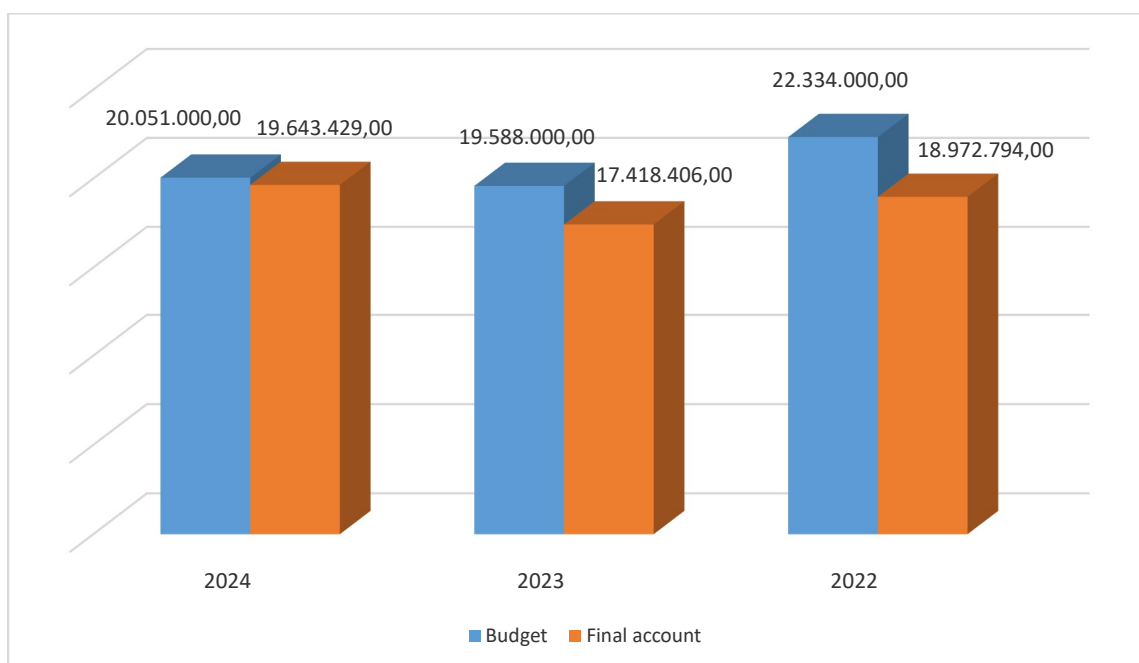


Chart no. 12: Budget and implementation of the budget in the last three years

6.4. FINAL ACCOUNTS FOR 2024

Copies of final accounts for the accounting period 01.01.2024 to 31.12.2024, for accounts 193026288063710, 193026288078511 and 193026288078526, are submitted as an attachment to the report. (**Appendix 1: Copy of final account for 2024**)

7. CONCLUSIONS:

1. In order to achieve even better results in the work and raise awareness and public opinion and knowledge about access to public information, it is necessary to increase the budget and increase the number of employees in the Agency, with the aim of creating opportunities for its more active and independent work based on its own resources.
2. In order to improve access to information in the Republic of North Macedonia, it is necessary to increase the competences of the Agency in the area of proactive transparency and continue with activities for the education of officials among the holders of information in the direction of increasing transparency and accountability, emphasizing the benefits of proactive transparency, as well as for faster and more efficient action on received requests for access to information;
3. The agency will continue with activities to update the list of holders of information in accordance with the legal solution, will continue cooperation with holders of information, as well as international cooperation, then will continue to inform the public, and will especially work on the plan of education of the general public with the aim of familiarizing citizens with the right to free access to public information and the method and procedure for using this constitutionally guaranteed right of man and citizen.

8. RECOMMENDATIONS:

4. A basic recommendation of the Agency for the Protection of the Right to Free Access to Public Information continues to be an increase in transparency, primarily proactive transparency, which means that information holders should self-initiatively, promptly and regularly publish the information they create or have at their disposal. In this way, the public interest is achieved, insight into the work of the public sector as a whole is enabled, which contributes to making better decisions and their better application, insight into the spending of public budget funds is enabled, as well as the confidence of citizens in public institutions is strengthened. The application of the principle of transparency and the provisions of the Law on free access to public information is of

exceptional importance from the aspect of the combat against corruption, strengthening the integrity of institutions and democratic processes in society.

5. Preparation of internal procedures for information holders to act on requests for access to public information with the aim of faster and more efficient action on received requests and avoiding the use of the institute "silence of the administration".

9. APPENDICES

Appendix 1: Copy of final account for 2024:

ЕМБС: 07406630
 Целосно име: АГЕНЦИЈА ЗА ЗАШТИТА НА ПРАВОТО НА СЛОБОДЕН ПРИСТАП ДО ИНФОРМАЦИИТЕ ОД ЈАВЕН КАРАКТЕР Скопје
 Вид на работа: 510
 Тип на годишна сметка: Сметка на органи на управа други органи од нестопанство - 603, 637
 Тип на документ: Годишна сметка
 Година : 2024

Биланс на приходи и трошоци

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста за тековна година	Нето за тековна година
1	-- I. ТЕКОВНИ РАСХОДИ (002+007+012+020+024+029+033+039)	17.083.945,00			18.996.621,00
2	-- а) ПЛАТИ И НАДОМЕСТОЦИ (003+004+005+006)	14.242.021,00			16.500.561,00
3	-- Плати и надоместоци	10.121.406,00			11.732.833,00
4	-- Придонеси за социјално осигурување	3.930.615,00			4.559.032,00
6	-- Надоместоци	190.000,00			208.696,00
12	-- в) СТОКИ И УСЛУГИ (ЗБИР ОД 013 ДО 019)	2.698.787,00			2.435.895,00
13	-- Патни и дневни расходи	138.676,00			89.544,00
14	-- Комунални услуги, греење, комуникација и транспорт	1.813.858,00			1.731.806,00
15	-- Ситен инвентар, алат и други материјали за поправка	159.872,00			149.976,00
16	-- Поправка и тековно одржување	171.509,00			138.421,00
17	-- Договорни услуги	245.694,00			196.164,00
18	-- Други тековни расходи	169.178,00			129.984,00
33	-- е) СУБВЕНЦИИ И ТРАНСФЕРИ (од 034 до 038)	143.137,00			60.165,00
37	-- Разни трансфери	143.137,00			60.165,00
44	-- II. КАПИТАЛНИ РАСХОДИ (од 045-054)	143.004,00			81.655,00
45	-- Купување на опрема и машини	143.004,00			81.655,00
59	-- А) ВКУПНО РАСХОДИ (001+044+055)	17.226.949,00			19.078.276,00
67	-- Г) ВКУПНО (059+060) =105, АКО 061 Е ПОГОЛЕМО ОД 060 ТОГАШ (059+061) =105	17.226.949,00			19.078.276,00
88	-- IV. ТРАНСФЕРИ И ДОНАЦИИ (089+090+091+092)	17.226.949,00			19.078.276,00
89	-- Трансфери од други нивоа на власт	17.226.949,00			19.078.276,00
103	-- А) ВКУПНО ПРИХОДИ(068+077+083+088+093+097+101+102)	17.226.949,00			19.078.276,00
105	-- В) ВКУПНО (103+104=067)	17.226.949,00			19.078.276,00
106	-- Г) ПОСЕБНИ ПОДАТОЦИ: Просечен број на вработени врз основа на часовите на работа во пресметковниот период (цел број)	21,00			20,00

Биланс на состојба

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста за тековна година	Нето за тековна година
111	-- А) АКТИВА: ПОСТОЈАНИ СРЕДСТВА (112+113+114+122+123)	10.923.888,00	22.371.323,00	11.221.750,00	11.149.573,00
112	-- I. НЕМАТЕРИЈАЛНИ СРЕДСТВА		86.964,00	86.964,00	
114	-- III. МАТЕРИЈАЛНИ СРЕДСТВА (115 ДО 121)	10.923.888,00	22.284.359,00	11.134.786,00	11.149.573,00
115	-- Градежни објекти	10.230.818,00	12.382.818,00	1.733.595,00	10.649.223,00
117	-- Опрема	616.725,00	9.399.842,00	8.974.064,00	425.778,00
120	-- Други материјални средства	76.345,00	501.699,00	427.127,00	74.572,00
124	-- Б) ПАРИЧНИ СРЕДСТВА И ПОБАРУВАЊА (125+134+135+140+141+142+143+144+145+146)	1.576.660,00	1.799.569,00		1.799.569,00
146	-- Други активни временски разгарничувања	1.576.660,00	1.799.569,00		1.799.569,00
159	-- ВКУПНА АКТИВА (111+124+147+154+158)	12.500.548,00	24.170.892,00	11.221.750,00	12.949.142,00
161	-- I. ПАСИВА: ИЗВОРИ НА КАПИТАЛНИ СРЕДСТВА (162+163)	10.923.888,00			11.149.573,00
162	-- Државен -јавен капитал	10.923.888,00			11.149.573,00
173	-- III. ТЕКОВНИ ОБВРСКИ (174+175+180+181+189+195+196+197+198)	1.576.660,00			1.799.569,00
175	-- б) Краткорочни обврски спрема добавувачи (176 до 179)	274.621,00			452.266,00
176	-- Обврски спрема добавувачи во земјата	256.621,00			422.266,00
179	-- Обврски спрема добавувачи - граѓани	18.000,00			30.000,00
189	-- д) Обврски спрема државата и други институциза (190 до 194)	2.000,00			3.333,00
193	-- Обврски за даноци и придонеси по договор за дело и авторско дело	2.000,00			3.333,00
197	-- ж) Краткорочни обврски за плати и други обврски спрема вработените	1.300.039,00			1.343.970,00
200	-- ВКУПНА ПАСИВА (161+164+165+173+199)	12.500.548,00			12.949.142,00

Државна евиденција

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста за тековна година	Нето за тековна година
613	-- Набавна вредност на патенти, лиценци, концесии и други права	82.587,00			86.964,00
615	-- Акумулирана амортизација (исправка на вредноста) на патенти, лиценци, концесии и други права	82.587,00			86.964,00
644	-- Набавна вредност на информациска и телекомуникациска опрема [2])	1.147.672,00			1.136.859,00
645	-- Вредносно усогласување (ревалоризација) на информациска и телекомуникациска опрема	919,00			2.717,00
646	-- Акумулирана амортизација (исправка на вредноста) на информациска и телекомуникациска опрема	1.017.393,00			1.079.932,00
647	-- Сегашна вредност на информациска и телекомуникациска опрема (< или = АОП	131.198,00			59.644,00

117 од БС)				
648	-- Набавна вредност на компјутерска опрема [3])	3.051.952,00		3.090.502,00
649	-- Вредносно усогласување (ревалоризација) на компјутерска опрема	2.411,00		5.359,00
650	-- Акумулирана амортизација (исправка на вредноста) на компјутерска опрема	2.870.545,00		2.987.515,00
651	-- Сегашна вредност на компјутерска опрема (< или = АОП 117 од БС)	183.818,00		108.346,00
652	-- Набавна вредност на други материјални средства	465.414,00		476.891,00
653	-- Вредносно усогласување (ревалоризација) на други материјални средства	765,00		3.442,00
654	-- Акумулирана амортизација (исправка на вредноста) на други материјални средства	389.834,00		405.761,00
655	-- Сегашна вредност на други материјални средства (< или = АОП 120 од БС)	76.345,00		74.572,00
659	-- Обврски за плати и надомести на плати (< или = на АОП 197 од БС)	1.300.039,00		1.343.970,00
660	-- Обврски за нето плати (< или = на АОП 197 од БС)	860.226,00		889.027,00
662	-- Даноци од плати и надомести (< или = на АОП 197 од БС)	74.863,00		78.640,00
663	-- Придонеси од плати и надомести од плати (< или = на АОП 197 од БС)	364.950,00		376.303,00
664	-- Електрична енергија (< или = на АОП 014 од БПР)	630.901,00		651.648,00
665	-- Водовод и канализација (< или = на АОП 014 од БПР)	108.488,00		139.525,00
666	-- Пошта, телефон, телефакс и други трошоци за комуникација (< или = на АОП 014 од БПР)	575.456,00		497.237,00
667	-- Горива и масла (< или = на АОП 014 од БПР)			2.500,00
670	-- Прехранбени продукти и пијалаци (< или = на АОП 015 од БПР)	37.548,00		37.791,00
672	-- Провизија за платен промет и банкарска провизија (< или = на АОП 017 од БПР)	9.290,00		8.000,00
673	-- Консултантски услуги (Издатоци за авторски хонорари) (< или = на АОП 017 од БПР)	67.968,00		
675	-- Плаќања за здравствени организации од Министерството за здравство (< или = на АОП 017 од БПР)	2.700,00		
677	-- Други оперативни расходи (< или = на АОП 018 од БПР)	2.366,00		6.263,00
679	-- Трансфери при пензионирање (< или = на АОП 037 од БПР)	66.022,00		
685	-- Трансфери од Буџетот на Република Македонија (< или = на АОП 088 од БПР)	17.226.949,00		19.078.276,00
688	-- Просечен број на вработени врз основа на состојбата на крајот на месецот	21,00		20,00

Структура на приходи по дејности

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста	Нето за тековна година
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2/19/25, 4:00 PM

Поднесување Годишни Сметки преку Веб - Централен Регистар на Република Северна Македонија

			за тековна година	
4565	- 84.110 - Општи дејности на јавната управа			19.078.276,00

Потпишано од:

LILJANA DUKOVIKJ

CN=KIBSTrust Issuing Qsig CA G2,
OID.2.5.4.97=NTRMK-5529581, OU=KIBSTrust
Services, O=KIBS AD Skopje, C=MK
KIBSTrust Issuing Qsig CA G2

Изјавувам, под морална, материјална и кривична одговорност, дека податоците во годишната сметка се точни и вистинити.

Податоците од годишната сметка се во постапка на доставување, која ќе заврши со одлука (одобрување/одбивање) од страна на Централниот Регистар.

ЕМБС: 07406630
 Целосно име: АГЕНЦИЈА ЗА ЗАШТИТА НА ПРАВОТО НА СЛОБОДЕН ПРИСТАП ДО ИНФОРМАЦИИТЕ ОД ЈАВЕН КАРАКТЕР Скопје
 Вид на работа: 510
 Тип на годишна сметка: Средства на буџетските корисници добиени по основ на донации - 785
 Тип на документ: Годишна сметка
 Година : 2024

Биланс на приходи и трошоци

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста за тековна година	Нето за тековна година
1	-- I. ТЕКОВНИ РАСХОДИ (002+007+012+020+024+029+033+039)	161.357,00			394.171,00
12	-- в) СТОКИ И УСЛУГИ (ЗБИР ОД 013 ДО 019)	161.357,00			349.139,00
13	-- Патни и дневни расходи	161.357,00			189.592,00
18	-- Други тековни расходи				159.547,00
33	-- е) СУБВЕНЦИИ И ТРАНСФЕРИ (од 034 до 038)				45.032,00
37	-- Разни трансфери				45.032,00
44	-- II. КАПИТАЛНИ РАСХОДИ (од 045-054)				170.982,00
48	-- Купување на мебел				170.982,00
59	-- А) ВКУПНО РАСХОДИ (001+044+055)	161.357,00			565.153,00
67	-- ģ) ВКУПНО (059+060) =105, АКО 061 Е ПОГОЛЕМО ОД 060 ТОГАШ (059+061) =105	161.357,00			565.153,00
77	-- II. НЕДАНОЧНИ ПРИХОДИ (078 ДО 082)	161.357,00			565.153,00
82	-- Други неданочни приходи	161.357,00			565.153,00
103	-- А) ВКУПНО ПРИХОДИ(068+077+083+088+093+097+101+102)	161.357,00			565.153,00
105	-- В) ВКУПНО (103+104=067)	161.357,00			565.153,00

Биланс на состојба

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста за тековна година	Нето за тековна година
111	-- А) АКТИВА: ПОСТОЈАНИ СРЕДСТВА (112+113+114+122+123)	4.354.241,00	4.836.396,00	134.510,00	4.701.886,00
114	-- III. МАТЕРИЈАЛНИ СРЕДСТВА (115 ДО 121)	4.354.241,00	4.836.396,00	134.510,00	4.701.886,00

115	-- Градежни објекти	4.354.241,00	4.662.165,00	123.771,00	4.538.394,00
117	-- Опрема		174.231,00	10.739,00	163.492,00
124	-- Б) ПАРИЧНИ СРЕДСТВА И ПОБАРУВАЊА (125+134+135+140+141+142+143+144+145+146)	1.850.658,00	1.285.505,00		1.285.505,00
125	-- I. ПАРИЧНИ СРЕДСТВА (126 до 133)	1.850.658,00	1.285.505,00		1.285.505,00
126	-- Сметка	1.850.658,00	1.285.505,00		1.285.505,00
159	-- ВКУПНА АКТИВА (111+124+147+154+158)	6.204.899,00	6.121.901,00	134.510,00	5.987.391,00
161	-- I. ПАСИВА: ИЗВОРИ НА КАПИТАЛНИ СРЕДСТВА (162+163)	4.354.241,00			4.701.886,00
162	-- Државен -јавен капитал	4.354.241,00			4.701.886,00
173	-- III. ТЕКОВНИ ОБВРСКИ (174+175+180+181+189+195+196+197+198)	1.850.658,00			1.285.505,00
198	-- з) Пасивни временски разграничувања	1.850.658,00			1.285.505,00
200	-- ВКУПНА ПАСИВА (161+164+165+173+199)	6.204.899,00			5.987.391,00

Државна евиденција

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста за тековна година	Нето за тековна година
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Структура на приходи по дејности

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста за тековна година	Нето за тековна година
4565	- 84.110 - Општи дејности на јавната управа				565.153,00

Потпишано од:

LILJANA DUKOVIKJ

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Services, O=KIBS AD Skopje, C=MK
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Изјавувам, под морална, материјална и кривична одговорност, дека податоците во годишната сметка се точни и вистинити.

Податоците од годишната сметка се во постапка на доставување, која ќе заврши со одлука (одобрување/ одбивање) од страна на Централниот Регистар.

ЕМБС: 07406630
 Целосно име: АГЕНЦИЈА ЗА ЗАШТИТА НА ПРАВОТО НА СЛОБОДЕН ПРИСТАП ДО ИНФОРМАЦИИТЕ ОД ЈАВЕН КАРАКТЕР Скопје
 Вид на работа: 510
 Тип на годишна сметка: Средства на буџетските корисници добиени по основ на донации /1
 Тип на документ: Годишна сметка
 Година : 2024

Биланс на приходи и трошоци

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста за тековна година	Нето за тековна година
44	-- II. КАПИТАЛНИ РАСХОДИ (од 045-054)	30.100,00			
45	-- Купување на опрема и машини	30.100,00			
59	-- А) ВКУПНО РАСХОДИ (001+044+055)	30.100,00			
67	-- Г) ВКУПНО (059+060) =105, АКО 061 Е ПОГОЛЕМО ОД 060 ТОГАШ (059+061) =105	30.100,00			
88	-- IV. ТРАНСФЕРИ И ДОНАЦИИ (089+090+091+092)	30.100,00			
92	-- Тековни донации	30.100,00			
103	-- А) ВКУПНО ПРИХОДИ(068+077+083+088+093+097+101+102)	30.100,00			
105	-- В) ВКУПНО (103+104=067)	30.100,00			

Биланс на состојба

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста за тековна година	Нето за тековна година
111	-- А) АКТИВА: ПОСТОЈАНИ СРЕДСТВА (112+113+114+122+123)	634.706,00	863.381,00	362.427,00	500.954,00
114	-- III. МАТЕРИЈАЛНИ СРЕДСТВА (115 ДО 121)	634.706,00	863.381,00	362.427,00	500.954,00
117	-- Опрема	582.092,00	791.653,00	332.604,00	459.049,00
120	-- Други материјални средства	52.614,00	71.728,00	29.823,00	41.905,00
124	-- Б) ПАРИЧНИ СРЕДСТВА И ПОБАРУВАЊА (125+134+135+140+141+142+143+144+145+146)	77.100,00	77.100,00		77.100,00
125	-- I. ПАРИЧНИ СРЕДСТВА (126 до 133)	77.100,00	77.100,00		77.100,00

126	-- Сметка	77.100,00	77.100,00		77.100,00
159	-- ВКУПНА АКТИВА (111+124+147+154+158)	711.806,00	940.481,00	362.427,00	578.054,00
161	-- I. ПАСИВА: ИЗВОРИ НА КАПИТАЛНИ СРЕДСТВА (162+163)	634.706,00			500.954,00
162	-- Државен -јавен капитал	634.706,00			500.954,00
173	-- III. ТЕКОВНИ ОБВРСКИ (174+175+180+181+189+195+196+197+198)	77.100,00			77.100,00
198	-- з) Пасивни временски разграничувања	77.100,00			77.100,00
200	-- ВКУПНА ПАСИВА (161+164+165+173+199)	711.806,00			578.054,00

Државна евиденција

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста за тековна година	Нето за тековна година
644	-- Набавна вредност на информациска и телекомуникациска опрема [2])	70.226,00			70.226,00
645	-- Вредносно усогласување (ревалоризација) на информациска и телекомуникациска опрема				2.535,00
646	-- Акумулирана амортизација (исправка на вредноста) на информациска и телекомуникациска опрема	12.557,00			22.389,00
647	-- Сегашна вредност на информациска и телекомуникациска опрема (< или = АОП 117 од БС)	57.669,00			50.372,00
648	-- Набавна вредност на компјутерска опрема [3])	618.144,00			618.581,00
649	-- Вредносно усогласување (ревалоризација) на компјутерска опрема	437,00			18.601,00
650	-- Акумулирана амортизација (исправка на вредноста) на компјутерска опрема	143.902,00			267.618,00
651	-- Сегашна вредност на компјутерска опрема (< или = АОП 117 од БС)	474.679,00			369.564,00
652	-- Набавна вредност на други материјални средства	68.118,00			68.118,00
653	-- Вредносно усогласување (ревалоризација) на други материјални средства				2.109,00
654	-- Акумулирана амортизација (исправка на вредноста) на други материјални средства	15.504,00			28.322,00
655	-- Сегашна вредност на други материјални средства (< или = АОП 120 од БС)	52.614,00			41.905,00

Структура на приходи по дејности

Ознака за АОП	Опис	Претходна година	Бруто за тековна година	Исправка на вредноста за тековна година	Нето за тековна година
4565	- 84.110 - Општи дејности на јавната управа				0,00

Потпишано од:

LILJANA DUKOVIKJ

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