



ANNUAL REPORT
ON THE IMPLEMENTATION OF THE
2021-2025 NATIONAL STRATEGY FOR THE PREVENTION OF
CORRUPTION AND CONFLICT OF INTEREST
for the period from 01.01.2025 to 31.12.2025

Skopje, March 2026

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List of abbreviations

Abbreviation	Full name
RECA	Real Estate Cadaster Agency
AFSARD	Agency for Financial Support for Agriculture and Rural Development
AQHI	Agency for Quality in Higher Education
MALMED	Agency for Medicines and Medical Devices
AYS	Agency for Youth and Sport
MoS	Ministry of Sport
ASPI	Agency for Protection of the Right to Free Access to Public Information
AES	Agency for Entrepreneurship Support
AJPP	Academy for Judges and Public Prosecutors
PPB	Public Procurement Bureau
BDE	Bureau for Development of Education
Government of RNM	Government of the Republic of North Macedonia
SCPC	State Commission for Prevention of Corruption
SIA	State Inspectorate for Agriculture
SEI	State Education Inspectorate
SAI	State Administrative Inspectorate
LSGs	Units of Local-Self Government
AJM	Association of Journalists of Macedonia
APP	Association of Public Prosecutors
PPO RNM	Public Prosecutor's Office of the Republic of North Macedonia
MoI	Ministry of Interior
MoH	Ministry of Health
MoAFWE	Ministry of Agriculture, Forestry and Water Economy
MoE	Ministry of Economy
MoEL	Ministry of Economy and Labor
MoEMMR	Ministry of Energy, Mining and Mineral Resources
MISA	Ministry of Information Society and Administration
MoPA	Ministry of Public Administration
MDT	Ministry of Digital Transformation
MoES	Ministry of Education and Science
MoJ	Ministry of Justice
MLSP	Ministry of Labor and Social Policy
MSPDY	Ministry of Social Policy, Demography and Youth
MoF	Ministry of Finance
MoTC	Ministry of Transport and Communications
MoT	Ministry of Transport
NS 2021-2025/Strategy	National Strategy for Prevention of Corruption and Conflict of Interest 2021-2025
Assembly	Assembly of the Republic of North Macedonia
CMEM	Council of Media Ethics in Macedonia
FPO	Financial Police Office
FIU	Financial Intelligence Unit
HIF	Health Insurance Fund
PDIF RNM	Pension and Disability Insurance Fund of the Republic of North Macedonia

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CA	Customs Administration
LPCCI	Law on Prevention of Corruption and Conflict of Interest
UGD	University "Goce Delchev" – Shtip
UKLO	University "St. Kliment Ohridski" – Bitola
UMT	University "Mother Teresa" - Skopje
UINT	University of Information Science and Technology "St. Paul the Apostle" – Ohrid
IC	Inspection Council
LOWBSA	Law on the Organization and Work of the Bodies of the State Administration

1. INTRODUCTION

National Strategy for Prevention of Corruption and Conflict of Interest for 2021-2025

The fight against corruption and conflict of interest constitutes one of the key strategic priorities of the Republic of North Macedonia in strengthening the rule of law, democracy, and institutional transparency. To this end, in 2019, the Law on Prevention of Corruption and Conflict of Interest was adopted, establishing clear mechanisms for prevention, detection, and suppression of corrupt practices in all areas of social life.

This Law stipulates the obligations and mechanisms for:

- Preventing corruption in the exercise of public authority, public powers, official duties, and political functions;
- Identifying, preventing, and managing conflict of interest;
- Reducing corrupt practices within legal entities associated with the exercise of public powers;
- Strengthening institutional capacity to combat corruption through appropriate policies, measures, and activities;
- Enhancing transparency, accountability and responsibility of institutions at both central and local levels;
- Assessing and managing corruption risks across various sectors; and
- Fostering a culture of ethics and integrity within the public administration, the business sector, and the civil society.

In accordance with the law, the State Commission for Prevention of Corruption (SCPC) is competent authority responsible for the implementation of measures to combat corruption and conflict of interest. As an independent and autonomous institution, the SCPC is entrusted with monitoring the implementation of the integrity system, preparing strategic anti-corruption documents, and undertaking concrete measures aimed at preventing corruption and its impact on institutions and citizens.

The current National Strategy for Prevention of Corruption and Conflict of Interest for the period of 2021-2025 was adopted on 10 December 2020, and enacted by the Assembly in April 2021. The 2021-2025 National Strategy represents a comprehensive medium-term policy document aimed at ensuring a systematic and coordinated approach to addressing corruption.

The Strategy is the result of a comprehensive analysis of corruption risks and was developed through inclusive consultation process involving representatives from the public and private sectors, media, civil society organizations, academic community, and relevant international organizations. It is grounded in the identified challenges and weaknesses within the institutional and normative system and provides clear guidance for addressing them. The document is accompanied by a detailed Action Plan, which sets

out specific measures, activities and indicators for monitoring progress in the fight against corruption.

The problems and measures are systematized across two horizontal areas and thirteen priority sectors:

- **Horizontal areas:** public procurements and employment;
- **Priority sectors:** political system, judiciary, law enforcement authorities, health, education, labor and social policy, urbanism and physical planning, environment, agriculture, sport, economy and business, public enterprises and state-owned joint-stock companies, media, and civil society.

In accordance with Article 18 paragraph 6 of the LPCCI, the SCPC is obliged to monitor the implementation of the measures set out in the Strategy and to prepare annual reports, which are submitted to the Assembly no later than 31 March of the current year for the preceding year.

These reports enable systematic evaluation of the implemented activities, identification of achieved results, as well as the formulation of proposed measures and recommendations for advancing the fight against corruption.

This report represents the fifth annual review of progress in the implementation of the Strategy, covering the period from 1 January to 31 December 2025. The previous annual reports for 2021, 2022, 2023 and 2024 were submitted within the legally prescribed deadlines and are publicly available on the SCPC website.

The structure of the report entails:

- A summary of key findings;
- Two sections dedicated to horizontal areas and
- Thirteen sections providing a detailed analysis of the situation and challenges withing each of the priority sectors.

Each section of the report presents findings on the implementation of the activities envisaged in the Action Plan, including an analysis of statistical data and an assessment of the level/status of implementation (implemented, not implemented, and ongoing).

This report provides an analytical basis for assessing the effectiveness of the policies and measures set out in the Strategy until 2025, with a view to systematically enhancing transparency, accountability, and integrity in the functioning of institutions and the society.

Methodology

The Annual Report is based on information submitted by the competent institutions regarding the level of implementation of the activities in 2025, in accordance with the Action Plan of the National Strategy for Prevention of Corruption and Conflict of Interest for 2021–2025. On the basis of the reports entered in the web-application by

coordinators from institutions, the State Commission for Prevention of Corruption conducted an analysis, and, in January 2026 determined the final status of activities (implemented, not implemented, and ongoing).

Given that the Action Plan for the implementation of the NS 2021-2025 did not foresee any activities with an implementation deadline exclusively in 2025, the subject of this evaluation included:

- Activities with implementation deadlines in 2021, 2022, 2023 and 2024, marked as **“Ongoing”** or **“Not implemented”** within the previous evaluation
- Continuous activities that are subject to evaluation on an annual basis

In analyzing the implementation of activities, the evaluation refers to the activities of the institution designated as lead responsible body for each activity. Although a significant number of activities require interinstitutional cooperation, they are presented under the institution identified in the Action Plan as the responsible/competent institution.

The adoption of the Law Amending and Supplementing the Law on the Organization and Work of the Bodies of the State Administration (“Official Gazette of the Republic of North Macedonia“ No. 121/24) resulted in changes of the institutional structure and competencies of the state administration bodies during the previous evaluation period. Although the activities in this report are presented according to the institutions that were competent prior to these amendments, the impact of the new institutional structure remains relevant in the current reporting period as well, particularly with regard to the implementation of certain activities in 2025.

2. EXECUTIVE SUMMARY

54 key problems have been identified within the Strategy, along with 111 measures and 191 specific activities aimed to address them. Out of the total number of activities, 34 are classified as continuous, meaning that their implementation is subject to annual evaluation following their initiation.

Breakdown of **problems, measures and activities**, is as follows:

Ordinal number	Area/Sector	Problems	Measures	Activities
1.	Public procurements	2	2	4
2.	Employment	3	8	13
3.	Political system	6	7	8
4.	Judiciary	3	7	14
5.	Law enforcement authorities	7	13	21
6.	Health	5	18	26
7.	Education	8	18	34
8.	Labor and social policy	1	5	10
9.	Urbanism and physical planning	1	1	1
10.	Environment	1	1	2
11.	Agriculture	5	9	16
12.	Sport	2	6	15
13.	Economy and business	4	8	13
14.	Public enterprises and Joint-stock companies	3	3	6
15.	Media and Civil Society	3	5	8
Total		54	111	191

Table 1: Tabular overview of problems, measures and activities by areas/sectors in the Strategy

The number of identified problems, as well as the defined measures and activities across sectors, depends primarily on the level of identified corruption risk in each respective area/sector. In addition, the involvement and contribution of institutions within each sector during the preparation process of the Strategy in 2019 played a significant role in defining the measures.

The analysis of the breakdown of problems, measures and activities shows that their scope depends on the identified corruption risks, the degree of institutions' involvement in the preparation of the Strategy, and the complexity of the problems. The largest number of measures and activities is foreseen in sectors traditionally exposed to higher corruption risks, such as the judiciary, health, education and law enforcement authorities, with the aim of reducing corruption and strengthening prevention and sanctioning mechanisms.

Problems by **areas/sectors**:

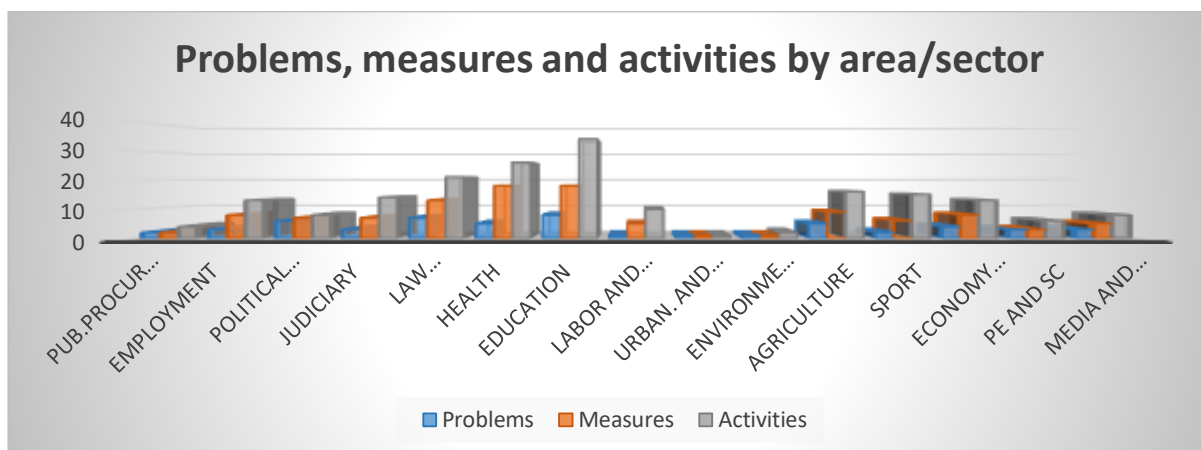


Figure 1: Number of problems, measures and activities by areas/sectors

Approximately 40% of all measures and activities refer to the education, health and law enforcement sectors.

Breakdown of **activities by year** is as follows:

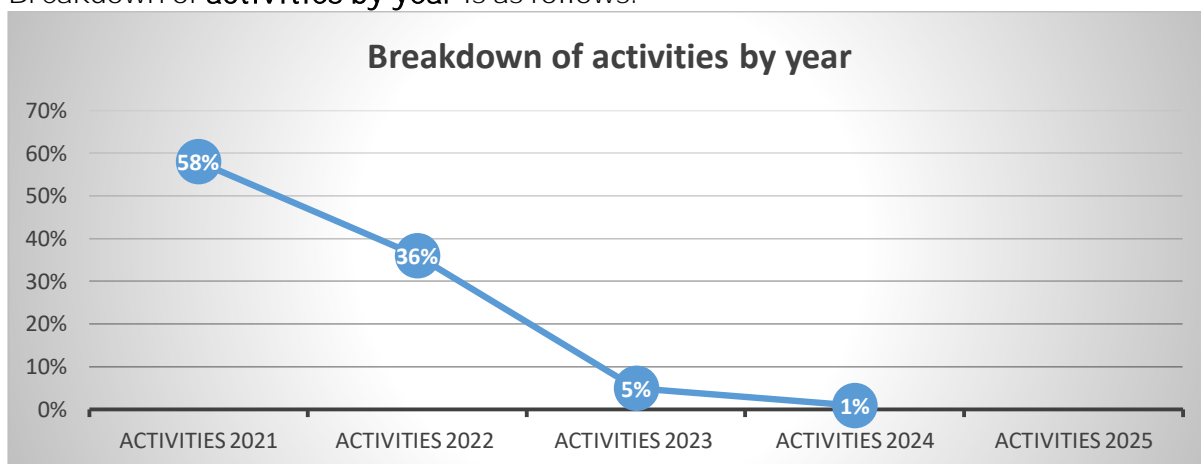


Figure 2: Breakdown of activities by year, in percentages

The breakdown of activities by year indicates that the largest number of activities was planned for the first year of implementation:

Breakdown of activities by year, in percentages

- 110 activities (58%) were foreseen for 2021;
- 70 activities (36%) were foreseen for 2022;
- 9 activities (5%) were foreseen for 2023;
- 2 activities (1%) were foreseen for 2024; and
- No new activities were foreseen for 2025.

Further, 27 activities of the Action Plan have been foreseen for continuous implementation throughout the entire 2021-2025 period, six activities commenced as continuous in 2022, and one activity has been foreseen as continuous from 2024. The total number of activities to be implemented in the 2021-2025 period amounts to 318.

In determining the implementation deadlines for the activities, a significant role was played by the institutions themselves and the stakeholders from the relevant sectors, which ensured a realistic approach to planning and prioritizing the measures for preventing corruption.

The status regarding the number of **activities by areas/sectors**, subject to evaluation in 2025, is as follows:

Area/Sector	Total number of activities subject to evaluation in 2025	Activities foreseen for 2025	Activities carried over from 2021, 2022, 2023 and 2024
Public procurements	3	0	3
Employment	11	0	11
Political system	7	0	7
Judiciary	8	0	8
Law enforcement authorities	15	0	15
Health	13	0	13
Education	21	0	21
Labor and social policy	5	0	5
Urbanism and physical planning	1	0	1
Environment	2	0	2
Agriculture	14	0	14
Sport	14	0	14
Economy and business	13	0	13
Public enterprises and joint-stock companies	5	0	5
Media and civil society	5	0	5
Total	137	0	137

Table 2: Tabular overview by areas/sectors of the number of activities for the current evaluation - number of activities subject to evaluation in 2025 and number of activities carried over from previous years

In 2025, no new activities were planned, meaning that all 137 activities were carried over from previous years, having remained with the status “Ongoing” or “Not implemented”, as well as continuous activities. Of these, 34 are continuous, while 103 are activities that in previous evaluations were marked as “Ongoing” or “Not implemented”.

Following the evaluation of the submitted reports and the determination of the final implementation status of the activities, the overview by **areas/sectors for 2025** is as follows:

Area/Sector	Implemented activities	Non-implemented activities	Ongoing
Public procurements	1	0	2
Employment	1	5	5

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Political system	0	4	3
Judiciary	4	2	2
Law enforcement authorities	1	8	6
Health	3	3	7
Education	6	8	7
Labor and social policy	1	2	2
Urbanism and physical planning	1	0	0
Environment	0	0	2
Agriculture	4	10	0
Sport	1	9	4
Economy and business	6	4	3
Public enterprises and Joint-stock companies	0	4	1
Media and civil society	2	1	2
Total	31	60	46

Table 3: Overview of implemented, not implemented and ongoing activities in 2025, by areas/sectors

The undertaken analysis of data shows the following:

Level of implementation of activities in 2025. Out of a total of 137 evaluated activities for 2025, 31 activities were implemented (23%), 60 activities were not implemented (44%), and 46 activities are ongoing (33%).

Analysis by areas/sectors

The highest level of implementation was observed in the education and economy & business sectors, with six implemented activities in each sector.

The lowest level of implementation was observed in the sectors of political system, environment, and public enterprises and state-owned joint-stock companies. In several sectors, particularly urbanism and physical planning, the number of non-implemented activities is high, indicating a lack of progress or blockages in implementation processes.

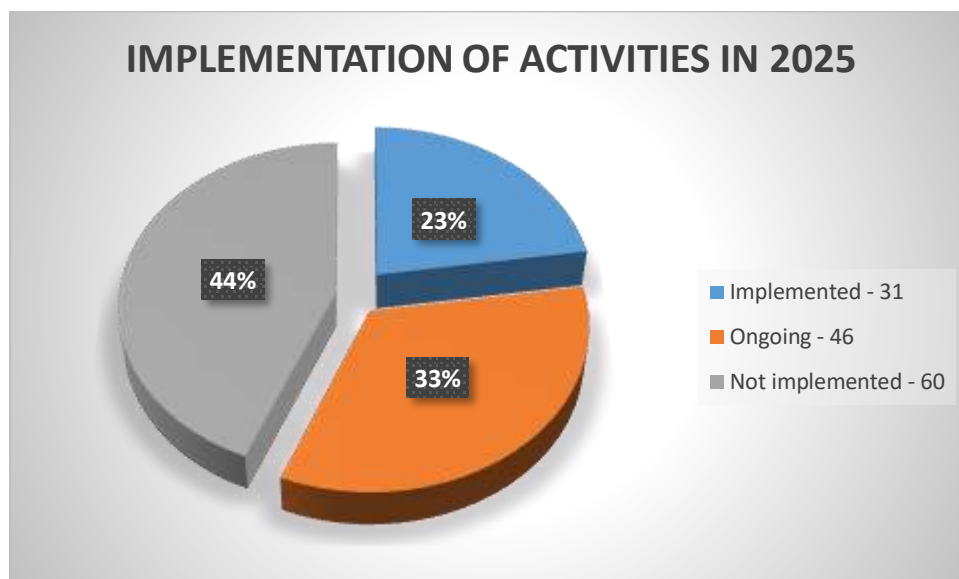


Figure 3: Graphic overview of the level of implementation In 2025

3. HORIZONTAL AREA -PUBLIC PROCUREMENTS

Description of horizontal area

Priority problems in horizontal area -public procurements are as follows:

- 1) Insufficient number of personnel with adequate qualifications and knowledge of standards in the process of defining technical specifications, as well as criteria for determining the capability of economic operators and
- 2) Insufficient transparency of institutions and a low level of integrity among the individuals involved in the implementation of public procurement procedures.

The competent institutions responsible for the implementation of the measures and activities aimed at addressing the problems in the area of public procurement are:

- 1) Public Procurement Bureau (hereinafter: PPB),
- 2) Ministry of Finance (hereinafter: MoF) and
- 3) Agency for the Protection of the Right to Free Access to Public Information (hereinafter: ASPI).

Level of implementation of activities in the area

In the horizontal area of public procurements, two measures and three activities have been stipulated for addressing the two identified problems during the reporting period. Based on the received data and the conducted analysis of this area, the status of implementation of the activities defined in the Action Plan of the Strategy for 2025 is as follows:

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Problem 1. Insufficient number of personnel with adequate qualifications and knowledge of standards in the process of defining technical specifications, as well as criteria for determining the capability of economic operators								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Strengthening the capacities of the personnel who prepare the tender documentation	1.1. Designing and implementing training on the application of standards in the preparation of technical specifications and qualification criteria, with the participation of the Institute for standardization	PPB Institute for standardization	Second half of 2021-continuously	Not Implemented	Ongoing	Not Implemented	Implemented	Implemented
Problem 2. Insufficient transparency of institutions and a low level of integrity among the individuals involved in the implementation of public procurement procedures								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Increasing Institutional integrity and transparency in public procurement	1.1 Amendments to the Law on Public Procurements to introduce a mandatory requirement for signing a confidentiality statement by persons involved in the preparation of the technical specification	MoF PPB	First half of 2023	Pending	Pending	Not Implemented	Ongoing	Ongoing
	1.2. In the tender documentation templates prepared by the PPB, it should be mandatory to specify the authorized persons responsible for receiving reports for protected internal and external reporting by whistleblowers, in relation to corruption in public procurements.	PPB	Second half of 2020	Implemented	/	/	/	/
	1.3. Strengthening oversight regarding the publication of information related to public procurement in accordance with Article 10 of the Law on Free Access to Public Information	ASPI	First half of 2021 - continuously	Not Implemented	Ongoing	Ongoing	Ongoing	Ongoing

Regarding the **Problem 1. Insufficient number of personnel with adequate qualifications and knowledge of standards in the process of defining technical specifications, as well as criteria for determining the capability of economic operators**, one **Measure 1** was envisaged: **Strengthening the capacities of the personnel who prepare the tender documentation**, along with one *Activity: 1.1. Designing and implementing training on the application of standards in the preparation of technical specifications and qualification criteria, with the participation of the Institute for standardization*, for which the implementation deadline was set for the second half of 2021 and continuously, while the competent institution is the PPB. This activity is currently being implemented. Namely, the established communication between the Public Procurement Bureau and the Institute for Standardization regarding the joint activity continues, without additional changes in standardization policies in the field of public procurement. The SCPC recommends that this cooperation between the Public Procurement Bureau and the Institute for Standardization should continue in the future as well, with the aim of monitoring trends and improving standards in the preparation of technical specifications and the criteria for determining the capability of economic operators.

With regard to **Problem 2. Insufficient transparency of institutions and a low level of integrity among the individuals involved in the implementation of public procurement procedures**, the following **Measure 1** was envisaged: **Increasing institutional integrity and transparency in public procurement**, along with three activities, of which two are foreseen for this reporting period, namely:

- *Activity 1.1 Amendments to the Law on Public Procurements to introduce a mandatory requirement for signing a confidentiality statement by persons involved in the preparation of the technical specification*, for which the deadline is the **first half of 2023**, while the lead institution is the **MoF**. According to the submitted report, the activity is marked as **“Ongoing”**. The Ministry of Finance (MoF) has designated this activity as ongoing, considering that the report notes that the Public Procurement Bureau has undertaken activities aimed at analyzing and identifying the provisions of the Law on Public Procurements that need to be amended, while also initiating the preparation of a draft template of the relevant Confidentiality Statement, which should be envisaged through the amendments. This activity shall be considered with the status **“Ongoing”** until its completion through the adoption of the appropriate legal amendments.
- *Activity 1.3 Strengthening oversight regarding the publication of information related to public procurement in accordance with Article 10 of the Law on Free Access to Public Information*. The deadline for the implementation of this activity is the **first half of 2021 and continuously**, while the lead institution is the Agency for Protection of the Right to Free Access to Public Information (ASPI). This activity has the status **“Ongoing”**, because ASPI informed that the Law on Free Access to Public Information does not provide misdemeanor provisions for imposing sanctions specifically for failure to publish the data referred to in this activity. However, the SCPC considers that the Law on Free Access to Public

Information does contain misdemeanor provisions sanctioning the non-publication of information related to public procurement in accordance with Article 10 of the Law. Namely, Article 10 of this Law determines the information that holders of information are obliged to publish on their websites, while item 18 establishes the obligation to publish the complete documentation concerning public procurements, concessions, and public-private partnership contracts. Furthermore, pursuant to Article 39, item 2 of this Law, a fine in the amount of EUR 250 in denar equivalent shall be imposed on the responsible official of the information holder if they fail to regularly maintain and update the list of information at their disposal and fail to publish it in an appropriate manner accessible to the applicant, in accordance with Article 9 of this Law. In any case, obstacles limiting the imposition of fines for failure to publish the data do exist and should be addressed.

Based on the data received and evaluated from the competent institutions, as well as the review and verification conducted by the SCPC, the overall level of implementation of the activities since the adoption of the Strategy until today in the area of public procurements is as follows:

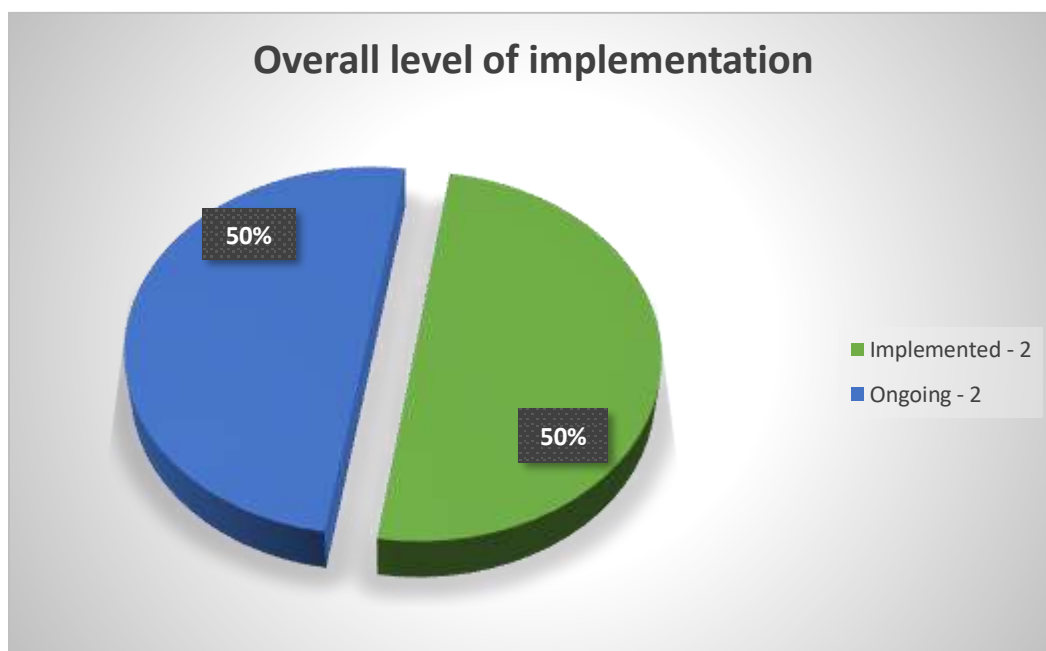


Figure 4: Overall level of Implementation in the respective area

Out of a total of four activities envisaged in the Strategy for this horizontal area, two activities have been implemented (50%), while two activities are still ongoing (50%).

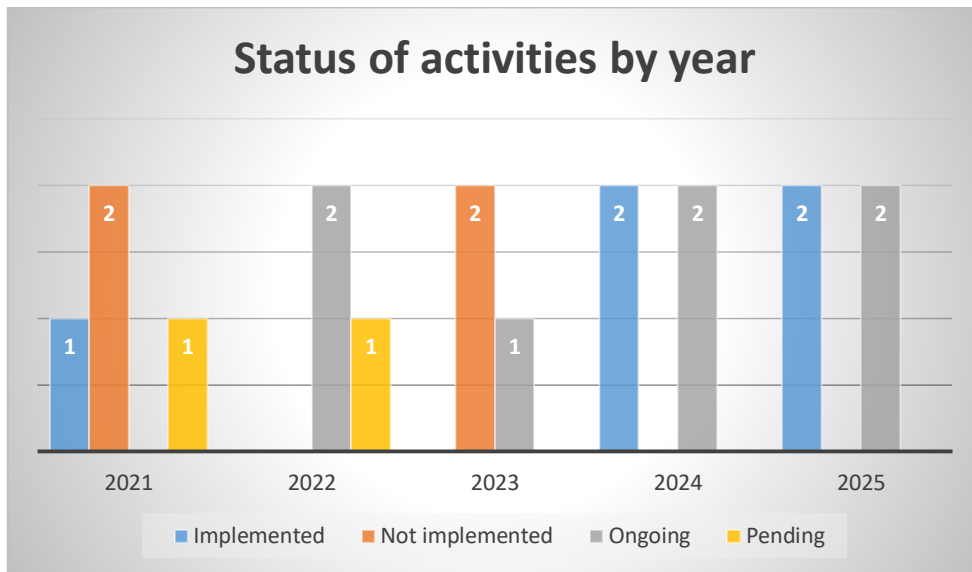


Figure 5: Status of activities' implementation, by years

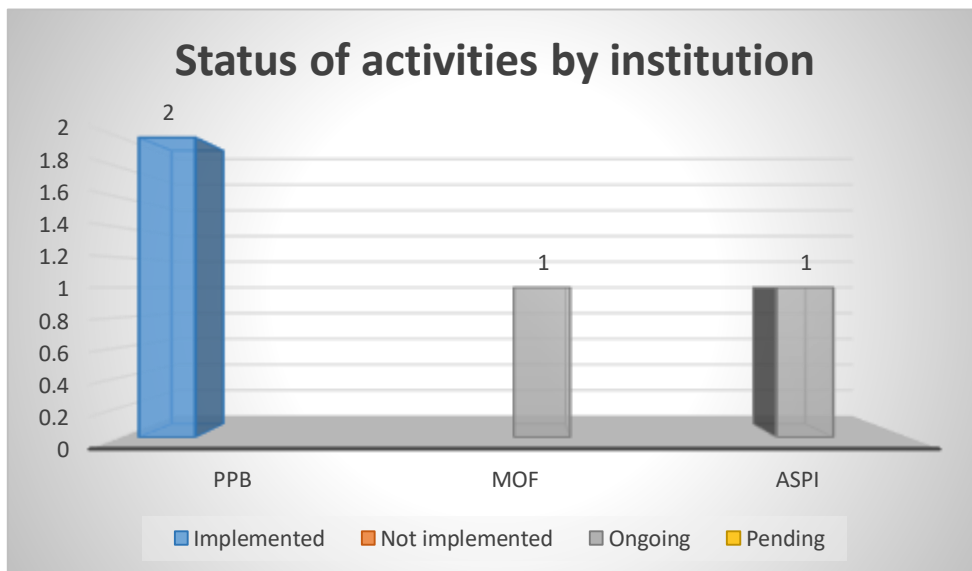


Figure 6: Status of activities' implementation, by institutions

- The Public Procurement Bureau (PPB) is the lead institution for two activities, both of which have been implemented.
- The Agency for Protection of the Right to Free Access to Public Information (ASPI) is the lead institution for one activity, which is ongoing.
- The Ministry of Finance (MF) is the lead institution for one activity, which is ongoing.

4. HORIZONTAL AREA -EMPLOYMENT

Description of horizontal area

Priority problems in the horizontal area - employment are as follows:

- 1) Lack of harmonization among a large number of laws regulating employment, which enables all forms of influence: political party influence, nepotism, cronyism, and clientelism;
- 2) Inefficient management, governance, and supervision in certain administrative bodies, agencies, public enterprises, and state-owned joint-stock companies, and
- 3) The legal framework lacks a clear system for evaluating selection criteria in the processes of employment and promotion in the public sector.

The competent institutions responsible for the implementation of the measures and activities for addressing the problems in the area of employment are:

- 1) The Government of the Republic of North Macedonia (hereinafter: the Government),
- 2) State Commission for Prevention of Corruption (hereinafter: SCPC),
- 3) Ministry of Information Society and Administration (hereinafter: MISA),
- 4) Ministry of Economy (hereinafter: MoE),
- 5) Ministry of Local Self-Government (hereinafter: MoLSG),
- 6) Ministry of Health (hereinafter: MoH),
- 7) Ministry of Education and Science (hereinafter: MoES),
- 8) Ministry of Labor and Social Policy (hereinafter: MLSP),
- 9) Ministry of Culture (hereinafter: MoC),
- 10) Other ministries (hereinafter: Ministries)
- 11) Municipalities and the City of Skopje (hereinafter: LSGs) and
- 12) Agency for the Protection of the Right to Free Access to Public Information (hereinafter: ASPI)

Level of implementation of activities in the respective area

In the horizontal area of employment, eight measures and 11 activities were envisaged, with a view to addressing the three priority problems during the reporting period. The largest number of these activities were planned for implementation in 2021, and based on the received data and conducted analysis, the following status has been determined:

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Problem 1: Lack of harmonization among a large number of laws regulating employment, which enables all forms of influence: political party influence, nepotism, cronyism, and clientelism								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Elimination of the possibility of employment through temporary employment agencies and of the possibility for temporary employment to be transformed into permanent employment without a regular employment procedure	1.1. Amendment of the Law on Public Sector Employees in order to abolish the possibility of employment through temporary employment agencies and to eliminate the option of transforming employment into permanent status without a regular employment procedure.	MoPA	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
	2.1. Preparation of functional analyses in public sector entities	MoPA Ministries LSGs	Second half of 2021 - continuously	Not Implemented	Not Implemented	Not Implemented	Implemented	Implemented
	2.2. Publication of the functional analysis on the websites of the institutions	MoPA Ministries LSGs	Second half of 2021 - continuously	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
2. Assessment of the actual needs for the number of employees and their qualifications in public sector entities.	2.3. Analysis of the need to introduce an annual workload assessment in public sector entities	MoPA	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
	3.1. Amendment of the "Rulebook on the content and method of preparation of acts on internal organization and job systematization, as well as the content of the functional analysis of public sector institutions."	MoPA MOE MoLSG	First half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
3. Proper definition of the type of education required for specific job positions in the job classification (systematization) acts								

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4. Improving transparency in public sector employment	4.1 Strengthening oversight regarding the publication of acts on organization and systematization and employment, in accordance with Article 10 of the Law on Free Access to Public Information	ASPI	First half of 2021 -continuously	Not Implemented	Ongoing	Ongoing	Ongoing	Ongoing
Problem 2: Inefficient management, governance, and supervision in certain administrative bodies, agencies, public enterprises, and state-owned joint-stock companies.								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Optimize the number of members in supervisory and governing boards of public enterprises and joint-stock companies	1.1. Establishing criteria (competencies, revenues/expenditures, number of employees) in the Law on Enterprises and the Law on Trading Companies regarding the optimization of the number of members in the governing bodies	MOE MoPA MoLSG	Second half of 2021	Ongoing	Ongoing	Ongoing	Implemented	/
	1.2. Alignment of the statutes of public enterprises and joint-stock companies in accordance with the amendments to the laws	Government of RNM LSGs	Second half of 2022	Pending	Ongoing	Ongoing	Ongoing	Ongoing
2. Introduction of criteria related to the type of education and competencies for the selection of directors and the appointment of members of governing and supervisory boards	2.1. Amendments and supplements to the Law on Public Enterprises and the Law on Trading Companies with a view to: - introducing a legal obligation to stipulate, through the Statute, the required type of education for managerial staff and for the members of management bodies; -establishing a procedure for the timely appointment of the legally required number of members of supervisory and governing boards; -introducing misdemeanor	MOE MoPA	Second half of 2021	Ongoing	Ongoing	Not Implemented	Not Implemented	Ongoing

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	sanctions on the founder for the untimely appointment of members or unlawful appointment/selection of a managerial official							
	2.2. Harmonization of the Statutes and internal acts with the amendments to the Law on Trading Companies and the Law on Public Enterprises by governing bodies, public enterprises and joint-stock companies	Government of RNM LSGs	Second half of 2022	Pending	Ongoing	Not Implemented	Ongoing	Ongoing
Problem 3: The legal framework lacks a clear system for evaluating selection criteria in the processes of employment and promotion in the public sector.								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishing a clear and transparent process for evaluating criteria for employment and promotion in the sectors of health, education, culture, social protection, and in state-owned joint-stock companies	1.1 Adoption of bylaws establishing objective criteria and evaluation process for employment and promotion, depending on the specific needs of each sector separately	Ministry of Health MoC MoE MoPA MLSP MoES	First half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Ongoing
2. Limiting the discretionary powers of the responsible person in the employment process	2.1. Analysis of the legal framework that allows discretionary powers of the responsible person in the employment process	SCPC	First half of 2021	Implemented	/	/	/	/
	2.2. Implementation of the findings from the prepared analysis	MoPA MoH MLSP MK MOE	Second half of 2022	Pending	Not Implemented	Not Implemented	Ongoing	Not Implemented

Problem 1: Lack of harmonization among a large number of laws regulating employment, which enables all forms of influence: political party influence, nepotism, cronyism, and clientelism.

Regarding the implementation of the **Measure 1: Elimination of the possibility of employment through temporary employment agencies and of the possibility for temporary employment to be transformed into permanent employment without a regular employment procedure**, one activity was envisaged, i.e., *Activity 1.1.: Amendment of the Law on Public Sector Employees in order to abolish the possibility of employment through temporary employment agencies and to eliminate the option of transforming employment into permanent status without a regular employment procedure*. The deadline for this activity was the **second half of 2021**, while the competent institution is the **MoPA**. The activity has been assessed as **“Not implemented”** for all five consecutive years. According to the report submitted by the MoPA, a new Law on Public Sector Employees was adopted (“Official Gazette of the Republic of North Macedonia“ No.144/25). However, the amended provisions show that the new law does not abolish the possibility of employment through temporary employment agencies. Furthermore, the initial restriction on the number of persons that may be employed through temporary employment agencies during the year was also removed by the amendment of the Law on Public Sector Employees of 16.12.2025.

Regarding the second part of the activity, which refers to the abolition of the possibility of transforming labor relations /employment without a regular employment procedure, the new Law on Public Sector Employees, unlike the previous one, does not explicitly stipulate whether such a transformation is possible. However, the possibility of transforming a fixed-term employment relationship into an indefinite one is regulated by the general labor legislation. Therefore, the absence of an explicit provision in the new Law on Public Sector Employees regarding the possibility of transforming employment without a regular employment procedure does not mean that such a possibility is prohibited or abolished.

For these reasons, the activity is considered “Not implemented”.

regarding the implementation of the **Measure 2: Assessment of the actual needs for the number of employees and their qualifications in public sector entities**, three activities were subject to evaluation during the reporting period. The implementation deadline was set for the **second half of 2021 and continuously thereafter**, while the competent institution for these activities is **MoPA**. *Activity 2.1. Preparation of functional analyses in public sector entities*, for which the MoPA reported that the Rulebook on internal organization and job systematization is prepared on the basis of a previously conducted functional analysis. The preparation of a functional analysis is mandatory when submitting new acts. However, under the provisions of the new Law on Public Sector Employees (“Official Gazette of the Republic of North Macedonia“ No.144/25 and 252/25), there is no explicit provision requiring that the functional analysis is submitted to MoPA either prior or together with the acts on internal organization and systematization. The Law on Public Sector Employees only stipulates that institutions shall adopt acts on internal organization and job systematization

following a previously conducted functional analysis. Additionally, the new Law on Public Sector Employees does not limit the possibility of amending and supplementing systematization acts, although frequent amendments to these acts were identified as one of the key issues under Problem 1 in the narrative section of the National Strategy for 2021-2025. However, given the formulation of the activity, it is considered **“Implemented”**.

Both Activity 2.2: Publication of the functional analysis on the websites of the institutions and Activity 2.3.: Analysis of the need to introduce an annual workload assessment in public sector entities have been assessed as **“Not implemented”** for the fifth consecutive year. Regarding Activity 2.2., the Ministry reported that it does not have a mandate to exercise control over documents published on institutions’ websites, and that institutions publish their acts on internal organization and job systematization on their websites. However, due to the absence of accurate data, this activity is considered **“Not implemented”**, and closer cooperation with the relevant institutions is required for its consistent implementation. Regarding Activity 2.3., the MoPA stated that, under the Law on Administrative Servants (LAS), it does not have the competence to conduct an analysis on annual workload assessment in public sector entities. However, this justification is in contrast with the activity indicator set out in the Strategy, according to which the Ministry is designated as competent institution responsible for preparing such an analysis.

Regarding the implementation of the Measure 3: Proper definition of the type of education required for specific job positions in the job classification (systematization) acts, one activity was foreseen, that is, *Activity 3.1.: **Amendment of the “Rulebook on the content and method of preparation of acts on internal organization and job systematization, as well as the content of the functional analysis of public sector institutions”, with the aim of defining the type of higher education through scientific fields, rather than scientific disciplines according to the Frascati classification of scientific fields, when determining the type of education in systematization act.*** The implementation deadline for this activity was the **first half of 2022**, the competent institution is the **MoPA**, and the activity is assessed as **“Not implemented”**. Although the MoPA reported that the Rulebook on the content and method of preparation of acts on internal organization and job systematization, as well as the content of the functional analysis of public sector institutions, has been amended, and considers the activity as implemented, a review of the Rulebook shows that it does not meet the intended requirements of this activity. Specifically, the type of higher education for a job position is not defined through scientific fields, but is still determined by specifying one scientific-research area or one specific scientific-research field, with reference to one, and at the most three, scientific-research areas corresponding to the job description.

Regarding the implementation of the Measure 4: Improving transparency in public sector employment, one activity was envisaged, that is, *Activity 4.1.: **Strengthening oversight regarding the publication of acts on organization and systematization***

and employment, in accordance with Article 10 of the Law on Free Access to Public Information, with an implementation deadline for the **first half of 2021** - continuously, and the **Agency for Protection of the Right to Free Access to Public Information (ASPI)** as competent institution. In 2021, the activity was assessed as “Not implemented”, while in 2022, 2023, 2024 and 2025, ASPI undertook activities and conducted monitoring of the websites of several institutions. Therefore, the activity for the current reporting period is considered “**Ongoing**”. In this case, it is also noted that obstacles limiting the imposition of fines for non-publication of relevant data still exist and need to be addressed.

Problem 2: Inefficient management, governance, and supervision in certain administrative bodies, agencies, public enterprises, and state-owned joint-stock companies.

Regarding the implementation of the **Measure 1: Optimize the number of members in supervisory and governing boards of public enterprises and joint-stock companies**, during the reporting period, one out of two activities remained for evaluation, i.e. *Activity 1.2: Alignment of the statutes of public enterprises and joint-stock companies in accordance with the amendments to the laws*, with implementation deadline set for the **second half of 2022**, and the competent institution being the **Government**. This activity is assessed as “**Ongoing**”, because 13 out of the total of 15 public enterprises established by the Government have already aligned their statutes, while the remaining 2 public enterprises are in the process of obtaining consent from the Government. In 2024, the Law on Trading Companies was also amended, regulating the rights, obligations, and the conditions that must be met by members of the supervisory boards, non-executive members of boards of directors in companies with dominant or full state-ownership, boards of directors, and members of governing boards in companies with dominant or full state ownership. However, state-owned trade companies have still not aligned their statutes with the amendments to the provisions of this law.

Regarding the implementation of the **Measure 2: Introduction of criteria related to the type of education and competencies for the selection of directors and the appointment of members of governing and supervisory boards**, two activities have been envisaged, as follows:

- *Activity 2.1: Amendments and supplements to the Law on Public Enterprises and the Law on Trading Companies with a view to introducing a legal obligation to stipulate, through the Statute, the required type of education for managerial staff and for the members of management bodies; establishing a procedure for the timely appointment of the legally required number of members of supervisory and governing boards; introducing misdemeanor sanctions on the founder for the untimely appointment of members or unlawful appointment/selection of a managerial official.* The implementation deadline for this activity was the **second half of 2021**, and the competent institution is the **MoEL**. This activity is assessed as “**Ongoing**”, given that the relevant amendments to the Law on Public Enterprises and the Law on Trading

Companies have been adopted, except for the part concerning the introduction of misdemeanor sanctions for the founder for the untimely appointment of members or unlawful appointment/selection of a managerial official.

- *Activity 2.2: Harmonization of the Statutes and internal acts with the amendments to the Law on Trading Companies and the Law on Public Enterprises by governing bodies, public enterprises and joint-stock companies*, with implementation deadline for the **second half of 2022**, and the **Government** being the competent institution. This activity is assessed as **“Ongoing”**. Namely, out of 15 public enterprises, 13 have already harmonized their statutes with the amendments to the Law on Public Enterprises, while 2 are in the process of obtaining Government approval. Regarding the amendments to the Law on Trading Companies (Official Gazette of the Republic of North Macedonia No. 272/2024), which started being applied as of 7 January 2025, state-owned trading companies have not yet harmonized their statutes.

Problem 3: The legal framework lacks a clear system for evaluating selection criteria in the processes of employment and promotion in the public sector.

Regarding the implementation of **Measure 1: Establishing a clear and transparent process for evaluating criteria for employment and promotion in the sectors of health, education, culture, social protection, and in state-owned joint-stock companies**, the following activity has been envisaged, that is, *Activity 1.1.: Adoption of bylaws establishing objective criteria and evaluation process for employment and promotion, depending on the specific needs of each sector separately*, with an implementation deadline for the **first half of 2022** and the **ministries** being the competent institutions. The status of the activity is assessed as **“Ongoing”** based on the activities undertaken by the Ministry of Health. In this regard, a working group has been formed which prepared draft amendments to the Law on Healthcare aimed at increasing transparency in the employment of healthcare workers, through public announcement of vacancies, ranking of candidates according to established criteria, and the abolition of the director’s discretionary power in candidate selection.

Regarding the implementation of **Measure 2: Limiting the discretionary powers of the responsible person in the employment process**, the remaining activity in this reporting period is the *Activity 2.2: Implementation of the findings from the prepared analysis*, which was scheduled for implementation in the **second half of 2022** by the **MoPA**, and is assessed as **“Not implemented”**. Namely, although an Analysis of the legal framework that allows discretionary powers of the responsible person in the employment process has been prepared, there is no information on the implementation of its findings.

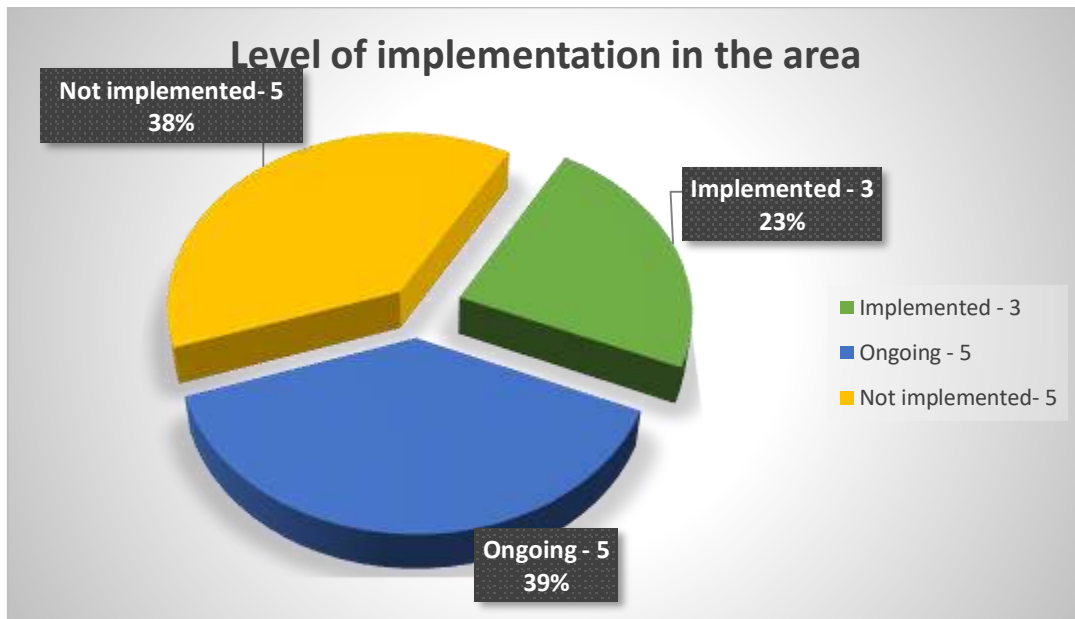


Figure 7: Overall level of implementation in the respective area

Out of the total 13 activities envisaged in the Strategy for this horizontal area, three activities have been implemented (23%), five have not been implemented (38,5%), and five activities are still ongoing (38,5%).

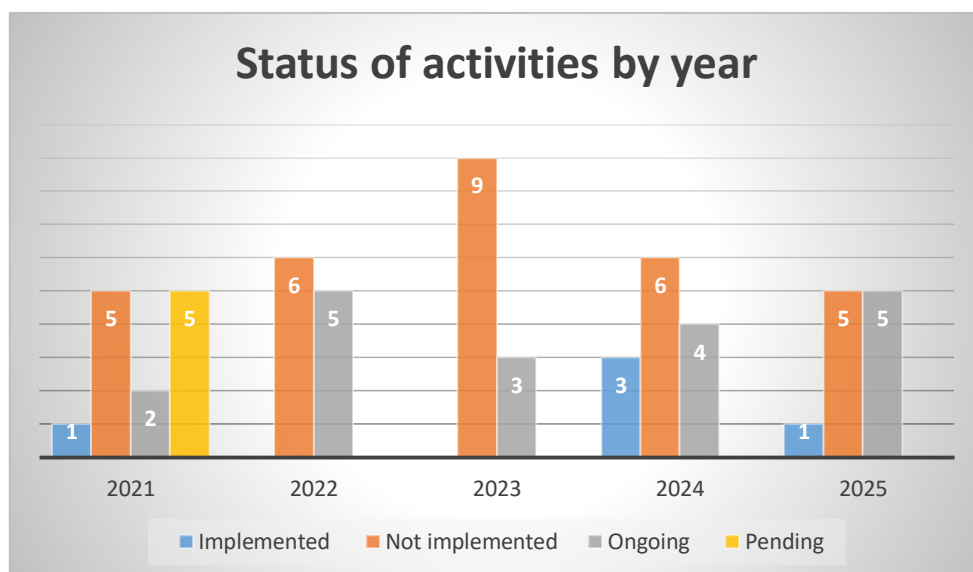


Figure 8: Status of activities' implementation, by years

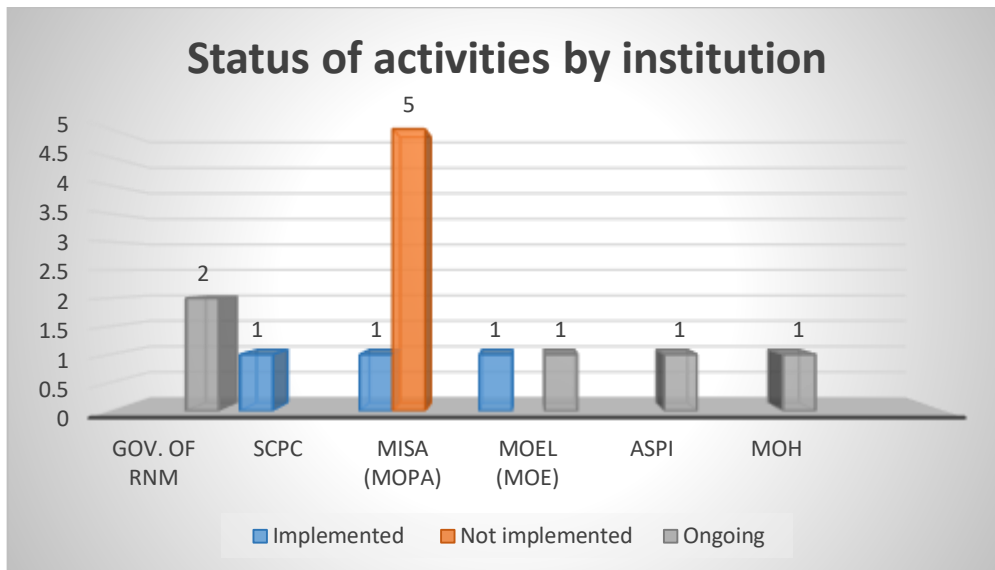


Figure 9: Status of activities, by institutions

- Six activities have been envisaged for the MoPA, of which one is implemented, and five are not implemented.
- Two activities have been envisaged for the Government, both of which are ongoing.
- There is one activity for ASPI, and it is ongoing.
- Two have been envisaged activities for MoEL, one of which is implemented, and the other one is ongoing.
- There is one activity for the MoH, which is ongoing.
- The SCPC had one activity, which was implemented in 2021.

5. SECTOR -POLITICAL SYSTEM

Sector description

With regard to the political system sector, the Strategy identifies the following six priority problems:

- 1) Adoption of a large number of laws through an expedited procedure without adequate justification for the use of this type of procedure;
- 2) Drafting, proposal, and adoption of legislation without prior adequate high-quality analyses, impact assessments, and consultative processes, in order to protect the public interest;
- 3) Failure to sanction persons who refuse to submit an asset and interest declaration despite having such an obligation;
- 4) Unregulated interaction between lobbyists and representatives of the legislative and executive branches, as well as officials from local governments;
- 5) Insufficient involvement of high-level officials in educational programs in the field of ethics and integrity;
- 6) There is no mechanism or body for the effective monitoring of media coverage of participants in the election campaign through Internet portals.

To address these problems, the Action Plan of the Strategy entails seven measures and eight activities, and the competent institutions for the implementation of these activities are:

- 7) The Assembly,
- 8) The Government,
- 9) SCPC,
- 10) MISA and
- 11) Ministry of Justice (hereinafter: MoJ).

Level of implementation of activities in the respective sector

In the political system sector, six priority problems have been identified. To address them, seven measures were envisaged during the reporting period, with seven activities remaining for implementation. Based on the received data and conducted analyses, the status of implementation of the activities set out in the Action Plan of the Strategy for the political system sector, is as follows:

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Problem 1: Adoption of a large number of laws through an expedited procedure without adequate justification for the use of this type of procedure								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Stipulating a definition of the complexity and scope of draft laws in the Rules of Procedure	1.1. Amendment of the Rules of Procedure of the Assembly of RNM	Assembly of RNM	Second half of 2021	Ongoing	Ongoing	Not Implemented	Not Implemented	Not Implemented
Problem 2: Drafting, proposal, and adoption of legislation is often carried out without prior adequate quality analyses, impact assessments, and consultative processes aimed at protecting the public interest								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Regulating the Regulatory Impact Assessment (RIA) process, with a view of making it mandatory	1.1. Adoption of a new Methodology for RIA, integrating the processes for evaluating regulatory implementation and anti-corruption proofing of legislation	MoPA Government	Second half of 2021	Ongoing	Not Implemented	Not Implemented	Not Implemented	Not Implemented
Problem 3: Failure to sanction the refusal to submit a declaration of assets and interests by persons who have such an obligation								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Definition of the situation of "refusal to declare assets and interests" by persons who have such a legal obligation	1.1. Amendments to the LPCCI	MoJ	First half of 2022	Pending	Ongoing	Ongoing	Ongoing	Ongoing
2. Establishing measures to determine accountability for persons who refuse to submit a declaration of assets and interests	2.1. Amendments to the LPCCI	MoJ	First half of 2022	Pending	Ongoing	Ongoing	Ongoing	Ongoing
Problem 4: Unregulated interaction between lobbyists and representatives of the legislative and executive branches, as well as officials from local governments								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishing rules to regulate the interaction between lobbyists and	1.1. Adoption of a new Law on Lobbying	MoJ	First half of 2021	Implemented	/	/	/	/

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representatives of public authorities								
Problem 5: Insufficient involvement of high-level officials of the executive branch in educational programs in the field of ethics and integrity								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Strengthening the integrity system of high-level executive office holders	1.1. Adoption of a program to raise awareness and strengthen the integrity of high-level officials in the executive branch	SCPC Government	First half of 2021	Ongoing	Ongoing	Ongoing	Ongoing	Not Implemented
	1.2. Implementation of a training program	SCPC	First half of 2021 – continuously	Not Implemented	Not Implemented	Ongoing	Implemented	Not Implemented
Problem 6: There is no mechanism or body for the effective monitoring of media coverage of participants in the election campaign through Internet portals								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. The cost for advertising on Internet portals should not be paid from the Budget of the RNM.	1.1. Amendment of the Electoral Code to exclude Internet portals from compensation for advertising costs of participants in election campaigns, until a legal framework for their regulation is adopted	MoJ	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Ongoing

Problem 1: Adoption of a large number of laws through an expedited procedure without adequate justification for the use of this type of procedure.

Regarding the implementation of **Measure 1: Stipulating a definition of the complexity and scope of draft laws in the Rules of Procedure**, one activity was envisaged, i.e., *Activity 1.1: Amendment of the Rules of Procedure of the Assembly of RMM*. The implementation deadline for this activity was the **second half of 2021**, with the **Assembly** being the competent institution. In 2021 and 2022, this activity had the status “Ongoing”, but considering that in 2023 the Assembly adopted the new Rules of Procedure, which do not include definition of the complexity and scope of draft laws, this activity is considered “**Not implemented**”.

Problem 2: Drafting, proposal, and adoption of legislation is often carried out without prior adequate quality analyses, impact assessments, and consultative processes aimed at protecting the public interest.

Regarding the implementation of the **Measure 1: Regulating the Regulatory Impact Assessment (RIA) process, with a view of making it mandatory**, one activity was envisaged: *Activity 1.1: Adoption of a new Methodology for RIA, integrating the processes for evaluating regulatory implementation and anti-corruption proofing of legislation*, with implementation deadline in the **second half of 2021**, and **MISA (MoPA)** as competent institution. No concrete activities have been undertaken towards the implementation of this activity, and it is therefore assessed as “**Not implemented**”.

Problem 3: Failure to sanction the refusal to submit a declaration of assets and interests by persons who have such an obligation.

Regarding the implementation of the **Measure 1: Definition of the situation of “refusal to declare assets and interests” by persons who have such a legal obligation**, one activity was envisaged, that is, *Activity 1.1: Amending and supplementing the Law on Prevention of Corruption and Conflicts of Interest*. The implementation deadline was the **first half of 2022**, and the lead institution is the Ministry of Justice (**MoJ**). This activity is assessed as “**Ongoing**”, with the MoJ reporting that the Draft Law Amending and Supplementing the *Law on Prevention of Corruption and Conflicts of Interest* is currently in the government procedure.

Regarding the **Measure 2: Establishing measures to determine accountability for persons who refuse to submit a declaration of assets and interests**, one activity was envisaged, that is: *Activity 2.1: Amending and supplementing the Law on Prevention of Corruption and Conflicts of Interest*, with a deadline in the **first half of 2022**, and the MoJ as lead institution. This activity is also assessed as “**Ongoing**”, as it is included within the above-mentioned Draft Law Amending and Supplementing the LPPCI.

Problem 5: Insufficient involvement of high-level officials of the executive branch in educational programs in the field of ethics and integrity

To address this problem, one measure has been envisaged, that is, **Measure 2: Strengthening the integrity system of high-level executive office holders**, which entails two activities during the reporting period. *Activity 1.1: Adoption of a program to raise awareness and strengthen the integrity of high-level officials of the executive branch*, with a deadline in the **first half of 2021**, and the competent institution being the **SCPC**. This activity is assessed as **“Not implemented”**. In this regard, within the strategic commitment to strengthening integrity and accountability in the public sector, the SCPC in 2024 identified the need for a systematic and continuous improvement of political accountability of high-level executive office holders. This stems from assessments that the prevention of corruption and conflict of interest cannot be sustainable without a clearly demonstrated political will and personal example from the top levels of the executive branch. For this purpose, several cycles of trainings, thematic workshops and round tables were initiated with appointed persons according to the LPCCI, with a special focus on: mayors and office-holders in local governments (with support from the OSCE Mission to Skopje) and appointed persons from the central government (**with the support from the “Partnership Against Corruption” project, funded by USAID**). These activities aimed to raise awareness of personal responsibility, conflict of interest risk management, transparency in decision-making, and the role of integrity as prerequisite for public trust. However, in the course of 2025, continuity in the implementation of these activities has not been ensured, primarily due to changes in priorities within donor support and the completion of project activities. The cooperation with OSCE during this period was focused on direct work with integrity officers within institutions, while the USAID-supported project was closed, resulting in reduced institutional and financial support for activities targeting the high-level office holders of the executive branch. The experience from 2024 and the lack of continuity in 2025 clearly confirm the need for these activities to be institutionalized through the formal adoption of a special program for raising awareness and strengthening the integrity of high-level office holders of the executive branch, rather than implementing them solely on a project basis. The establishment of such a program would ensure: a systemic approach rather than ad-hoc activities, a regular and mandatory educational component, a clear link with the strategic goals of increasing political accountability and a visible demonstration of political will towards strengthening integrity.

Activity 2.2. Implementation of a training program is assessed as **“Not implemented”**. During 2025, no targeted trainings were delivered for high-level office holders of the executive branch, due to the absence of an institutionalized program and the discontinuation of the project support which had previously enabled the organization of such activities. This fact further underlines the need to establish a formal program and to allocate budget and organizational resources for its continuous implementation. During the reporting period, no high-level office holders of the executive branch were registered as having participated in a dedicated training program in the field of integrity and ethics. Experience from previous years shows that interest and participation in such activities are significantly higher when there is a clear institutional framework, political support, and formalized obligation to participate. Therefore, in the coming strategic

period, it is necessary to establish a mechanism that will ensure systematic and measurable participation of high-level officials.

Problem 6: There is no mechanism or body for the effective monitoring of media coverage of participants in the election campaign through Internet portals, for which one measure has been envisaged, i.e. **Measure 1: The cost for advertising on Internet portals should not be paid from the Budget of the RNM**, coupled with one *Activity 1.1: Amendment of the Electoral Code to exclude Internet portals from compensation for advertising costs of participants in election campaigns, until a legal framework for their regulation is adopted.* The deadline for the implementation of this activity was the **second half of 2021** and the competent institution being the **MoJ**. The status of this activity is assessed as **“Ongoing”**. The MoJ reported that in 2025 amendments to the Electoral Code were prepared, which incorporated some of the OSCE/ODIHR recommendations. In the second half of January 2026, it will establish a working group due to the need for systematic and comprehensive regulation of the Electoral Code, within which all current issues and recommendations from domestic and international organizations will be reviewed, including the measures envisaged by the Strategy.

The SCPC conducted a review and verification of the data received from the competent institutions and established the following status of the activities in the political system sector:

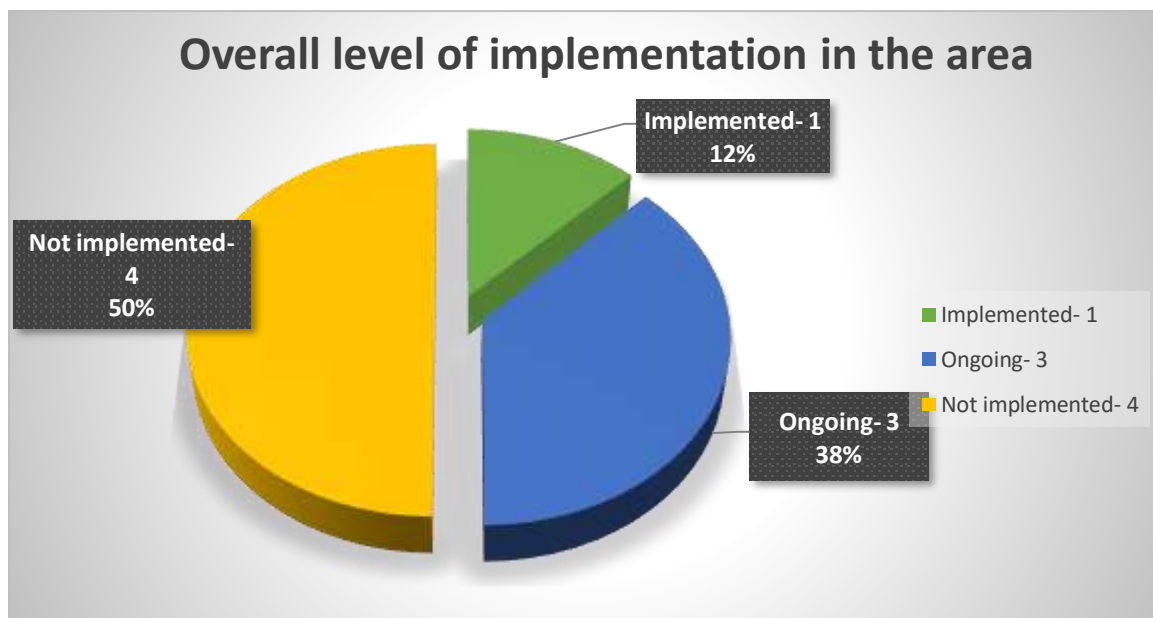


Figure 10: Overall level of implementation within the sector

Out of a total of eight activities envisaged in the Strategy for the political system sector, one activity has been implemented (12%), three activities are Ongoing (38%), and four activities have not been implemented (50%).

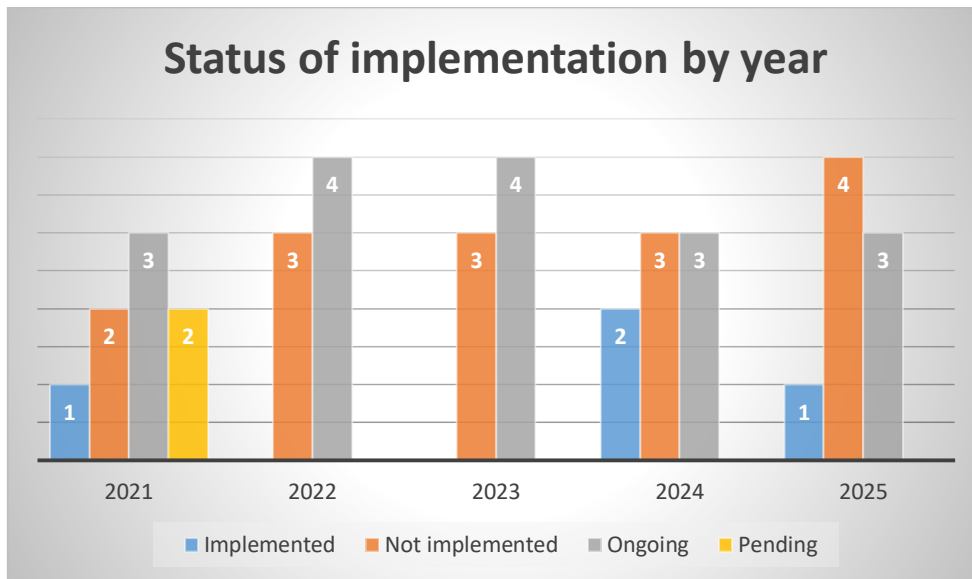


Figure 11: Status of activities' implementation, by years

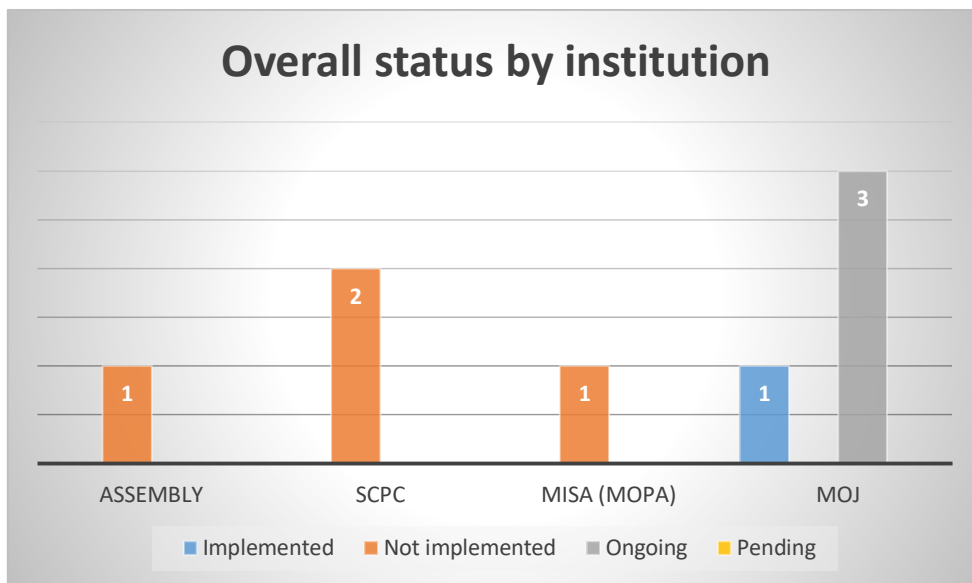


Figure 12: Status of activities' implementation, by institutions

- One activity has been envisaged for the MoPA, which has not been implemented.
- One activity has been envisaged for the Assembly of RNM, which has not been implemented.
- Four activities have been envisaged for the MoJ, of which one has been implemented, and three are ongoing.
- Two activities have been envisaged for the SCPC, both of which have not been implemented.

6. SECTOR - JUDICIARY

Sector description

Priority problems in the judiciary sector are:

- 1) Insufficiently efficient system for strengthening integrity in the judiciary and the public prosecutor's office;
- 2) Insufficient material and human resources, absence of an automated system for the allocation and monitoring of cases in the Public prosecutor's office, and insufficient transparency in the work of the Council of public prosecutors;
- 3) Insufficient efficiency and transparency in the work of the State Attorney's Office.

To address the problems in the judiciary sector, the competent institutions responsible for the implementation of the measures and activities are:

- 4) MoJ
- 5) MoF
- 6) Public Prosecutor's Office of the Republic of North Macedonia (hereinafter PPO RNM)
- 7) State Attorney's Office (hereinafter: State Attorney)
- 8) Academy for Judges and Public Prosecutors (hereinafter AJPP) and
- 9) Association of Public Prosecutors.

Level of implementation of activities in the respective sector

In the judiciary sector, three problems have been identified. To address them, five measures and eight activities remained for implementation during the reporting period. The SCPC conducted a review and analysis of the received data regarding the implementation of the measures and activities in the judiciary sector and established the following situation:

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Problem 1: Insufficiently efficient system for strengthening integrity in the judiciary and the public prosecutor's office								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Supplementing the Code of Public Prosecutors with comments and examples	1.1. Submission of proposed comments and examples for the Code by the Association of Public Prosecutors.	Association of Public Prosecutors	Second half of 2021	Implemented	/	/	/	/
	1.2. Adoption of the amendment to the Code of public prosecutors	PPO RNM	Second half of 2021	Implemented	/	/	/	/
2. Implementation of mandatory training for judges and public prosecutors for the purpose of implementing codes of professional conduct	2.1. Adoption of programs for mandatory training on professional conduct for judges and public prosecutors	AJPP	Second half of 2021	Implemented	/	/	/	/
	2.2. Implementation of trainings by the Academy for judges and public prosecutors	AJPP	Second half of 2021 and continuously	Implemented	Implemented	Implemented	Implemented	Implemented
3. Conducting an assessment of corruption risks in judiciary	3.1. Establishment of an expert working group for assessing corruption risks in judiciary	SCPC	First half of 2022	Pending	Implemented	/	/	/
	3.2. Preparation of an in-depth analysis and assessment of the factors that generate corruption in the judiciary	SCPC	Second half of 2022	Pending	Ongoing	Implemented	/	/
Problem 2: Insufficient material and human resources, absence of an automated system for the allocation and monitoring of cases in the public prosecutor's office, and insufficient transparency in the work of the Council of public prosecutors								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025

Annual Report on the Implementation of the 2021-2025 National Strategy for the Prevention of Corruption and Conflict of Interest for the period from 01.01.2025 to 31.12.2025

1. Staffing of public prosecutor's offices in accordance with the existing job systematization acts	1.1. Increase of budget funds for the Public Prosecutor's Office for new employments	MoF	Second half of 2021	Ongoing	Ongoing	Not Implemented	Ongoing	Not Implemented
	1.2. Implementation of trainings for newly appointed public prosecutors	AJPP	2021, Continuously	Implemented	Implemented	Implemented	Implemented	Implemented
2. Establishing investigative centers within the public prosecutor's offices	2.1. Provision of budget funds for investigative centers	MoF	2021, Continuously	Ongoing	Implemented	Not Implemented	Not Implemented	Implemented
	2.2. Adoption of a decision on the establishment of investigative centers	PPO RNM	2021, Continuously	Ongoing	Implemented	Implemented	Ongoing	Implemented
3. Establishing an automated system for the allocation and monitoring of cases in the public prosecutor's office	3.1. Analysis of the case management process in the Public Prosecutor's Office of the Republic of North Macedonia (PPO RNM).	PPO RNM	First half of 2021	Implemented	/	/	/	/
	3.2. Procurement of an automated system for the allocation and tracking of cases	PPO RNM	First half of 2022	Pending	Not Implemented	Not Implemented	Ongoing	Ongoing
	3.3. Training of staff for its use	PPO RNM	Second half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
Problem 3: Insufficient efficiency and transparency in the work of the State Attorney's Office								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Increasing the efficiency and transparency of the State Attorney's Office	1.1. Adoption of a new Law on the State Attorney's Office	MoJ	Second half of 2022	Pending	Not Implemented	Not Implemented	Ongoing	Ongoing

With regard to **Problem 1: Insufficiently efficient system for strengthening integrity in the judiciary and the public prosecutor's office**, and the foreseen **Measure 2: Implementation of mandatory training for judges and public prosecutors for the purpose of implementing codes of professional conduct**, in the reporting period, only one activity remains, i.e., *Activity 2.2: Implementation of trainings by the Academy for judges and public prosecutors*, under the responsibility of the **AJPP**, with a deadline for implementation in **2021 and continuously**. This activity has been marked as **"Implemented"** for the fifth consecutive year. Specifically, the implementation of 20 thematic trainings in 2025, with significant number and diversity of participants from the judicial system, indicates an active and functional approach to improving professional and ethical standards.

Problem 2: Insufficient material and human resources, absence of an automated system for the allocation and monitoring of cases in the public prosecutor's office, and insufficient transparency in the work of the Council of public prosecutors.

To address this problem in the judiciary sector, three measures have been foreseen.

Measure 1: Staffing of public prosecutor's offices in accordance with the existing job systematization acts, entails two activities:

- *Activity 1.1: Increase of budget funds for the Public Prosecutor's Office for new employments*, with an implementation deadline in the second half of 2021, under the responsibility of the **Ministry of Finance (MoF)**. This activity is assessed as **"Not implemented"**, although the MoF has marked its status as **"Ongoing"**. Namely, according to the submitted report, the MoF issued a negative opinion on the Annual Employment Plan of the PPO RNM for 2025 due to fiscal implications, and a revised plan for 2025 has not been submitted to the MoF.
- *Activity 1.2: Implementation of trainings for newly appointed public prosecutors*, under the responsibility of **AJPP** with an implementation deadline of **2021 - continuously**. This activity has been marked as **"Implemented"** for the fifth consecutive year. According to the submitted report from AJPP, in the course of 2025, one five-day training was held for 5 newly elected public prosecutors, attended by a total of 29 newly elected public prosecutors from the fifth generation in initial training at the AJPP.

Regarding **Measure 2: Establishing investigative centers within the Public Prosecutor's offices**, the following two activities remain in the reporting period:

- *Activity 2.1: Provision of budget funds for investigative centers*, under the responsibility of the **MoF**, has been foreseen as **continuous** activity. The MoF reported that the Public Prosecutor's Office of the Republic of North Macedonia (PPO RNM) has an increased budget for 2025 compared to the execution in 2024, amounting to approximately 131 million denars. In the budget circular for 2025, the PPO RNM did not request/plan funds for the investigative centers. Within the approved budget, the PPO RNM implements its activities, in accordance with its competences and defined priorities. Given that for the past four years under the Strategy, the reporting has remained identical, and the activity has been

assessed as “Not implemented” because the PPO RNM did not plan or request budget funds for the investigative centers, the same assessment as “Not implemented” was maintained in the previous report on the National Strategy. However, when analyzing Activity 2.2. according to PPO RNM reporting, in 2025, the Public Prosecutor adopted a decision to establish two new investigative centers in Bitola and Shtip. This indicates that the PPO RNM established new investigative centers despite not requesting specific budget allocations from the MoF. As a result, the number of investigative centers in the public prosecutor’s offices has increased to six in total. As of 01.08.2025, the investigative center at the Basic Public Prosecutor’s Office in Bitola officially began operations, with two investigators from the Ministry of Interior assigned to it. Regarding the investigative center in the Basic Public Prosecutor’s Office Shtip, by the end of 2025 activities for its staffing had begun, including preparation for a public call for the recruitment of two investigators. After having analyzed Activity 2.1. and 2.2., it can be concluded that within the approved budget, the PPO RNM has implemented its activities, in accordance with its competences and defined priorities. This activity is assessed as „**implemented**“ because the 2025 budget was increased compared to 2024, and although no funds were specifically requested for the investigative centers, in the course of 2025, two new investigative centers were established within the approved budget, one of which has officially started operating, while activities for staffing the second one are ongoing.

- *Activity 2.2: Adoption of a decision on the establishment of investigative centers, under the responsibility of the PPO RNM and defined as a **continuous** activity.* According to the submitted report, in 2025, the PPO RNM adopted a decision to establish two new investigative centers in Bitola and Shtip. As result, the total number of investigative centers in the public prosecutor’s offices has increased to six. As of 1.08.2025, the investigative center in the Basic Public Prosecutor’s Office Bitola officially began operating, with two investigators from the Ministry of Interior assigned to it. Regarding the investigative center in the Basic Public Prosecutor’s Office Shtip, by the end of 2025, activities for its staffing had begun, including preparation for the announcement of a public call for the recruitment of two investigators. As noted above, this activity is considered “**Implemented**”.

Regarding **Measure 3: Establishing an automated system for the allocation and monitoring of cases in the Public Prosecutor’s Office**, two activities have been evaluated in the reporting period:

- *Activity 3.2: Procurement of an automated system for the allocation and tracking of cases, with an implementation deadline of the **first half of 2022**, under the responsibility of the PPO RNM.* According to the submitted report, in 2025, through the project “EU Support for Rule of Law”, funds were secured for a new electronic case management system, and a tender was launched for the selection of a company to develop the software solution. The system is to be financed

through IPA funds, with partial national co-financing which has not been secured. Considering the activities undertaken so far, this activity is assessed as “Ongoing”.

- *Activity 3.3: Training of staff for its use*, with an implementation deadline of the **second half of 2022**, under the responsibility of the **PPO RNM**. This activity is linked to the previous one, namely the procurement of the system, which has not yet been fully implemented. Therefore, this activity is assessed as “**Not implemented**”.

Regarding the **Problem 3: Insufficient efficiency and transparency in the work of the State Attorney’s Office**, for which Measure 1: **Increasing the efficiency and transparency of the State Attorney’s Office** is foreseen, including Activity 1.1: *Adoption of a new Law on the State Attorney’s Office*, with a deadline of the **second half of 2022** under the responsibility of the Ministry of Justice (**MoJ**). According to the submitted report and based on the review of the ENER system, in 2025, a Draft Law on the State Attorney’s Office was prepared and the procedure for its further processing is ongoing. Accordingly, this activity is considered “**Ongoing**”.

Following examination and verification of the data submitted in the reports by the competent institutions, the SCPC has determined the following status of activities in the judiciary sector:

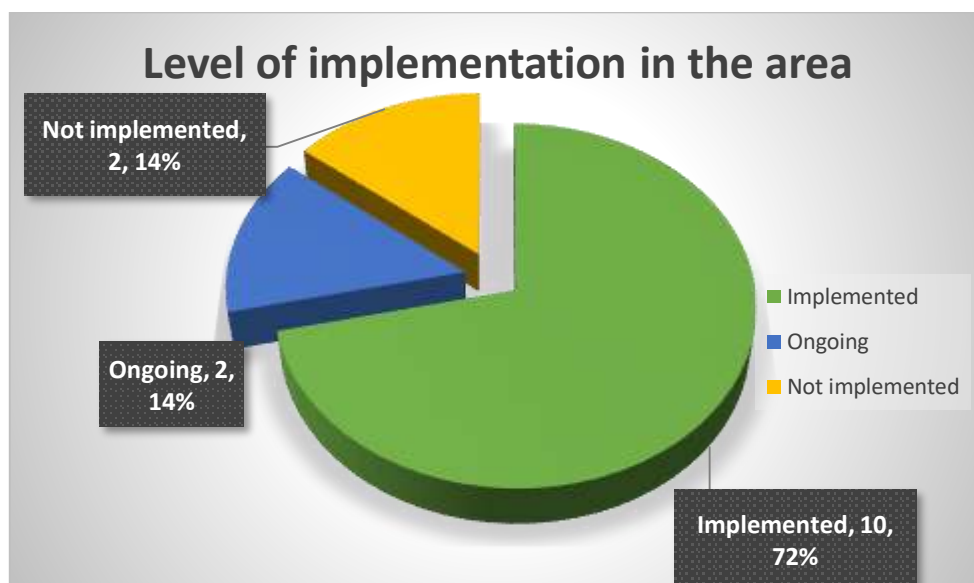


Figure 13: Overall level of Implementation within the sector

Out of a total of 14 activities foreseen in the Strategy for the judiciary sector, ten activities have been implemented (72%), two activities have not been implemented (14%), and two activities are ongoing (14%).

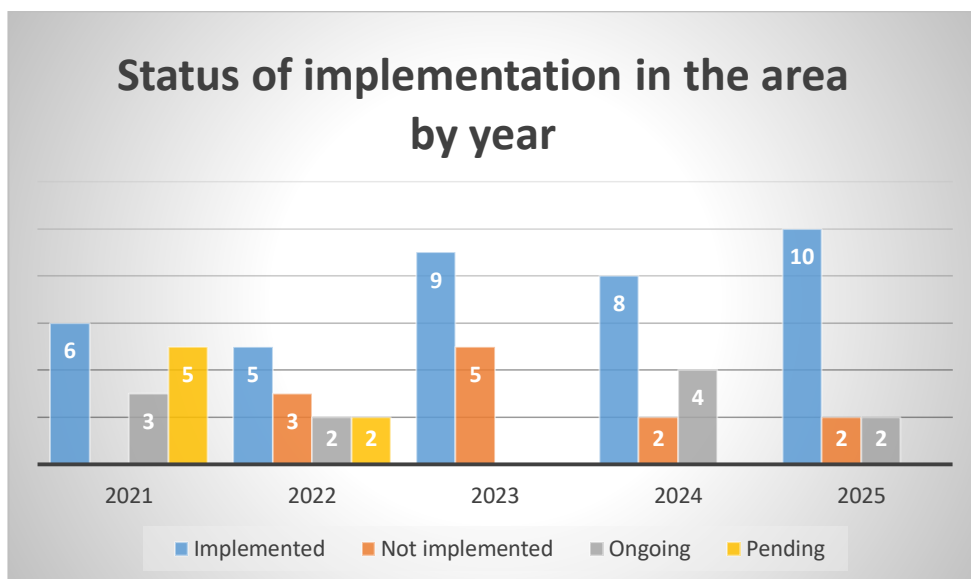


Figure 14: Status of overall implementation of activities, by years

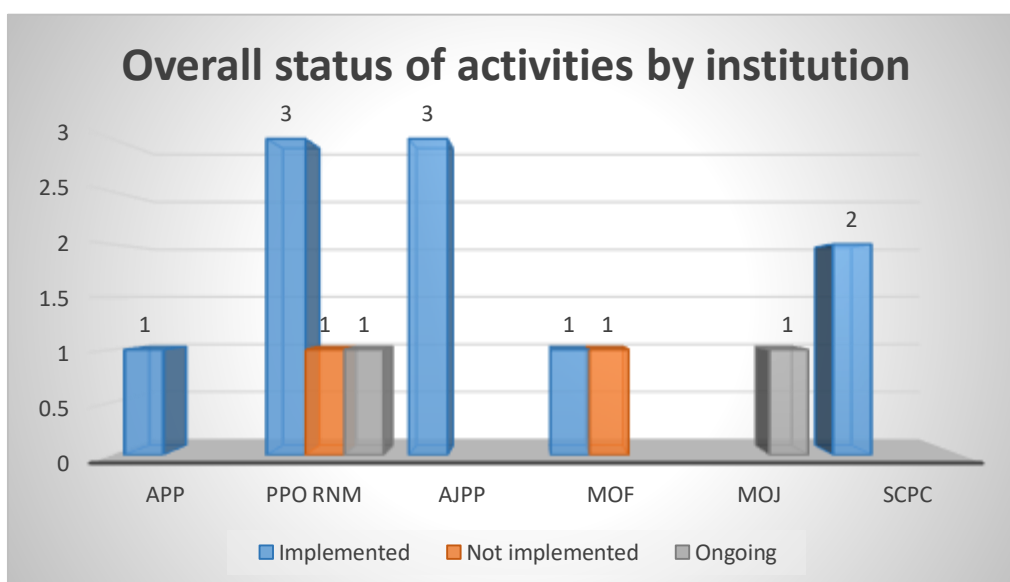


Figure 15: Status of activities, by institutions

- One activity has been foreseen for the Association of Public Prosecutors (APP), which was implemented in 2021.
- One activity has been foreseen for the Ministry of Justice (MoJ), which is ongoing.
- Five activities have been foreseen for the PPO RNM, of which three have been implemented, one activity has not been implemented and one activity is ongoing.
- Two activities have been foreseen for the MoF, one of which has not been implemented, and the other is implemented.
- Two activities have been foreseen for the SCPC, which have been implemented.

- Three activities have been foreseen for the AJPP, which have been implemented.

7. SECTOR - LAW ENFORCEMENT

Sector description

With regard to law enforcement authorities, the following seven problems are identified in the Strategy:

- 1) Extensive discretionary powers of responsible officials and lack of transparency in recruitment and promotions within the MoI;
- 2) Inefficient system for determining professional responsibility in law enforcement authorities;
- 3) Unclear and imprecisely defined competences, and overlapping competences of the inspectorates;
- 4) Subjective and inappropriate conduct by inspectors in exercising their duties;
- 5) Insufficiently functional inspection oversight in local self-government;
- 6) The leadership of institutions do not implement the recommendations of internal audit and the State Audit Office (SAO);
- 7) Influence of responsible officials in public institutions on the independence of internal audit;

Regarding the implementation of the measures and activities aimed to address the problems in the law enforcement sector, the following institutions are competent:

- 8) The Government;
- 9) Ministry of Interior (hereinafter: MoI);
- 10) Ministry of Finance (hereinafter: MoF);
- 11) Financial Police Office (hereinafter: FPO);
- 12) Financial Intelligence Unit (hereinafter: FIU);
- 13) MoJ
- 14) Customs Administration (hereinafter: CA);
- 15) SCPC;
- 16) Inspection Council (hereinafter: IC);
- 17) Ministries;
- 18) MISA/MoPA;
- 19) State Administrative Inspectorate (hereinafter: SAI) and
- 20) State Audit Office (hereinafter: SAO).

Level of implementation of activities in the respective sector

In the law enforcement sector, seven problems have been identified. To tackle these problems, 10 measures and 15 activities were evaluated during the reporting period. The SCPC carried out verification and analysis of the received data regarding the implementation of the measures and activities in the law enforcement sector and determined the following status of activities in this sector:

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Problem 1: Discretionary powers of responsible officials and lack of transparency in recruitment and promotions within the MoI								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishing transparency in the recruitment and promotion procedure at the MoI, except for recruitments undertaken on the basis of special provisions of the Law on Internal Affairs.	1.1 Amendments to the Law on Internal Affairs	MoI	First half of 2022	Pending	Implemented	/	/	/
2. Ensuring transparency of the acts on the organization and systematization of job positions in the MoI and their publication on the MoI website, except for job positions governed by special provisions of the Law on Internal Affairs	2.1. Declassification of the acts on the organization and systematization of job positions in the Ministry of Interior	MoI	First half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
Problem 2: Inefficient system for determining professional responsibility in law enforcement authorities								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Introducing a separate organizational unit for internal control and professional standards in the FIU and FPO	1.1 Amendments to the Law on Financial Police	MoF	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Ongoing	Ongoing
	1.2 Alignment of the acts on internal organization and systematization of job positions in FIU and FPO	FPO FIU	Second half of 2021	Not Implemented	Ongoing	Not Implemented	Ongoing	Ongoing

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2. Improving the disciplinary proceedings process in the MoI	2.1 Harmonization of internal acts with the “Strategy for Advancement and Improvement of Disciplinary Procedures for 2020-2022.”	MoI	Second half of 2021	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
3. Introducing the status of judicial police for employees of the Sector for professional responsibility within the Customs Administration (in accordance with Articles 46 and 47 of the Criminal Procedure Law)	3.1 Amending and supplementing Article 47, paragraph 2 of the Criminal Procedure Law, extending the scope of crimes to include corruption-related offences committed by employee of the Customs Administration, thereby expanding the competence of judicial police officers within the Customs Administration	MoJ	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
	3.2 Amending and supplementing the Law on Customs Administration (alignment with the amendments to the Criminal Procedure Law).	MoF	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
	3.3 Amending and supplementing the Rulebooks on the systematization and organization of the Customs Administration (alignment with the amendments to the	CA	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented

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	Criminal Procedure Law and Law on Customs Administration).							
4. Introducing an obligation for customs officers to submit declarations of assets and interests, as well as changes in assets and interests	4.1 Amending and supplementing the Law on Prevention of Corruption and Conflict of Interest in order to ensure precision of the provision of Article 83.	MoJ	First half of 2022	Pending	Ongoing	Ongoing	Ongoing	Ongoing
	4.2 Amending and supplementing the Law on Customs Administration (alignment with the amended Law on Prevention of Corruption and Conflict of Interest).	CA	First half of 2022	Pending	Implemented	/	/	/
Problem 3: Unclear and imprecisely defined competences, and overlapping competences of the Inspectorates								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	
1. Specifying and clearly delineating the competences of individual inspection services.	1.1 Analysis of the legal competencies of inspection services	IC	First half of 2022	Pending	Ongoing	Ongoing	Ongoing	Ongoing
	1.2 Amendments of laws in which the analysis has identified imprecise competences or overlapping with other inspection services	Line ministries	Second half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
Problem 4: Subjective and inappropriate conduct by inspectors in exercising their duties								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025

Annual Report on the Implementation of the 2021-2025 National Strategy for the Prevention of Corruption and Conflict of Interest for the period from 01.01.2025 to 31.12.2025

1. Strengthening the integrity of the inspection services.	1.1 Development of a methodology for assessing corruption risks in inspection services	MISA	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
	1.2 Preparation of an analysis of corruption risks in inspection services	MISA	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Implemented	/
2. Prescribing an obligation for inspectors to declare their assets and interests to the Inspection Council	2.1 Amendment of the substantive laws relating to inspection services in order to establish an obligation to declare assets and interests	MISA, IC, Line ministries	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
3. Prescribing disciplinary liability for inspectors' failure to declare their assets and interests.	3.1 Supplementing the substantive laws on inspection services by prescribing disciplinary measures for failure to submit declarations	MISA, IC, Line ministries	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
Problem 5: Insufficiently functional inspection oversight in local self-government								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Strengthening the inspection services in local self-government units with authorized inspectors	1.1 Implementing continuous inspection oversight by the State Administrative Inspectorate in local self-government units regarding compliance with the legal	SAI	2021, continuously	Implemented	Implemented	Implemented	Implemented	Implemented

Annual Report on the Implementation of the 2021-2025 National Strategy for the Prevention of Corruption and Conflict of Interest for the period from 01.01.2025 to 31.12.2025

	obligation to employ authorized inspectors							
Problem 6: Responsible or managerial staff in Institutions do not implement the recommendations of the internal audit and SAO								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishment of an efficient system for reporting on the non/implementation of recommendations from internal audit and SAO to higher supervisory and control bodies	1.1 Amendments to the Law on Internal Public Finance Control	MoF	First half of 2021	Ongoing	Ongoing	Not Implemented	Implemented	/
	1.2 Amendments to the Law on State Audit	MoF	First half of 2021	Ongoing	Ongoing	Not Implemented	Ongoing	Ongoing
Problem 7: Influence of responsible officials in public institutions on the independence of internal audit								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Ensuring independence in the work of internal audit through the establishment of a separate unit within the Ministry of Finance	1.1 Amendments to the Law on Internal Public Finance Control	MoF	First half of 2023	Pending	Pending	Ongoing	Implemented	/
	1.2 Amendments to the act on the organization and systematization of the Ministry of Finance	MoF	Second half of 2023	Pending	Pending	Ongoing	Implemented	/

Regarding the **Problem 1: Discretionary powers of responsible persons and lack of transparency in recruitment and promotions within the Ministry of Interior (MoI)**, the following measure and activity remain in the reporting period: **Measure 2. Ensuring transparency of the acts on the organization and systematization of job positions in the MoI and their publication on the MoI websites, except for job positions governed by special provisions of the Law on Internal Affairs** and *Activity 2.1: Declassification of the acts on the organization and systematization of job positions in the Ministry of Interior*. The deadline for implementation of this activity was the **first half of 2022**, and it falls under the responsibility of the **MoI**. The activity is assessed as **“Not implemented.”** The MoI reported that, in accordance with the new Law on Internal Affairs (“Official Gazette of the Republic of North Macedonia“ No. 160/25), the adoption of several bylaws has been foreseen, including the acts on the organization and systematization of job positions within the MoI. Given the deferred application of the law and the deadlines for adopting the bylaws, activities are currently being taken for their preparation. Within this process, an analysis will be carried out, along with consultations and coordination with the competent organizational unit for security of classified information, regarding the necessity, possibility, and the manner of declassifying the acts on the organization and systematization of job positions, followed by determining a final position on the matter.

Problem 2: Inefficient system for determining professional responsibility in law enforcement authorities.

Measure 1. Introducing a separate organizational unit for internal control and professional standards in the FIU and FPO, includes two activities in the reporting period:

- *Activity 1.1: Amendments to the Law on Financial Police*, with a deadline of the **second half of 2021**, and **MoF** as competent institution. The Ministry of Finance reported that the procedure regarding the Draft Law Amending and Supplementing the Law on Financial Police is **“Ongoing”**.
- *Activity 1.2: Alignment of the acts on internal organization and systematization of job positions in FIU and FPO*. The deadline for this activity was the **second half of 2021**, and the competent institution is the **FPO**. The FPO reported that the Draft Law Amending and Supplementing the Law on the Financial Police includes a provision on introducing a separate organizational unit for internal control within the Financial Police Office. The draft law has been submitted to the MoF for further consideration and action. The FIU has completed this activity in 2022. This activity is assessed as **“Ongoing”**.

Measure 2. Improving the disciplinary proceedings process in the MoI includes one *Activity 2.1: Harmonization of internal acts with the “Strategy for Advancement and Improvement of Disciplinary Procedures for 2020-2022”*, with implementation deadline in the **second half of 2021** and **MoI** as competent institution. Although the MoI reported

that the activity has been implemented, the content in the report indicates that, by Decision of the Minister of interior No.13.1.2-40179/1 dated 08.04.2025, the validity of the decision establishing the working group responsible for implementing the strategic commitments of the Ministry in the area of disciplinary procedures (No.13.1.1-90201/1 dated 20.08.2023 and No.13.1.2-108721/1 dated 12.10.2023) has been terminated. In order to clarify the reasons for adopting this decision, the MoI was requested to supplement the report with data on the reasons for issuing the decision in question and whether it is a result of the full completion of the strategic commitments in the area of disciplinary procedures, i.e., due to the conducted harmonization of internal acts with the “Strategy for Advancement and Improvement of Disciplinary Procedures for 2020-2022.” Given that no additional information has been submitted by the MoI, the activity is still considered “Ongoing” until the full harmonization of the internal acts is completed.

Measure 3. Introducing the status of judicial police for employees of the Sector for professional responsibility within the Customs Administration (in accordance with Articles 46 and 47 of the Criminal Procedure Law), includes three activities that were evaluated in the reporting period:

- *Activity 3.1: Amending and supplementing Article 47, paragraph 2 of the Criminal Procedure Law, extending the scope of crimes to include corruption-related offences committed by employees of the Customs Administration, thereby expanding the competence of judicial police officers within the Customs Administration.* The deadline was the **second half of 2021**, with the **MoJ** as competent institution. This activity has been assessed as “**Not implemented**” for the fifth consecutive year. The MoJ reported that the proposed amendments were not accepted by the working group drafting the Criminal Procedure Law, because the activity is considered contrary to the established external control mechanism over the work of the police and law enforcement authorities.
- *Activity 3.2: Amending and supplementing the Law on Customs Administration (alignment with the amendments to the Criminal Procedure Law),* with implementation deadline in the **second half of 2021** and **MoF** as competent institution. The activity has been assessed as “**Not implemented**” for the fifth consecutive year, as it is contingent upon the implementation of Activity 3.1.
- *Activity 3.3: Amending and supplementing the Rulebooks on the systematization and organization of the Customs Administration (alignment with the amendments to the Criminal Procedure Law and Law on Customs Administration),* with implementation deadline in the **second half of 2021** and the **CA** as competent institution. The activity has also been assessed as “**Not implemented**” for the fifth consecutive year, as it depends on the implementation of Activity 3.1.

Measure 4. Introducing an obligation for customs officers to submit declarations of assets and interests, as well as changes in assets and interests, includes one activity in the reporting period, that is, *Activity 4.1: Amending and supplementing the Law on*

Prevention of Corruption and Conflict of Interest in order to ensure precision of the provision of Article 83, with an implementation deadline in the first half of 2022 and MoJ as competent institution. This activity has been assessed as “Ongoing”. The MoJ reported that the Draft Law Amending and Supplementing the Law on Prevention of Corruption and Conflict of Interest is currently in government procedure (inter-ministerial consultations have been completed and it has been reviewed by the government committees – final phase as of 22.07.2025).

Problem 3: Unclear and imprecisely defined competences, and overlapping competences of the inspectorates, includes one Measure 1: Specifying and clearly delineating the competences of individual inspection services, along with two activities:

- *Activity 1.1: Analysis of the legal competencies of inspection services, with an implementation deadline in the first half of 2022 and the IC as competent institution. The activity is assessed as “Ongoing”. According to the submitted report from the IC, out of 28 inspection services, 13 identified overlaps in regulations, while 5 inspection services did not identify overlaps in the regulations under which they operate.*
- *Activity 1.2: Amendments of laws in which the analysis has identified imprecise competences or overlapping with other inspection services, with an implementation deadline in the second half of 2022 and under the competence of the line ministries. Given that no specific competent institution has been designated for this activity, it is marked as “Not implemented”.*

Problem 4: Subjective and inappropriate conduct by inspectors in exercising their duties, includes three measures:

Measure 1: Strengthening the integrity of the inspection services, includes one activity in the reporting period, i.e., Activity 1.1: Development of a methodology for assessing corruption risks in inspection services, with an implementation deadline in the second half of 2021 and MISA (MoPA) as the competent institution. The status of the activity, for the fifth consecutive year, has been assessed as “Not Implemented”. The MoPA informed that this activity is implemented, indicating that, in inspection services, inspection oversight is based on risk assessment which is conducted during the preparation of the annual work plan of the inspection service. In this regard, within the project “Support for Improving the Effectiveness of Inspections – Coordination in the Inspection Council”, one of the several implemented activities by the Council was the development of Methodologies for risk assessment for each of the inspectorates.

However, taking into account that Activity 1.1 envisages the development of a Methodology for assessing corruption risks in inspection services, aimed at overcoming risks of subjective and inappropriate conduct by inspectors, which differs from the aforementioned methodologies adopted by inspection services pursuant to the Law on Inspection Oversight, the activity is considered **“Not implemented.”**

Measure 2: Prescribing an obligation for inspectors to declare their assets and interests to the Inspection Council includes one activity, i.e., *Activity 2.1: Amendment of the substantive laws relating to inspection services in order to establish an obligation to declare assets and interests*, with an implementation deadline in the **second half of 2021** and under the competence of the **MISA (MoPA)**. The status of this activity has been assessed as **“Not implemented”** for the fifth consecutive year. The report submitted by MISA for 2025 is identical to last year’s report and does not correspond to the actual situation. Namely, in 2025, a new Law on Inspection Oversight (“Official Gazette of the Republic of North Macedonia“ No.135/25) was adopted, which came into effect on 1 January 2026. As in the previous law, the new law also does not stipulate provisions establishing an obligation for inspectors to declare their assets and interests.

Measure 3: Prescribing disciplinary liability for inspectors’ failure to declare their assets and interests, also includes one activity, that is, *Activity 3.1: Supplementing the substantive laws on inspection services by prescribing disciplinary measures for failure to submit declarations*, with an implementation deadline in the **second half of 2021** and **MISA (MoPA)** as competent institution. For five consecutive years, the activity has had the status **“Not implemented”**. The activity is conditional upon the implementation of Activity 2.1. under the previous Measure 2.

Problem 5: Insufficiently functional inspection oversight in local self-government, includes one **Measure 1: Strengthening the inspection services in local self-government units with authorized inspectors** and one *Activity 1.1: Implementing continuous inspection oversight by the State Administrative Inspectorate in local self-government units regarding compliance with the legal obligation to employ authorized inspectors*, with an implementation deadline in **2021 and continuously**, under the competence of the **SAI**. In all five reporting periods, the activity has had the status **“Implemented.”**

Problem 6: Responsible or managerial staff in institutions do not implement the recommendations of the internal audit and SAO, is aimed to be addressed through **Measure 1: 1. Establishment of an efficient system for reporting on the non/implementation of recommendations from internal audit and SAO to higher supervisory and control bodies** and the remaining *Activity 1.2: Amendments to the Law on State Audit*, with an implementation deadline in the **first half of 2021** and the **MoF** as competent institution. According to the submitted report, the prepared wording of the Draft Law on State Audit is currently in the process of intersectoral coordination with the MoF, and it is expected to be finalized in the coming period so that the legislative procedure may begin. Therefore, this activity is considered as **“Ongoing”**.

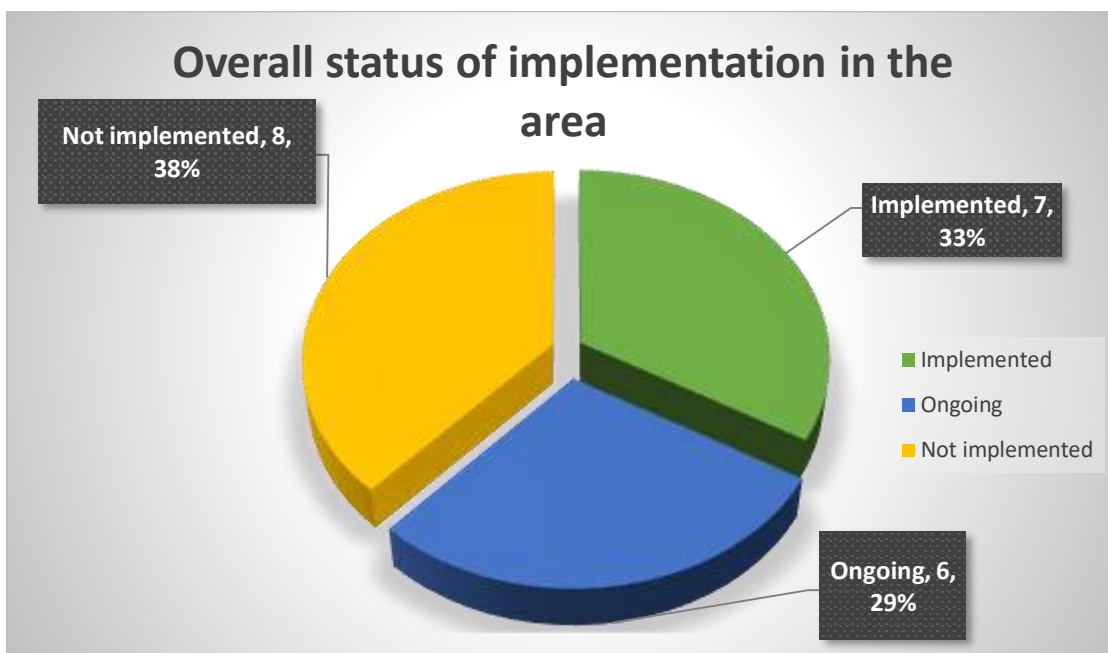


Figure 16: Overall level of implementation within the sector

Out of a total of 21 activities envisaged in the Strategy for the law enforcement sector, seven activities have been implemented (33 %), six activities are ongoing (29%), and eight activities have not been implemented (38%).

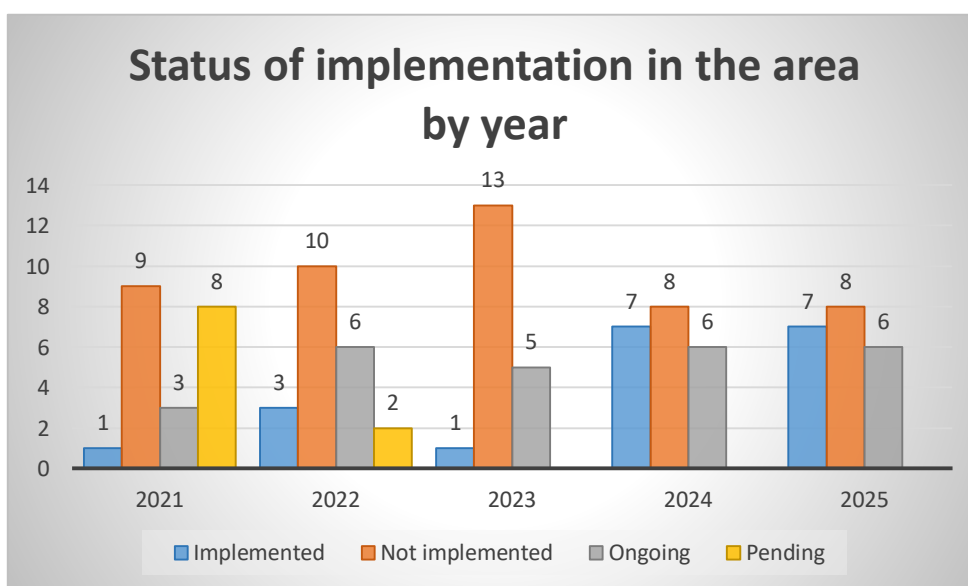


Figure 17: Status of activities' implementation, by years

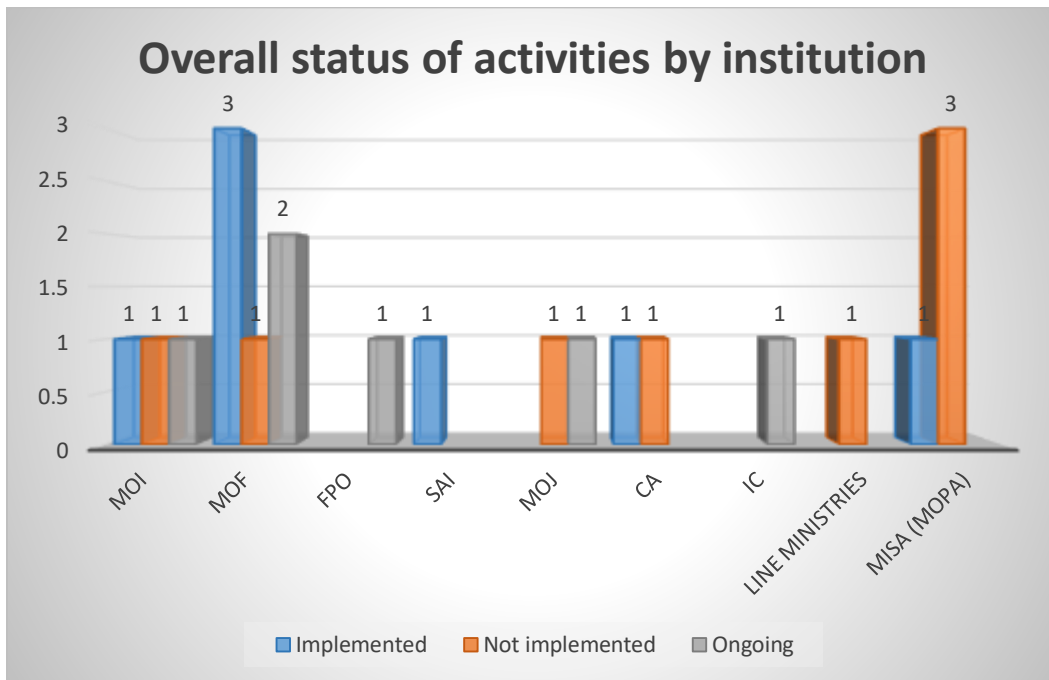


Figure 18: Status of activities, by institutions

- Four activities have been foreseen for MISA (MoPA), of which three have not been implemented, and one activity has been implemented.
- Three activities have been foreseen for MoI, of which one has been implemented, one is ongoing and one is not implemented.
- Two activities have been foreseen for the MoJ, of which one has not been implemented and one is ongoing.
- One activity has been foreseen for the IC, which is still ongoing.
- There are total of six activities for the MoF, of which three have been implemented, two activities are ongoing, and one has not been implemented.
- There is one activity foreseen to be addressed by the ministries, which has not been implemented.
- There is one continuous activity for the SAI which has been implemented for five consecutive years.
- There is one activity foreseen for the FPO, which is ongoing.
- Two activities have been foreseen for the CA, of which one has been implemented, and the other one has not been implemented.

8. SECTOR -HEALTH

Sector description

With regard to the health sector, the following five problems are identified in the Strategy:

- 1) There are no effective criteria for determining contractual compensations (limits/budgets) for healthcare institutions (public and private healthcare institutions), and for setting the prices of healthcare services and medicines, as well as regarding criteria for the transparent determination and allocation of the budget intended for healthcare institutions, new technologies and medicines, and methods for healthcare services;
- 2) Subjectivism in the selection of medicines covered by public funds, i.e. from citizens' health insurance contributions, while the evidence-based medicine regulations are not applied consistently;
- 3) Abuses in procedures for granting/receiving donations, clinical studies, and projects;
- 4) Unethical practices in the marketing of medicines;
- 5) Transparent and objective decision-making in the procedure for medical treatment abroad.

Regarding the implementation of the measures and activities foreseen to address the problems in the health sector, the following institutions are competent:

- 1) Ministry of Health (MoH),
- 2) Health Insurance Fund (hereinafter: HIF of RNM),
- 3) Agency for medicines and medical devices (hereinafter: MALMED),
- 4) Doctor's Chamber (hereinafter: DC),
- 5) Healthcare institutions (hereinafter: HI).

Level of implementation of activities in the respective sector

In the health sector, five problems have been identified for which 11 measures and 13 activities are being evaluated in the reporting period.

The SCPC carried out a verification and analysis of the received data from the competent institutions regarding the implementation of the measures and activities in the health sector and determined the following status:

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Problem 1: There are no effective criteria for determining contractual compensations (limits/budgets) for healthcare institutions (public and private healthcare institutions), and for setting the prices of healthcare services and medicines, as well as regarding criteria for the transparent determination and allocation of the budget intended for healthcare institutions, new technologies and medicines, and methods for healthcare services								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishing effective criteria for the allocation of the HIF budget for healthcare services and institutions	1.1. Preparation of an analysis of the existing regulation for the allocation of the HIF budget for healthcare services and healthcare institutions	HIF of RNM	Second half of 2021	Implemented	/	/	/	/
	1.2. Amendment of the Rulebook on establishing criteria for determining contractual compensation with a view of setting measurable and relevant criteria that will directly affect the amount of the contractual compensation	HIF of RNM	First half of 2022	Pending	Not Implemented	Implemented	/	/
2. Strengthening the capacities of the Health Insurance Fund for planning, analytics, and health economics, with a special focus on the Methodology for Health Technology Assessment (HTA).	2.1. Establishment of a Department for analytics/development/health economics within the Health Insurance Fund (HIF)	HIF of RNM	First half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
3. Ensuring an inclusive approach to the allocation of the budget across levels and areas of healthcare by an independent body (association,	3.1 Establishment of an independent body (association, organization, etc.) with representatives from healthcare institutions, which will represent and advocate for the interests of all healthcare institutions and participate in	HIF of RNM, MoH, HI	First half of 2022	Pending	Not Implemented	Not Implemented	Ongoing	Ongoing

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organization, etc.) with representatives from healthcare institutions	the negotiations on determining their budgets							
	3.2. Annual allocation of the healthcare budget - total amount by levels and areas of healthcare, as well as individually by healthcare institution	HIF of RNM, MoH, HI	Second half of 2022, continuously	Pending	Not Implemented	Implemented	Implemented	Implemented
4. Digitalization and integration of the financial and accounting management systems of healthcare service providers	4.1. Establishment of an electronic system with a database (software) for all costs related to materials, salaries, medicines, equipment, and other expenses of healthcare institutions, as a basis for determining realistic service prices as well as for assessing the need for revision	HIF of RNM	First half of 2022	Pending	Not Implemented	Not Implemented	Ongoing	Ongoing
5. Improving the regulations and the transparency of the process for setting reference prices for healthcare services and medicines	5.1. Preparation/revision of the rulebooks on determining the prices of healthcare services and medicines	HIF of RNM	First half of 2022	Pending	Not Implemented	Ongoing	Implemented	/
	5.2. Inclusion of provision on “Managed entry agreements” for medicines with a monopolistic market position, amendments to the Law on Health Insurance, as well as amendments to the Rulebook on the positive list of medicines and the Rulebook on reference prices of medicines	HIF of RNM MoH	First half of 2022	Pending	Not Implemented	Implemented	/	/
	5.3. Adoption of procedures for price negotiations with healthcare institutions and pharmaceutical companies, based on the principle of transparency	HIF of RNM	First half of 2022	Pending	Not Implemented	Ongoing	Implemented	/

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6. Establishing a system for determining "standard" and "above the standard" materials included in healthcare services	6.1. Preparation of by-laws defining standard and above-standard services, materials, devices, etc.	HIF of RNM MoH	First half of 2022	Pending	Not Implemented	Not Implemented	Ongoing	Ongoing
7. Conducting internal controls and audits of the process of setting medicine prices and the proper application of methodologies	7.1. Inclusion of regular and extraordinary controls of the process and methodologies for setting the uniform prices of medicines in the Ministry of Health and the reference prices of medicines in the HIF of RNM	HIF of RNM MoH	First half of 2022	Pending	Ongoing	Ongoing	Ongoing	Ongoing
8. Introducing transparency and formal procedures in the process of adopting and allocating the HIF budget to healthcare institutions	8.1. Adoption of a Rulebook on the manner and procedure for adopting and allocating the budget	HIF of RNM	First half of 2022	Pending	Not Implemented	Implemented	/	/
	8.2. Establishing an obligation for the public disclosure of the budgets of the HIF	HIF of RNM	First half of 2022	Pending	Not Implemented	Ongoing	Implemented	/
9. Establishing and maintaining a system of measurable and transparent performance indicators for healthcare institutions	9.1. In the systematization of job positions, the HIF of RNM and MoH should designate a responsible organizational unit for establishing a system for monitoring performance indicators of healthcare institutions; define a procedure for communication with healthcare institutions; and enable online publication and monitoring of performance indicators.	HIF of RNM, MoH with "Moj termin" and HI	First half of 2022	Pending	Not Implemented	Ongoing	Ongoing	Ongoing
10. Annual revision of the prices of healthcare	10.1 In the methodology for determining reference prices of healthcare services, deadlines	HIF of RNM Healthcare institutions	Second half of 2023	Pending	Pending	Implemented	/	/

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services and medicines	should be established for a full revision of prices at least once a year, taking into account the cost-calculation elements that contribute to price formation							
Problem 2: Subjectivism in the selection of medicines covered by public funds, i.e. from citizens' health insurance contributions, while the evidence-based medicine regulations are not applied consistently								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishing a legal framework for the selection of medicines to be covered by the state budget, which will be unified and applicable to all medicines	1.1. Establishing criteria for the selection of medicines covered by the HIF of RNM	MoH HIF of RNM	Second half of 2021	Not Implemented	Ongoing	Implemented	/	/
	1.2. Adoption of a Rulebook on the Positive List of Medicines based on the Health Technology Assessment (HTA) methodology	MoH HIF of RNM	Second half of 2021	Not Implemented	Ongoing	Implemented	/	/
	1.3. Inclusion of provisions on "Managed entry agreements" for medicines with monopolistic market position in the legal framework, as well as in the Rulebook on the positive list of medicines and the Rulebook on reference prices on medicines	MoH HIF of RNM	Second half of 2021	Not Implemented	Not Implemented	Implemented	/	/
2. Ensuring transparency in the implementation of the programs of the MoH, which also include the provision of medicines	2.1. Public disclosure of the list of medicines covered by the programs of the Ministry of Health (MoH), including the criteria on the basis of which the selection was made.	MoH	First half of 2021	Not Implemented	Ongoing	Not Implemented	Not Implemented	Not Implemented
3. Consistent application of the evidence-based medicine	3.1. Updating the guidelines for practicing evidence-based medicine within the legally prescribed procedure	MoH Chambers Professional associations HIF of RNM	Second half of 2021	Not Implemented	Not Implemented	Ongoing	Ongoing	Ongoing
	3.2. Adoption of guidelines for evidence-based medicine in	MoH Chambers	the second half of 2021	Not Implemented	Ongoing	Ongoing	Ongoing	Implemented

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	areas where such guidelines do not exist.	Professional associations HIF of RNM						
Problem 3: Abuses in procedures for granting/receiving donations, clinical studies, and projects								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Ensuring precision of the characteristics, conditions and manner of receiving donations by public healthcare institutions (PHIs)	1.1. Preparation of a by-law on the acceptance of donations	MoH Agency for medicines	First half of 2021	Not Implemented	Ongoing	Ongoing	Not Implemented	Not Implemented
2. Establishing a publicly accessible register of donations of medicines, equipment, and clinical studies	2.1. Designing a Register	MoH Agency for medicines	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Ongoing	Implemented
Problem 4: Unethical practices in the marketing of medicines								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Regulating and monitoring the relationship between pharmaceutical companies and doctors in relation to the marketing of medicines	1.1. Adoption of a Code of Ethics for the conduct of all stakeholders in the marketing of medicine	MALMED Doctors' Chamber	Second half of 2021	Not Implemented	Implemented	/	/	/
2. Establishing a system of "Therapeutic Committees" and "Register of Hospital Medicines" at hospital level	2.1. Adoption of legal amendments and by-laws mandating the establishment of a system of "Therapeutic Committees" and "Registers of hospital medicines" in all hospitals in the country	MoH PHI	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Ongoing

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Problem 5: Transparent and objective decision-making in the procedure for treatment abroad								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1.Designation of reference hospitals through clearly defined criteria in a by-law	1.1. Amendment of acts that define the criteria	HIF of RNM	Second half of 2021	Not Implemented	Implemented	/	/	/

To address the Problem 1: There are no effective criteria for determining contractual compensations (limits/budgets) for healthcare institutions (public and private healthcare institutions), and for setting the prices of healthcare services and medicines, as well as regarding criteria for the transparent determination and allocation of the budget intended for healthcare institutions, new technologies and medicines, and methods for healthcare services, six measures and seven activities remain for implementation during the reporting period.

Measure 2: Strengthening the capacities of the Health Insurance Fund for planning, analytics, and health economics, with a special focus on the Methodology for Health Technology Assessment (HTA) includes one *Activity 2.1: Establishment of a Department for analytics/development/health economics within the Health Insurance Fund (HIF of RNM)*. The deadline for implementation of this activity is the **first half of 2022** and it is under the competence of the **HIF of RNM**. This activity has been assessed as **“Not implemented”**, and the HIF of RNM reported that it has not been Implemented due to objective reasons, namely the lack of qualified staff, and the outflow of such personnel to the private sector. Specialized staff who would deal with health economics are produced only to a very limited extent through formal education (only at the Faculty of Pharmacy in relation to medicines), while no such formal education exists in the field of healthcare services.

Measure 3: Ensuring an inclusive approach to the allocation of the budget across levels and areas of healthcare by an independent body (association, organization, etc.) with representatives from healthcare institutions includes two activities:

- *Activity 3.1: Establishment of an independent body (association, organization, etc.) with representatives from healthcare institutions, which will represent and advocate for the interests of all healthcare institutions and participate in the negotiations on determining their budgets.* The deadline for the implementation of this activity was the **first half of 2022**, and the competent institution is the **HIF of RNM**. The HIF of RNM reported that it is under the competence of the MoH. Although the HIF of RNM reported that the activity is implemented through the adoption of the Rulebook on the allocation of funds from the budget of the Health Insurance Fund of the Republic of North Macedonia (“Official Gazette of the Republic of North Macedonia“, No. 206/23), considering that the activity itself envisages the establishment of an independent body, the State Commission for Prevention of Corruption (SCPC) will assess the activity as **“Ongoing”** until the said independent body is formally established.
- *Activity 3.2: Annual allocation of the healthcare budget - total amount by levels and areas of healthcare, as well as individually by healthcare institution.* The deadline for the implementation of this activity is the **second half of 2022 and continuously thereafter**, and it falls under the competence of the HIF of RNM. This activity is assessed as **“Implemented”** for 2025. Specifically, the HIF of RNM reported that the Rulebook on the allocation of funds from the budget of the Health Insurance Fund of the Republic of North Macedoni (“Official

Gazette of the Republic of North Macedonia“, No. 206 dated 3.10.2023) has been adopted, and based on this rulebook negotiations for the healthcare institutions’ budgets for 2026 have been completed.

Measure 4: Digitalization and integration of the financial and accounting management systems of healthcare service providers is the fourth measure, which includes the *Activity 4.1: Establishment of an electronic system with a database (software) for all costs related to materials, salaries, medicines, equipment, and other expenses of healthcare institutions, as a basis for determining realistic service prices as well as for assessing the need for revision.* The deadline for the implementation of this activity is the **first half of 2022**, and it falls under the competence of the HIF of RNM. This activity has been assessed as **“Ongoing”**. Namely, the HIF of RNM reported that the procurement of such software was envisaged in the Annual Public Procurement Plans for 2023, 2025 and 2026. However, given the fact that these procurements were not approved, the institution has sought support from donors for the procurement of such software.

Regarding the **Measure 6: Establishing a system for determining “standard” and “above the standard” materials included in healthcare services**, the following activity has been foreseen, that is, *Activity 6.1: Preparation of by-laws defining standard and above-standard services, materials, devices, etc.* The deadline for the implementation of this activity is the **first half of 2022** and it falls under the competence of the **HIF of RNM**. The activity has been assessed as **“Ongoing”**, and due to the extensive scope of work required, the HIF of RNM is unable to provide a timeframe when the activity will be fully implemented.

Regarding the **Measure 7: Conducting internal controls and audits of the process of setting medicine prices and the proper application of methodologies**, the following activity has been foreseen, that is, *Activity 7.1: Inclusion of regular and extraordinary controls of the process and methodologies for setting the uniform prices of medicines in the Ministry of Health and the reference prices of medicines in the HIF of RNM.* The deadline for the implementation of this activity is the **first half of 2022**, and it falls under the competence of the **HIF of RNM**. Namely, according to the report of the Health Insurance Fund of the Republic of North Macedonia (HIF of RNM), acting upon Control Order No. 12-4967/1 issued by the Directors of the HIF of RNM, a control was carried out over the process of setting reference prices and the proper application of the methodology for determining reference prices of medicines within the HIF of RNM. The control over the application of the methodology and the calculations related to the determination of reference prices of medicines, pursuant to the control order, was conducted on a random sample of five generic medicines from the List of Medicines covered by the HIF of RNM, including all pharmaceutical forms and strengths, for the period 2018–2022. The control was performed by the Internal Control Department and the Internal Audit Department. The following is the link to the Report on conducted control: <https://fzo.org.mk/sites/default/files/fzo/izvestaj/izvestaj-referentni-ceni-so-preporaki.pdf>

Considering that the stated control was carried out on the basis of the obligation arising from the National Strategy and represents an ad hoc control, while the activity itself envisages the introduction of regular and extraordinary controls, this activity shall be considered “Ongoing” until regular and extraordinary controls are formally introduced.

Regarding the implementation of the **Measure 9: Establishing and maintaining a system of measurable and transparent performance indicators for healthcare institutions**, one activity has been foreseen, as follows: *Activity 9.1: In the systematization of job positions, the HIF of RNM and MoH should designate a responsible organizational unit for establishing a system for monitoring performance indicators of healthcare institutions; define a procedure for communication with healthcare institutions; and enable online publication and monitoring of performance indicators.* The deadline for the implementation of this activity is the **first half of 2022**, and it falls under the competence of the **HIF of RNM**. The HIF of RNM reported that, within the Department for budget coordination and negotiating, and in accordance with the agreement concluded with public healthcare institutions, a system has been established for quarterly monitoring of the performance of healthcare institutions in specialist-consultative healthcare services through the use of multiple indicators. However, based on the submitted report, it is evident that online monitoring and public disclosure of these indicators has not yet been established. Therefore, this activity shall be considered “Ongoing” until its full implementation.

With regard to the **Problem 2: Subjectivism in the selection of medicines covered by public funds, i.e. from citizens’ health insurance contributions, while the evidence-based medicine regulations are not applied consistently**, two measures and three activities are subject to evaluation in the reporting period.

Regarding the **Measure 2: Ensuring transparency in the implementation of the programs of the MoH, which also include the provision of medicines**, the following activity has been foreseen: *Activity 2.1: Public disclosure of the list of medicines covered by the programs of the Ministry of Health (MoH), including the criteria on the basis of which the selection was made.* The deadline for this activity was the **first half of 2021**, and the designated competent institution was the **MoH**. The MoH indicated that, in the section “Annual reports on program and budget implementation” on its website, it publishes data on the Program for Treatment of Persons with Rare Diseases in the Republic of North Macedonia. According to the Ministry, these reports contain the following information: a tabular overview of medicines procured through the program, including the generic and brand name of the medicine, pharmaceutical form, dosage, and the name of the wholesale supplier; a list of public healthcare institutions to which the procured medicines were distributed, as well as the number of persons who used the therapy, with indicated diagnosis of rare diseases; the number of persons in the Registry of rare diseases by diagnosis, and data on budget execution for activities financed from the basic budget of the Ministry of Health and from the budget of self-financing activities.

Following the search on the website of the Ministry of Health, <https://zdravstvo.gov.mk/mk-MK/dokumenti/izvestai>, it was established that the annual reports on the implementation of healthcare programs, are published by years. However, taking into account that the activity requires the public disclosure of a list of medicines covered by the programs of the Ministry of Health, together with the criteria on the basis of which their selection was made, such information is not publicly available in the aforementioned reports. Therefore, this activity is assessed as “**Not Implemented.**”

With regard to the **Measure 3: Consistent application of the evidence-based medicine**, two activities have been foreseen. Specifically, *Activity 3.1: Updating the guidelines for practicing evidence-based medicine within the legally prescribed procedure*, with a deadline for implementation in the **second half of 2021**, and under the competence of the **MoH**. The MoH reported that the activity is being continuously implemented. In the period 2021-2025, only one Guideline was updated, published in the Official Gazette No.141/23, while new guidelines were published in the Official Gazette.136/21 (one guideline), 148/21 (two guidelines), 75/23 (one guideline), 170/23 (five guidelines), 174/25 (one guideline), 186/25 (one guideline), and 223/25 (one guideline). Considering that only one guideline was updated, while a total of 12 new guidelines were adopted in the period 2021–2025, this activity is assessed as “**Ongoing.**”

Activity 3.2: Adoption of guidelines for evidence-based medicine in areas where such guidelines do not exist, with a deadline in the second half of 2021, and under the competence of the MoH. Based on the annual reports, the MoH has each year adopted and published new guidelines for evidence-based medicine in the Official Gazette. Considering that in previous reporting periods the activity was marked as “**Ongoing**” due to its non-continuous nature, the SCPC assesses that the activity should be considered “**Implemented,**” with the note that the MoH should continue the practice of adopting new evidence-based medicine guidelines.

For the purpose of addressing the **Problem 3: Abuses in procedures for granting/receiving donations, clinical studies, and projects**, two measures and two activities have been foreseen.

Measure 1: Ensuring precision of the characteristics, conditions and manner of receiving donations by public healthcare institutions (PHIs), includes the *Activity 1.1: Preparation of a by-law on the acceptance of donations*, with implementation deadline in the **first half of 2021**, and **MoH** as the competent institution. According to the submitted report by the MoH, a Decision establishing a Methodology for the distribution of donations of medical equipment and consumables in public healthcare institutions has been adopted and published on the MoH website: <http://zdravstvo.gov.mk/wp-content/uploads/2023/01/Metodologija-za-raspredelba-na-donatsii-vo-JZU.pdf>. However, since the activity envisages the adoption of a by-law regulating the acceptance of donations, and considering that the MoH has not undertaken actions towards the adoption of such a by-law, the activity is assessed as “**Not implemented.**”

Regarding the implementation of the **Measure 2: Establishing a publicly accessible register of donations of medicines, equipment, and clinical studies**, there is one foreseen *Activity 2.1: Designing a Register*. The deadline for this activity is the **second half of 2021**, and the competent institution is the **MoH**. The MoH reported that the activity has been implemented. In addition to the register of donations within the Department for medical equipment and donations, published on the MoH website: <https://zdravstvo.gov.mk/lista-na-informacii-od-javen-karakter/>, the MoH has also developed a digital portal covering all received donations in public healthcare institutions. This portal is continuously updated in real time by representatives of public healthcare institutions. Therefore, this activity is assessed as **“Implemented”**.

To address the **Problem 4: Unethical practices in the marketing of medicines**, the remaining measure for implementation is **Measure 2: Establishing a system of “Therapeutic Committees” and “Hospital Register of Medicines” at hospital level**, including the *Activity 2.1: Adoption of legal amendments and by-laws mandating the establishment of a system of “Therapeutic Committees” and “Registers of hospital medicines” across all hospitals in the country*. The deadline for this activity was the **first half of 2021**, and the competent institution is the **MoH**. This activity, according to the submitted report, is **“Ongoing”**. Namely, the problem of corrupt practices related to prescribing medicines has not been addressed through the establishment of **“Therapeutic Committees” and “Hospital Registers of Medicines,”** but rather through other systemic mechanisms. According to the MoH, doctors prescribe medicines by their generic name rather than by protected brand name, which reduces the possibility of favoring certain manufacturers.

The choice of therapy is determined in the mandatory Evidence-Based Medicine Guidelines, while the procurement of medicines is carried out through public procurement procedures using generic names. In this way, decisions on the use of medicines are regulated at a systemic level for all healthcare institutions, rather than through individual bodies within each institution.

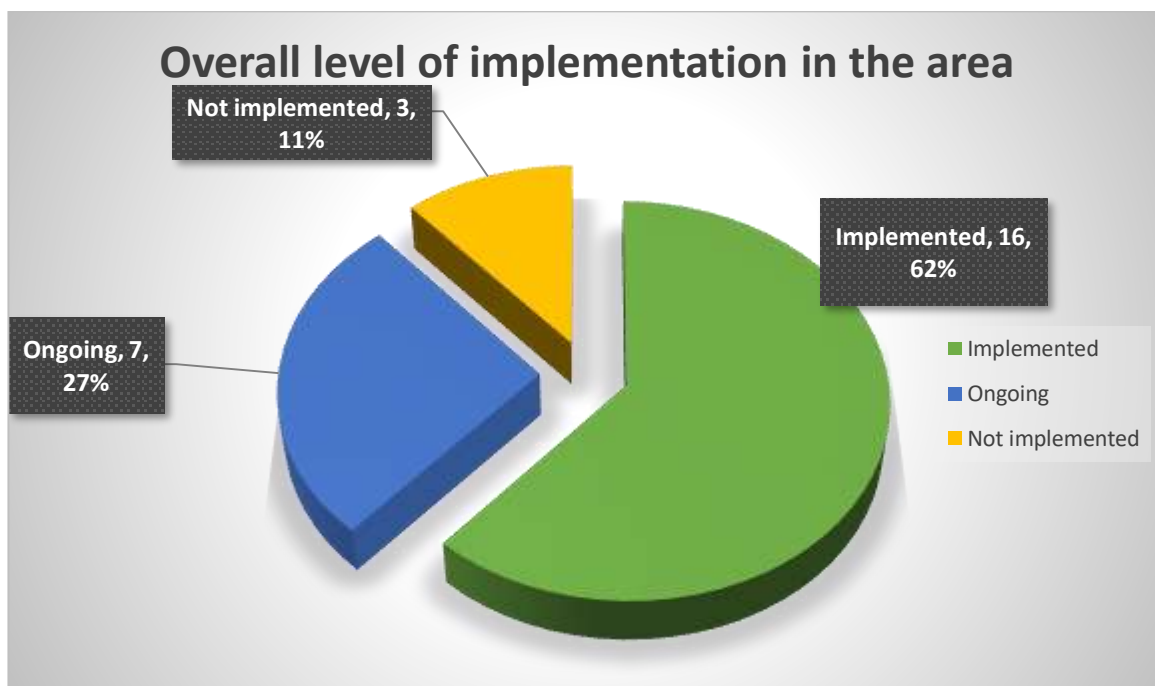


Figure 19: Overall level of implementation within the sector

Out of a total of 26 activities envisaged in the Strategy for the health sector, 16 activities have been implemented (62%), seven activities are ongoing (27%), and three activities have not been implemented (11%).

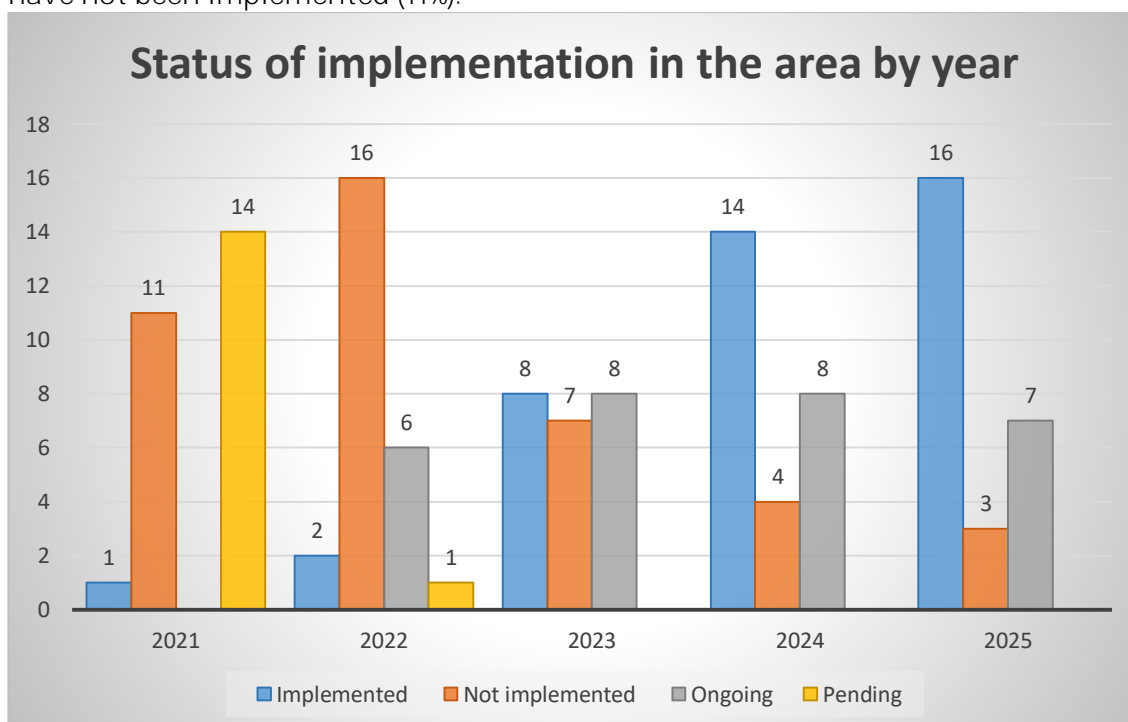


Figure 20: Status of activities' implementation, by years

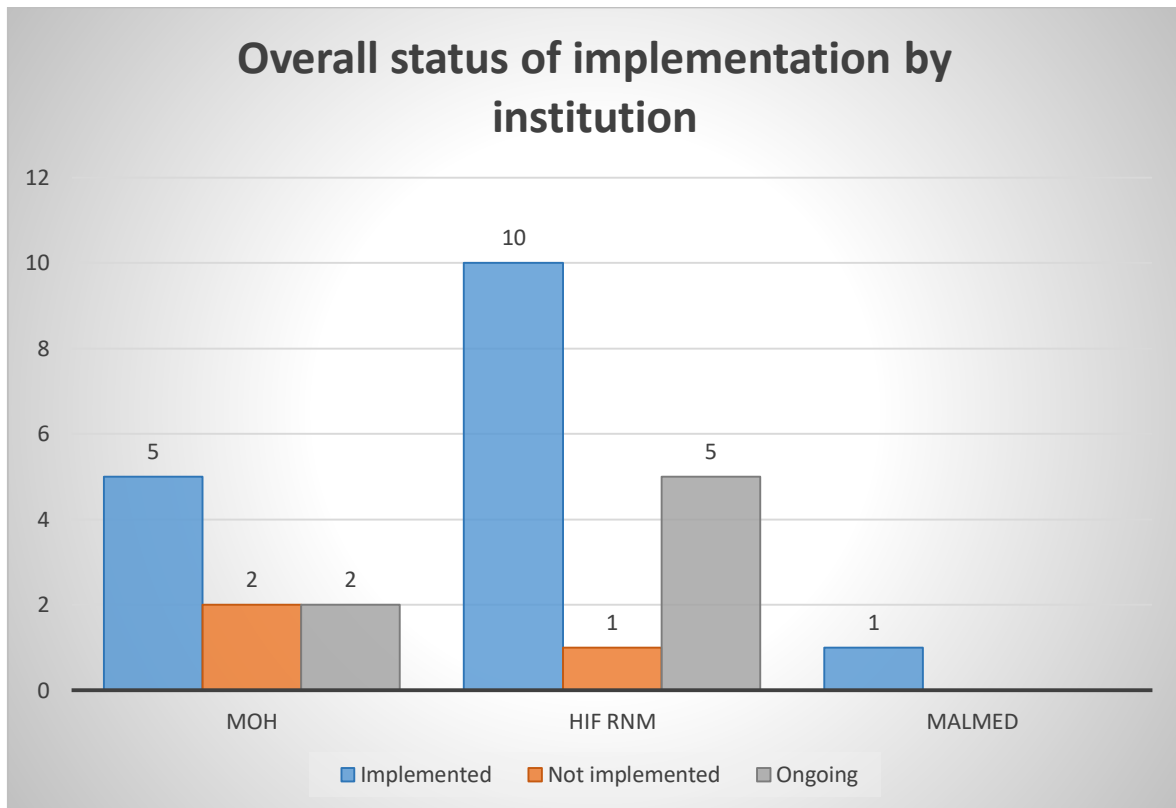


Figure 21: Status of activities, by institutions

- 9 activities have been foreseen for the MoH, of which five have been implemented, two are ongoing, and two have not been implemented.
- Sixteen activities have been envisaged for the HIF of RNM, of which ten activities have been implemented, five are still ongoing, and one is not implemented.
- One activity has been foreseen for MALMED and it is implemented.

9. SECTOR - EDUCATION

Sector description

With regard to the education sector, the following eight problems have been identified in the Strategy:

- 1) Significant influence and discretionary powers regarding the employment in education sector;
- 2) Insufficiently developed capacities of the State Education Inspectorate;
- 3) Low awareness of addressing the issue of corruption within educational institution;
- 4) Absence of precise regulations for the use of teaching aids and didactic materials;
- 5) Lack of procedures for procurement carried out in educational institutions outside the Law on Public Procurement;
- 6) Lack of by-laws regulating the manner of leasing immovable property of educational institutions;
- 7) Raising the quality of higher education in the field of accreditation of higher education institutions, scientific institutions, and accreditation of study programs;
- 8) Insufficient content in the secondary education regarding the principles of good governance and integrity.

Regarding the implementation of measures and activities aimed to address the problems in the education sector, the following institutions are competent:

- 1) The Government,
- 2) MoES,
- 3) MoF,
- 4) MoES,
- 5) IC,
- 6) SCPC,
- 7) LSGs,
- 8) Bureau for Development of Education (hereinafter: BDE),
- 9) Centre for Vocational Education (hereinafter: CVE),
- 10) State Education Inspectorate (hereinafter: SEI),
- 11) State Examination Centre (hereinafter: SEC),
- 12) The Senates of the universities and
- 13) Agency for Quality in Higher Education (hereinafter: AQHI).

Level of implementation of activities in the respective sector

In the education sector, eight problems have been identified, for which 14 measures and 21 activities are foreseen under the Action Plan of the Strategy for the reporting period. Following the verification and analysis of the received data regarding the implementation of the measures and activities in the education sector, the State Commission for Prevention of Corruption (SCPC) determined the following situation:

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Problem 1: Significant influence and discretionary powers regarding the employment in education sector								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishing clear scoring criteria and procedures for conducting interviews in the recruitment of teachers in primary and secondary education	1.1. Adoption of by-laws regarding the interviews and the establishment of scoring criteria in the selection of candidates for teachers	MoES BDE CVE	First half of 2021	Not implemented	Not implemented	Not implemented	Not implemented	Not implemented
	2. Establishing a legal obligation for decisions on the dismissal of directors of primary and secondary schools before the expiry of their mandate to contain a detailed reasoning and to be subject to inspection oversight	2.1. Amendments to the Law on Education Inspection introducing mandatory oversight of decisions of early dismissal of directors of primary and secondary schools	MoES	Second half of 2021	Not implemented	Not implemented	Not implemented	Not implemented
	2.2. Conducting oversight regarding the content of the reasoning in decisions on the early dismissal of directors of primary and secondary schools	SEI	Second half of 2021 - Continuously	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
3. Establishing a mechanism for regular oversight by the State Education Inspectorate (SEI)	3.1. Adoption of an annual plan/program of the SEI for oversight of procedures for	SEI MoES	First half of 2021 – continuously	Not implemented	Implemented	Implemented	Implemented	Ongoing

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over procedures for election of academic and teaching-scientific titles	election of academic and teaching-scientific titles							
Problem 2: Insufficiently developed capacities of the State Education Inspectorate								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Improving the material-technical conditions and human resources of the State Education Inspectorate (SEI)	1.1. Preparation of an analysis for assessing the capacities of the State Education Inspectorate (SEI)	SEI Inspection Council	Second half of 2021	Ongoing	Ongoing	Not implemented	Not implemented	Not implemented
	1.2. Increasing the budget of the SEI	MoF	Second half of 2021	Ongoing	Ongoing	Ongoing	Ongoing	Implemented
	1.3. Increasing the number of inspectors	MoF SEI	First half of 2022	Ongoing	Ongoing	Ongoing	Ongoing	Implemented
	1.4. Extraordinary inspection oversight to be carried out by at least two inspectors	SEI	Second half of 2021	Ongoing	Not implemented	Not implemented	Not implemented	Ongoing
2. Education and training to strengthen the resilience of employees in the SEI against undue influence	2.1. Implementation of education and training on ethics and integrity, as well as raising awareness among employees of the SEI on how to report attempts to influence the competent authority – SCPC and/or IC	SCPC IC SEI	Second half of 2021 - continuously	Ongoing	Not implemented	Ongoing	Ongoing	Ongoing
3. Strengthening the mechanisms for controlling the work	3.1. Preparation of an analysis for establishing a mechanism for	SEI SCPC	Second half of 2021	Ongoing	Ongoing	Not implemented	Not implemented	Not implemented

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of Inspectors in the SEI	controlling the work of inspectors							
	3.2. Established mechanisms for controlling the work of inspectors	MoES SEI	First half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
Problem 3: Low awareness of addressing the issue of corruption within educational Institution								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Raising awareness among school directors and teachers on corruption prevention in primary and secondary education	1.1. Designing a training program for school directors and teachers on ethics and integrity	BDE SEC CVET	First half of 2022	Pending	Not Implemented	Ongoing	Not Implemented	Not Implemented
	1.2. Preparation of a Guide/Brochure on corruption prevention	BDE SEC SCPC CVET	First half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
	1.3. Organization and implementation of educational workshops with school directors and teachers	BDE SEC SCPC CVET	Second half of 2022 - continuously	Pending	Not Implemented	Ongoing	Ongoing	Ongoing
2. Raising awareness about the use of mechanisms for reporting corruption at universities	2.1. Implementation of activities for reporting corruption at universities with student participation	University "Goce Delchev" - Shtip	First half of 2021	Implemented	/	/	/	/
	2.1. Implementation of activities for reporting corruption at universities with student participation	University "Mother Teresa" – Skopje	First half of 2021	Not Implemented	Ongoing	Implemented	/	/
	2.1. Implementation of activities for	University of Information	First half of 2021	Implemented	/	/	/	/

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	reporting corruption at universities with student participation	Science and Technology “St. Paul the Apostle” – Ohrid						
	2.1. Implementation of activities for reporting corruption at universities with student participation	University “St. Kliment Ohridski” – Bitola	First half of 2021	Implemented	/	/	/	/
3. Establishing a mechanism for monitoring the commitments set out in the Draft Anti-Corruption Policy at the university	3.1. Continuous monitoring of the implementation of the Draft Anti-Corruption Policy at the university and public disclosure of annual reports.	University “Goce Delchev” - Shtip	First half of 2021	Ongoing	Implemented	/	/	/
	3.1. Continuous monitoring of the implementation of the Draft Anti-Corruption Policy at the university and public disclosure of annual reports.	University “Mother Teresa” – Skopje	First half of 2021	Not implemented	Ongoing	Ongoing	Implemented	/
	3.1. Continuous monitoring of the implementation of the Draft Anti-Corruption Policy at the university and public disclosure of annual reports.	University of Information Science and Technology “St. Paul the Apostle” – Ohrid	First half of 2021	Ongoing	Implemented	/	/	/

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	3.1 Continuous monitoring of the implementation of the Draft Anti-Corruption Policy at the university and public disclosure of annual reports.	University "St. Kliment Ohridski" – Bitola	First half of 2021	Implemented	/	/	/	/
Problem 4: Absence of precise regulations for the use of teaching aids and didactic materials								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishing precise criteria for the procurement and use of teaching aids in primary and secondary schools	1.1. Preparation of an analysis of current practice and definition of criteria for the procurement and use of teaching aids	MoES BDE	First half of 2021	Not implemented	Ongoing	Not implemented	Implemented	/
	1.2. Adoption of amendments to the Law on Textbooks	MoES	Second half of 2021	Ongoing	Not implemented	Ongoing	Implemented	/
	1.3. Adoption of appropriate by-laws	MoES BDE CVE	Second half of 2021	Not implemented	Not implemented	Not implemented	Ongoing	Implemented
Problem 5: Lack of procedures for procurement carried out in educational institutions outside the Law on Public Procurement (e.g. school excursions, school security services, student photography and yearbook production, snack procurement, etc.).								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Preparation of by-laws regulating the manner of conducting procurement in educational institutions that are not subject to the Law on Public Procurement	1.1. Adoption of by-laws/rulebooks	MoES	First half of 2022	Pending	Not implemented	Not implemented	Not implemented	Implemented
Problem 6: Lack of by-laws regulating the manner of leasing immovable property of educational institutions								

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Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Preparation of by-laws, instructions and guidelines regulating the leasing of immovable property of educational and higher educational institutions	1.1. Adoption of by-laws, instructions and guidelines	MoES LSGs	First half of 2022	Pending	Not Implemented	Not implemented	Not Implemented	Not implemented
Problem 7: Raising the quality of higher education in the field of accreditation of higher education institutions, scientific institutions, and accreditation of study programs								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. The National Council for Higher Education and Scientific Research and the Agency for Quality in Higher Education are fully functional	1.1. Appointment of members of the National Council and the Agency for Quality in Higher Education	Government MoES	Second half of 2020	Implemented	/	/	/	/
2. Regulating the accountability of the Agency for Quality in Higher Education	2.1. Drafting amendments to the Law on Higher Education to precisely regulate the accountability of the Agency for Quality in Higher Education	MoES AQHI	Second half of 2021	Not implemented	Implemented	/	/	/
3. Ensuring transparency in the selection of members of the Agency for Quality in Higher Education	3.1. Publication of reasoned decisions on the selection of members of the Agency for Quality in Higher Education	Government MoES	First half of 2020 - Continuously	Ongoing	Implemented	Implemented	Implemented	Implemented
4. Ensuring transparency in the	4.1. Publication of detailed reasoned	AQHI	First half of 2021 - continuously	Ongoing	Ongoing	Ongoing	Ongoing	Implemented

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work of the Agency for Quality in Higher Education in the field of accreditation of higher education institutions, scientific institutions, and study programs	decisions of the Agency regarding accreditation, re-accreditation, and other professional activities							
5.Membership of the Agency for Quality in Higher Education in the European Association for Quality Assurance in Higher Education - ENQA	5.1. Preparation of a plan for the membership of the Agency for Quality in Higher Education in ENQA	AQHI	First half of 2022	Pending	Ongoing	Ongoing	Ongoing	Ongoing
Problem 8: Insufficient content in the secondary education regarding the principles of good governance and integrity								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Introduction of anti-corruption education content for secondary school students as part of the regular curricula	1.1. Implementation of the project – Anti-corruption education in pilot secondary schools	BDE MoES SCPC	First half of 2021	Implemented	/	/	/	/
	1.2 Adoption of appropriate acts for the introduction of anti-corruption education into regular curricula	BDE	Second half of 2021 - continuously	Not Implemented	Ongoing	Not Implemented	Not Implemented	Ongoing

Problem 1: Significant influence and discretionary powers regarding the employment in education sector

Regarding **Measure 1: Establishing clear scoring criteria and procedures for conducting interviews in the recruitment of teachers in primary and secondary education**, the following activity has been foreseen: *Activity 1.1: Adoption of by-laws regarding the interviews and the establishment of scoring criteria in the selection of candidates for teachers*. The deadline for the implementation of this activity was the **first half of 2021**, and it falls under the competence of the **MoES**. The MoES reported that the activity is “Ongoing”, stating that the drafting of a new Law on Teachers and Professional Associates in Primary and Secondary Education is in progress. However, considering that this activity had a defined implementation deadline in 2021, and it remains unimplemented for the fifth consecutive year, it is assessed as “**Not implemented.**”

Regarding the **Measure 2: Establishing a legal obligation for decisions on the dismissal of directors of primary and secondary schools before the expiry of their mandate to contain a detailed reasoning and to be subject to inspection oversight**, the following two activities have been foreseen:

- *Activity 2.1: Amendments to the Law on Education Inspection introducing mandatory oversight of decisions of early dismissal of directors of primary and secondary schools*. The deadline for the implementation of this activity was the **second half of 2021**, and it falls under the competence of the **MoES**. In the submitted report, the MoES indicated that the activity is “Ongoing”. However, based on the review of previous reports, it is evident that in the last amendments and supplements to the Law on Education Inspection, no provision has been introduced establishing mandatory oversight over decisions on the early dismissal of primary and secondary school directors. Therefore, the activity is assessed as “**Not implemented.**”
- *Activity 2.2: Conducting oversight regarding the content of the reasoning in decisions on the early dismissal of directors of primary and secondary schools*. The deadline for the implementation of this activity is the **second half of 2021 and continuously**, and it falls under the competence of the **State Education Inspectorate (SEI)**. The activity is assessed as “**Ongoing,**” given that, despite conducted inspections by the SEI, its full implementation is planned to follow the realization of Activity 2.1, which has not been implemented.

Measure 3: Establishing a mechanism for regular oversight by the State Education Inspectorate (SEI) over procedures for election of academic and teaching-scientific titles, along with one *Activity 3.1: Adoption of an annual plan/program of the SEI for oversight of procedures for election of academic and teaching-scientific titles*. The deadline for the implementation of this activity is the **first half of 2021 -continuously**, and it falls under the competence of the **SEI**. This activity was assessed in 2021 as “Not

implemented”, while in the following three years it was marked as “Implemented”. However, in 2025, the SEI reported that the activity is “Ongoing” since, for overseeing the procedures for election to teaching-scientific and scientific titles in higher educational institutions (both public and private) and scientific institutes, an annual plan/program for conducting regular oversight has been adopted, with a three-month implementation deadline. On this basis, extraordinary inspection oversight has been carried out. For these reasons, the activity is considered as „Ongoing“.

Problem 2: Insufficiently developed capacities of the State Education Inspectorate

Measure 1: Improving the material-technical conditions and human resources of the State Education Inspectorate (SEI), includes four activities:

- *Activity 1.1: Preparation of an analysis for assessing the capacities of the State Education Inspectorate (SEI).* The deadline for the implementation of this activity is the **second half of 2021**, and the competent institution is the **SEI**. According to the submitted report, the State Education Inspectorate (SEI) states that the activity is assessed as “**Not implemented,**” highlighting the need for employment of inspectors and other administrative staff to fill vacant positions arising for various reasons, as well as the need for promotion of existing staff and improvement of material and technical capacities. In previous reports, SEI noted that the Ministry of Finance (MoF) does not approve funds for the employment of new personnel.
- *Activity 1.2: Increasing the budget of the SEI.* The deadline for the implementation of this activity is the **second half of 2021**, and the competent institution is the **MoF**. Based on SEI reports, the institution’s budget has been continuously increasing, and in the Budget for 2026 it is higher by approximately 3.8 million denars compared to 2025. Therefore, this activity is assessed as “**Implemented.**”
- *Activity 1.3: Increasing the number of inspectors.* The deadline for the implementation of this activity is the **first half of 2022**, and the competent institution is the **MoF**. This activity is assessed as “**Implemented**”. Based on the submitted report, decisions for employment of six persons in the SEI have been adopted, while for two positions the selection was not completed due to the absence of qualified candidates for employment.
- *Activity 1.4: Extraordinary inspection oversight to be carried out by at least two inspectors.* The deadline for the implementation of this activity is the **second half of 2021**, and the competent institution is the **SEI**. This activity was assessed as “**Not implemented**” for **four reporting cycles**. According to the latest submitted report, when conducting extraordinary inspections, depending on the complexity and scope of the allegations, as well as considerations of objectivity and corruption risks, the Director of SEI in most cases assigns the handling of cases to two inspectors. This activity will be considered as “**Ongoing**” until a formal obligation is established requiring that every extraordinary inspection is carried out by at least two inspectors.

Regarding the **Measure 2: Education and training to strengthen the resilience of employees in the SEI against undue influence**, one activity was foreseen: *Activity 2.1: Implementation of education and training on ethics and integrity, as well as raising awareness among employees of the SEI on how to report attempts to influence the competent authority – SCPC and/or IC*. The deadline for the implementation of this activity was the **second half of 2021 and continuously**, and it falls under the competence of the **SCPC**. The status of this activity is assessed as **“Ongoing”**. Following the establishment of the integrity system in 2023, the SEI has continuously taken activities aimed at education on ethics and integrity. Namely, within the Annual program for generic trainings for inspectors (2022), the Inspection Council, in cooperation with the SCPC, included training on the topic **“Prevention of corruption”**, which also included the employees of the SEI. The program was further enhanced in 2025 (topics 1.13 and 1.14), ensuring continuity of education.

Once the donor support was discontinued (USAID), the SEI included the trainings on prevention of corruption and integrity in its Annual work plan for 2025, thereby ensuring institutional sustainability and independence from project-based support.

Regarding the **Measure 3: Strengthening the mechanisms for controlling the work of inspectors in the SEI**, the following activities have been foreseen:

- *Activity 3.1: Preparation of an analysis for establishing a mechanism for controlling the work of inspectors*. The deadline for the implementation of this activity is the **second half of 2021**, and it falls under the competence of the **SEI**. The SEI reported that this activity is still **“Not implemented”**. However, according to the report, the Ministry of Education and Science (MoES) has carried out an inspection of the work of inspectors, and an **“E-Inspector”** application has been developed to enable continuous monitoring of inspectors’ work.
- *Activity 3.2: Establishing a mechanism for controlling the work of inspectors*. The deadline for the implementation of this activity is the **first half of 2022**, and it falls under the competence of the **MoES**. Although the SEI (through the MoES) reported that the activity is **“Ongoing,”** noting that it plans to develop a checklist for monitoring inspectors’ performance during inspection activities, the activity is assessed as **“Not implemented”** until an effective mechanism for controlling the work of inspectors is fully established.

Problem 3: Low awareness of addressing the issue of corruption within educational institution.

Measure 1: Strengthening awareness of school directors and teachers on corruption prevention in primary and secondary education includes three activities:

- *Activity 1.1: Designing a training program for school directors and teachers on ethics and integrity*. The deadline for the implementation of this activity is the **first half of 2022**, and it falls under the competence of the **BDE**. In the submitted

report, the BDE reported that the activity is “**Not implemented**“, due to lack of funding.

- *Activity 1.2: Preparation of a Guide/Brochure on corruption prevention.* The deadline for the implementation of this activity is the **first half of 2022**, and it falls under the competence of the **BDE**. The institution reported that the activity is “**Not implemented**” in 2025, but that it will be included in the Annual Work Plan for 2026 with the aim of preparing a guide/brochure on corruption prevention.
- *Activity 1.3: Organization and implementation of educational workshops with school directors and teachers.* The deadline for the implementation of this activity is the **second half of 2022 and- continuously**, and it falls under the competence of the **BDE**. The activity is assessed as “**Ongoing**” for the current reporting period. The BDE, in line with the new curricula that include content on corruption prevention, continuously conducts trainings with teachers implementing the new curricula, and in 2025 trainings were carried out with teachers from the seventh grade.

Regarding the **Problem 4: Absence of precise regulations for the use of teaching aids and didactic materials**, the Action Plan of the Strategy stipulates one **Measure 1: Establishing precise criteria for the procurement and use of teaching aids in primary and secondary schools**, along with three activities, of which the first two were implemented in 2024.

- *Activity 1.3: Adoption of appropriate by-laws.* The deadline for implementation of this activity is the **second half of 2021**, and the competent institution is the **MoES**. The Ministry reported that this activity has been “**Implemented**“. Following the adoption of the new Law on Textbooks, in 2025 two additional procedures were adopted and made publicly available on the websites of the MoES and the Pedagogical Service, namely: the Procedure for the manner of conducting the approval process for foreign language textbooks, and the Procedure for the manner of conducting the approval process through a public call. These procedures aim to strengthen legality in decision-making and serve as guidance for all stakeholders involved in these processes.

In addition, in 2025, the following by-laws have also been adopted:

- Decree establishing the formula for determining the catalogue value of textbooks;
- Rulebook on the method of registration in the database of reviewers and the method of work of reviewers;
- Rulebook on the form and content of the Catalogue of approved textbooks for use;
- Rulebook on the method of receipt, storage, distribution, and return of textbook sets in primary and secondary schools;
- Rulebook on the procedure for approving workbooks for use in school.

Problem 5: Lack of procedures for procurement carried out in educational institutions outside the Law on Public Procurement (e.g. school excursions, school security services, student photography and yearbook production, snack procurement, etc.), includes one Measure 1: Preparation of by-laws regulating the manner of conducting procurement in educational institutions that are not subject to the Law on Public Procurement along with the Activity 1.1: Adoption of by-laws/rulebooks. The deadline for this activity was the **first half of 2022**, and MoES designated as competent institution. This activity has been **“Implemented”**. The MoES, on the basis of the Law on Primary Education and the Law on Secondary Education, in September 2025, adopted new rulebooks for primary and secondary education:

- Rulebook on the manner and procedure for the use of funds collected by primary schools from parents, i.e. guardians of pupils (<https://portal.mdt.gov.mk/post-body-files/pravilnici-mon-file-hQJq.pdf>) and
- Rulebook on the manner and procedure for the use of funds collected by secondary schools from parents, i.e. guardians of pupils (<https://portal.mdt.gov.mk/post-body-files/pravilnici-mon-file-IOJI.pdf>).

Regarding the **Problem 6: Lack of by-laws regulating the manner of leasing immovable property of educational institutions**, there is only one measure foreseen, that is, **Measure 1: Preparation of by-laws, instructions and guidelines regulating the leasing of immovable property of educational and higher educational institutions**, aimed to be implemented through the following *Activity 1.1: Adoption of by-laws, guidelines and instructions*. The deadline for implementation of this activity was the **first half of 2022**, with MoES designated as the competent institution. This activity has been assessed as **“Not implemented”**. Although the MoES considers the activity to be implemented, the submitted report clearly shows that the required by-laws, instructions, and guidelines regulating the leasing of immovable property have not been adopted.

Problem 7: Problem 7: Raising the quality of higher education in the field of accreditation of higher education institutions, scientific institutions, and accreditation of study programs.

Measure 3: Ensuring transparency in the selection of members of the Agency for Quality in Higher Education includes the *Activity 3.1: Publication of reasoned decisions on the selection of members of the Agency for Quality in Higher Education*. The deadline for this activity is the **first half of 2020 - continuously**, and the leading institution is the **Government**. This activity is currently assessed as **“Implemented”** according to the Government, through the publication in the Official Gazette of the Republic of North Macedonia of decisions on the dismissal or appointment of members of the Board for Accreditation and the Board for Evaluation of Higher Education. However, the SCPC notes that the adopted decisions do not contain detailed reasoning for the selection/dismissal of members.

Regarding Measure 4: Ensuring transparency in the work of the Agency for Quality in Higher Education in the field of accreditation of higher education institutions, scientific institutions, and study programs, the following activity should be implemented, i.e., Activity 4.1: *Publication of detailed reasoned decisions of the Agency regarding accreditation, re-accreditation, and other professional activities*. The deadline for this activity is the **first half of 2021 and continuously**, and the leading institution is the AQHI. Unlike previous years when this activity was consistently assessed as “Ongoing,” the AQHI reported that the activity has been „**Implemented**“ in 2025. According to the submitted report, during the past year the Agency publicly published documents arising from its work, including six-month reports on the work of both boards (the Board for Accreditation and the Board for Evaluation), decisions on accreditation of study programs, decisions on the commencement of study programs, and related documents.

In the course of 2025, the following decisions have been adopted and published on the website:

- 139 decisions on accreditation and
- 134 decisions on commencement of work.

Measure 5: Membership of the Agency for Quality in Higher Education in the European Association for Quality Assurance in Higher Education - ENQA includes the *Activity 5.1: Preparation of a plan for the membership of the Agency for Quality in Higher Education in ENQA*. The deadline for this activity was the **first half of 2022**, and the leading institution is the AQHI. This activity is assessed as “Ongoing.” According to the submitted report, AQHI as an associate member of ENQA, pays an annual membership fee. As part of the membership plan, the Agency has prepared an Action Plan which includes: renewal of associate membership status, payment of the annual ENQA membership fee, adoption of a Law on Quality ensuring compliance with ESG 2015 standards, adoption of by-laws deriving from the new Law on Quality, definition of necessary processes and procedures, and preparation of the Agency for monitoring by ENQA.

Problem 8: Insufficient content in the secondary education regarding the principles of good governance and integrity, includes only one **Measure 1: Introduction of anti-corruption education content for secondary school students as part of the regular curricula**, along with two activities, of which the first one was implemented in 2021.

- *Activity 1.2: Adoption of appropriate acts for the introduction of anti-corruption education into regular curricula*. The deadline for this activity was the **second half of 2021 and continuously**, and the leading institution is the BDE. This activity is considered as “Ongoing“, as during this reporting period, the BDE began developing new curricula for general secondary education in which anti-corruption education topics are being progressively incorporated. New curricula for the first and second year have been adopted. Students in the first year of gymnasium are already studying under the new curricula, while in the 2026/2027 academic year the curricula for the second year will be implemented, where the

subject Sociology includes content on anti-corruption education (https://bro.gov.mk/wp-content/uploads/2025/12/NP_Sociologija_II-god_GO.pdf).

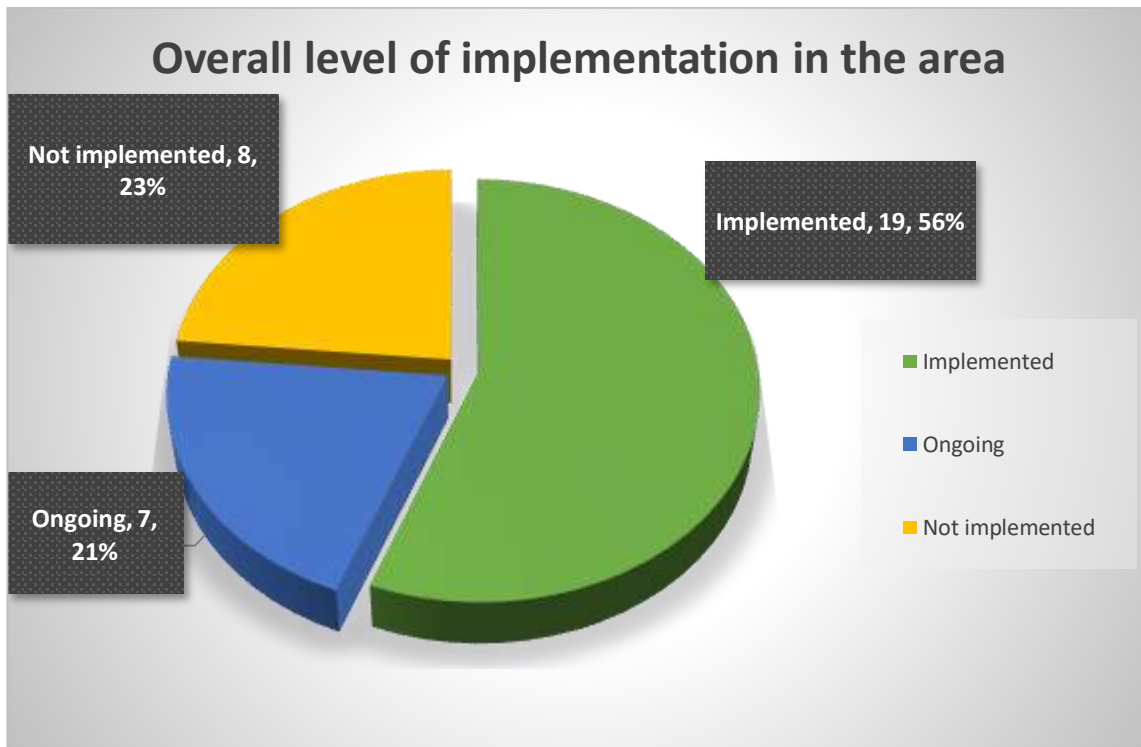


Figure 22: Overall level of implementation within the sector

Out of a total of 34 activities envisaged in the Strategy for the education sector, 19 activities have been implemented (56%), 7 activities are ongoing (21%), and 8 activities have not been implemented (23%).

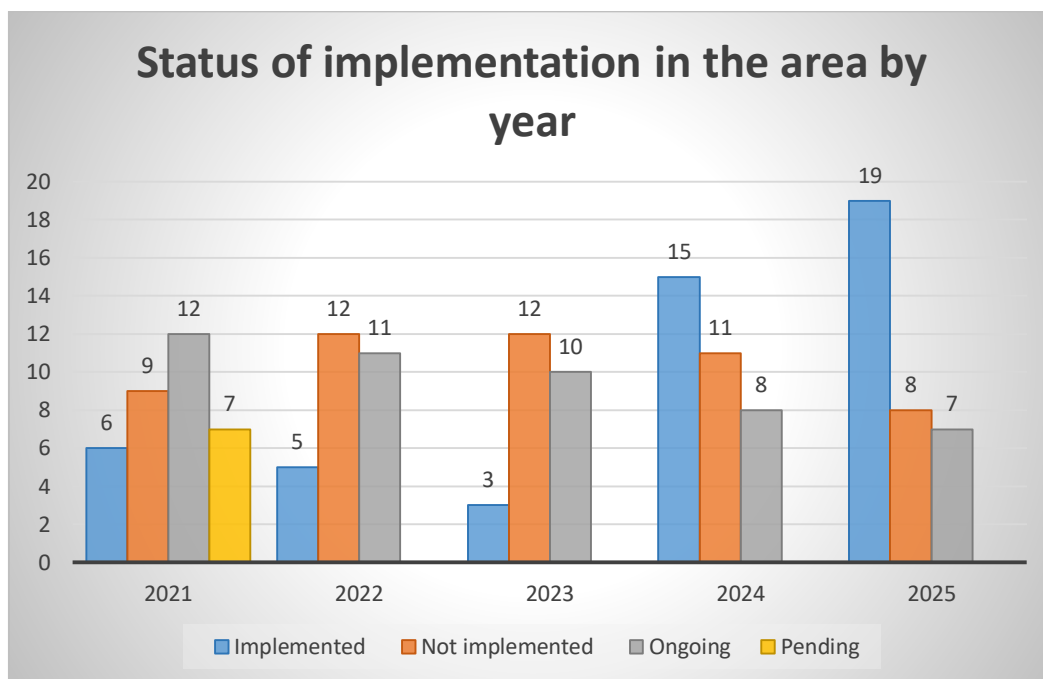


Figure 23: Status of activities, by evaluation period

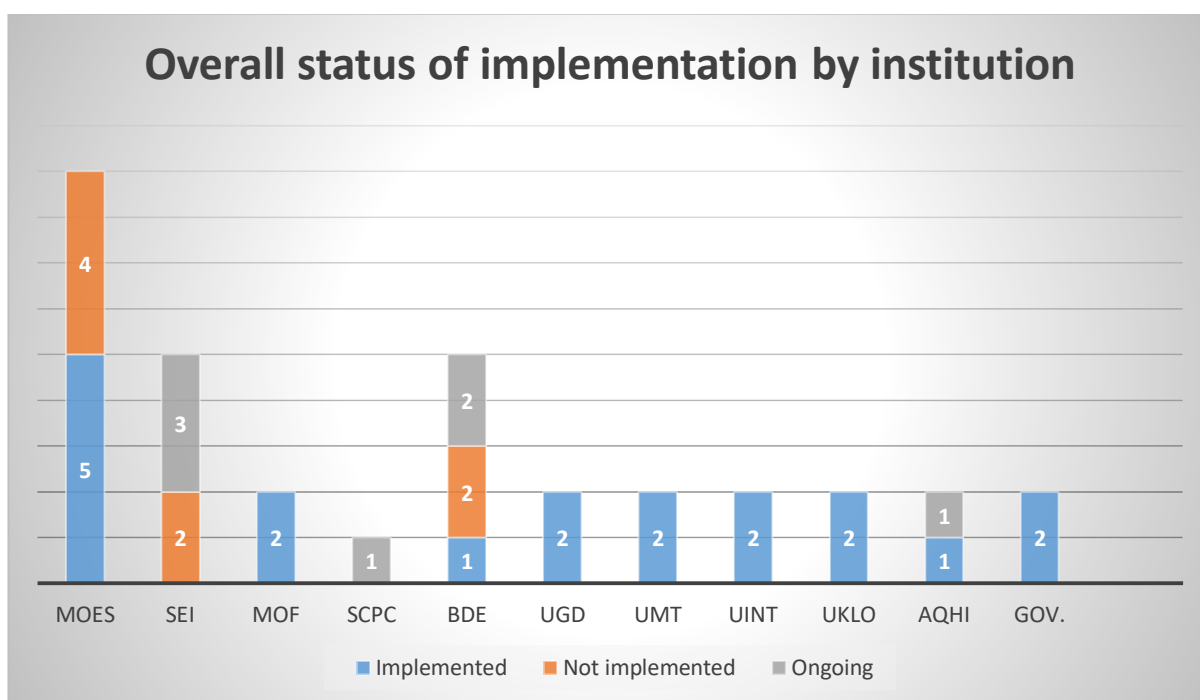


Figure 24: Overall status of activities, by institutions

- 9 activities have been foreseen for the MoES, of which 5 activities have been implemented, and 4 activities are not implemented.
- 5 activities have been foreseen for the SEI, of which 2 have not been implemented, and 3 activities are ongoing.
- There are total of 5 activities for the BDE, of which 1 has been implemented, two activities have not been implemented, and two activities are ongoing.
- There is one foreseen activity for the SCPC, and it is ongoing.

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- There are two foreseen activities for the MoF and both have been implemented.
- There are two foreseen activities for the AQHI, of which one is implemented, and the other one is ongoing.
- There are two foreseen activities for the Government, and both have been implemented.
- The universities UGD, UKLO, UINT and UMT have two activities each, that is, a total of eight activities, of which all have been implemented.

10. SECTOR - LABOR AND SOCIAL POLICY

Sector description

With regard to the labor and social policy sector, the following priority problem is set out in the Strategy:

- 1) Lack of oversight in procedures for exercising rights under pension and disability insurance.

Regarding the implementation of the measures and activities foreseen to address the problem in the labor and social policy sector, the following institutions are competent:

- 1) Ministry of Labor and Social Policy (hereinafter: MLSP)
- 2) MoH and
- 3) Pension and Disability Insurance Fund of the Republic of North Macedonia (hereinafter: PDIF RNM)

Level of implementation of activities in the respective sector

Within the labor and social policy sector, one priority problem has been identified, for which 4 measures and 6 activities are foreseen under the Action Plan of the Strategy during the reporting period.

Based on the data received and the conducted analysis regarding the implementation of the measures and activities in the labor and social policy sector, the situation is as follows:

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Problem 1: Lack of oversight in procedures for exercising rights under pension and disability insurance								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishment of a unified digitized central system for social insurance	1.1. Amendment to the legal framework in the field of social insurance	MLSP Other competent institutions	First half of 2022	Pending	Ongoing	Implemented	/	/
	1.2. Establishing a unified digitized central social insurance system	MLSP	Second half of 2023	Pending	Pending	Ongoing	Ongoing	Ongoing
2. Establishment of a new body for centralized expert assessment/evaluation of disability/work capacity, aimed at reducing the possibility of corruption in decision-making	2.1. Preparation of an analysis of the current process for assessing disability/work capacity	MLSP PDIF RNM	Second half of 2021	Ongoing	Ongoing	Ongoing	Implemented	/
	2.2. Adoption of a legal solution for the establishment of the expert assessment body	MLSP PDIF RNM	First half of 2022	Pending	Ongoing	Implemented	/	/
	2.3. Establishment of the expert assessment body	MLSP PDIF RNM	Second half of 2022	Pending	Not implemented	Not implemented	Ongoing	Ongoing
3. Improving the regulations governing the procedure for selecting the members of the Commission for the review of findings, assessment, and opinion on determining disability	3.1 Analysis of the Rulebook on the organization, composition, and working procedures of the Commission for the review of findings, assessment, and opinion on determining disability, in order to identify ambiguities regarding the	MLSP	Second half of 2022	Pending	Not implemented	Implemented	/	/

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	selection of its members.							
	3.2. Amendment of the Rulebook on the organization, composition, and working procedures of the Commission for the review of findings, assessment, and opinion on determining disability	MLSP	First half of 2023	Pending	Pending	Not Implemented	Implemented	/
4. Strengthening the oversight in procedures for exercising rights under pension and disability insurance	4.1. Adoption of a Methodology for conducting controls (regular and ad hoc)	MLSP	First half of 2022	Pending	Ongoing	Not Implemented	Not Implemented	Not Implemented
	4.2. Conducting regular and ad hoc controls (not only based on complaints)	MLSP	2021, continuously	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
5. Strengthening the oversight in procedures for exercising the right to assistance and care from another person	5.1. Conducting regular and ad hoc controls (not only based on complaints)	MLSP MoH	2021, continuously	Not Implemented	Ongoing	Ongoing	Not Implemented	Implemented

Problem 1: Lack of oversight in procedures for exercising rights under pension and disability insurance.

Regarding **Measure 1: Establishment of a unified digitized central system for social insurance**, two activities have been foreseen, of which the first one was implemented in 2023.

- *Activity 1.2: Establishing a unified digitized central social insurance system.* The deadline for the implementation of this activity was the **second half of 2023**, and the competent institution is **MLSP (MSPDY)**. The activity is assessed as **“Ongoing”**. The MSPDY reported that the activities are still ongoing until the full establishment of the system. As indicated, several project activities related to the establishment of a unified system for maintaining the register of mandatory social insurance have been implemented, such as the adoption of a special Law on the Register of Mandatory Social Insurance, system design, systematization of job positions within the Directorate for Maintaining the Register of Mandatory Social Insurance, and others. Currently, work is ongoing on the design of the ICT system for the Register of Mandatory Social Insurance.

Given that the implementation of the activity has been delayed, it is expected that the unified register of mandatory social insurance system will be fully established by the end of 2027.

Measure 2: Establishment of a new body for centralized expert assessment/evaluation of disability/work capacity, aimed at reducing the possibility of corruption in decision-making includes three activities, of which, two were implemented in 2024 and 2023, respectively.

- *Activity 2.3: Establishment of the expert assessment body.* The deadline for the implementation of this activity was the **second half of 2022**, and it falls under the competence of the **MLSP (MSPDY)**. The activity is assessed as **“Ongoing”**. The MSPDY reported that this activity has not yet been fully implemented. A new Law on the System for Assessment of Persons with Disabilities has been adopted (“Official Gazette of the Republic of North Macedonia“ No. 209/2023), which will be applied eighteen months after its entry into force. As further indicated by the MSPDY, additional activities have been undertaken, including the systematization of job positions within the sector for coordination of centralized expert assessment of disability/work capacity, the drafting of a Methodology for conducting disability/work capacity assessment, and other related activities. Currently, work is ongoing on the design of an ICT system and piloting of the Methodology for conducting disability/work capacity assessment.

Given that the implementation of the activity has been delayed, it is expected that the unified system for social insurance will be fully established by the end of 2027.

Regarding **Measure 3: Improving the regulations governing the procedure for selecting the members of the Commission for the review of findings, assessment, and opinion on determining disability**, two activities have been foreseen, of which both were implemented in 2023 and 2024, respectively.

Regarding **Measure 4: Strengthening the oversight in procedures for exercising the right to assistance and care from another person**, two activities have been foreseen:

- *Activity 4.1: Adoption of a Methodology for conducting controls (regular and ad hoc)* with an implementation deadline in the **first half of 2022** and **MLSP (MSPDY)** designated as the competent institution. The Ministry reported that the activity is “Ongoing”, and that the Methodology is planned to be adopted by the end of 2026. Since the Methodology for conducting controls (regular and ad hoc) has not yet been adopted, the activity is considered as “**Not implemented**”.
- *Activity 4.2: Conducting regular and ad hoc controls (not only based on complaints)*. The deadline for the implementation of this activity is **2021 - continuously**, and the competent institution is the **MLSP (MSPDY)**. Namely, according to the submitted report for activity 4.1., the Methodology for conducting controls (regular and ad hoc) will be adopted in 2026, while the implementation of activity 4.2. is dependent on its adoption. Considering the above, this activity is assessed as “**Not implemented**”.

Regarding **Measure 5: Strengthening the oversight in procedures for exercising the right to assistance and care from another person**, the following has been foreseen:

Activity 5.1: Conducting regular and ad hoc controls (not only based on complaints), with implementation deadline in **2021 and continuously**, and under the competence of the **MLSP (MSPDY)**. Unlike previous years when this activity was assessed as “Not implemented”, the Sector for inspection oversight in the field of social protection and child protection carried out a total of 21 extraordinary and control inspection oversights in 2025 related to assistance and care from another person, of which 14 were extraordinary and 7 were control inspection oversights. Therefore, this activity is assessed as “**Implemented**” in 2025.

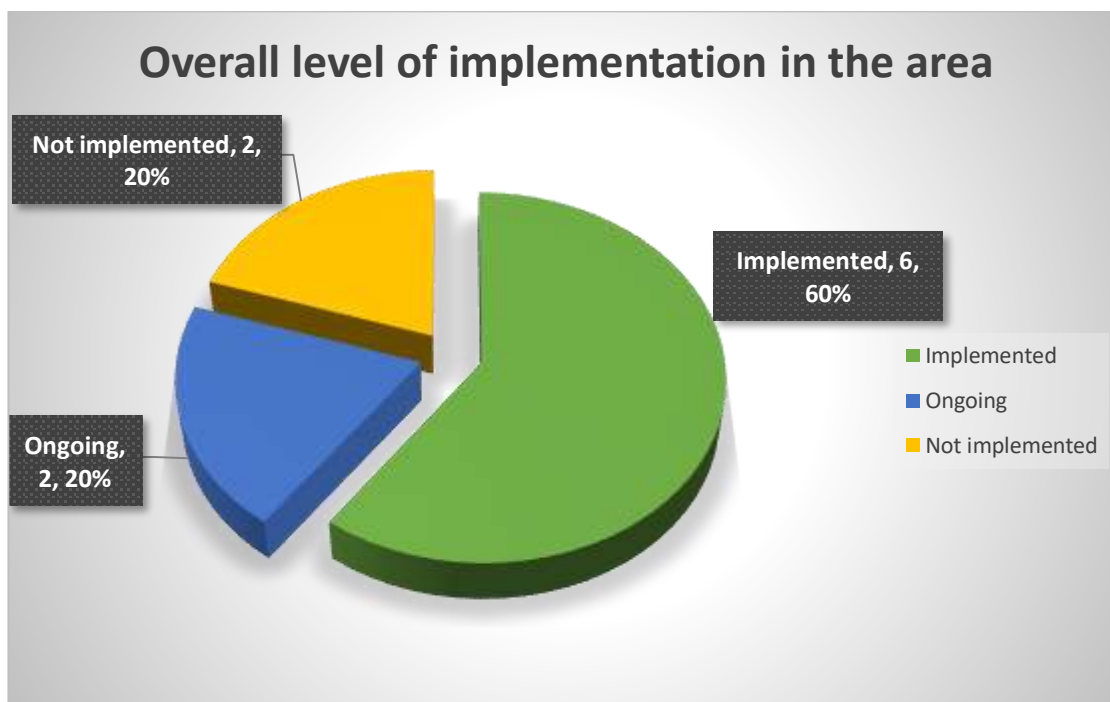


Figure 25: Overall level of implementation within the sector

Out of a total of 10 activities envisaged in the Strategy for the labor and social policy sector, 6 activities have been implemented (60%), two activities are ongoing (20%) and other two activities have not been yet implemented (20%).

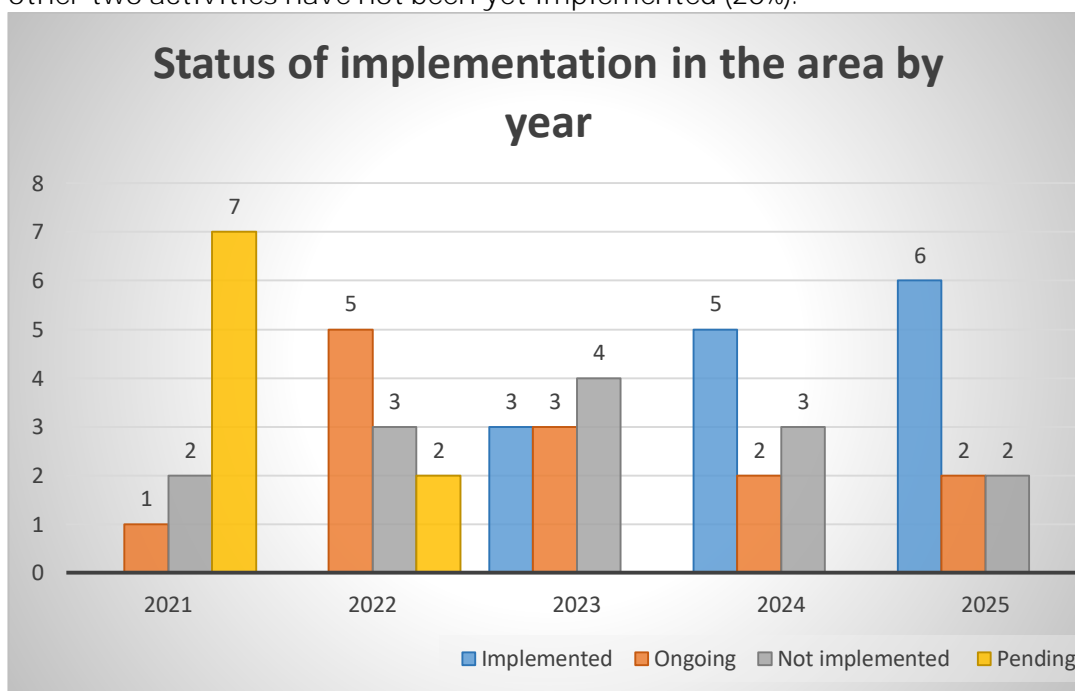


Figure 26: Status of activities, by evaluation period

All the activities in this area fall under the competence of the MLSP (MSPDY).

11. SECTOR - URBANISM AND PHYSICAL PLANNING

Sector description

In relation to the urbanism and physical planning sector, the Strategy identifies the following priority problem:

- 1) Insufficient supervision over the execution of construction works of second-category buildings

Regarding the implementation of the measure and activity envisaged to address the problem in the urbanism and physical planning sector, the competent institution is:

- 1) The Ministry of Transport and Communications (hereinafter: MoTC)

Level of implementation of activities in the respective sector

In the sector of urbanism and physical planning, one problem has been identified for which one measure and one activity are foreseen under the Action Plan of the Strategy during the reporting period.

Based on the data received and the conducted analysis regarding the implementation of the measure and activity in the sector urbanism and physical planning, the situation is as follows:

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Problem 1: Insufficient supervision over the execution of construction works of second category buildings								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1.Strengthening supervision over the execution of construction works of second-category buildings.	1.1. Amendment of the Law on Construction introducing a mandatory initiation of proceedings for revocation of a legal entity's supervision license if an irregularity involving the presentation of a false situation is established	MoTC	Second half of 2022 - continuously	Pending	Ongoing	Ongoing	Ongoing	Implemented

Regarding the single **Problem 1: Insufficient supervision over the execution of construction works of second-category buildings** in the urbanism and physical planning sector, one measure has been foreseen, that is, **Measure 1: Strengthening supervision over the execution of construction works of second-category buildings**, including only one *Activity 1.1: Amendment of the Law on Construction introducing a mandatory initiation of proceedings for revocation of a legal entity's supervision license if an irregularity involving the presentation of a false situation is established*. The deadline for implementation is the **second half of 2022 and – continuously**, and the leading institution is the **MoTC (MoT)**. The institution reported that the activity is **“Implemented”** through the Law Amending and Supplementing the Law on Construction (“Official Gazette of the Republic of North Macedonia“ No.101/25), which introduces an additional provision in Article 38 defining the grounds for revocation of licenses issued under the law. Namely, with the amendments adopted on 21 May 2025, enhanced ex officio supervision (at least twice per year) has been introduced by the MoT, aimed at regular verification and determination, not only upon submitted complaints. This applies in cases where a legal entity performing supervision prepares or certifies reports on construction phases, final reports, or technical inspection reports containing findings inconsistent with the actual construction works, and prepares and certifies a report on technical inspection contrary to the provisions of Article 90 paragraphs (3) and (4) of the law.

By the end of December 2025, the MoT conducted mandatory inspections of all issued licenses, not only those related to supervision (unlike previously, when selection was made randomly). As a result, 41 licenses for construction supervision were revoked, of which 27 are final, while the remaining cases are pending in administrative court proceedings.

The MoT reported that this activity is now conducted regularly on an annual basis; therefore, it is assessed as **“Implemented.”**

12. SECTOR -ENVIRONMENT

Sector description

In relation to the environment sector, the Strategy identifies the following priority problem:

- 1) Non-established integrated system for regional waste management.

Regarding the implementation of the measure and activities aimed at addressing the problem in the agriculture sector, the following institutions are competent:

- 1) The Ministry of Environment and Physical Planning (hereinafter: MoEPP) and
- 2) Units of local self-government (LSGs).

Level of implementation of activities in the respective sector

In the sector of environment, one problem has been identified, for which one measure and two activities are foreseen under the Action Plan of the Strategy in the reporting period.

The State Commission for Prevention of Corruption (SCPC) carried out a verification of the submitted data and conducted an analysis regarding the implementation of measures and activities in the environment sector, and established the following situation

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Problem 1: Non-established integrated system for regional waste management								
Measure	Activity	Competent institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishment of regional centers for waste management	1.1. Publication of a call for selection of concessionaires.	MoEPP	First half of 2022	Pending	Ongoing	Ongoing	Ongoing	Ongoing
	1.2. Adoption of decisions on awarding concessions for waste management	LSGs LSGs	Second half of 2022	Pending	Not implemented	Not implemented	Ongoing	Ongoing

For the single **Problem 1: Non-established integrated system for regional waste management** in the sector environment, one measure is envisaged: **Measure 1: Establishment of regional centers for waste management**, which includes two activities:

- *Activity 1.1: Publication of a call for selection of concessionaires.* The deadline for implementation was the **first half of 2022** and the leading institution is the **MoEPP**. The activity is continuously implemented over the years but has not yet been fully completed; therefore, it is assessed as **“Ongoing”**. The MoEPP reported that the focus of activities in the waste management sector continues towards establishing an integrated regional waste management system, in line with obligations under EBRD loans and IPA projects.

Ongoing activities include the Corporate Development and Institutional Support project (since December 2024) and the feasibility study for the Vardar and South-East regions (since July 2025), which are part of the “Regional Waste Management” project. In the framework of the same project, in 2025, procurement of equipment for the maintenance of the regional landfill in Rusino was carried out, as well as procurement of vehicles, bins, and containers for municipalities in the Pelagonia/South-West region. Delivery of equipment is still ongoing.

For the Eastern and North-Eastern regions, an IPA II-funded project for strengthening local self-government capacities for implementation of the regional waste management system was implemented and completed in December 2025. The project for closure of non-compliant landfills in the Eastern region (also IPA II funded) is still ongoing.

- *Activity 1.2: Adoption of decisions on awarding concessions for waste management,* with implementation deadline in the **second half of 2022** and **LSGs** as leading institutions. As in the 2024 report, in 2025, ZELS again stated that they are not the competent institution for this activity and refer to media reports on undertaken activities related to its implementation.

Namely, on 10 December 2025, under the organization of SALAR International and in cooperation with the MoEPP, fourteen mayors established the Inter-Municipal Waste Management Board (IMWM) for the South-West and Pelagonija regions, as a form of cooperation for joint performance of municipal responsibilities and achievement of common interests and goals. This activity is assessed as **“Ongoing.”**

13. SECTOR - AGRICULTURE

Sector description

With regard to the agriculture sector, the Strategy identifies the following five priority problems:

- 1) Redefining the system for the sale of agriculture land in state ownership and establishing effective supervision over the purpose of land use and the fulfillment of contracts for the use of state-owned agricultural land;
- 2) Frequent changes in regulations and imprecise criteria for granting subsidies;
- 3) Insufficient number of employees and their training, inadequate assistance in guiding citizens, and lack of transparency in procedures;
- 4) Concentration of powers in the creation of policies, their implementation, and supervision in the field of food and
- 5) Concentration of powers in the creation of policies, their implementation, and supervision in the field of veterinary medicine.

Regarding the implementation of the measures and activities foreseen for addressing the problems in the agriculture sector, the following institutions are competent:

- 1) Ministry of Agriculture, Forestry and Water Economy (hereinafter: MoAFWE),
- 2) MoF,
- 3) Inspection Council (IC),
- 4) Food and Veterinary Agency (hereinafter: FVA),
- 5) Agency for Financial Support of Agriculture and Rural Development (hereinafter: AFSARD),
- 6) Agency for the Promotion of Agricultural Development (hereinafter: APAD) and
- 7) State Agriculture Inspectorate (hereinafter: SAI).

Level of implementation of activities in the respective sector

In the sector of agriculture, five problems have been identified, for which 9 measures and 14 activities are foreseen under the Action Plan of the Strategy in the reporting period.

The State Commission for Prevention of Corruption (SCPC) carried out a verification of the submitted data and conducted an analysis regarding the implementation of the measures and activities in the agriculture sector, and established the following situation:

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Problem 1: Redefining the system for the sale of agriculture land in state ownership and establishing effective supervision over the purpose of land use and the fulfillment of contracts for the use of state-owned agricultural land								
Measure	Activity	Competent institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Strengthening oversight over the purposeful use of land and the implementation of contracts for the lease of agricultural land	1.1. Establishing detailed procedures for overseeing the proper use and implementation of contracts for the lease of agricultural land	MoAFWE	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Implemented
	1.2. Amendment of the Law on the Use of Agricultural Land in order to define sanctions for identified violations, especially regarding the members of the commission, and within the organizational unit for management of agricultural land, as well as among the competent inspectors who oversee the economic operators who have agricultural land under concession	MoAFWE	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
2. Revision of the rules for sale of agricultural land in state ownership	2.1. Revision of the Methodology for the sale of state-owned agricultural land in accordance with market conditions, based on agricultural land classification	MoAFWE	First half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
3. Establishment of an independent state administration body founded by the Assembly of the Republic of North Macedonia for the sale of agriculture	3.1. Changing the legal status of the Commission for the sale of state-owned agricultural land into an independent state administration body established by the Assembly of the Republic of North	MoAFWE	First half of 2022	Pending	Not Implemented	Not implemented	Not implemented	Not implemented

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land in state ownership	Macedonia through the adoption of a law							
Problem 2: Frequent changes in regulations and imprecise criteria for granting subsidies								
Measure	Activity	Competent institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Creation of new measures and policies for support based on the principles of environment protection, introduction of good agricultural practices, production of healthy and safe food, as well as economically justified subsidy amounts	1.1. Establishing clear and detailed procedures for introducing measures that will ensure environmental protection and promote good agricultural practices, as well as the production of healthy and safe food	MoAFWE	First half of 2022	Pending	Not Implemented	Not Implemented	Ongoing	Implemented
	1.2. The design of each measure should be accompanied by a success indicator in order to monitor the effects of financial support	MoAFWE	First half of 2022	Pending	Not Implemented	Ongoing	Ongoing	Implemented
2. Establishing measurability of the effects of the implementation of measures for financial support in agriculture	2.1. Establishing a Methodology that will ensure that subsidy measures serve the development of agriculture, and that subsidy amounts are economically justified and stimulate real production	MoAFWE	First half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
Problem 3: Insufficient number of employees and their training, inadequate assistance in guiding citizens, and lack of transparency in procedures								
Measure	Activity	Competent institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Strengthening the human capacities of institutions in order to timely and transparently provide	1.1. Strengthening human resources in order to ensure timely processing of requests for financial support	MoF MoAFWE AFSARD APAD	First half of 2021	Ongoing	Ongoing	Ongoing	Ongoing	Implemented

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potential beneficiaries with relevant information for easier access to these funds and timely processing of applications	1.2 Establishing competence for submitting applications for direct payments (subsidies) with a single competent authority for continuous application procedure	MoF MoAFWE AFSARD	First half of 2021	Not Implemented	Not Implemented	Not implemented	Not implemented	Not implemented
	1.3. Adoption of a legal solution for establishing advisory services to provide assistance to potential beneficiaries regarding the allocation of financial support	MoAFWE AFSARD APAD	First half of 2022	Pending	Ongoing	Ongoing	Implemented	/
2. Increasing the transparency of procedures and providing potential beneficiaries with relevant information for easier access to these funds.	2.1. Establishing procedures for transparency- informing potential beneficiaries about the conditions for granting financial support	MoAFWE AFSARD APAD	First half of 2021	Not Implemented	Not Implemented	Implemented	/	/
	2.2. Conduct training for employees to improve their knowledge and strengthen integrity	MoAFWE AFSARD APAD	Second half of 2020 - continuously	Not Implemented	Not Implemented	Ongoing	Not implemented	Not implemented
Problem 4: Concentration of powers in the creation of policies, their implementation, and supervision in the field of food								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Clear separation of responsibilities for policy-making, their implementation, and supervision	1.1. Amendment of the legislative package in the field of food to ensure clear separation of responsibilities for policy-making, implementation, supervision, and conducting misdemeanor procedures in the field of food and feed, through the Law on Food Safety and the Law on Feed Safety	MoAFWE	Second half of 2021	Not Implemented	Not Implemented	Ongoing	Not Implemented	Not Implemented
	1.2. Establishment of a separate body for the food inspection service, or transfer	MoAFWE IC FVA SAI	Second half of 2021	Not Implemented	Not Implemented	Ongoing	Not Implemented	Not Implemented

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	of inspectors to the State Agriculture Inspectorate							
Problem 5: Concentration of powers in the creation of policies, their implementation, and supervision in the field of veterinary medicine								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Clear delineation of responsibilities across three segments: policy-making, exercise of professional competences, and supervision	1.1. Amendment of the legislative package with the aim of delimiting competences for policy-making, their implementation, supervision, and conducting misdemeanor proceedings in the field of veterinary healthcare, namely the Law on Veterinary Healthcare, the Law on Veterinary Medicinal Products, the Law on Animal By-products, and the Law on Identification and Registration of Animals.	MoAFWE	Second half of 2021	Not Implemented	Not Implemented	Ongoing	Not Implemented	Not Implemented
	1.2. Establishment of a separate body for the veterinary healthcare inspection service, separating it from the body responsible for implementing veterinary healthcare policies into a separate inspectorate, or transferring the inspectors to the State Agriculture Inspectorate	MoAFWE	Second half of 2021	Not Implemented	Not Implemented	Ongoing	Not Implemented	Not Implemented

Problem 1: Redefining the system for the sale of agriculture land in state ownership and establishing effective supervision over the purpose of land use and the fulfillment of contracts for the use of state-owned agricultural land, includes three measures and four activities.

Measure 1: Strengthening oversight over the purposeful use of land and the implementation of contracts for the lease of agricultural land, includes the following activities:

- *Activity 1.1: Establishing detailed procedures for overseeing the proper use and implementation of contracts for the lease of agricultural land.* The deadline for the implementation of this activity was the **second half of 2021**, and falls under the competence of the **MoAFWE**. Unlike previous years, when the activity was “Not implemented”, in 2025, the MoAFWE reported that it is **“Implemented”**. Specifically, a checklist has been uploaded on the MoAFWE website (<https://diz.gov.mk/dokumenti/obrazci-tarifnici/>), designed for the needs of the State Agriculture Inspectorate and used in carrying out oversight over users of state-owned land.
- *Activity 1.2: Amendment of the Law on the Use of Agricultural Land in order to define sanctions for identified violations, especially regarding the members of the commission, and within the organizational unit for management of agricultural land, as well as among the competent inspectors who oversee the economic operators who have agricultural land under concession.* The deadline for the implementation of this activity was the **second half of 2021**, and falls under the competence of the **MoAFWE**. As in previous years, this activity remains **“Not implemented”**. The MoAFWE reported that sanctions have not been foreseen for the members of the Commission or the sector responsible for the management of agricultural land.

Measure 2: Revision of the rules for sale of agricultural land in state ownership includes one *Activity 2.1: Revision of the Methodology for the sale of state-owned agricultural land in accordance with market conditions, based on agricultural land classification.* **MoAFWE**, as the competent institution, was required to implement this activity in the **first half of 2021**. As in previous years, this activity remains **„Not implemented”**, since no amendments have been made to the Law on the Sale of State-Owned Agricultural Land.

Measure 3: Establishment of an independent state administration body founded by the Assembly of the Republic of North Macedonia for the sale of agriculture land in state ownership includes the following *Activity 3.1: Changing the legal status of the Commission for the sale of state-owned agricultural land into an independent state administration body established by the Assembly of the Republic of North Macedonia through the adoption of a law.* The deadline for implementation was the **first half of 2022**, and the competent institution is **MoAFWE**. As in previous years, this activity

remains “**Not implemented**”, since no change has been made to the legal status of the Commission for sale of state-owned land.

Problem 2: Frequent changes in regulations and imprecise criteria for granting subsidies includes two measures, along with three activities.

Regarding **Measure 1: Creation of new measures and policies for support based on the principles of environment protection, introduction of good agricultural practices, production of healthy and safe food, as well as economically justified subsidy amounts**, two activities have been foreseen:

- *Activity 1.1: Establishing clear and detailed procedures for introducing measures that will ensure environmental protection and promote good agricultural practices, as well as the production of healthy and safe food.* The deadline for the implementation of this activity is the **first half of 2022**, and falls under the competence of the **MoAFWE**. Unlike previous years, in 2025, this activity is marked as “**Implemented**”. According to the submitted report, MoAFWE has adopted the National Strategy for Agriculture and Rural Development for the period from 2021-2027 (<https://faolex.fao.org/docs/pdf/mac209144.pdf>), in which Part II. Objectives, types of policy interventions and measures for the 2021-2027 period, also includes Section II.5.6. Policies for the management of natural resources and mitigation of the impact of climate change.
- *Activity 1.2: The design of each measure should be accompanied by a success indicator in order to monitor the effects of financial support.* The deadline for the implementation of this activity is the **first half of 2022**, and falls under the competence of the **MoAFWE**. In 2025, this activity was marked as “**Implemented**” through the adoption of the National Strategy for Agriculture and Rural Development for the period from 2021-2027, which stipulates success indicators for monitoring the effects of financial support.

Regarding **Measure 2: Establishing measurability of the effects of the implementation of measures for financial support in agriculture**, one activity has been foreseen, i.e., *Activity 2.1: Establishing a Methodology that will ensure that subsidy measures serve the development of agriculture, and that subsidy amounts are economically justified and stimulate real production.* The deadline for implementation was the **first half of 2022**, and the **MoAFWE** designated as competent institution. Although the MoAFWE reported that the activity has been implemented, it is evident from the submitted report that no methodology has been established to ensure that subsidy measures serve the development of agriculture, and that subsidy amounts are economically justified and stimulate real production. Therefore, this activity is considered “**Not implemented**”.

Problem 3: Insufficient number of employees and their training, inadequate assistance in guiding citizens, and lack of transparency in procedures includes two measures, coupled with five activities.

Measure 1: Strengthening the human capacities of institutions in order to timely and transparently provide potential beneficiaries with relevant information for easier access to these funds and timely processing of applications, includes the following activities:

- *Activity 1.1: Strengthening human resources in order to ensure timely processing of requests for financial support.* The deadline for the implementation of this activity was the **first half of 2021**, and falls under the competence of the **MoF**. Unlike previous years, in 2025, this activity is marked as **“Implemented”**. The total number of employees in AFSARD in October 2025 amounted to 236 persons, which represents an increase of 17 employees compared to December 2024.
- *Activity 1.2: Establishing competence for submitting applications for direct payments (subsidies) with a single competent authority for continuous application procedure.* The deadline for the implementation of this activity was the **first half of 2021**, and falls under the competence of the **MoF**. As in previous years, this activity remains **“Not implemented”**. Namely, the MoF reported that in the course of 2025 no request was submitted for the transfer of employees from the MoAFWE to the AFSARD. It is evident from previous reports that, to date, no employees have been transferred from the MoAFWE to the AFSARD.

Measure 2: Increasing the transparency of procedures and providing potential beneficiaries with relevant information for easier access to these funds includes two activities, of which the following was subject to evaluation in this period:

- *Activity 2.2: Conduct training for employees to improve their knowledge and strengthen integrity.* The deadline for the implementation of this activity is **2021 and continuously**, and the competent institution is the **MoAFWE**. The activity remains **“Not implemented”** since the Training Plan of the MoAFWE does not provide for specialized trainings aimed at improving knowledge on integrity.

In order to address the **Problem 4: Concentration of powers in the creation of policies (laws and by-laws), their implementation, and supervision in the field of food**, the Action Plan of the Strategy stipulates one **Measure 1: Clear separation of responsibilities for policy-making, their implementation, and supervision**, along with the *Activity 1.1: Amendment of the legislative package in the field of food with the aim of delimiting competences for policy-making, their implementation, supervision, and conducting misdemeanor proceedings in the field of food and animal feed, within the Law on Food Safety and the Law on Animal Feed Safety* and *Activity 1.2: Establishment of a separate body for the food inspection service, or transfer of inspectors to the State Agriculture Inspectorate*. The deadline for the implementation of these two activities is the **second half of 2021**, and the **MoAFWE** is the leading institution. Although these activities are formally marked as **“Not implemented”**, with the changes and amendments

to the Strategy adopted by the SCPC in 2023 and submitted to the Assembly of RNM, Problem 4 in the agriculture sector was removed, whereby the activities related to it were assessed as no longer applicable.

Problem 5: Concentration of powers in the creation of policies, their implementation, and supervision in the field of veterinary medicine in the agriculture sector also includes one **Measure 1: Clear delineation of responsibilities across three segments: policy-making, exercise of professional competencies, and supervision** with two activities: *Activity 1.1: Amendment of the legislative package with the aim of delimiting competences for policy-making, their implementation, supervision, and conducting misdemeanor proceedings in the field of veterinary healthcare, namely the Law on Veterinary Healthcare, the Law on Veterinary Medicinal Products, the Law on Animal By-products, and the Law on Identification and Registration of Animals* and *Activity 1.2: Establishment of a separate body for the veterinary healthcare inspection service, separating it from the body responsible for implementing veterinary healthcare policies into a separate inspectorate, or transferring the inspectors to the State Agriculture Inspectorate*. The deadline for these two activities is the **second half of 2021**, and the leading institution is the **MoAFWE**. Although these activities are formally marked as “Not implemented“, with the changes and amendments to the Strategy adopted by the SCPC in 2023 and submitted to the Assembly of RNM, Problem 5 in the agriculture sector was removed, whereby the activities related to it were assessed as no longer applicable.

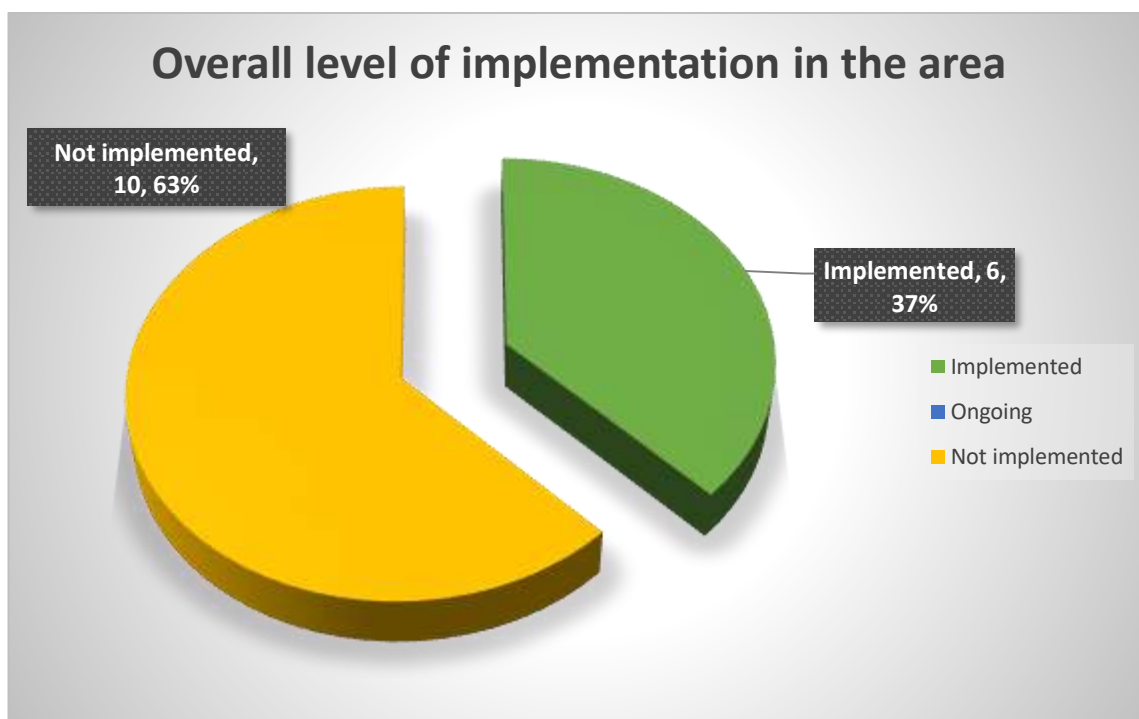


Figure 27: Overall level of implementation within the sector

Out of a total of 16 activities envisaged in the Strategy for the agriculture sector, 6 have been implemented (37%), while 10 activities remain not implemented (63%). There are no ongoing activities in this sector.

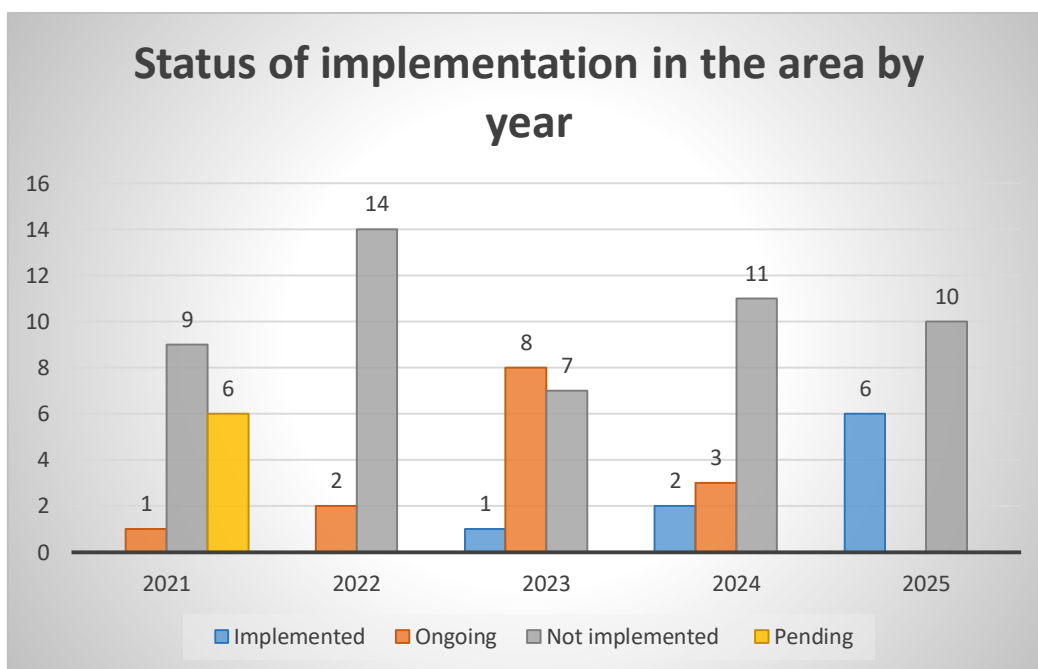


Figure 28: Status of activities, by evaluation period

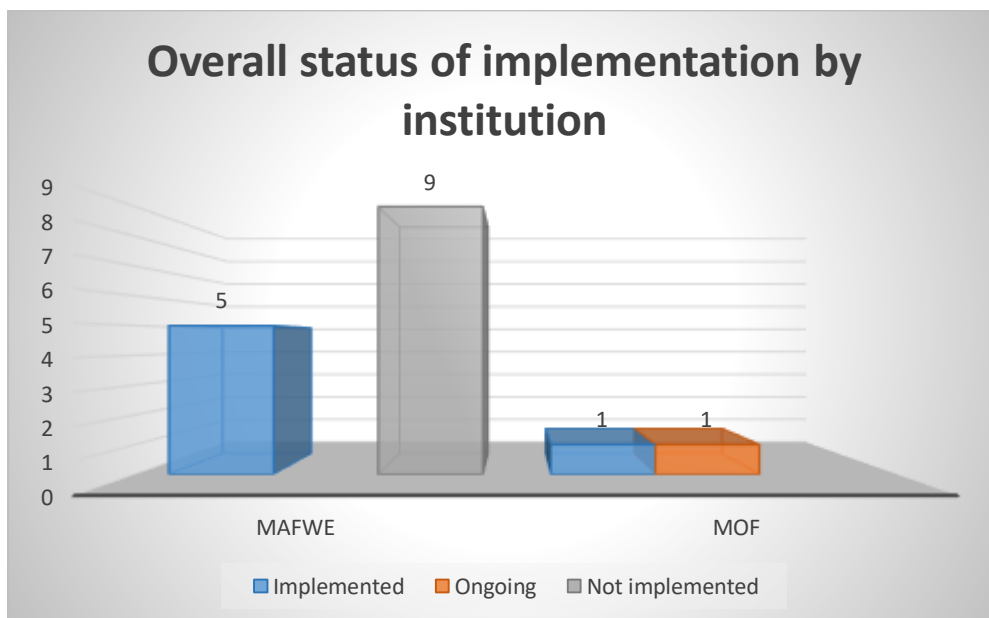


Figure 29: Overall status of activities, by institutions

- 14 activities have been foreseen for the MoAFWE, of which 9 remain not implemented and 5 have been implemented.
- 2 activities have been foreseen for the MoF, of which one is implemented and one remains not implemented.

14. SECTOR -SPORT

Sector description

In relation to the sports sector, the Strategy identifies the following two priority problems:

- 1) Problems in the management, use, and maintenance of sport facilities owned by the Republic of North Macedonia and sport facilities owned by LSGs;
- 2) Lack of inspection oversight in the field of sports.

Regarding the implementation of the measures and activities foreseen to address the problems in the sports sector, the following institutions are competent:

- 1) Agency for Youth and Sport (hereinafter: AYS),
- 2) The Government,
- 3) MoJ,
- 4) SCPC and
- 5) LSGs.

Level of activities' implementation

In the sports sector, two problems have been identified. To address them, the Action Plan for the Strategy stipulates 6 measures and 14 activities in the reporting period.

The SCPC carried out a verification and analysis of the data regarding the implementation of the measures and activities in the sports sector and established the following situation:

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Problem 1: Inadequate management, use, and maintenance of sports facilities owned by the Republic of North Macedonia and by local self-government units								
Measure	Activity	Competent institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Adoption of a strategy for sports facilities in state ownership	1.1. Analysis of the situation regarding sports facilities in state ownership	AYS Government	Second half of 2021	Not Implemented	Ongoing	Ongoing	Not Implemented	Not Implemented
	1.2. Inventory of sports facilities in state ownership	AYS LSGs	First half of 2022	Pending	Not Implemented	Not Implemented	Ongoing	Ongoing
	1.3. Preparation of a Strategy for sports facilities in state ownership based on the analysis and inventory, particularly with regard to categorization, ownership, management, disposal, use, and decentralization.	AYS	Second half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
2. Regulating the legal status of sports facilities in state ownership	2.1. Analysis of contracts for the use of sports facilities owned by the Republic of North Macedonia and LSGs (legal and economic justification, deadlines, and compliance)	AYS LSGs	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Ongoing	Ongoing
	2.2. Taking legal measures to regulate the legal status of sports facilities owned by the RNM and the LSGs	AYS LSGs	Second half of 2022 - continuously	Pending	Not Implemented	Not Implemented	Ongoing	Ongoing

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	2.3. Conducting inspection oversight regarding the use of sports facilities owned by the RNM and the LSGs	AYS LSGs	2021, Continuously	Not Implemented	Not Implemented	Ongoing	Not Implemented	Implemented
3. Legal regulation of sports facilities	3.1. Adoption of a Law on Sports Facilities	MoJ	First half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
	3.2. Adoption of by-laws on: - Categorization of sports facilities - Rulebook on determining the fee for the use of sports facilities	MoJ	Second half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
4. Establishment of an information system for the registration of sports facilities in state ownership	4.1. Development of a database of sports facilities in state ownership (location, category, municipality, ownership, area, year of construction, facilities, structure, etc.)	AYS	First half of 2023	Pending	Pending	Not Implemented	Ongoing	Ongoing
Problem 2: Lack of inspection oversight in the field of sports								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishment of an independent inspection oversight in sports and sports facilities	1.1. Analysis of the current situation regarding inspection oversight in the sports sector and sports facilities	AYS	First half of 2021	Not Implemented	Ongoing	Ongoing	Implemented	/
	1.2. Amendments and supplements to the Law on Sports concerning the inspection oversight	MoJ	First half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented

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	1.3. Establishment of a State Inspectorate for Sports	MoJ	Second half of 2022	Pending	Not implemented	Not implemented	Not implemented	Not implemented
2. Education on integrity and ethics for sports federations, clubs, and administration	2.1. Adoption of a training and education program on integrity and ethics for sports federations, clubs, administration, and sports workers	AYS LSGs	First half of 2021	Ongoing	Ongoing	Not implemented	Not implemented	Not implemented
	2.2. Implementation of trainings, workshops, round tables, and public media appearances on integrity and ethics	AYS SCPC	Continuously	Not implemented	Ongoing	Ongoing	Not implemented	Not implemented
	2.3. Preparation of promotional materials on integrity and ethics in sports	AYS SCPC	Continuously	Not implemented	Ongoing	Ongoing	Not implemented	Not implemented

Problem 1: Inadequate management, use, and maintenance of sports facilities owned by the Republic of North Macedonia and by local self-government units includes 4 measures and 9 activities.

Regarding the **Measure 1: Adoption of a strategy for sports facilities in state ownership**, the following activities have been foreseen:

- *Activity 1.1: Analysis of the situation regarding sports facilities in state ownership.* The deadline for the implementation of this activity was the **second half of 2021**, and it falls under the competence of the **AYS (MoS)**. This activity is assessed as **“Not implemented”**, as in previous years, since the MoS reported insufficient human resources in the sector responsible for sports facilities.
- *Activity 1.2: Inventory of sports facilities in state ownership.* The deadline for the implementation of this activity was the **first half of 2022**, and falls under the competence of the **AYS (MoS)**. This activity is assessed as **“Ongoing”**. The MoS indicated that the existing inventory includes 1366 sports facilities in RNM. 90% of municipalities have submitted data on existing sports facilities on their territory, while the remaining 10% despite an official request from a competent authority, have not provided the required data. A Commission has been established by the Minister of sport for the implementation of the relevant activities.
- *Activity 1.3: Preparation of a Strategy for sports facilities in state ownership based on the analysis and inventory, particularly with regard to categorization, ownership, management, disposal, use, and decentralization.* The deadline for the implementation of this activity was the **second half of 2022**, and falls under the competence of the **AYS (MoS)**. This activity remains **“Not implemented”** as in previous years.

Measure 2: Regulating the legal status of sports facilities in state ownership includes the following activities:

- *Activity 2.1: Analysis of contracts for the use of sports facilities owned by the Republic of North Macedonia and LSGs (legal and economic justification, deadlines, and compliance).* The deadline for the implementation of this activity is the **second half of 2021**, and it falls under the competence of the **AYS (MoS)**. The MoS reported that a Commission has been established by the Minister of sport regarding the competencies of the Public enterprise for managing sport facilities in state ownership and the facilities under its competence. This activity is assessed as **“Ongoing”**.
- *Activity 2.2: Taking legal measures to regulate the legal status of sports facilities owned by the RNM and the LSGs.* The deadline for the implementation of this activity was the **first half of 2022 and continuously**, and falls under the competence of the **AYS (MoS)**. This activity is assessed as **“Ongoing”** as the Ministry of Sport reported that a working group has been established tasked with

preparing an action plan for regulating the legal status of sports facilities owned by the Republic of North Macedonia and local self-government units.

- *Activity 2.3: Conducting inspection oversight regarding the use of sports facilities owned by the RNM and the LSGs.* This activity is to be continuously implemented from **2021**, and falls under the competence of the AYS (MoS). Unlike in previous years, the MoS informed that the has been **“Implemented”** in this evaluation cycle, as in 2025 an extraordinary inspection oversight was carried out at the ski center **“Popova Shapka”**, for which an official report No.14-188/4 dated 24.02.2025, was prepared.

Measure 3: Legal regulation of sports facilities includes *Activity 3.1: Adoption of a Law on Sports Facilities* and *Activity 3.2: Adoption of by-laws on Categorization of sports facilities and Rulebook on determining the fee for the use of sports facilities.* The deadline for the implementation of these two activities is **2022**, and the competent institution in the previous reporting periods was the **MoJ**, while, since 2024, the competent institution is the MoS. Both activities have been assessed as **“Not Implemented”** since, according to the report of the MoS, work is currently underway on the preparation of a new Law on Sports, and the adoption of by-laws is dependent on the adoption of the respective law.

Measure 4: Establishment of an information system for the registration of sports facilities in state ownership includes one *Activity 4.1: Development of a database of sports facilities in state ownership (location, category, municipality, ownership, area, year of construction, facilities, structure, etc.).* The deadline for the implementation of this activity is the **first half of 2023**, and it falls under the competence of the AYS (MoS). This activity has been assessed as **“Ongoing”** as the MoS reported that a database of sport facilities in state ownership has been prepared, which still needs to be updated with data from municipalities that have not yet submitted information on sports facilities.

Problem 2: Lack of inspection oversight in the field of sports includes two measures and 6 activities.

Measure 1: Establishment of an independent inspection oversight in sports and sports facilities includes three activities, of which the first was implemented in 2024.

- *Activity 1.2: Amendments and supplements to the Law on Sports concerning the inspection oversight.* The deadline for the implementation of this activity was the **first half of 2022**, and competent institution in the previous reporting periods was the **MoJ**, while since 2024, the competent institution is the **MoS**. According to the report submitted by the MoS, the procedure for amending the Law on Sport is ongoing; however, since no activities have been undertaken in 2025, the activity is assessed as **“Not implemented”**.
- *Activity 1.3: Establishment of a State Inspectorate for Sports.* The deadline for the implementation of this activity was the **second half of 2022**, and the competent institution in the previous reporting periods was the **MoJ**, while from 2024

onwards it is the Ministry of Sport. According to the MoS report, this issue will be regulated through amendments to the Law on Sports and the Law on Inspection Oversight; however, for the time being, the activity remains “Not implemented”.

Measure 2: Education on integrity and ethics for sports federations, clubs, and administration includes three activities:

- *Activity 2.1: Adoption of a training and education program on integrity and ethics for sports federations, clubs, administration, and sports workers.* The deadline for this activity was the **first half of 2021**, and the competent institution is the **AYS (MoS)**. The institution considers this activity as “Ongoing”. However, given that the indicator of this activity is the “adoption of a training and education program”, and for the fifth consecutive year it has been reported that such a program is still under preparation, the activity is assessed as “Not implemented”.
- *Activity 2.2: Implementation of trainings, workshops, round tables, and public media appearances on integrity and ethics.* The deadline for this activity was the **first half of 2021**, and the competent institution is the **AYS (MoS)**. According to the submitted report for 2025, the MoS informed that the activity is continuously implemented. However, it is still assessed as “Not implemented”, as no training and education program has been adopted.
- *Activity 2.3: Preparation of promotional materials on integrity and ethics in sports.* The deadline for this activity was the **first half of 2021**, and the competent institution is the **AYS (MoS)**. The activity is assessed as “Not implemented”.

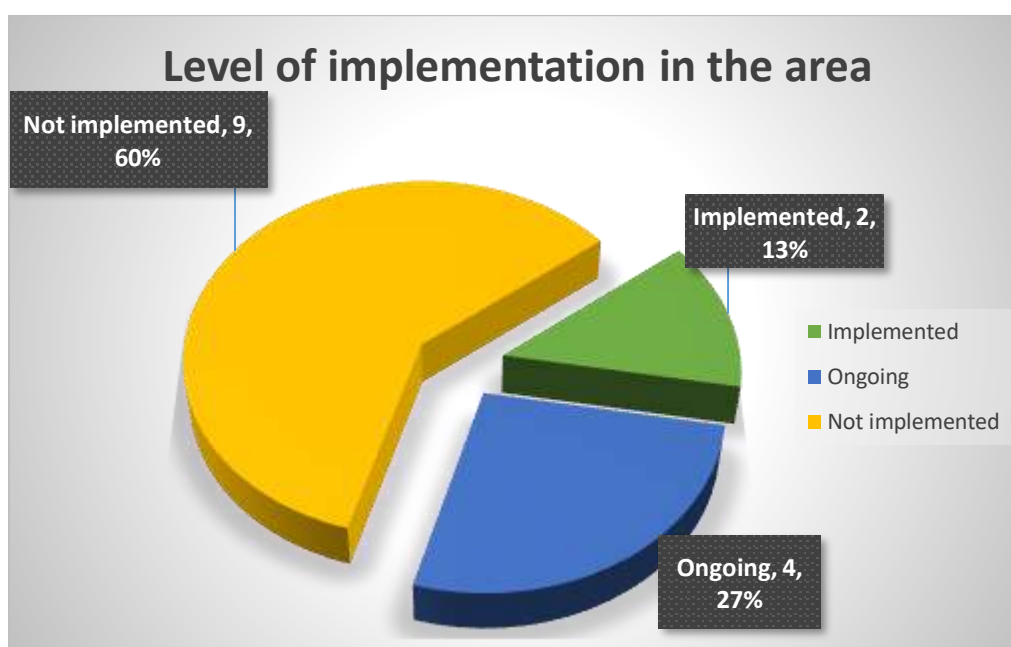


Figure 30: Overall level of implementation within the sector

Out of the total of 15 activities stipulated in the Strategy for the sports sector, 9 activities have not been implemented (60%), 4 activities are ongoing (26,7%), and only two activities have been implemented (13,3%).

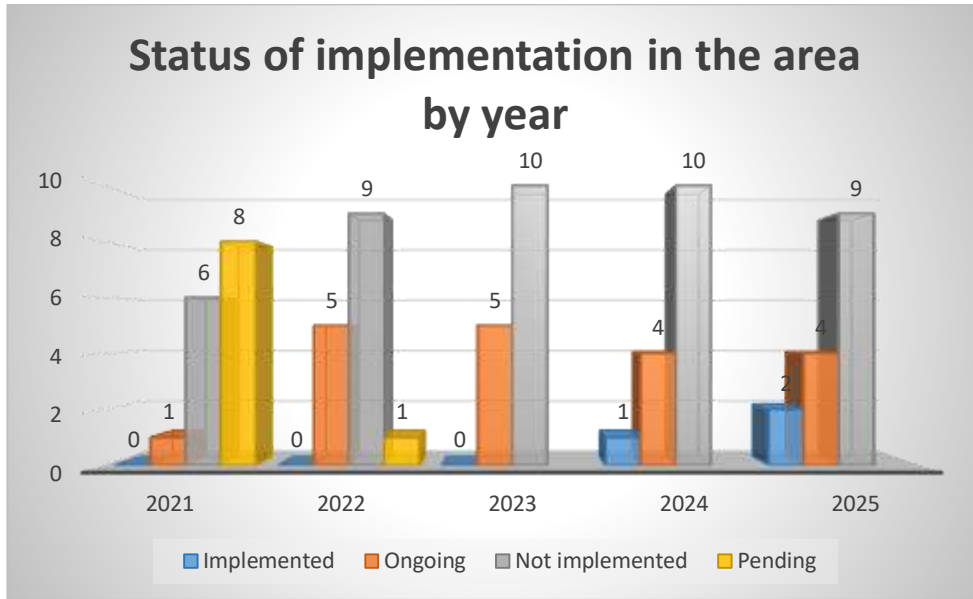


Figure 31: Status of activities, by evaluation period

Since 2024, all activities in the sports sector fall under the competence of the Ministry of Sport (MoS).

15. SECTOR -ECONOMY AND BUSINESS

Sector description

In relation to the economy and business sector, the Strategy identifies the following four priority problems:

- 1) Lack of a register of state aid granted to economic operators owned by domestic and foreign legal entities;
- 2) Excessive awarding of concessions, insufficient transparency of concession agreements, and underdeveloped mechanisms for determining the actual concession fee for exploited raw materials;
- 3) Lack of registers of property owned by the Republic of North Macedonia and LSGs;
- 4) Insufficient involvement of smaller economic entities in the process of creating economic or other policies relevant to the business community.

Regarding the implementation of the measures and activities aimed to address the problems in the economy and business sector, the following institutions are competent:

- 1) The Government,
- 2) MOE,
- 3) MoEPP,
- 4) MoAFWE,
- 5) MoH,
- 6) MISA,
- 7) MoI,
- 8) Real Estate Cadaster Agency (hereinafter: RECA),
- 9) Commission for Protection of Competition (hereinafter: CPC),
- 10) Agency for Entrepreneurship Support (hereinafter: AES),
- 11) Civil sector and
- 12) Business community.

Level of activities' implementation

In the economy and business sector, four problems have been identified. To address them, the Action Plan of the Strategy stipulates 8 measures and 13 activities for the reporting period.

The SCPC carried out a verification and analysis of the data regarding the implementation of the measures and activities in the economy and business sector and established the following situation:

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Problem 1: Lack of a register of state aid granted to economic operators owned by domestic and foreign legal entities								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1.Establishment, public disclosure, and updating of a register containing information on each form of state aid	1.1. Development of a state aid register within the Commission for Protection of Competition	CPC	Second half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
Problem 2: Excessive awarding of concessions, insufficient transparency of concession agreements, and underdeveloped mechanisms for determining the actual concession fee for exploited raw materials								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1.Optimization of the use of natural resources with a view to environmental protection	1.1. Preparation of a feasibility study to assess the situation regarding the use of natural resources by sector/area	MOE	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Implemented
	1.2. Adoption of policies and measures aimed at implementing the recommendations from the feasibility study	MOE Government	Second half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Implemented
2. Increasing transparency of concession awarding	2.1. Public disclosure of concession agreements for the exploitation of raw materials	MOE MoEPP MoAFWE	Second half of 2022 – continuously	Pending	Ongoing	Not Implemented	Not Implemented	Implemented
3.Development of mechanisms for determining and collecting the actual concession fee for exploited raw materials	3.1. Analysis and revision of the amount of the concession fee and the level of its collection	MOE MoEPP MoAFWE	First half of 2021 – continuously	Implemented	Implemented	Not Implemented	Not Implemented	Implemented
	3.2. Development of a methodology and mechanisms for determining a realistic concession fee	MoE	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Ongoing

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4. Increasing control over the exploitation of raw materials under granted concessions	4.1. Increasing the number of employees in inspection services	MoE MoEPP	First half of 2021	Ongoing	Not Implemented	Not implemented	Not implemented	Implemented
	4.2. Conducting trainings for employees in the competent inspection services	MoH	First half of 2021	Not Implemented	Not implemented	Not implemented	Not implemented	Not implemented
Problem 3: Lack of registers of property owned by the Republic of North Macedonia and LSGs								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishment of a unified register of real estate in the Republic of North Macedonia	1.1. Updating the electronic records of real estate in state ownership, as well as real estate owned by the state and used by state authorities and legal entities established by the state and LSGs	RECA	First half of 2021 -continuously	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
	1.2 Ensuring transparency by introducing an option for open search of state-owned property on the distribution portal of the Real Estate Cadaster Agency (by single identification number, name of state authority, type of real estate, and other criteria)	RECA	First half of 2021 - continuously	Not Implemented	Ongoing	Not Implemented	Not Implemented	Not Implemented
2. Establishment of a publicly accessible register of motor	2.1 Upgrade the existing motor vehicle register maintained by	Moi	Second half of 2021	Not Implemented	Not Implemented	Not implemented	Not implemented	Ongoing

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vehicles owned by public sector institutions and LSGs (except for vehicles intended for special purposes)	the MoI to allow data to be publicly accessible and easily searchable by institutions							
Problem 4: Insufficient involvement of smaller economic entities in the process of creating economic or other policies relevant to the business community								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Increasing the transparency of the process of developing economic and other relevant policies for the business community	1.1. Amendment of the Regulatory Impact Assessment (RIA) Methodology to ensure more detailed disclosure of the reasons for adopting a specific legal solution, the main proposals considered (and their proponents), and the impact of the selected solution on the economic climate and the business community	MISA	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Not Implemented
	1.2. Conducting training, mentorship, and support for micro and small enterprises to build common positions and approach regarding policies that affect the economic climate and the conditions for their business operations in the country	AES Civil sector Business associations	First half of 2022 - continuously	Pending	Implemented	Implemented	Implemented	Implemented

To address the **Problem 1: Lack of a register of state aid granted to economic operators owned by domestic and foreign legal entities**, one measure was foreseen: **Measure 1: Establishment, public disclosure, and updating of a register containing information on each form of state aid**, with one *Activity 1.1: Development of a state aid register within the Commission for Protection of Competition*. The deadline for the implementation of this activity was the **second half of 2022**, and it falls under the competence of the **CPC**. This activity further remains **“Not implemented”**. The CPC reported that the activity has not been implemented due to the financial implications for the Commission, as well as the involvement of other state institutions in the development/implementation of the register (Government of the Republic of North Macedonia and Ministry of Finance).

Problem 2: Excessive awarding of concessions, insufficient transparency of concession agreements, and underdeveloped mechanisms for determining the actual concession fee for exploited raw materials.

Measure 1: Optimization of the use of natural resources with a view to environmental protection includes the following activities:

- *Activity 1.1: Preparation of a feasibility study to assess the situation regarding the use of natural resources by sector/area.* The deadline for the implementation of this activity was the **second half of 2021**, and it falls under the competence of the **MoEMMR**, in accordance with the Law Amending and Supplementing the LOWBSA. The MoEMMR reported that the activity has been **“Implemented”** in 2025 through the preparation of the *Strategy for Geological Exploration and Sustainable Utilization and Exploitation of Mineral Raw Materials of the Republic of North Macedonia 2025–2045*, which was submitted to the Government of the RNM (https://gsgovmk-my.sharepoint.com/:b:/g/personal/teodora_cvetkoska_energy_gov_mk/IQBQix1CgT1KS5KWaOYkrQ3SAcQh5BwttKxCnHuLchy2f9c?e=Siwnwj), and adopted on the 27 January 2026 and published in the Official Gazette of the Republic of North Macedonia No.17 dated 29.01.2026 (https://gsgovmk-my.sharepoint.com/:b:/g/personal/teodora_cvetkoska_energy_gov_mk/IQBnDIRx6BMqQYVz52fh-vjLASXL4fgYd-kmkZVR8jSewgI?e=QEZPVp).
- *Activity 1.2: Adoption of policies and measures aimed at implementing the recommendations from the feasibility study.* The deadline for the implementation of this activity was the **second half of 2022**, and it falls under the competence of the **MoEMMR**, in accordance with the Law Amending and Supplementing the LOWBSA. The MoEMMR reported that the activity has been **“Implemented”** through the preparation of the *Strategy for Geological Exploration and Sustainable Utilization and Exploitation of Mineral Raw Materials of the Republic of North Macedonia 2025–2045*, in which the policies and measures for the management and use of natural resources are defined in three priority areas (economy, environment and social protection) via general and specific objectives,

measures and activities set out in the Action Plan with a defined timeframe for the implementation of the measures.

Measure 2: Increasing transparency of concession awarding includes *Activity 2.1: Public disclosure of concession agreements for the exploitation of raw materials*, foreseen to be implemented in the **second half of 2022 and continuously**, and it falls under the competence of the **MoEMMR**, according to the previous year's report from the Ministry of Economy and Labor, in line with the Law Amending and Supplementing the LOWBSA. On the website of the MoEMMR, scanned copies of concluded concession agreements for the exploitation of raw materials are published and are continuously being uploaded (<https://energy.gov.mk/mk-MK/dokumenti/dogovori-za-koncesija>). Therefore, the activity is assessed as **"Implemented"**.

Measure 3: Development of mechanisms for determining and collecting the actual concession fee for exploited raw materials includes the following two activities:

- *Activity 3.1: Analysis and revision of the amount of the concession fee and the level of its collection*, foreseen for the **first half of 2021 and continuously**, was originally under the competence of the **MoE (MoEL)**, but, like in previous activities, it is now under the competence of the **MoEMMR**. In the current reporting period, the MoEMMR reported that this activity has been **"Implemented"**. Based on a detailed analysis, a new Tariff Book on determining the amount of the concession fee for conducting detailed geological exploration and exploitation of mineral raw materials was adopted (Official Gazette of the Republic of North Macedonia No.268/24) dated 25.12.2024, which comes into effect as of 01.01.2025 and it revised the level of the concession fee. The collection of the concession fee for land use and for exploited sold quantities is subject to continuous monitoring.
- *Activity 3.2: Development of a methodology and mechanisms for determining a realistic concession fee*, scheduled for the **second half of 2021**, was originally under the competence of the **MoE (MoEL)**, and since 2024 it is under the competence of the **MoEMMR**. The institution reported that a new Tariff Book is being developed with the aim of establishing a realistic concession fee, derived from the Law on Mineral Raw Materials. During the preparation of the Tariff Book, and with the aim of establishing a realistic concession fee, a comparative analysis is conducted in relation to the market price of mineral raw materials. This market price varies across the countries in the region, as well as in European and global markets (https://gsgovmk-my.sharepoint.com/:b:/g/personal/teodora_cvetkoska_energy_gov_mk/IQBlabj4FNaoSqKIzO_UVFzZAcQdCCwTWkep9IMuij0Kvss?e=X82twb). The MoEMMR stated that a process is under way for the drafting of the Law on Mining, which will define the procedure for adopting the Tariff Book. This Tariff Book will determine the level of fees for issuing permits and concessions for the exploitation of mineral raw materials, depending on the type, quantity, quality, processing method of the mineral resources, the degree of resource utilization,

and the methodology for quality classification of marble and architectural-building stone. The activity is considered “**Ongoing**” until the adoption of the relevant law and the establishment of the methodology and mechanisms for determining a real concession fee.

Measure 4: Increasing control over the exploitation of raw materials under granted concessions also includes two activities:

- *Activity 4.1: Increasing the number of employees in inspection services.* The deadline for the implementation of this activity was the **first half of 2021 and continuously**. It was initially under the competence of the **MoE (MoEL)**, and since 2024, it falls under the competence of the **MoEMMR**. The institution reported that the activity aimed at increasing the number of employees in the inspection services has been “**Implemented**”. Namely, in 2025, two additional inspectors were employed in the State Inspectorate for Energy, Mining and Mineral Raw Materials, which operates within the Ministry of Energy, Mining and Mineral Resources. As a result, the total number of employees in the inspectorate amounts to 16 persons, of which 13 are inspectors.
- *Activity 4.2: Conducting trainings for employees in the competent inspection services.* The deadline for the implementation of this activity was the **first half of 2021**, and it falls under the competence of the **MoH**. Although in the past four years the MoH has stated that it is not the competent institution, this year it reported that the activity has been “implemented”. The MoH also informed that all planned trainings for the competent inspection services have been conducted; however, the measure concerns strengthening control over the exploitation of raw materials after granting the concessions. Given that the MoH is realistically not competent institution for the stated activity, as well as the fact that no implemented training program has been submitted for review to the SCPC regarding the content of the trainings, the activity is assessed as “**Not implemented.**”

Problem 3: Lack of registers of property owned by the Republic of North Macedonia and LSGs

Measure 1: Establishment of a unified register of real estate in the Republic of North Macedonia includes the following activities:

- *Activity 1.1: Updating the electronic records of real estate in state ownership, as well as real estate owned by the state and used by state authorities and legal entities established by the state and LSGs.* The deadline for the implementation of this activity was the **first half of 2021 and continuously**, and it falls under the competence of the Real Estate Cadaster Agency (**RECA**). This activity is assessed as “**Ongoing**,” as in previous reports. According to the report, the register of state-owned real estate has been established, and its updating depends on the timely submission by institutions of decisions on registration of ownership rights, decisions on granting permanent use of immovable property, and similar acts.

- *Activity 1.2: Ensuring transparency by introducing an option for open search of state-owned property on the distribution portal of the Real Estate Cadaster Agency (by single identification number, name of state authority, type of real estate, and other criteria).* The deadline for the implementation of this activity was the **first half of 2021 and continuously**, and it falls under the competence of the **RECA**. According to the submitted report by the RECA, this activity has not been initiated at all, and is therefore assessed as **“Not implemented”**.

Measure 2: Establishment of a publicly accessible register of motor vehicles owned by public sector institutions and LSGs (except for vehicles intended for special purposes) includes one *Activity 2.1: Upgrade the existing motor vehicle register maintained by the Mol to allow data to be publicly accessible and easily searchable by institutions.* The deadline for the implementation of this activity was the **second half of 2021**, and it falls under the competence of the **Mol**. This activity is assessed as **“Ongoing”**. According to the report, a technical specification has been prepared for the development of a software for a vehicle register (as a fully integrated web solution) with a single centralized database. The tender documentation for the development of vehicle register software has also been prepared, and a tender for its procurement has been published.

Problem 4: Insufficient involvement of smaller economic entities in the process of creating economic or other policies relevant to the business community. For this problem, a single **Measure 1: Increasing the transparency of the process of developing economic and other relevant policies for the business community**, has been foreseen and it includes the following activities:

- *Activity 1.1: Amendment of the Regulatory Impact Assessment (RIA) Methodology to ensure more detailed disclosure of the reasons for adopting a specific legal solution, the main proposals considered (and their proponents), and the impact of the selected solution on the economic climate and the business community.* The deadline for the implementation of this activity was the **second half of 2021**, and it falls under the competence of the **MISA (MoPA)**. As in previous years, the status of this activity is **“Not implemented”**. The MoPA informed that the activity is **“Ongoing”**. According to the 2023-2030 Strategy for Public Administration Reform, the preparation of new regulatory impact assessment (RIA) acts is foreseen, including RIA methodology, instructions on the procedure for ministries in implementing RIA and decision on the form and content of the RIA report. However, it is evident that no activities have been initiated aimed at amending the current methodology.
- *Activity 1.2: Conducting training, mentorship, and support for micro and small enterprises to build common positions and approach regarding policies that affect the economic climate and the conditions for their business operations in the country.* The deadline for the implementation of this activity was the **first half of 2022 and continuously**, and it falls under the competence of the **AES**. This activity is assessed as **“Implemented”** in this evaluation period, as in

previous years. In 2025, the economic operator responsible for the implementation of workshops aimed at raising awareness on digitalization among small and medium-sized enterprises, organized six workshops with a total of 100 participants in the following cities: on 07.11.2025 in Bitola, on 12.11.2025 in Shtip, on 18.11.2025 in Strumica, on 18.11.2025 in Ohrid, on 26.11.2025 in Prilep and on 28.11.2025 in Kochani. The participant profile consisted of a diverse audience – representatives of medium and small enterprises, young people, and women entrepreneurs. The selection of thematic content focused on the current needs of the economy, particularly digitalization.

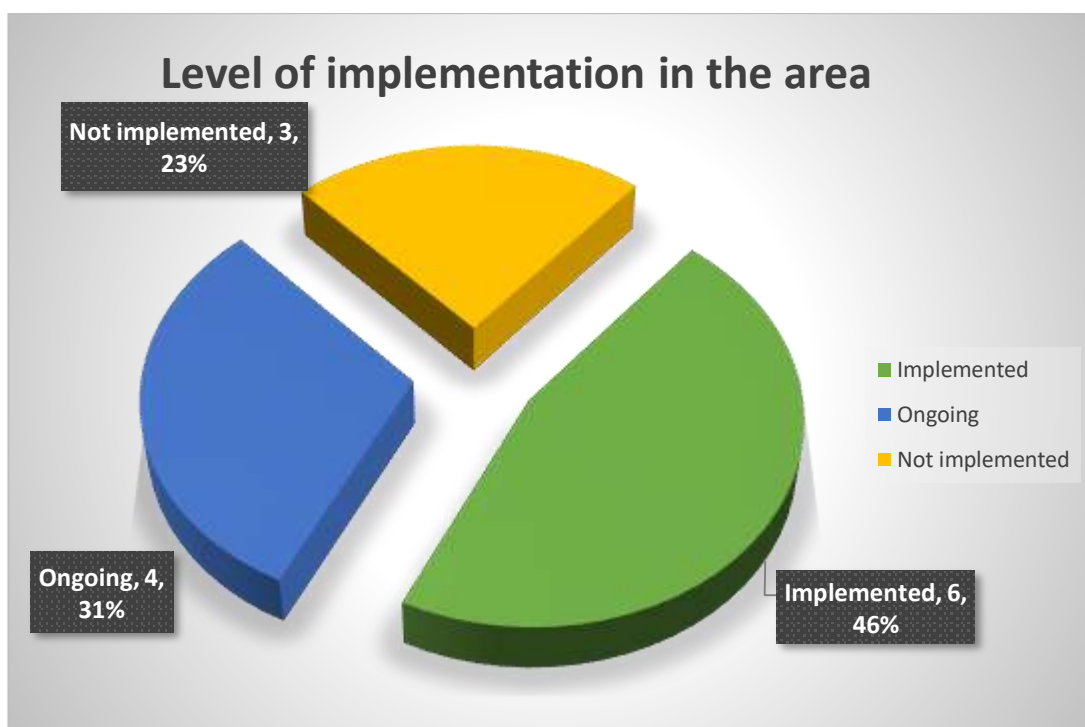


Figure 32: Overall level of implementation within the sector

Out of a total of 13 activities stipulated in the Strategy for the economy and business sector, 6 activities have been implemented (46%), 4 activities have not been implemented (31%) and 3 activities are ongoing (23%).

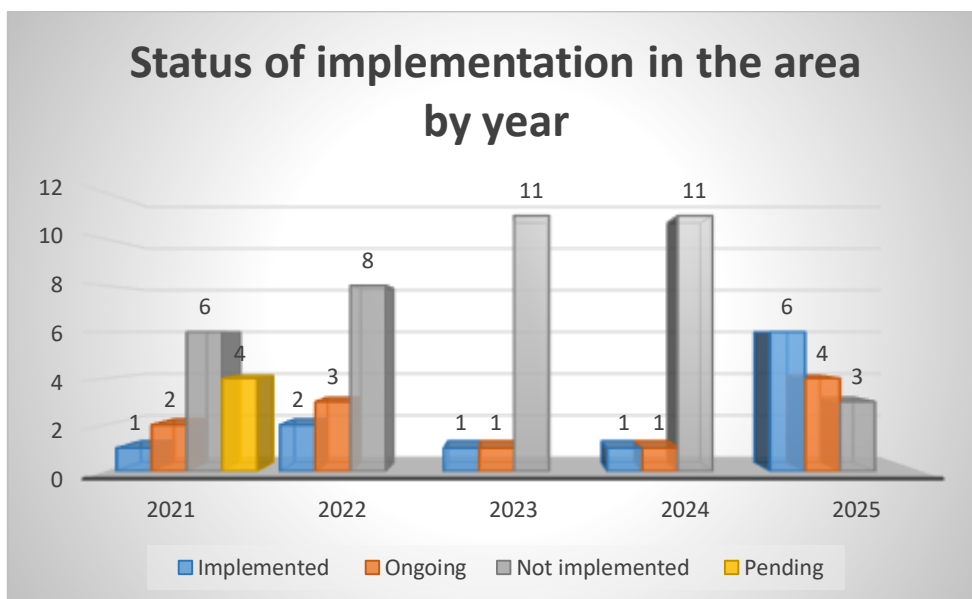


Figure 33: Status of activities, by evaluation period

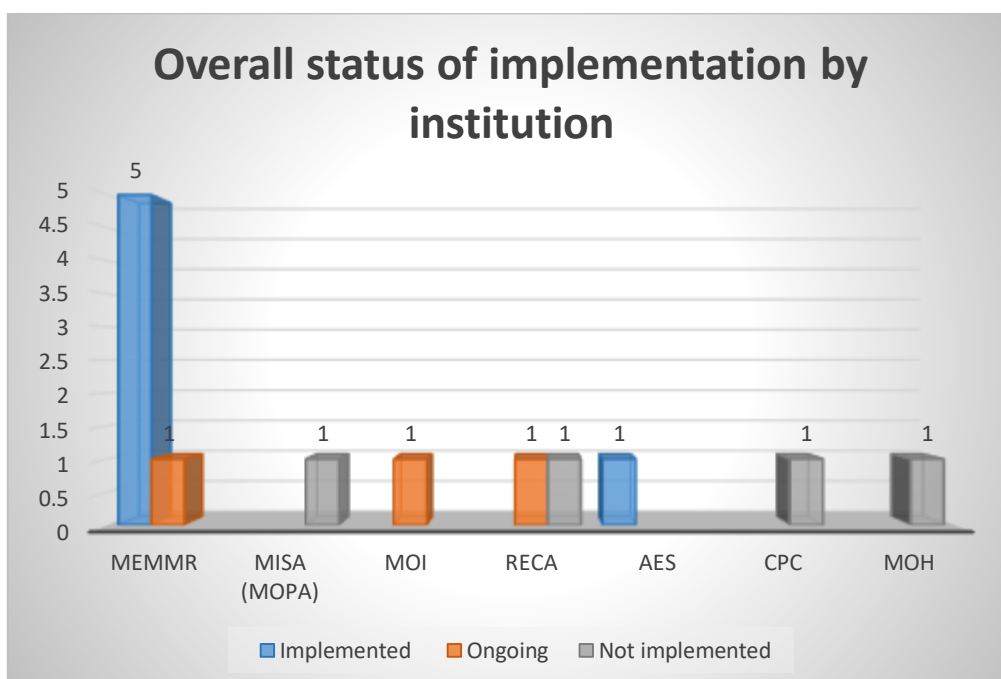


Figure 34: Overall status of activities, by institutions

- 6 activities have been foreseen for the MoEMMR, of which 5 have been implemented, and one is ongoing.
- 1 activity has been foreseen for the MoPA and it has not been implemented.
- 1 activity has been foreseen for the MoI, and it is ongoing.
- 2 activities have been foreseen for the RECA, of which one activity is ongoing and one activity is not implemented.
- 1 activity has been foreseen for the AES, and it has been implemented.
- 1 activity has been foreseen for the CPC, which has not been implemented.

- 1 activity has been foreseen for the MoH, which has not been implemented.

16. SECTOR - PUBLIC ENTERPRISES AND STOCK-COMPANIES OWNED BY THE STATE AND LSGs

Sector description

In relation to the sector of public enterprises and companies owned by the state and LSGs, the Strategy identifies the following three priority problems:

- 1) Lack of unified and official information on legal entities owned by the state and LSGs;
- 2) Lack of a systemic approach to preventing corruption in enterprises owned by the state and the LSGs;
- 3) Inadequate legal framework for the operation of enterprises owned by the state and LSGs.

Regarding the implementation of measures and activities aimed at addressing the problems in the economy and business sector, the following institutions are competent:

- 1) The Government,
- 2) MOE,
- 3) SCPC,
- 4) MoLG,
- 5) MoF,
- 6) Central Registry of the Republic of North Macedonia (hereinafter: CR of RNM).

Level of activities' implementation

In the sector of public enterprises and stock-companies owned by the state and LSGs, three problems have been identified. To address these problems, the Action Plan of the Strategy stipulates 3 measures and 5 activities during the reporting period.

Based on the received data and the conducted analysis regarding the implementation of the measure and activity in the sector of public enterprises and stock-companies owned by the state and LSGs, the situation is as follows:

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Problem 1: Lack of unified and official information on legal entities owned by the state and LSGs								
Measure	Activity	Competent institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Development of a unified database of legal entities established under the Law on Public Enterprises and the Law on Trading Companies, in which the state and LSGs are owners or hold ownership shares	1.1. Establishment and updating of a register with data on ownership and financial performance of enterprises	MoE MoLSG MoF CR of RNM	First half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
Problem 2: Lack of a systemic approach to preventing corruption in enterprises owned by the state and the LSGs								
Measure	Activity	Competent institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Introduction and implementation of an anti-corruption program for enterprises in dominant ownership of the state and LSGs	1.1. Development of an anti-corruption program for enterprises in dominant ownership of the state and LSGs	SCPC	Second half of 2023	Pending	Pending	Implemented	/	/
	1.2. Adoption of the anti-corruption program for enterprises in dominant ownership of the state and LSGs by the Government	Government	First half of 2024	Pending	Pending	Pending	Not Implemented	Not Implemented
	1.3. Establishing effective monitoring of the implementation of the program	Government	Second half of 2024-continuously	Pending	Pending	Pending	Not Implemented	Not Implemented
Problem 3: Inadequate legal framework for the operation of enterprises owned by the state and LSGs								
Measure	Activity	Competent institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025

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1. Establishing a unified legal framework for the operation of trading companies in dominant state ownership and public enterprises established by the Government and LSGs	1.1. Comparative analysis of legislation of the countries in the region and EU member-states in order to identify good solutions	MoE	Second half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented
	1.2. Adoption of a single law regulating the operation of these categories of legal entities	MoE	First half of 2023	Pending	Pending	Not Implemented	Not Implemented	Ongoing

Regarding the **Problem 1: Lack of unified and official information on legal entities owned by the state and LSGs**, the following has been foreseen: **Measure 1: Development of a unified database of legal entities established under the Law on Public Enterprises and the Law on Trading Companies, in which the state and LSGs are owners or hold ownership shares**, along with the *Activity 1.1: Establishment and updating of a register with data on ownership and financial performance of enterprises*. The deadline for implementation was the **first half of 2022**, and it falls under the competence of the **MoE (MoEL)**. This activity remains **“Not implemented”** as in previous reporting periods. The MoEL informed that a draft law is currently prepared, which foresees the establishment of a register; however, it does not include data on ownership. Instead, it is indicated that ownership will be included in a separate register.

Regarding the **Problem 2: Lack of a systemic approach to preventing corruption in enterprises owned by the state and the LSGs**, the following has been foreseen: **Measure 1: Introduction and implementation of an anti-corruption program for enterprises in dominant ownership of the state and LSGs**.

- *Activity 1.2: Adoption of the anti-corruption program for enterprises in dominant ownership of the state and LSGs by the Government*. The deadline for the implementation of this activity is the **first half of 2024**, and it falls under the competence of the **Government**. The Government of RNM informed that the anti-corruption program adopted by the SCPC in 2023 has not been adopted within the foreseen timeframe, and therefore the activity is assessed as **“Not implemented”**.
- *Activity 1.3: Establishing effective monitoring of the implementation of the program*. The deadline for the implementation of this activity is the **second half of 2024 and continuously**, and it falls under the competence of the **Government**. Because the anti-corruption program was not adopted within the prescribed deadline, the activity is assessed as **“Not implemented”**.

Regarding the **Problem 3: Inadequate legal framework for the operation of enterprises owned by the state and LSGs**, the following has been foreseen: **Measure 1: Establishing a unified legal framework for the operation of trading companies in dominant state ownership and public enterprises established by the Government and LSGs**, which includes the following activities:

- *Activity 1.1: Comparative analysis of legislation of the countries in the region and EU member-states in order to identify good solutions*, scheduled for the **second half of 2022** and under the competence of the **MoEL**. The institution reported that the activity is assessed as **“Not implemented,”** although the report indicates that a comparative analysis was carried out during the preparation of a draft strategy and a draft law on public enterprises and trading companies.
- *Activity 1.2: Adoption of a single law regulating the operation of these categories of legal entities*. The deadline for the implementation of this activity is the **first half of 2023 and continuously**, and it falls under the competence of the **MoEL**. This activity was assessed as **“Not implemented”**; however, in 2025, the MoEL conducted a comparative analysis, after which a draft strategy and draft law on

public enterprises and trading companies in state ownership were prepared. These aim to regulate the operation of these categories of legal entities, but they do not cover public enterprises and trading companies established by the local self-government, that is, municipalities and the City of Skopje. For this reason, the activity is assessed as “Ongoing”.

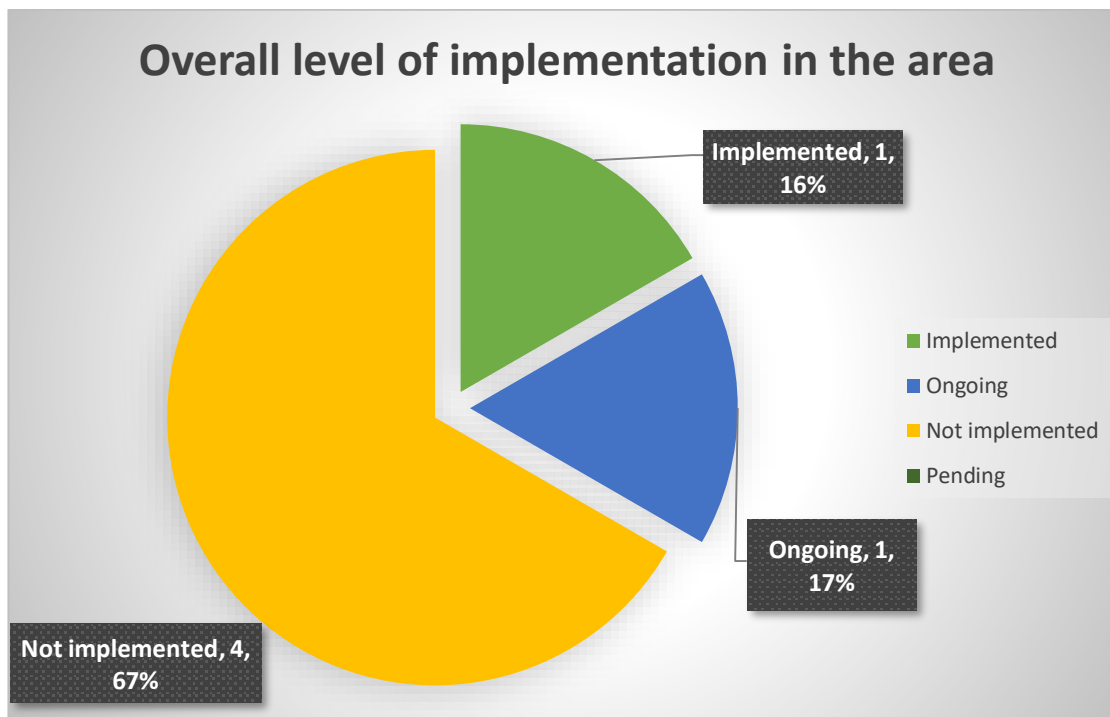


Figure 35: Overall level of implementation within the sector

Out of a total of 6 activities stipulated in the Strategy for the sector of public enterprises and stock-companies owned by the state and LSGs, one activity has been Implemented (16%), 4 activities have not been implemented (67%), and one activity is ongoing (16, %).

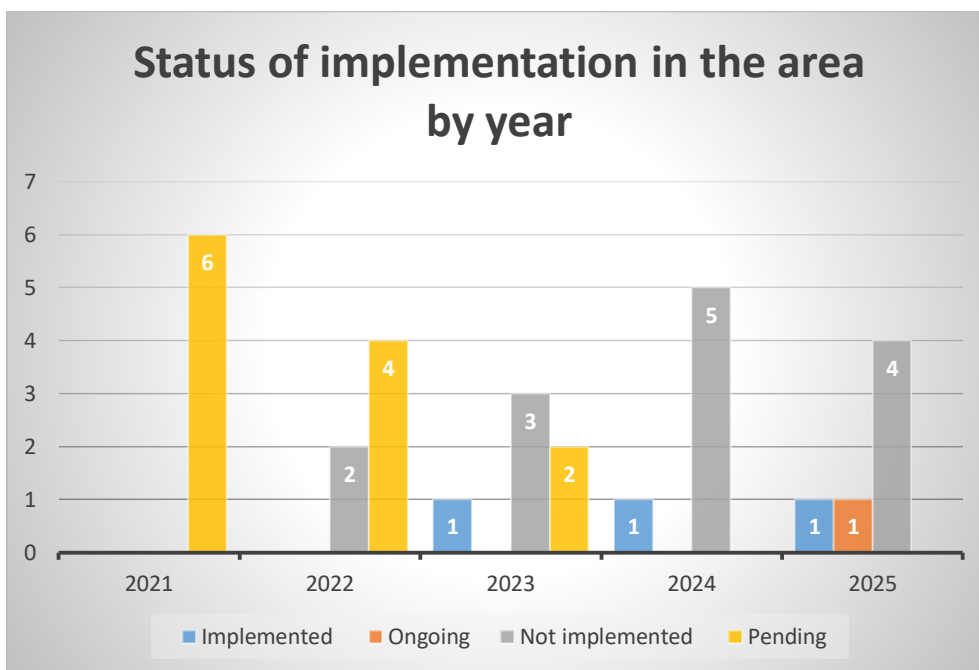


Figure 36: Status of activities, by evaluation period

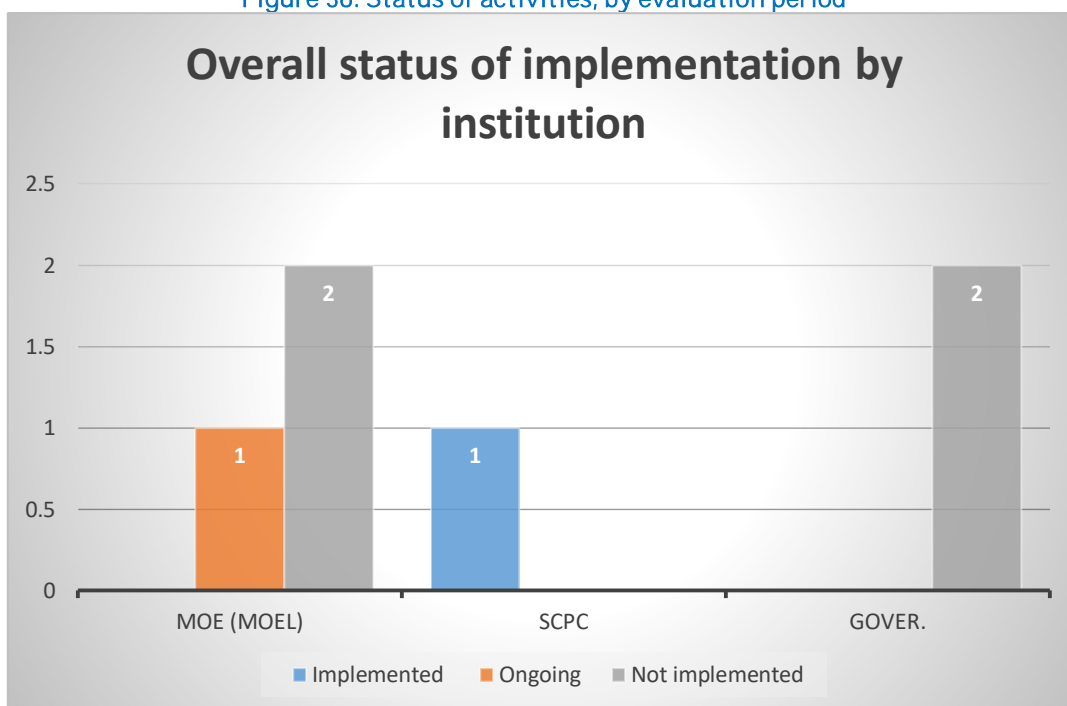


Figure 37: Overall status of activities, by institutions

- A total of 3 activities have been foreseen for the MoEL, of which two have not been implemented, and one is ongoing.
- 1 activity has been foreseen for the SCPC, which has been implemented.
- Two activities have been foreseen for the Government, which have not been implemented.

17. SECTOR - MEDIA AND CIVIL SOCIETY

Sector description

In relation to the media and civil society sector, the Strategy identifies the following three priority problems:

- 1) Insufficient transparency of public sector institutions regarding cooperation with media, online portals, marketing agencies, and media workers;
- 2) Absence of a legal basis for the regulation and registration of online media;
- 3) Strengthening the transparency of institutions in planning funds for financing CSOs, as well as for accountability of implementation and impact of projects

Regarding the implementation of measure and activities aimed at addressing the problems in the media and civil society sector, the following institutions are competent:

- 1) The Government,
- 2) MISA
- 3) MoJ,
- 4) MoF
- 5) Association of Journalists of Macedonia (hereinafter: AJM),
- 6) Council of Media Ethics (hereinafter: CMEM) and
- 7) Economic Chamber

Level of activities' implementation

In the media and civil society sector, three problems have been identified. To address the problems, the Action Plan of the Strategy stipulates 4 measures and 5 activities during the reporting period.

The SCPC conducted a verification and analysis of the data regarding the implementation of the measures and activities in the media and civil society sector and established the following situation:

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Problem 1: Insufficient transparency of public sector institutions regarding cooperation with media, online portals, marketing agencies, and media workers								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Establishing an obligation for the public sector institutions to submit reports on concluded and implemented contracts with media, online portals, marketing agencies, and media workers	1.1. Amendments to the Law on the Agency for Audio and Audiovisual Media Services (AVMU) introducing an obligation for public sector institutions and local self-government units (LSGs) to publicly disclose reports on concluded and implemented contracts of any kind with media, online portals, marketing agencies, and media workers.	MISA	First half of 2022	Pending	Not Implemented	Ongoing	Ongoing	Not Implemented
	2. Improving the criteria for awarding state aid to print media	2.1. Analysis of existing criteria for awarding state aid	Government	First half of 2022	Pending	Ongoing	Ongoing	Implemented
	2.2. Amendment of the decision on the program for support of print media and distribution of print media	Government	Second half of 2022	Pending	Not Implemented	Ongoing	Implemented	/
Problem 2: Strengthening self-regulation in relation to online media								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Strengthening self-regulation in relation to online media	1.1. Analysis of the situation of online media in terms of professionalism and integrity in their operations	AJM and CMEM	Second half of 2021	Ongoing	Ongoing	Not Implemented	Not Implemented	Implemented

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	1.2. Establishing mechanisms to strengthen self-regulation of online media	AJM and CMEM	Second half of 2021	Implemented	/	/	/	/
2. Upgrading the register of professional online media	2.1. Adoption and application of positive international practices for upgrading the register of professional online media	AJM and CMEM	Second half of 2021 - continuously	Implemented	Ongoing	Not implemented	Implemented	Implemented
Problem 3: 3) Strengthening the transparency of Institutions in planning funds for financing CSOs, as well as for accountability of Implementation and Impact of projects								
Measure	Activity	Competent Institution	Implementation deadline	Status 2021	Status 2022	Status 2023	Status 2024	Status 2025
1. Strengthening the transparency of institutions in planning funds for financing CSOs, as well as accountability for the implementation and impact of projects	1.1. Amending and supplementing the Law on Associations and Foundations to prescribe an obligation to establish a unified database containing information on allocated funds and the impact of projects for all CSOs receiving funds from public institutions and LSGs	MoJ MoF MISA	First half of 2022	Pending	Ongoing	Ongoing	Not implemented	Ongoing
	1.2. Amending and Supplementing the Law on Associations and Foundations in order to prescribe an obligation for public institutions and LSGs to regularly update the unified database	MoJ MoF MISA	First half of 2022	Pending	Ongoing	Ongoing	Not implemented	Ongoing

Problem 1: Insufficient transparency of public sector institutions regarding cooperation with media, online portals, marketing agencies, and media workers.

Measure 1: Establishing an obligation for the public sector institutions to submit reports on concluded and implemented contracts with media, online portals, marketing agencies, and media workers, includes three activities, of which two were implemented last year. The *Activity 1.1: Amendments to the Law on the Agency for Audio and Audiovisual Media Services (AVMU) introducing an obligation for public sector institutions and local self-government units (LSGs) to publicly disclose reports on concluded and implemented contracts of any kind with media, online portals, marketing agencies, and media workers* remains to be implemented. The deadline for the implementation of this activity was the **first half of 2022**, and it falls under the competence of the **MISA (MDT)**. This activity is assessed as **“Not implemented”**. The MDT reported that in December 2025, it initiated the process of aligning the Macedonian with the European legislation, within which a process will be undertaken to prepare a Strategy for the development of the media sector with an Action Plan, as well as the transposition of the European Media Freedom Act in the domestic legislation. The MDT informed that in this process, the recommendations, measures and activities contained in the area 5.13 Media and civil society, will be taken into account.

Problem 2: Strengthening self-regulation in relation to online media.

Measure 1: Strengthening self-regulation in relation to online media includes two activities, the second of which was implemented in 2021:

- *Activity 1.1: Analysis of the situation of online media in terms of professionalism and integrity in their operations*, with implementation deadline in the **second half of 2021**, and under the competence of the Association of Journalists of Macedonia (**AJM**). This activity has been **“implemented”**. Although the AJM did not submit a formal report on the activity, a review and analysis of available documents in the field of online media professionalism and integrity shows that certain analyses have been conducted, particularly regarding professionalism and integrity in online media operations. Relevant analyses, guides, and guidelines are available at the following links:
https://www.undp.org/sites/g/files/zskgke326/files/2024-01/media_integrity_guide_mk_final_0.pdf;
[znm.org.mk/wp-content/uploads/2023/11/MK-Fact-Finding-PFM-Report-251023-web-final.pdf](https://www.znm.org.mk/wp-content/uploads/2023/11/MK-Fact-Finding-PFM-Report-251023-web-final.pdf);
<https://semm.mk/nasoki-za-etichko-izvestuvanje-na-onlajn-mediumite/>.

Measure 2: Upgrading the register of professional online media includes one *Activity 2.1: Adoption and application of positive international practices for upgrading the register of professional online media*. The deadline for the implementation of this activity is the **second half of 2021 - continuously**, and it falls under the competence of the **AJM**. This activity is assessed as **“Implemented”** for the current reporting period. The AJM did not submit a report for this period. However, a review of the website of the

Agency for Audio and Audiovisual Media Services (AAVMS) shows that in June 2025 a Rulebook was adopted on the form and content of the application for entry in the register of online media publishers-Internet portals. The conditions that publishers must meet to be entered in this register are set out in Article 5 of the Rulebook:

- to have registered their activity in the Central Registry of the Republic of North Macedonia;
- to have a registered seat and editorial office in the Republic of North Macedonia;
- to have registered a Macedonian .mk or .mkd Internet domain; and
- to meet the minimum staffing requirements set out in Article 5 paragraphs 11 and 12 of the Law on Media.

To address the **Problem 3: Strengthening the transparency of institutions in planning funds for financing CSOs, as well as accountability for the implementation and impact of projects**, the following has been foreseen, that is, **Measure 1: Strengthening the transparency of institutions in planning funds for financing CSOs, as well as accountability for the implementation and impact of projects**, which includes *Activity 1.1: Amending and supplementing the Law on Associations and Foundations to prescribe an obligation to establish a unified database containing information on allocated funds and the impact of projects for all CSOs receiving funds from public institutions and LSGs* and *Activity 1.2: Amending and Supplementing the Law on Associations and Foundations in order to prescribe an obligation for public institutions and LSGs to regularly update the unified database*. The deadline for the implementation of these activities was the **first half of 2022**, and both activities fall under the competence of the **MoJ**. The institution reported that a draft new Law on Associations and Foundations has been prepared and published on ENER, which includes provisions aimed at strengthening transparency in the planning of funds for financing CSOs, as well as accountability for the implementation and impact of projects. Therefore, the status of these two activities is assessed as **“Ongoing”**.

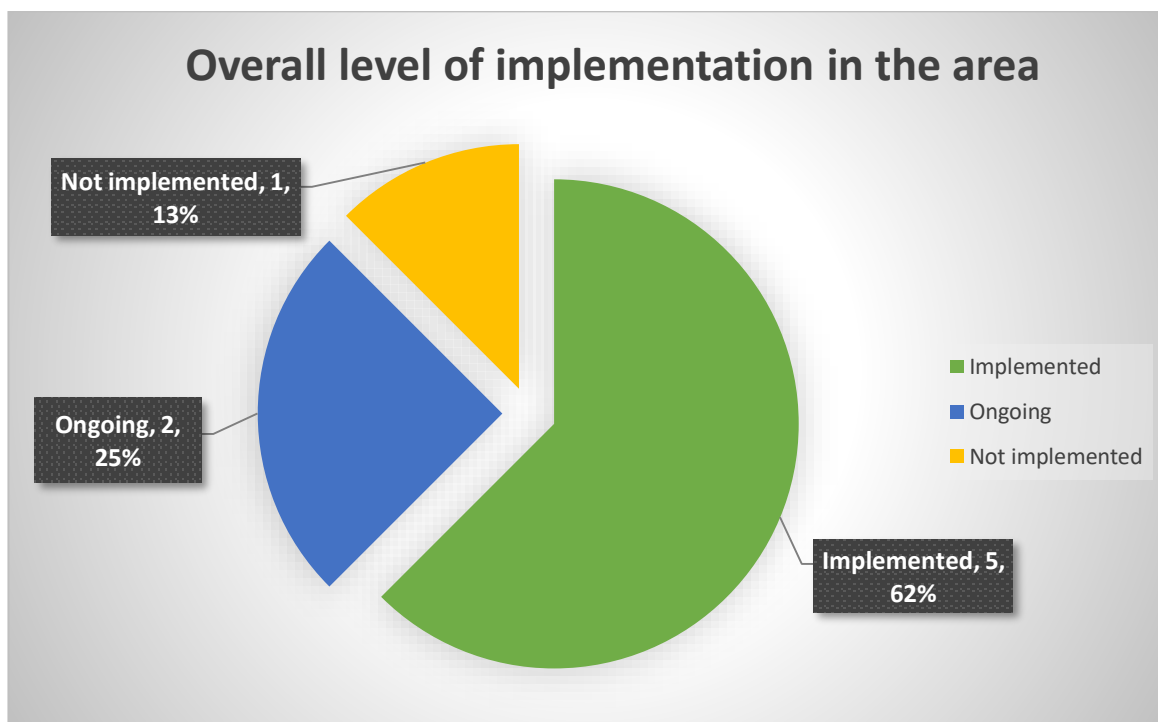


Figure 38: Overall level of implementation within the sector

Out of a total of 8 activities stipulated in the Strategy for the media and civil society sector, 5 activities have been implemented (62%), one activity has not been implemented (13%), while two activities are ongoing (25%).

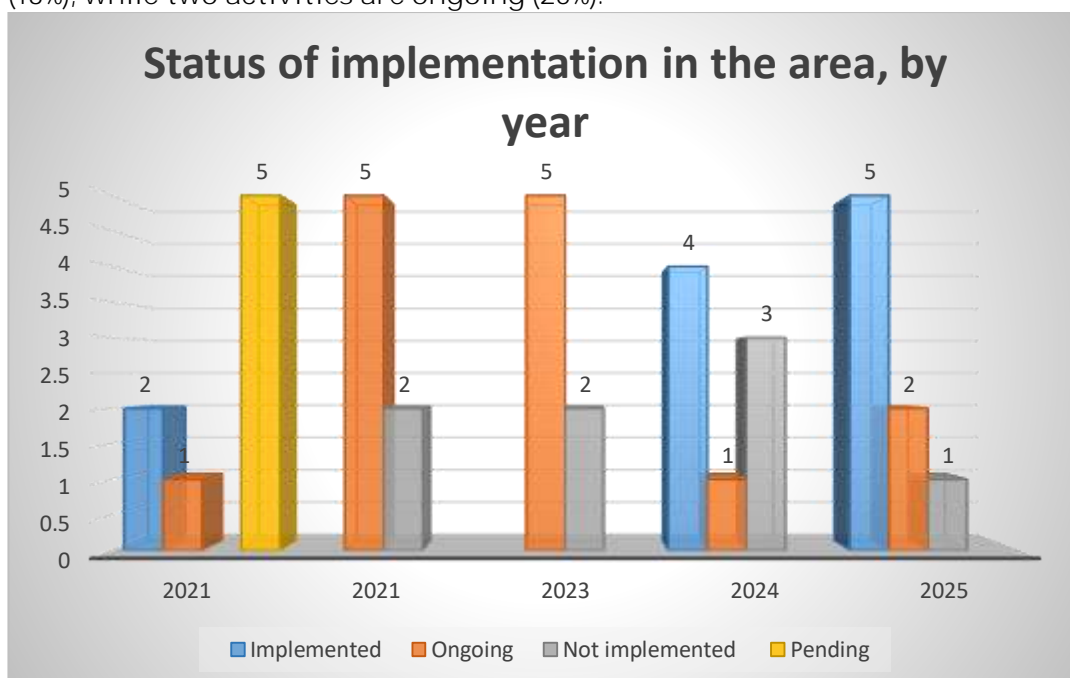


Figure 39: Status of activities by evaluation period

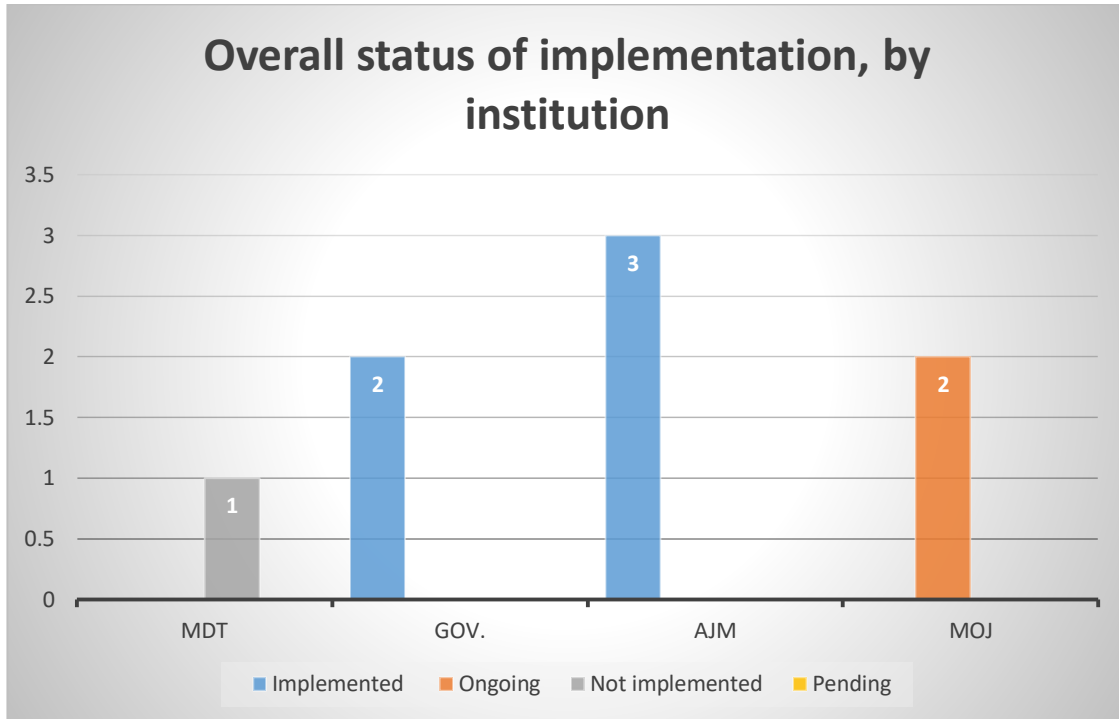


Figure 40: Overall status of activities, by institutions

- 1 activity has been foreseen for the MDT which is not yet implemented.
- 2 activities have been foreseen for the Government, and both have been implemented.
- 2 activities have been foreseen for the AJM and have been implemented.
- 2 activities have been foreseen for the MoJ which are ongoing.