



FINAL REPORT ON THE IMPLEMENTATION OF THE
2021-2025 NATIONAL STRATEGY FOR THE PREVENTION OF
CORRUPTION
AND CONFLICT OF INTEREST

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

Final Report on the Implementation of the 2021-2025 National Strategy for the Prevention of Corruption and Conflict of Interest for the period from 01.01.2021 – 31.12.2025

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

INTRODUCTION

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

In January 2019, the Assembly of the Republic of North Macedonia adopted the current Law on the Prevention of Corruption and Conflict of Interest (hereinafter: LPCCI), aimed to regulate measures and activities for:

- Preventing corruption in the exercise of public authority, public powers, official duties, and politics,
- Preventing conflict of interest and
- Preventing corruption in the performance of activities of public interest by legal entities related to the exercise of public authorizations.

In accordance with the LPCCI, the State Commission for Prevention of Corruption (SCPC) is competent authority responsible for the implementation of measures and activities to combat corruption and conflict of interest (hereinafter: SCPC), which is guaranteed full autonomy and independence in performing its work within its remit. Within its competences, the SCPC adopts a five-year National Strategy for Prevention of Corruption and Conflict of Interest, along with an Action Plan for its implementation. The National Strategy is submitted to the Assembly of the Republic of North Macedonia (hereinafter: the Assembly) for adoption.

The current National Strategy for Prevention of Corruption and Conflict of Interest (hereinafter: the Strategy) was adopted on 10 December 2020 for the period 2021-2025. It is grounded on a previously conducted corruption risk analysis and was drafted through a broad, transparent and inclusive consultation process involving representatives from the public and private sectors, the media, civil associations and foundations, experts, and representatives of relevant international organizations. The Strategy was adopted by the Assembly in April 2021. An integral part of the Strategy is the Action Plan in which the identified measures are elaborated in details through activities and indicators.

The problems and measures in the Strategy are systematized into 2 horizontal areas and 13 vulnerable sectors, as follows:

1. Public procurements – horizontal area
2. Employment – horizontal area
3. Political System
4. Judiciary
5. Law enforcement authorities
6. Health
7. Education
8. Labor and social policy
9. Urbanism and physical planning
10. Environment

11. Agriculture
12. Sport
13. Economy and business
14. Public enterprises and joint-stock companies owned by the state and LSGs
15. 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 and a final report on the implementation of the National Strategy, which are submitted to the Assembly no later than 31 March of the current year for the previous year.

Given that the Strategy covers the period from 2021 to 2025, this document represents the Final Report on the implementation of the measures from the National Strategy for Prevention of Corruption and Conflict of Interest for the period from 01.01.2021 to 31.12.2025. The annual reports for all previous reporting periods since the adoption of the Strategy have been adopted by the SCPC and submitted to the Assembly within the legally prescribed deadline, and are publicly available on the SCPC website.

This report consists of a total of 19 sections, that is: an Introduction, an Executive Summary, two sections related to the horizontal areas, 13 sections related to each of the sectors covered by the Strategy, as well as section on concluding observations and recommendations. Each of these sections presents the findings regarding the implementation of activities set out in the Action Plan, including the statistical data on the number of implemented activities, respective analysis and recommendations for addressing the identified problems.

Methodology

The annual reports, including the Final Report on the implementation of the Strategy, are based on information submitted by competent institutions for each evaluation period. These institutions submitted annual reports on the level of implementation of the activities through a software- web application- for which they were designated as responsible. After collecting the annual reports, the SCPC conducted an analysis and evaluation of the data submitted by the institutions, and subsequently determined the final status of all activities under the Strategy (implemented, ongoing, or not implemented).

The final evaluation included all activities planned for implementation in the period from 2021 to 2025, along with a comprehensive analysis of continuous activities which are subject to evaluation each year from their due date for implementation. The total number of evaluated activities for the entire five-year period amounts to 318.

The adoption of the Law Amending and Supplementing the Law on the Organization and Work of the Bodies of State Administration (“Official Gazette of RNM“ No. 121/24)

resulted in changes to the institutional structure, the competencies of state administration bodies, and the names of some of the competent institutions.

EXECUTIVE SUMMARY

A total of 54 key problems has been identified in the Strategy, along with a total of 111 measures and 191 specific activities stipulated to tackle them. Out of the total number of activities, 34 are designated as continuous (27 activities are set with a deadline starting in 2021 and continuously, six activities from 2022 and continuously and one activity from 2024 and continuously), meaning that their implementation is to be evaluated each year after they become due. Accordingly, for the indicated five-year period, a total of 318 activities have been evaluated.

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

Ord.No.	Area/Sector	Problems	Measures	One-off activities	Total number of continuous activities	Total number of evaluated activities
1.	Public procurements	2	2	2	10	12
2.	Employment	3	8	10	15	25
3.	Political System	6	7	7	5	12
4.	Judiciary	3	7	10	20	30
5.	Law enforcement authorities	7	13	20	5	25
6.	Health	5	18	25	4	29
7.	Education	8	18	27	34	61
8.	Labor and social policy	1	5	8	10	18
9.	Urbanism and physical planning	1	1	0	4	4
10.	Environment	1	1	2	0	2
11.	Agriculture	5	9	15	5	20
12.	Sport	2	6	11	19	30
13.	Economy and business	4	8	8	23	31
14.	PE and SC	3	3	5	2	7
15.	Media and civil society	3	5	7	5	12
Total		54	111	157	161	318

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

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

Problems by **area/sector**:

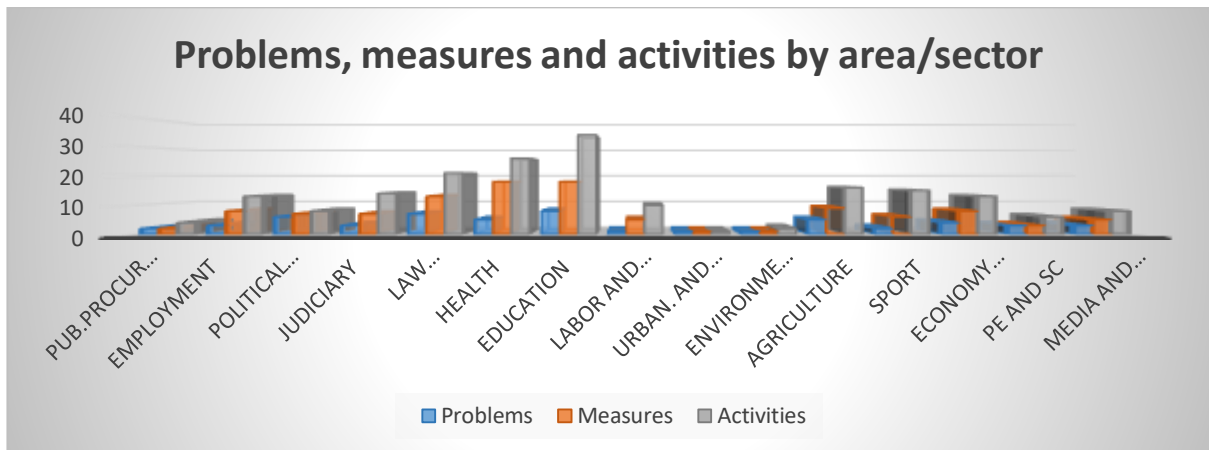


Figure 1: Number of problems, measures and activities by area/sector

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

The breakdown of **activities by year** is as follows:

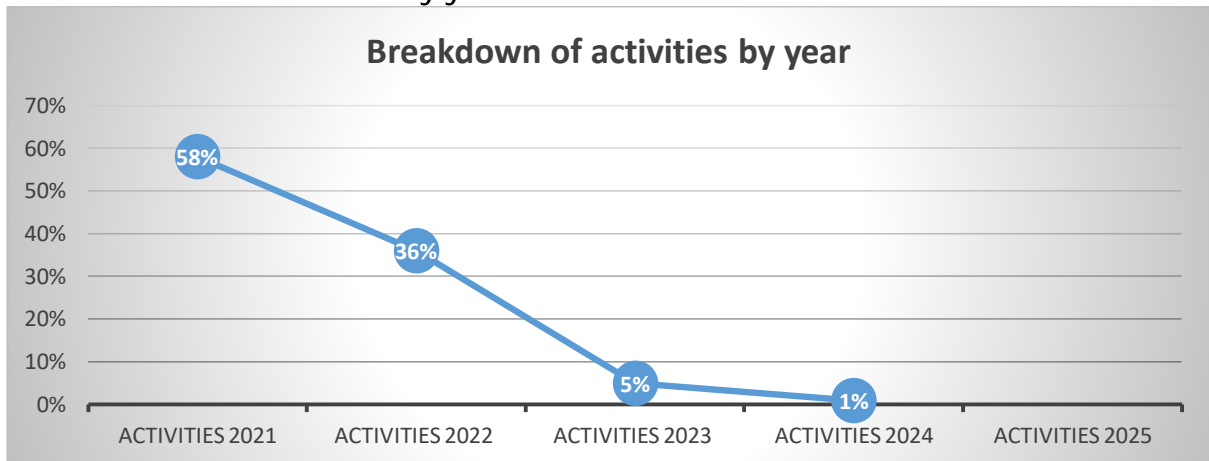


Figure 2: Breakdown of activities by year, in percentages

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 %

- 110 activities (58%) were foreseen for 2021, of which 27 are continuous;
- 70 activities (36%) were foreseen for 2022, of which 6 are continuous;
- 9 activities (5%) were foreseen for 2023;
- 2 activities (1%) were foreseen for 2024, of which 1 is continuous and
- No new activities were foreseen for 2025.

In determining the deadlines for the implementation of the activities, the institutions and the participants from the relevant sectors played a significant role.

Following the analysis of all annual evaluations of the implementation of the Strategy's activities, the summary by area/sector of the overall status of implementation of activities for the 2021 – 2025 period, is as follows:

Area/Sector	Implemented activities	Not implemented activities	Ongoing activities
Public procurements	3	3	6
Employment	4	13	8
Political System	2	6	4
Judiciary	21	4	5
Law enforcement authorities	11	8	6
Health	18	4	7
Education	25	14	22
Labor and social policy	6	8	4
Urbanism and physical planning	1	0	3
Environment	0	0	2
Agriculture	6	13	1
Sport	2	18	10
Economy and business	11	11	9
PE and SC	1	5	1
Media and civil society	7	2	3
Total	118	109	91

Table 2: Overview of implemented and non-implemented activities, as well as ongoing activities in the period 2021–2025 by area/sector

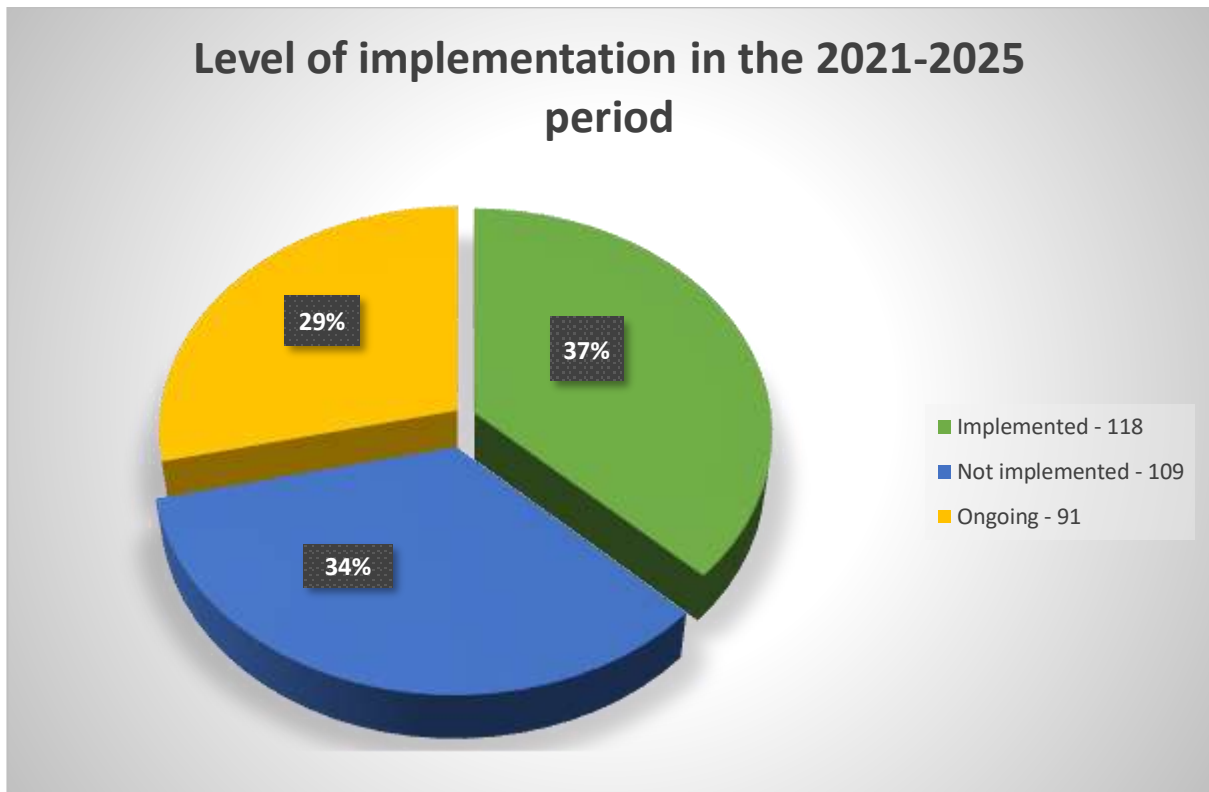


Figure 3. Level of implementation for the 2021-2025 period

Level of implementation of activities for the period 2021-2025. Out of a total of 318 evaluated activities in the period 2021-2025, 118 activities have been implemented (37%), 109 activities have not been implemented (34%), and 91 activities are ongoing (29%).

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, in order to address the two priority problems, 2 measures and 4 activities were envisaged, of which 2 activities are one-off, and 2 activities are designated for continuous implementation from 2021 to 2025, resulting in a total of 12 evaluated activities for the five-year period. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

Final Report on the Implementation of the 2021-2025 National Strategy for the Prevention of Corruption and Conflict of Interest for the period from 01.01.2021 – 31.12.2025

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.* The deadline for implementation was set for the **second half of 2021 and continuously**, while the competent institution is the **PPB**. The activity has been implemented in 2024 and 2025. 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, as follows:

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**. In 2025, the MoF informed that the activity is “**Ongoing**”, considering that Public Procurement Bureau has undertaken activities aimed at analyzing and identifying the provisions of the Law on Public Procurements that need to be amended. The PBB also initiated the preparation of a draft template of the relevant Confidentiality Statement, which should be envisaged through the amendments. Therefore, the final status of this activity is assessed as “**Ongoing**”.

Activity 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. The deadline for implementation was set for the **second half of 2020**, while the competent institution is the **PPB**. This activity has been “**Implemented**” in 2021, taking into account that the model tender documentation for low-value procurement and the model tender documentation for the simplified open procedure have been updated. Namely, the model tender documents now include a section in which contracting authorities are required to indicate the person within the institution who, in accordance with the Law on Whistleblower Protection, is authorized to receive reports for protected internal and external reporting by whistleblowers.

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 was 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 had the status of **“Not implemented”** in 2021, while the status changed to **“Ongoing”** in the period 2022-2025, due to the fact that one of the three indicators for implementation of this activity related to the number of imposed sanctions for non-publication of data under Article 10 of the Law on Free Access to Public Information, which ASPI considers not to be within their competence, and therefore, the activity cannot be considered as fully implemented. Further, the 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, while the SCPC considers that the Law on Free Access to Public Information contains misdemeanor provisions that sanction the non-publication of information regarding public procurement in accordance with Article 10 of the Law. 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.

Given the above stated, obstacles limiting the imposition of fines for failure to publish the data do exist and should be addressed.

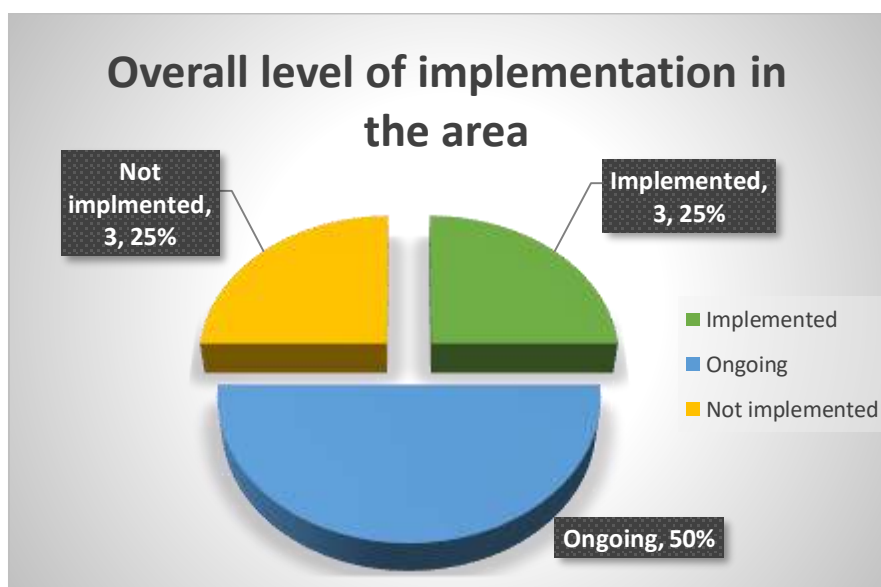


Figure 4: Overall level of implementation in the respective area

Out of a total of 4 activities foreseen in this area, two activities were foreseen as one-off, and 2 activities were planned as continuous in the 2021-2025 period, meaning that a total

of 12 activities have been evaluated in the indicated five-year period. Of these, three activities have been implemented (25%), three activities have not been implemented (25%), and six activities are ongoing (50%).

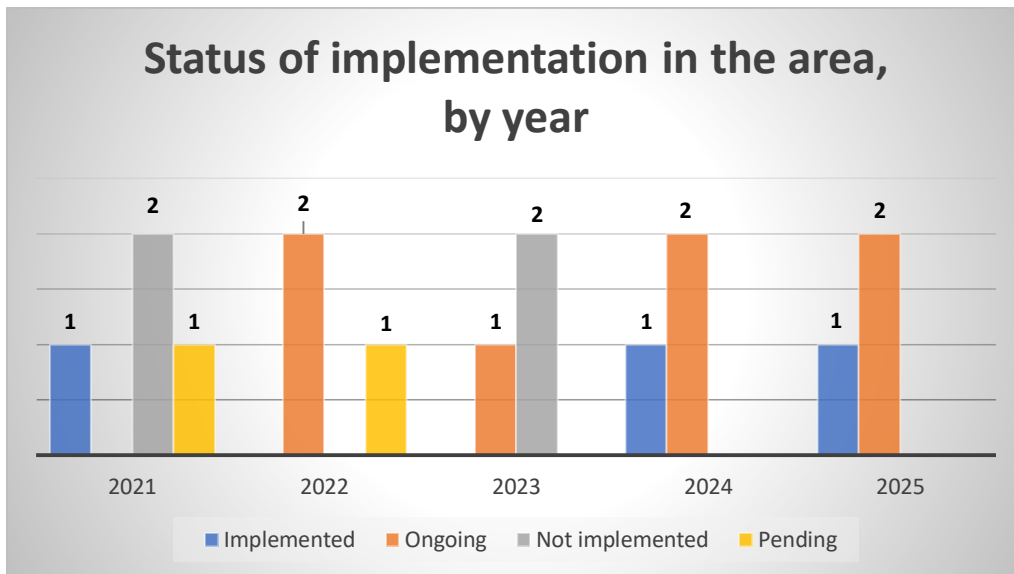


Figure 5: Status of activities' implementation, by year

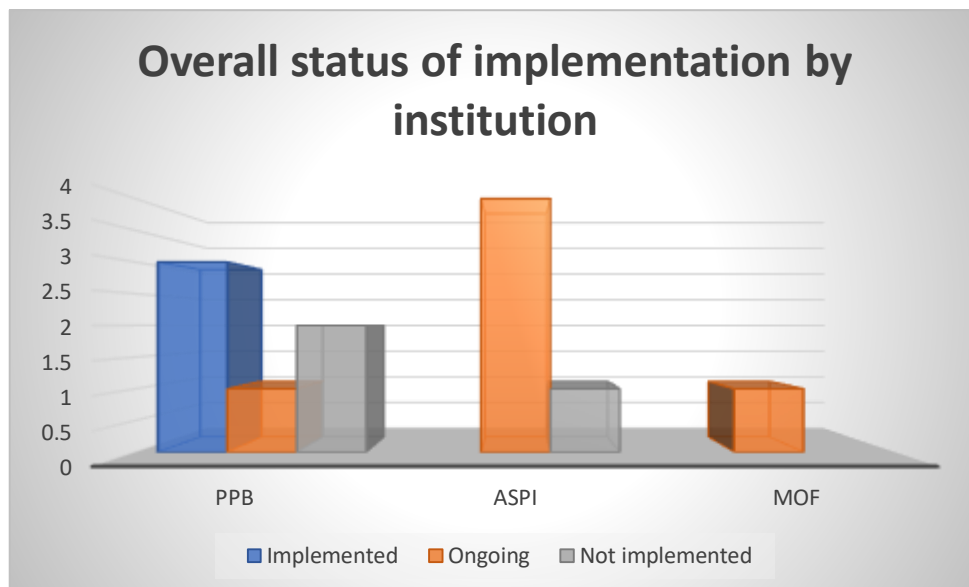


Figure 6: Status of activities, by Institutions

The Public Procurement Bureau (PPB) is the lead institution for 6 activities, of which three have been implemented, two activities have not been implemented, and one activity is ongoing.

The Agency for Protection of the Right to Free Access to Public Information (ASPI) is the lead institution for 5 activities, of which one has not been implemented, and four activities are ongoing.

The Ministry of Finance (MoF) is the lead institution for one activity, which is ongoing.

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 area

In the horizontal area of employment, in order to address the three priority problems, 8 measures and 25 activities were defined, of which 10 activities are one-off and 3 activities are designated for continuous implementation from 2021 to 2025, resulting in a total of 25 evaluated activities for the five-year period. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

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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 Trade 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 Trade 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 Trade 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

With regard to the **Problem: Lack of harmonization among a large number of laws regulating employment, which enables all forms of influence: political party influence, nepotism, cronyism, and clientelism**, the following **Measure 1** was envisaged: **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** and *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 for 2025, 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 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 planned, of which two activities with an implementation deadline in the **second half of 2021 and continuously**, and one activity with an implementation deadline in the **second half of 2021**. The competent institution for these three activities is **MoPA**. Regarding the **Activity 2.1. Preparation of functional analyses in public sector entities**, the MoPA informed that institutions are obliged to submit the conducted functional analysis in order to obtain consent about designed Rulebooks on internal organization and job systematization. This activity has the status of **“Implemented”** in 2024 and 2025.

Activity 2.2: Publication of the functional analysis on the websites of the institutions has been assessed as **“Not implemented”** for the fifth consecutive year. Namely, the MoPA 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, as well as functional analyses, on their websites.

Activity 2.3.: Analysis of the need to introduce an annual workload assessment in public sector entities, with an implementation deadline due in the second half of 2021, remains “Not implemented” until 2025, for the reason that the MoPA informed that it has no power to analyze the annual workload of public sector entities based on the Law on Administrative Servants.

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, have 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.: 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 from 2022 to 2025, ASPI undertook activities and conducted monitoring of the websites of several institutions and therefore the activity was 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.

To address the **Problem 2: Inefficient management, governance, and supervision in certain administrative bodies, agencies, public enterprises, and state-owned joint-stock companies**, the following **Measure 1: Optimize the number of members in supervisory and governing boards of public enterprises and joint-stock companies** and two activities have been foreseen.

- *Activity 1.1.: Establishing criteria (competencies, revenues/expenditures, number of employees) in the Law on Enterprises and the Law on Trade*

Companies regarding the optimization of the number of members in the management bodies (supervisory and governing boards), with implementation deadline set for the second half of 2022, and the competent institution being the MoE (MoEL). In 2021, 2022 and 2023, the activity was marked as “Ongoing”, because amendments to the Law on Public Enterprises were adopted, but not to the Law on Trade Companies. This activity was marked as “Implemented” in 2024 with the adoption of the Law Amending and Supplementing the Law on Trade Companies (Official Gazette of the Republic of North Macedonia No. 272/24), which reduces the number of members in governing and supervisory boards of companies in majority or full state ownership (the supervisory board may have a maximum of 5 members, and the governing board a maximum of 7 members).

- *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 Trade 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, 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 Trade 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 Trade 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 Trade Companies and the Law on Public Enterprises** with an 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 established by the Government, 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 Trade Companies (Official Gazette of the Republic of North Macedonia No. 272/2024), which started being applied as of 7 January 2025, state-owned trade companies have not yet harmonized their statutes.

Regarding the **Problem 3: The legal framework lacks a clear system for evaluating selection criteria in the processes of employment and promotion in the public sector**, one measure has been foreseen, as follows: **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** and **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**, two activities have been foreseen, that is, **Activity 2.1.: Analysis of the legal framework that allows discretionary powers of the responsible person in the employment process**, with an implementation deadline in the **first half of 2021** and SCPC as leading institution. The activity was **“Implemented “within** the foreseen deadline. **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 by the SCPC, there is no information on the implementation of its findings.

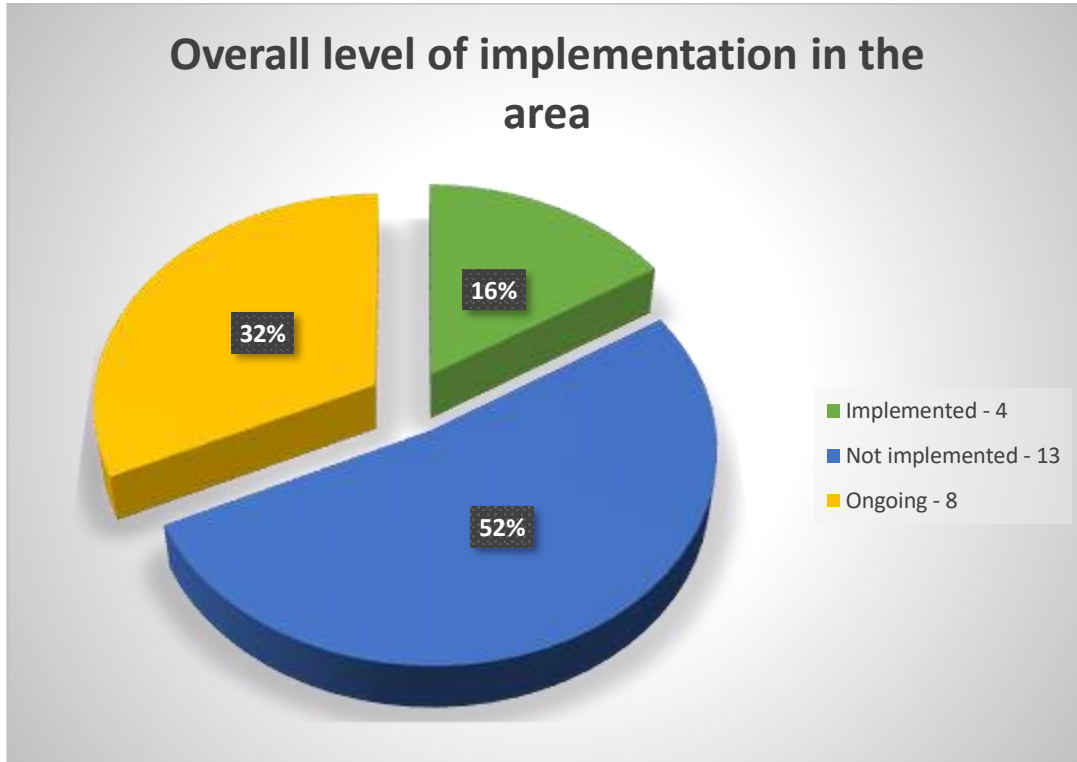


Figure 7: Overall level of implementation in the respective area

Out of a total of 13 activities envisaged for this area, 10 activities were planned as one-off activities, while 3 activities were planned as continuous activities for the period 2021-2025, meaning that for the indicated five-year period a total of 25 activities were evaluated. Of these, 4 activities have been implemented (16%), 13 have not been implemented (52%), and 8 activities are ongoing (32%).

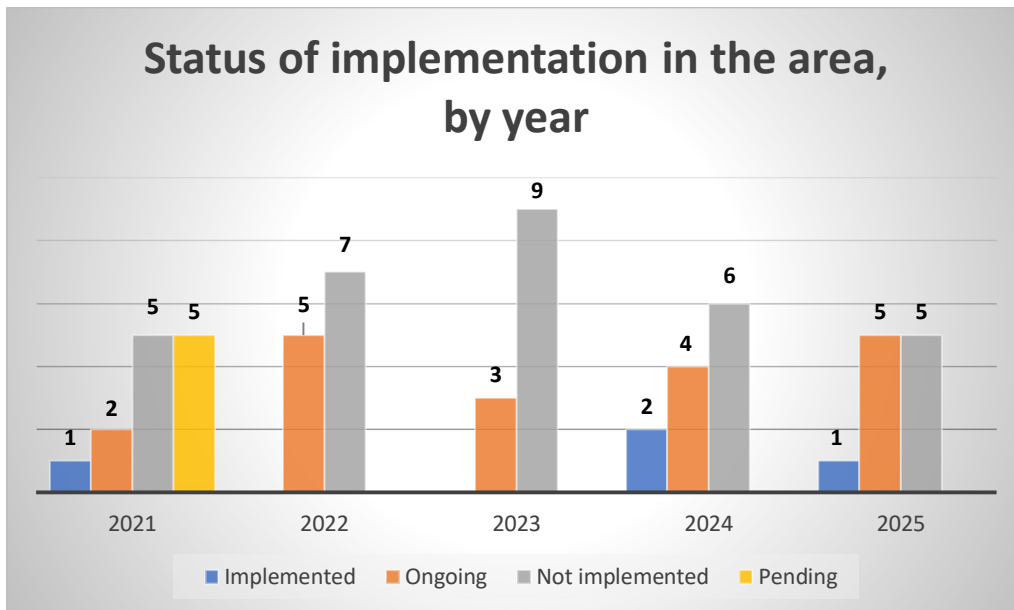


Figure 8: Status of activities' implementation, by year

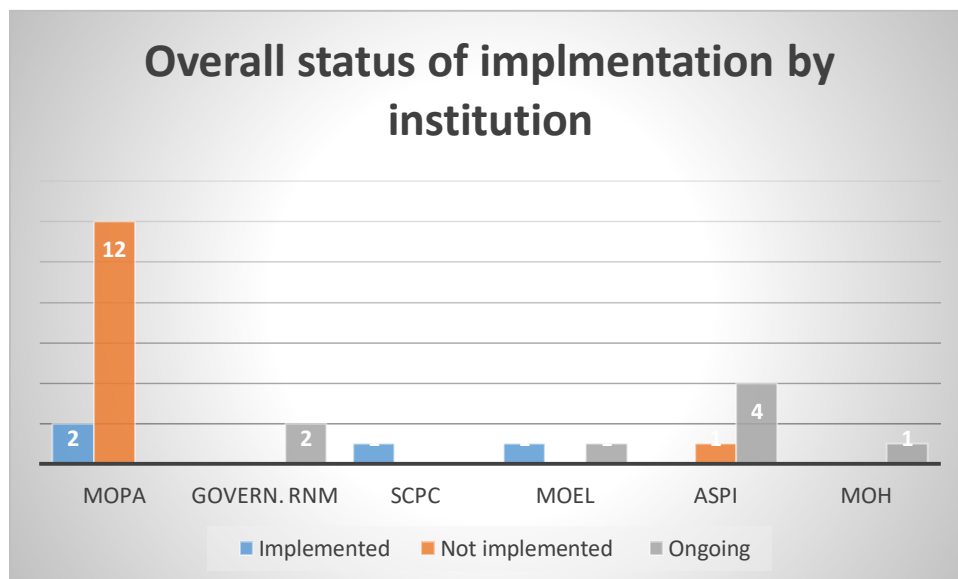


Figure 9: Status of activities, by institutions

- 14 activities have been foreseen for the MoPA, of which 2 activities have been implemented, and 12 activities have not been implemented.
- 2 activities have been planned for the Government which are ongoing.
- 5 activities have been foreseen for the ASPI, of which 1 activity has not been implemented, and 4 activities are ongoing.
- 2 activities have been foreseen for the MoEL, of which 1 activity has been implemented, and 1 activity is ongoing.
- 1 activity has been foreseen for the MoH and it is ongoing.
- 1 activity has been foreseen for the SCPC and it has been implemented in 2021.

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, in order to address the six priority problems, 7 measures and 12 activities were envisaged, of which 7 are one-off activities, and one activity is designated for continuous implementation from 2021 to 2025, resulting in a total of 12 evaluated activities for the five-year period. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

Final Report on the Implementation of the 2021-2025 National Strategy for the Prevention of Corruption and Conflict of Interest for the period from 01.01.2021 – 31.12.2025

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

Regarding the **Problem 1: Adoption of a large number of laws through an expedited procedure without adequate justification for the use of this type of procedure**, the following has been foreseen: **Measure 1: Stipulating a definition of the complexity and scope of draft laws in the Rules of Procedure and Activity 1.1: Amendment of the Rules of Procedure of the Assembly of RNM**. The implementation deadline for this activity was the **second half of 2021**, with the **Assembly** being the competent institution. The final status of this activity is assessed as **“Not implemented“**, for the reason that although the Assembly adopted the new Rules of Procedure in 2023, it does not include definition of the complexity and scope of draft laws.

To address the **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**, the following has been foreseen: **Measure 1: Regulating the Regulatory Impact Assessment (RIA) process, with a view of making it mandatory and Activity 1.1: Adoption of a new Methodology for RIA, integrating the processes for evaluating regulatory implementation and anti-corruption proofing of legislation**, with an 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“**.

With regard to the **Problem 3: Failure to sanction the refusal to submit a declaration of assets and interests by persons who have such an obligation**, two measures have been foreseen.

Measure 1: Definition of the situation of “refusal to declare assets and interests” by persons who have such a legal obligation along with **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 LPCCI.

To address the **Problem 4: Unregulated interaction between lobbyists and representatives of the legislative and executive branches, as well as officials from local governments**, the following has been foreseen: **Measure 1: Establishing rules to regulate the interaction between lobbyists and representatives of public authorities**, along with **Activity 1.1: Adoption of a new Law on Lobbying**. The deadline

for the implementation of this activity was the **first half of 2021**, and the **MoJ** as lead institution. This activity has been **“Implemented”** within the foreseen deadline.

Regarding the **Problem 5: Insufficient involvement of high-level officials of the executive branch in educational programs in the field of ethics and integrity**, the following measure has been foreseen: **Measure 2: Strengthening the integrity system of high-level executive office holders**, along with two activities.

- **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**, also with a deadline in the **first half of 2021**– continuously and **SCPC** as competent institution, is assessed as **“Not implemented”**. This activity has been implemented only in 2024. 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 are 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.

With regard to the **Problem 6: There is no mechanism or body for the effective monitoring of media coverage of participants in the election campaign through Internet portals**, one measure has been foreseen, i.e., **Measure 1: The cost for advertising on Internet portals should not be paid from the Budget of the RNM**, along with the *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.

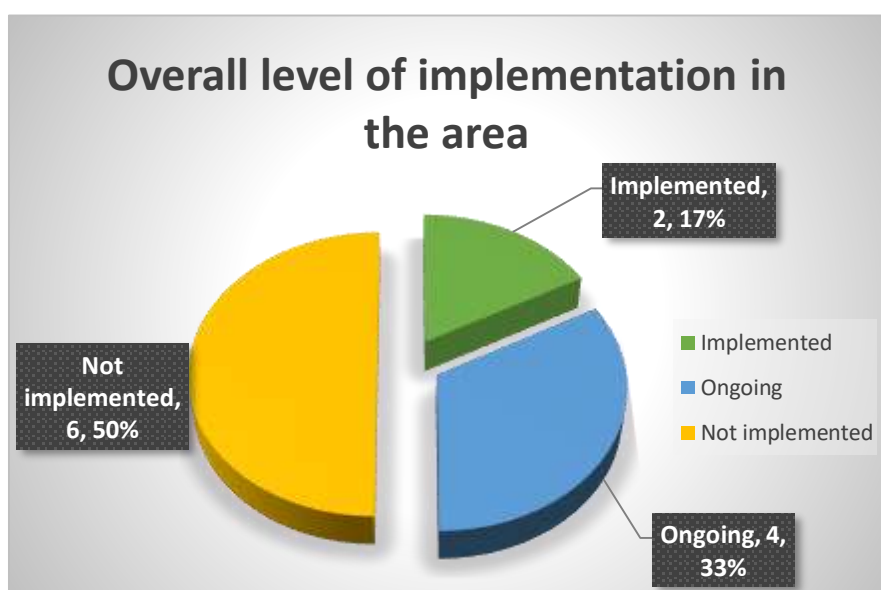


Figure 10: Overall level of implementation within the sector

Out of a total of 12 activities in the Strategy for the political system sector (with 1 activity envisaged for continuous implementation from 2021 to 2025), 2 activities have been implemented (17%), 6 activities have not been implemented (50%), and 4 activities are ongoing (33%).

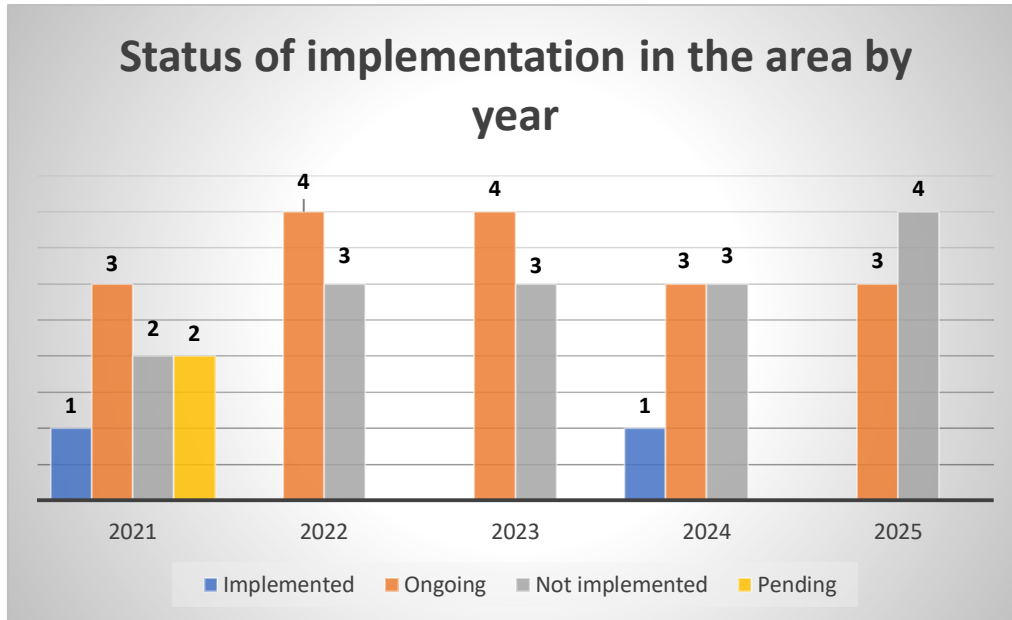


Figure 11: Status of activities' implementation, by year

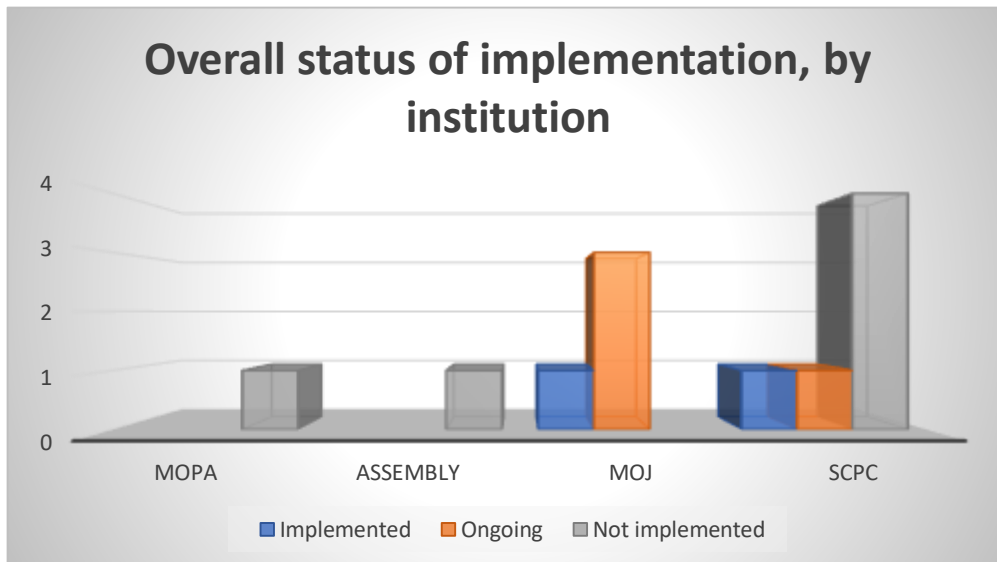


Figure 12: Status of activities' implementation, by institution

- 1 activity has been foreseen for the MoPA, which has not been implemented.
- 1 activity has been foreseen for the Assembly, which has not been implemented.
- 4 activities have been foreseen for the MoJ, of which 1 activity has been implemented and 3 activities are ongoing.

- 6 activities have been foreseen for the SCPC, of which 1 activity has been implemented, 4 activities have not been implemented, and 1 activity is ongoing.

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, in order to address the three priority problems, 7 measures and 14 activities have been foreseen, of which 10 activities are one-off and 4 activities have been designated for continuous implementation from 2021 to 2025, resulting in a total of 30 evaluated activities for the five-year period. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

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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

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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

In order to address the **Problem 1: Insufficiently efficient system for strengthening integrity in the judiciary and the public prosecutor's office**, the planned **Measure 1: Supplementing the Code of Public Prosecutors with comments and examples** includes two activities:

- *Activity 1.1: Submission of proposed comments and examples for the Code by the Association of Public Prosecutors (APP) under its competence.*
- *Activity 1.2: Adoption of the amendment to the Code of Public Prosecutors*, under the competence of the **Association of Public Prosecutors** and the **PPO RNM**. The deadline for the both activities was the **second half of 2021** and both activities have been **"Implemented"** within the foreseen deadline.

Measure 2: Implementation of mandatory training for judges and public prosecutors for the purpose of implementing codes of professional conduct includes two activities:

- *Activity 2.1: Adoption of programs for mandatory training on professional conduct for judges and public prosecutors*, with implementation deadline in the **second half of 2021** and the **AJPP** as the lead institution. The activity was **"Implemented"** within the foreseen deadline.
- *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, in the period from 2021 to 2025, the AJPP delivered around 80 thematic trainings, with significant number and diversity of participants from the judicial system. The implementation of this activity showcases an active and functional approach to improving professional and ethical standards.

Measure 3: Conducting an assessment of corruption risks in judiciary, includes two activities:

- *Activity 3.1: Establishment of an expert working group for assessing corruption risks in judiciary*, with implementation deadline in the **first half of 2022**, and the **SCPC** as the lead institution. This activity has been **"Implemented"** in a timely manner.
- *Activity 3.2: Preparation of an in-depth analysis and assessment of the factors that generate corruption in the judiciary* with implementation deadline in the **second half of 2022**, also under the competence of the **SCPC**. The activity was **"Implemented"** in 2023 and the Report on the conducted in-dept analysis, along with findings, was publicly presented by the expert working group. The Report on the corruption risk assessment in the judiciary is published on the SCPC website.

To address the **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, three measures have been foreseen. **Measure 1: Staffing of the 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"**. Namely, according to the submitted report for 2025, 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 continuously **"Implemented"** for the overall five-year period. According to reports submitted by the AJPP, four one-day and/or several-day trainings were delivered, attended by a total of 59 newly elected public prosecutors.

Regarding the **Measure 2: Establishing investigative centers within the Public Prosecutor's Offices,** the following two activities were being implemented during 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 since 2021**. In 2021, this activity was marked as **"Ongoing"**, in 2023 and 2024 as **"Not implemented"**, and marked with status **"Implemented"** in 2022 and 2025.
- **Activity 2.2: Adoption of a decision on the establishment of investigative centers,** under the responsibility of the PPO RNM, has been foreseen as continuous activity since 2021. The activity has been marked as **"Ongoing"** in the course of 2021 and 2024, while in 2022, 2023 and 2025, it was marked as **"Implemented"**. During the five-year period of the Strategy implementation, the PPO RNM has established and made operational a total of six investigative centers, specifically in: PPO Skopje, PPO Kumanovo, PPO Tetovo, PPO OCC (established by decision of 2018, and staffed and made operational during the reporting period), PPO Stip and PPO Bitola (both established by decision in 2025).

Regarding the **Measure 3: Establishing an automated system for the allocation and monitoring of cases in the Public Prosecutor's Office,** three activities have been foreseen.

- **Activity 3.1: Analysis of the case management process in the Public Prosecutor's Office of the Republic of North Macedonia (PPO RNM)** with implementation deadline in the **second half of 2021**, under the competence of the PPO RNM. The activity has been **"Implemented"** within the foreseen deadline.
- **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. The final status of this activity is **"Ongoing"**. Specifically, the PPO RNM on 10.02.2022 adopted a Rulebook on the

allocation of cases in public prosecutor's offices through an electronic case allocation system. Due to a lack of budget funds for the procurement of a system for automated case allocation and tracking, the Public Prosecutor's Office of the Republic of North Macedonia, through the project "EU Support for the Rule of Law," secured funds for a new electronic case management system, and in 2025 a tender was announced for the selection of a company to develop the software solution. Although the system is financed within the framework of IPA funds, the project relies on partial state co-financing, which had not been secured until December 2025.

- **Activity 3.3: Training of staff for using the system**, with an implementation deadline in 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".

Problem 3: Insufficient efficiency and transparency in the work of the State Attorney's Office, entails the **Measure 1: Increasing the efficiency and transparency of the State Attorney's Office**, and **Activity 1.1: Adoption of a new Law on the State Attorney's Office**, with an implementation deadline in the **second half of 2022**, under the competence of the **MoJ**. According to the submitted reports, since 2024, this activity is assessed as "Ongoing", taking into account that the new Law on the State Attorney's Office, which has been prepared and published on the ENER system, is still not adopted.

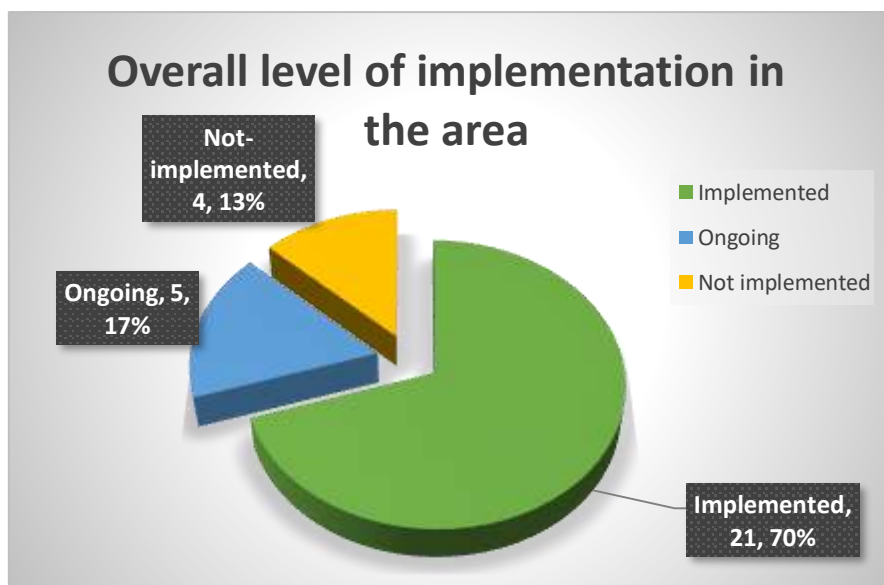


Figure 13: Overall level of Implementation within the sector

Out of a total of 14 activities envisaged for this sector, 10 activities were planned as one-off activities, and 4 activities were planned as continuous for the 2021-2025 period, meaning that a total of 30 activities were evaluated in the indicated five-year period. Of these, 21 activities have been implemented (70%), 4 activities have not been implemented (13%), and 5 activities are ongoing (17%).

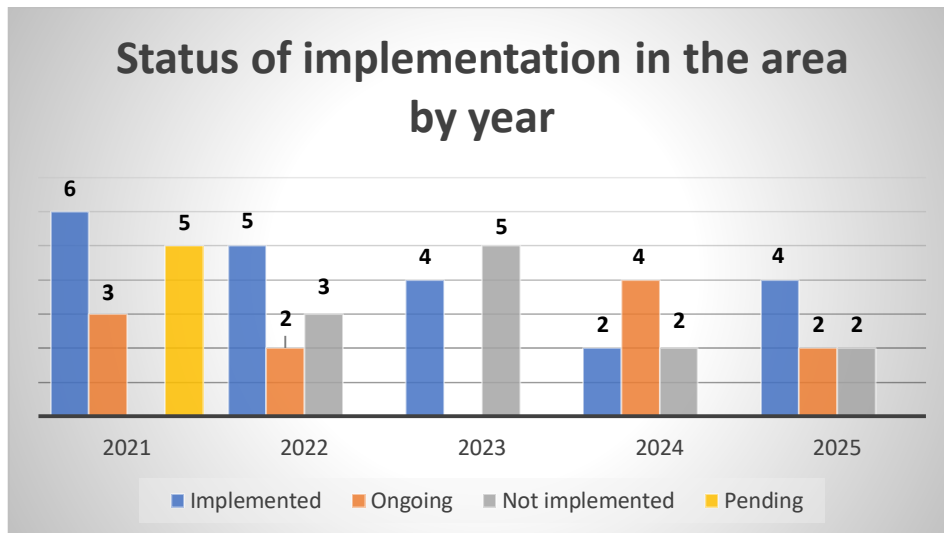


Figure 14: Status of overall implementation of activities by years

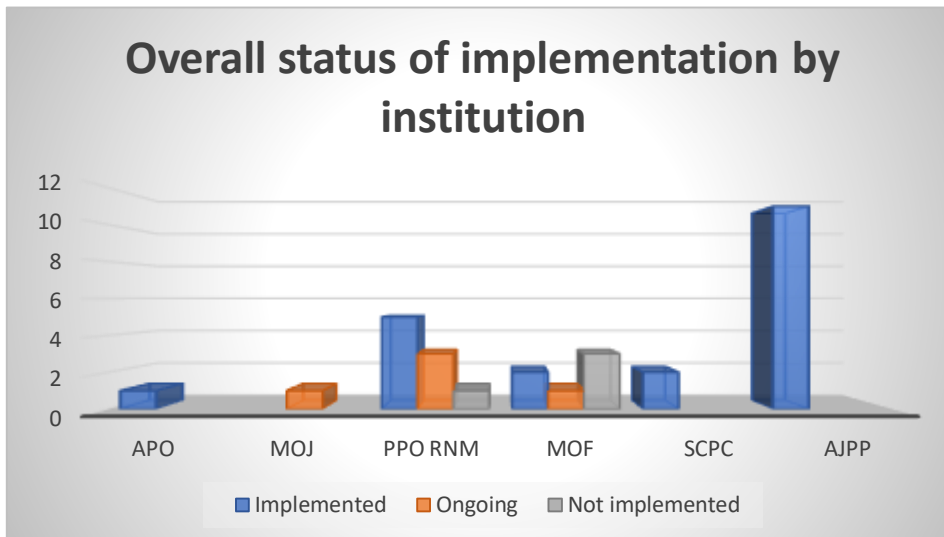


Figure 15: Status of activities, by institutions

- 1 activity has been foreseen for the APP, and it has been implemented in 2021.
- 1 activity has been foreseen for the MoJ, and it is ongoing.
- 9 activities have been foreseen for the PPO RNM, of which 5 have been implemented, 1 activity has not been implemented, and 3 activities are ongoing.
- 6 activities have been foreseen for the MoF, of which 2 activities have been implemented, 3 activities have not been implemented, and 1 activity is ongoing.
- SCPC implemented two activities.
- AJPP implemented 11 activities.

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, in order to address the seven priority problems, 13 measures and 21 activities have been foreseen, of which 20 activities are one-off, and 1 activity is designated for continuous implementation from 2021 to 2025, resulting in a total of 25 evaluated activities in the five-year period. Based on the

analysis of the annual reports, the status of implementation of the activities is as follows:

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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

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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

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	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 were planned: **Measure 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 and *Activity 1.1: Amendments to the Law on Internal Affairs***. The deadline for the implementation was the **first half of 2022**, and the **MOI** designated as the competent institution. This activity was **“Implemented”** through the adoption of the Law Amending and Supplementing the Law on Internal Affairs (“Official Gazette of the Republic of North Macedonia“ No.89/22).

Measure 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 includes the ***Activity 2.1: Declassification of the acts on the organization and systematization of job positions in the Ministry of Interior*** with implementation deadline in the **first half of 2022**, and under the competence of the **MoI**. The final status of this activity is **“Not implemented”**. From the due date of the activity until 2025, the MoI has not undertaken all the necessary activities for the declassification of the acts on organization and systematization of job positions. In this respect, in 2025, the Assembly adopted a new Law on Internal Affairs (“Official Gazette of RNM“ No. 160/25), the application of which is postponed, and which, in its transitional and final provisions, the adoption of several by-laws is stipulated, including acts on the organization and systematization of job positions in the Ministry of Interior. The State Commission for the Prevention of Corruption (SCPC) recommends that, when adopting the acts on organization and systematization of job positions in the Ministry of Interior, due consideration should be given to fulfilling the obligations under this measure.

Regarding the **Problem 2: Inefficient system for determining professional responsibility in law enforcement authorities**, the following has been planned: **Measure 1. Introducing a separate organizational unit for internal control and professional standards in the FIU and FPO, along with two activities.**

- ***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 final status of this activity is **“Ongoing”**, given that, until December 2025, the procedure on the Draft Law Amending and Supplementing the Law on Financial Police, was not yet completed.
- ***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. The final status of this activity is “Ongoing”, given that in the period from 2021, the *MoI* has continuously undertaken activities to implement the strategic commitments of the Ministry in the field of disciplinary proceedings; however, these have not been fully implemented until December 2025.

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:

- **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. The final status of this activity is “**Not implemented**”, given 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 final status of this activity is „**Not implemented**“, 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 final status of the activity is “**Not implemented**”, 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 two activities:

- **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. The final status of the activity is “Ongoing”.

The Draft Law Amending and Supplementing the Law on Prevention of Corruption and Conflict of Interest was in government procedure until December 2025.

- **Activity 4.2: Amending and supplementing the Law on Customs Administration (alignment with the amended Law on Prevention of Corruption and Conflict of Interest)** with an implementation deadline in the second half of 2022, and under the competence of the MoF. The activity was **“Implemented”** within the foreseen deadline.

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 final status of the activity is **“Ongoing”**, due to the fact that, out of a total of 28 inspection services, only 18 submitted data to the IC during the reporting period, of which 13 identified overlaps in the 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 in the Action Plan of the Strategy 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 **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 final status of this activity is **“Not implemented”**. The MoPA has been continuously informing that the activity has been implemented, indicating that, inspection oversight is undertaken by inspection services based on the Law on Inspection Oversight. Following the analysis of the reports, the SCPC concluded that the provisions of the Law on Inspection Oversight refer to the adoption of a methodology on risk assessment prepared during the drafting of the annual work plan of the inspection service, while the Methodology for assessing corruption risks in inspection services envisaged under Activity 1.1. of this measure differs from the methodologies adopted by inspection services in accordance with the Law on Inspection Oversight.

Activity 1.2. Preparation of an analysis of corruption risks in inspection services, with an implementation deadline in 2021 and the MoPA designated as the competent

institution, is marked as “**Implemented**” although it does not follow the sequence of foreseen activities under this measure. Namely, within the framework of the USAID Civic Engagement Project, under the activity “Technical Assistance for Inspection Reforms,” one of the implemented activities was the preparation of the document “Analysis of Potential Hotspots for the Occurrence of Corruption in the Work of Inspection Services.” This document identifies corruption risk points in three selected inspectorates (the State Environmental Inspectorate, the State Sanitary and Health Inspectorate, and the State Market Inspectorate), and based on the findings, a list of so-called “hotspots” for the occurrence of corruption in inspection supervision at a general level in the Republic of North Macedonia was prepared, along with recommendations for addressing them across all inspection services.

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 final status of this activity is “**Not implemented**”. 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. The final status of this activity is “**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*. The deadline for the implementation was **2021** and **continuously**, under the competence of the **SAI**. The status of the activity was “**Implemented**” for five consecutive years.

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 two activities:

- **Activity 1.1. Amendments to the Law on Internal Public Finance Control**, with an implementation deadline in the **first half of 2021**, and under the competence of the **MoF**. The activity was marked as **“Implemented”** in 2025, through the adoption of the Law on the Internal Finance Control System in the Public Sector (“Official Gazette of the Republic of North Macedonia“ No.255/24).
- **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. The status of this activity is **“Ongoing”**, given that the prepared wording of the Draft Law on State Audit is currently in the process of intersectoral coordination with the MoF and has not been finalized.

Problem 7: Influence of responsible officials in public institutions on the independence of internal audit, is aimed to be address through **Measure 1: Ensuring independence in the work of internal audit through the establishment of a separate unit within the Ministry of Finance**, and two activities.

- **Activity 1.1: Amendments to the Law on Internal Public Finance Control**, under the competence of the **MoF**, with an implementation deadline in the **first half of 2023**. According to the report, this activity is marked as **“Implemented”**, because a new Law on the Internal Finance Control System in the Public Sector has been adopted in 2025.
- **Activity 1.2: Amendments to the act on the organization and systematization of the Ministry of Finance**, under the competence of the **MoF**, and an implementation deadline in the **second half of 2023**. This activity is considered **“Implemented”** due to the implementation of Activity 1.1.

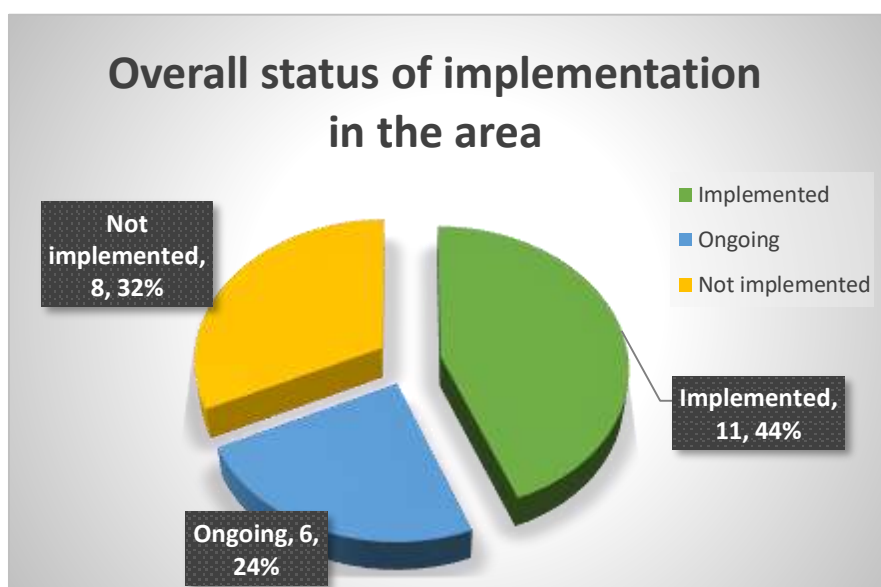


Figure 16: Overall level of implementation within the sector

Out of a total of 21 activities planned in this sector, 20 activities were planned to be one-off activities, while 1 activity was planned as continuous for the 2021-2025 period, resulting in a total of 25 evaluated activities in the indicated five-year period. Of these, 11 activities have been implemented (44%), 8 activities have not been implemented (32%), while 6 activities are ongoing (24%).

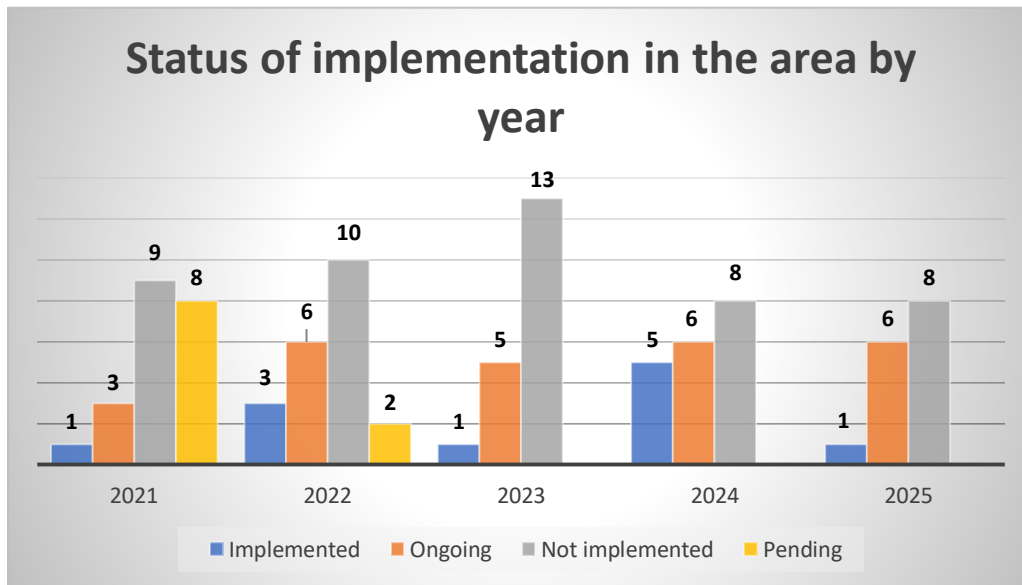


Figure 17: Status of activities' implementation, by year

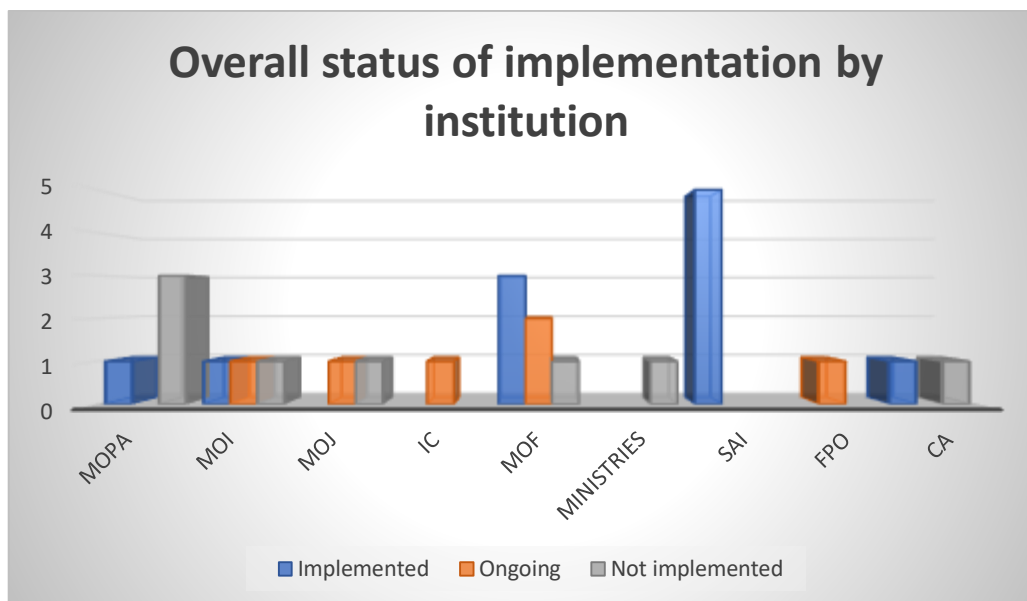


Figure 18: Status of activities, by institutions

- 4 activities have been foreseen for the MoPA, of which 1 was implemented, and 3 activities have not been implemented.
- 3 activities have been foreseen for the MoI, of which 1 activity has been implemented, 1 activity has not been implemented, and 1 activity is ongoing.
- 2 activities have been foreseen for the MoJ, of which 1 activity has not been implemented, and 1 activity is ongoing.

- 1 activity has been foreseen for the IC, which is ongoing.
- 6 activities have been foreseen for the MoF, of which 3 activities have been implemented, 1 activity has not been implemented, and 2 activities are ongoing.
- 1 activity has been foreseen for the Ministries, which has not been implemented.
- The SAI has implemented 5 activities.
- 1 activity of the FPO is still ongoing.
- 2 activities have been foreseen for the CA, of which 1 activity has been implemented and the other activity is not implemented.

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, in order to address the five priority problems, 18 measures and 26 activities have been envisaged, of which 25 were one-off activities, 1 activity is designated for continuous implementation from 2022 to 2025, resulting in a total of 20 evaluated activities for the five-year period. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

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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, organization, etc.) with	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	HIF of RNM, MoH, HI	First half of 2022	Pending	Not Implemented	Not Implemented	Ongoing	Ongoing

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representatives from healthcare institutions	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	/
6. Establishing a system for determining “standard” and “above the standard”	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

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materials included in healthcare services								
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 services and medicines	10.1 In the methodology for determining reference prices of healthcare services, deadlines 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	HIF of RNM Healthcare institutions	Second half of 2023	Pending	Pending	Implemented	/	/

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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 areas where such guidelines do not exist.	MoH Chambers Professional associations HIF of RNM	the second half of 2021	Not Implemented	Ongoing	Ongoing	Ongoing	Implemented
Problem 3: Abuses in procedures for granting/receiving donations, clinical studies, and projects								

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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
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

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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	/	/	/
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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, the following was foreseen: Measure 1. Establishing effective criteria for the allocation of the HIF budget for healthcare services and institutions along with two activities:

- *Activity 1.1.: Preparation of an analysis of the existing regulation for the allocation of the HIF budget for healthcare services and healthcare institutions*, with an implementation deadline in the **second half of 2021** and the HIF of RNM as the competent institution. The activity has been **“Implemented”** with the foreseen deadline.
- *Activity 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*, with an implementation deadline in the **first half of 2022** and under the competence of the HIF of RNM. This activity has been **“Implemented”** in the course of 2023. Specifically, on 23.08.2023, a new Decision establishing the criteria for determining contractual compensation in healthcare institutions (“Official Gazette of RNM“ No. 206/2023) was adopted, including a general and specific criteria on determining the contractual compensation of healthcare institutions.

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 the *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 is the **first half of 2022**, and the

competent institution is the HIF of RNM. The final status of this activity is “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. In the period from 2023 to 2025, this activity has been continuously implemented, in accordance with the Rulebook on the allocation of funds from the budget of the Health Insurance Fund of the Republic of North Macedonia (“Official Gazette of RNM” No. 206/23).

Measure 4: Digitalization and integration of the financial and accounting management systems of healthcare service providers 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. The final status of this activity is „Ongoing“, given that the HIF of RNM stipulated the procurement of such a software in the Annual Public Procurement Plans for 2023, 2025 and 2026; however, the institution has sought support from donors for the procurement of such a software as budget funds were not secured.

Measure 5: Improving the regulations and the transparency of the process for setting reference prices for healthcare services and medicines, includes three activities:

- **Activity 5.1: Preparation/revision of the rulebooks on determining the prices of healthcare services and medicines.** 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 “Implemented” in 2024, through the adoption of the Rulebook amending and supplementing the Rulebook on the manner and methodology of setting reference prices for medicines (“Official Gazette of RNM” 6p.5/2024).
- **Activity 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.** 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 “Implemented” in 2023.
- **Activity 5.3: Adoption of procedures for price negotiations with healthcare institutions and pharmaceutical companies, based on the principle of transparency.** The deadline for the implementation of this activity is the **first half of 2022**, under the competence of the HIF of RNM. This activity has been “Implemented” in 2024, through the adoption of by-laws published in the “Official

Gazette of RNM” No. 206/23 and “Official Gazette of RNM” No. 77/23, which exclude direct negotiations with pharmaceutical companies, while for the contracting and negotiation of prices for health services, the Reference Prices Commission involves healthcare institutions. Additionally, a new Rulebook and methodology have been adopted for determining reference prices for healthcare services in primary, specialist-consultative, and hospital healthcare (“Official Gazette of RNM” No.5/24).

Regarding the **Measure 6: Establishing a system for determining “standard” and “above the standard” materials included in healthcare services**, the following *Activity 6.1: Preparation of by-laws defining standard and above-standard services, materials, devices, etc.* has been foreseen. 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 final status of this activity is “Ongoing“.

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 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* has been foreseen. The deadline for the implementation of this activity is the **first half of 2022**, and its final status is „Ongoing“. The Department for Internal Control and the Department for Internal Audit within the HIF of RNM conducted an audit of the process of establishing reference prices and the proper application of the methodology for setting reference prices for medicines in the HIF of RNM. Given that this control was carried out based on an obligation from the National Strategy and represents an ad hoc audit, while the activity itself stipulates the introduction of regular and extraordinary controls, this activity cannot be considered fully implemented.

Measure 8: Introducing transparency and formal procedures in the process of adopting and allocating the HIF budget to healthcare institutions includes two activities:

- *Activity 8.1: Adoption of a Rulebook on the manner and procedure for adopting and allocating the budget*, with an implementation deadline in the **first half of 2022**, under the competence of the HIF of RNM. This activity has been marked as “**Implemented**” in 2023.
- *Activity 8.2: Establishing an obligation for the public disclosure of the budgets of the HIF of RNM*, with an implementation deadline in the **first half of 2022**, under the competence of the HIF of RNM. This activity has been “**Implemented**” in 2024.

Regarding the **Measure 9: Establishing and maintaining a system of measurable and transparent performance indicators for healthcare institutions**, the following has been foreseen: *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 activity has been marked with final status “Ongoing”, as the HIF of RNM has introduced the quarterly monitoring of the performance of healthcare institutions in specialist-consultative healthcare services through multiple indicators; however, these have not been published.

Measure 10: Annual revision of the prices of healthcare services and medicines includes the *Activity 10.1: In the methodology for determining reference prices of healthcare services, deadlines 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.* The deadline for the implementation of this activity is the **second half of 2023**, and it falls under the competence of the **HIF of RNM**. This activity has been “Implemented” within the specified deadline.

With regard to **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**, the following **Measure 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** has been foreseen, which includes three activities:

- *Activity 1.1: Establishing criteria for the selection of medicines covered by the HIF of RNM.* The deadline for this activity was the **second half of 2021**, and the **MoH** as the lead institution. This activity has been “Implemented” in 2023.
- *Activity 1.2: Adoption of a Rulebook on the Positive List of Medicines based on the Health Technology Assessment (HTA) methodology.* The deadline for this activity was the **second half of 2021**, and the **MoH** as the lead institution. This activity has also been “Implemented” in the course of 2023.
- *Activity 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.* The deadline for this activity was the **second half of 2021**, and the **MoH** as the lead institution. This activity has also been “Implemented” in 2023.

Measure 2: Ensuring transparency in the implementation of the programs of the MoH, which also include the provision of medicines, includes the following *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 the implementation of this activity was the **first half of 2021**, and the **MoH** as the lead institution. The final status of this activity is “Not implemented”. 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 verification of 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 **Measure 3: Consistent application of the evidence-based medicine**, two activities have been foreseen:

- **Activity 3.1: Updating the guidelines for practicing evidence-based medicine within the legally prescribed procedure**, with an implementation deadline in the second half of 2021, and the MoH as the lead institution. The MoH reported that the activity is being continuously implemented; however, considering that only one guideline was updated in the five-year period, and a total of 12 new guidelines have been adopted, the status of 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 an implementation deadline in the second half of 2021, and the MoH as the lead institution, has been “Implemented” in 2025.

For the purpose of addressing **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 an implementation deadline in the first half of 2021, under the competence of the MoH. The final status of the activity is “Not implemented”, considering that the MoH adopted a Decision establishing a Methodology for the distribution of donations of medical equipment and consumables in public healthcare institutions (<http://zdravstvo.gov.mk/wp-content/uploads/2023/01/Metodologija-za-raspredelba-na-donatsii-vo-JZU.pdf>), and not a by-law regulating the acceptance of donations.

Measure 2: Establishing a publicly accessible register of donations of medicines, equipment, and clinical studies, includes the **Activity 2.1: Designing a Register**. The

deadline for the implementation is the **second half of 2021**, and the **MoH** is the lead institution. This activity has been **“Implemented”** in 2025. 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.

To address the **Problem 4: Unethical practices in the marketing of medicines**, the following has been foreseen: **Measure 1: Regulating and monitoring the relationship between pharmaceutical companies and doctors in relation to the marketing of medicines** and *Activity 1.1: Adoption of a Code of Ethics for the conduct of all stakeholders in the marketing of medicine*. The deadline for the implementation is the **second half of 2021**, and **MALMED** is the lead institution. This activity has been **“Implemented”** in 2022.

Measure 2: Establishing a system of “Therapeutic Committees” and “Hospital Register of Medicines” at hospital level, includes 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” in all hospitals in the country*. The deadline for the implementation of this activity is the **first half of 2021**, and the **MoH** is the lead institution. The final status of the activity 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.

In order to address **Problem 5: Transparent and objective decision-making in the procedure for treatment abroad**, one **Measure 1: Designation of reference hospitals through clearly defined criteria in a by-law** and *Activity 1.1: Amendment of acts that define the criteria* have been foreseen. The Deadline for the implementation of this activity was the **second half of 2021**, and the **HIF of RNM** as the lead institution. This activity has been **“Implemented”** in 2022.

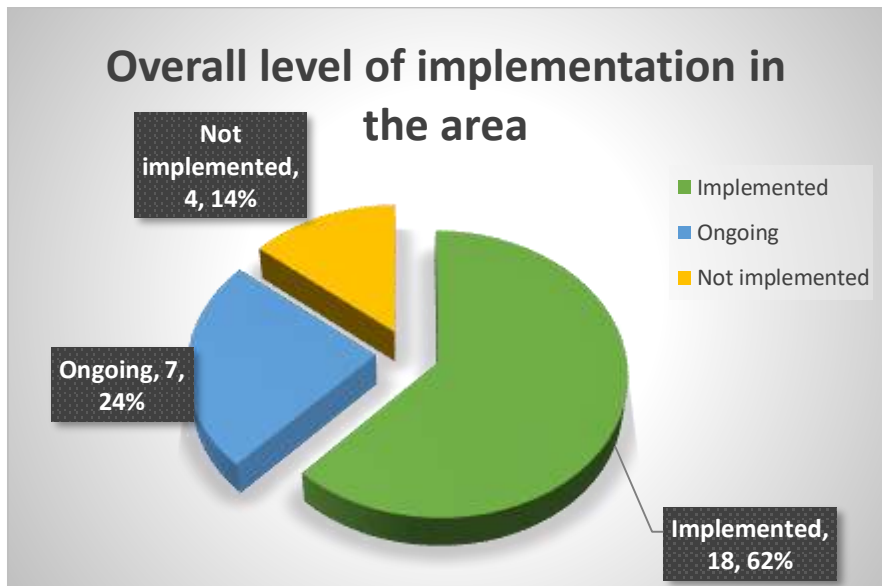


Figure 19: Overall level of implementation within the sector

Out of a total of 26 activities planned for this area, 25 activities were planned as one-off, while one activity was planned as continuous for the period 2022-2025, meaning that for the indicated five-year period a total of 29 activities were evaluated. Of these, 18 activities have been implemented (62%), 4 have not been implemented (14%), and 7 are ongoing (24%).

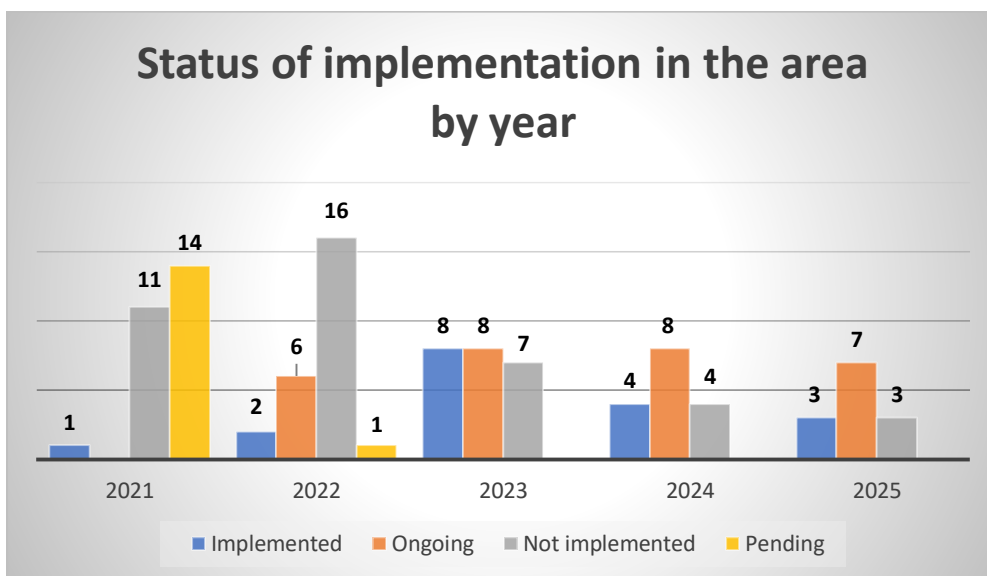


Figure 20: Status of activities' implementation, by year

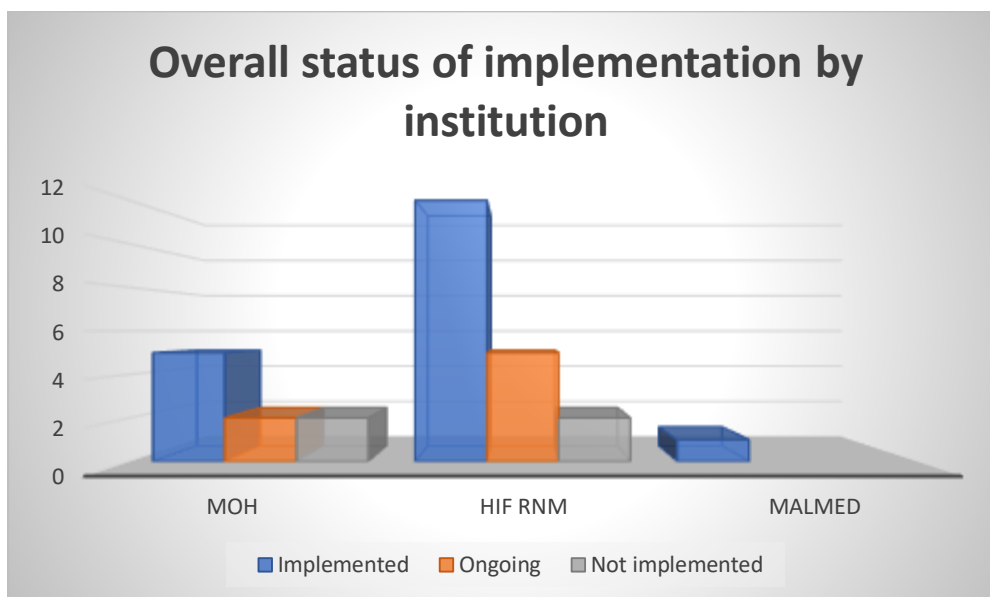


Figure 21: Status of activities, by institutions

- 9 activities have been foreseen for the MoH, of which 5 activities have been implemented, 2 activities have not been implemented, and 2 activities are ongoing.
- 19 activities have been foreseen for the HIF of RNM, of which 12 activities have been implemented, 2 activities have not been implemented, and 5 activities are ongoing.
- 1 activity has been implemented by MALMED.

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, to address the eight priority problems, 18 measures and 34 activities have been planned. Of these, 27 are one-off activities, 6 activities are designated to be implemented continuously from 2021 to 2025, and one activity has been designated to be implemented continuously from 2022 to 2025, resulting in a

total of 61 evaluated activities during the five-year period. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

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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	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	3.1. Adoption of an annual plan/program of the SEI for oversight of	SEI MoES	First half of 2021 – continuously	Not implemented	Implemented	Implemented	Implemented	Ongoing

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Inspectorate (SEI) over procedures for election of academic and teaching-scientific titles	procedures for 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" - Stip	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” - Stip	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

Measure 1: Establishing clear scoring criteria and procedures for conducting interviews in the recruitment of teachers in primary and secondary education, includes the following *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 is 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, the status of this activity during the overall reporting period is **“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 on 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**. This activity has been marked with the status **“Not implemented”** during the overall reporting period.
- *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 was the **second half of 2021-continuously**, and it falls under the competence of the State Education Inspectorate (SEI). During the overall reporting period, the status of this activity is **“Ongoing”**.

Measure 3: Establishing a mechanism for regular oversight by the State Education Inspectorate (SEI) over procedures for election of academic and teaching-scientific titles, includes 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 marked as **“Not implemented”** in 2021, while in 2022, 2023 and 2024 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.

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**. The final status of the activity is **“Not implemented”** as the SEI conducted an analysis to assess capacities, and in the submitted reports, it highlighted the need for employment of inspectors and other administrative staff to fill vacant positions arising for various reasons, as well as the need for improvement of material and technical capacities.
- **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**. In the past four years, this activity has been marked as **“Ongoing”**, to ensure that the MoF reports on the increased of the SEI budget every year. In 2025, the activity has been finally **“Implemented”**. Based on MoF reports, the budget of the SEI has been continuously increased.
- **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**. The final status of this activity is **“Implemented”** in 2025.
- **Activity 1.4: Extraordinary inspection oversight to be carried out by at least two inspectors.** The deadline for the implementation of this activity is **second half of 2021**, and the competent institution is the **SEI**. In 2021, this activity was assessed as **“Ongoing”**, while in the following years it was assessed as **“Not implemented”**. According to the latest submitted report in 2025, when conducting extraordinary inspection oversight, 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 oversight 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 has been 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 -continuously**, and it falls under the competence of the **SCPC**. Apart from 2022 when this activity was assessed as **“Not implemented”**, the status in the following years is **“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.

Measure 3: Strengthening the mechanisms for controlling the work of inspectors in the SEI, includes the following activities:

- *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 final status of this activity is **“Not implemented”**, since no analysis for establishing a mechanism for controlling the work of inspectors, has been conducted.
- *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. The final status of the activity is **“Not implemented”**.

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. The final status of this activity is **“Not implemented”**.
- *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 final status of this activity is **“Not implemented”**.
- *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 - continuously**, and it falls under the competence of the BDE. This activity was not implemented in 2022, while from 2023 onwards it has been marked as **“Ongoing”**. The BDE, in accordance with the new curricula that include content on corruption prevention, has been continuously conducting trainings with teachers implementing the new curricula.

Measure 2: Raising awareness about the use of mechanisms for reporting corruption at universities includes one *Activity 2.1: Implementation of activities for reporting corruption at universities with student participation, covering five institutions.* The deadline for the implementation of this activity is the **first half of 2021**, and falls under the competence of the **Senates of universities**. This activity has

been “Implemented” by all universities that made a commitment to submit reports (UGD, UKLO, UINT and UMT).

Measure 3: Establishing a mechanism for monitoring the commitments set out in the Draft Anti-Corruption Policy at the university includes one *Activity 3.1: Continuous monitoring of the implementation of the Draft Anti-Corruption Policy at the university and public disclosure of annual reports*. The deadline for the implementation of this activity is the **first half of 2021**, under the competence of the **Senates of the universities**. This activity has been “Implemented” by all universities that made a commitment to submit reports (UGD, UKLO, UINT and UMT).

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

- *Activity 1.1: Preparation of an analysis of current practice and definition of criteria for the procurement and use of teaching aids*. The deadline for the implementation of this activity is the **first half of 2021**, and the competent institution is the **MoES**. This activity has been “Implemented” in 2024, through the adoption of the Law on Textbooks for Primary and Secondary Education (“Official Gazette of RNM” No. 3/25) regulating the procedures for procurement and use of teaching aids.
- *Activity 1.2: Adoption of amendments to the Law on Textbooks*. The deadline for this activity was the **second half of 2021**, with **MoES** as the lead institution. This activity has been “Implemented” in 2024, through the adoption of the new Law on Textbooks for Primary and Secondary Education (“Official Gazette of RNM” No. 3/25) regulating the procedures for procurement and use of teaching aids.
- *Activity 1.3: Adoption of appropriate by-laws*. The deadline for the implementation of this activity was the **second half of 2021**, with **MoES** as the lead institution. This activity was not implemented in the first three years, while in 2024 it was marked as “ongoing”, and was finally “Implemented” in 2025. 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 of reviewers in the database 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 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 *Activity 1.1: Adoption of by-laws/rulebooks*. The deadline for the implementation of this activity was the **first half of 2022**, under the competence of the **MoES**. This activity was not implemented in the previous years; however, it was **“Implemented”** in 2025 through the adoption of new rulebooks on 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>).

Problem 6: Lack of by-laws regulating the manner of leasing immovable property of educational institutions, also includes 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 *Activity 1.1: Adoption of by-laws, guidelines and instructions*. The deadline for the implementation of this activity was the **first half of 2022**, and the **MoES** as the lead institution. This activity is assessed as **“Not implemented”** throughout the entire reporting period.

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 1: The National Council for Higher Education and Scientific Research and the Agency for Quality in Higher Education are fully functional includes *Activity 1.1: Appointment of members of the National Council and the Agency for Quality in Higher Education*. The deadline for this activity was the **second half of 2020**, and the lead institution is the **Government**. This activity has been **“Implemented”** in 2021.

Measure 2: Regulating the accountability of the Agency for Quality in Higher Education, also includes *Activity 2.1: Drafting amendments to the Law on Higher Education to precisely regulate the accountability of the Agency for Quality in*

Higher Education. The deadline for this activity was the **second half of 2021**, and the **MoES** as the lead institution. This activity has been **“Implemented”** in 2022.

Measure 3: Ensuring transparency in the selection of members of the Agency for Quality in Higher Education includes *Activity 3.1: Publication of reasoned decisions on the selection of members of the Agency for Quality in Higher Education*. The deadline for the implementation of this activity was the **first half of 2020 - continuously**, and the **Government** as the lead institution. This activity has been assessed as ongoing in 2021, while in the period from 2022 to 2025 it was marked as **“Implemented”**. According to the Government reports, decisions on the dismissal or appointment of members of the Board for Accreditation and the Board for Evaluation of Higher Education are now regularly published in the Official Gazette of the Republic of North Macedonia. Regardless of the status **“Implemented”**, the SCPC notes that the adopted decisions do not contain detailed reasoning for the selection/dismissal of members.

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, is aimed to be pursued through *Activity 4.1: Publication of detailed reasoned decisions of the Agency regarding accreditation, re-accreditation, and other professional activities*. The deadline for the implementation of this activity is the **first half of 2021 - continuously**, under the competence of the **AQHI**. Unlike previous years, when this activity was consistently assessed as **“Ongoing”**, in 2025, this activity has been marked as **“Implemented”**.

Measure 5: Membership of the Agency for Quality in Higher Education in the European Association for Quality Assurance in Higher Education - ENQA includes one Activity *5.1: Preparation of a plan for the membership of the Agency for Quality in Higher Education in ENQA*. The deadline for the implementation of this activity was the first half of 2022, and the **AQHI** designated as the competent institution. This activity has had the status **“Ongoing”** throughout the entire reporting period, considering that the AQHI 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:

- *Activity 1.1: Implementation of the project – Anti-corruption education in pilot secondary schools*, with an implementation deadline in the **first half of 2021**, and the **BDE** as the leading institution. The activity has been **“Implemented”** within the foreseen deadline.

- **Activity 1.2: Adoption of appropriate acts for the introduction of anti-corruption education into regular curricula.** The deadline for implementing this activity was the **second half of 2021 - continuously**, and the **BDE** as the lead institution. This activity was not implemented in 2021, 2023 and 2024, while it was marked as “Ongoing” in 2022 and 2025.

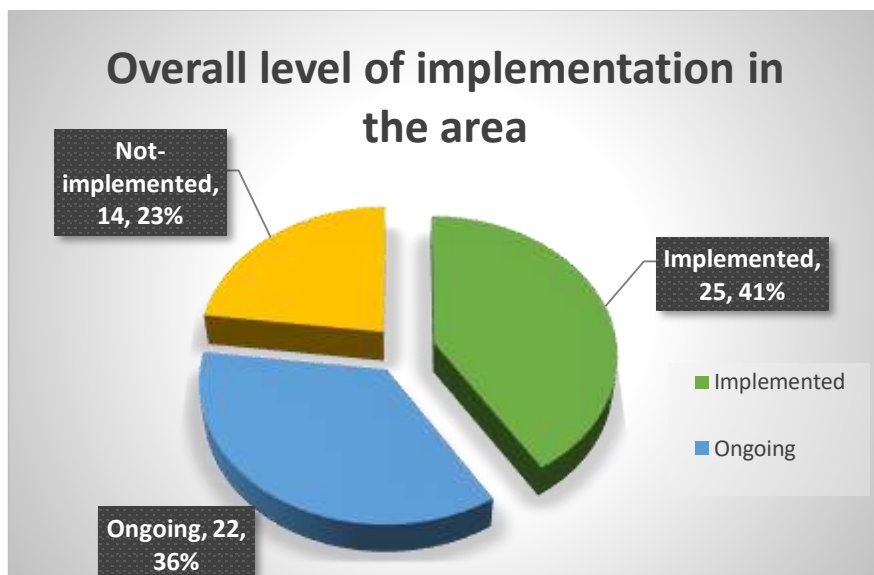


Figure 22: Overall level of implementation within the sector

Out of a total of 34 activities planned for this sector, 27 activities were intended to be implemented as one-off activities, 6 activities were intended to be implemented continuously in the 2021-2025 period, and one activity to be continuously implemented in the 2022-2025 period, resulting in a total of 61 evaluated activities in the indicated five-year period. Of these, 25 activities have been implemented (41%), 22 activities are ongoing (36%), and 14 activities have not been implemented (23%).

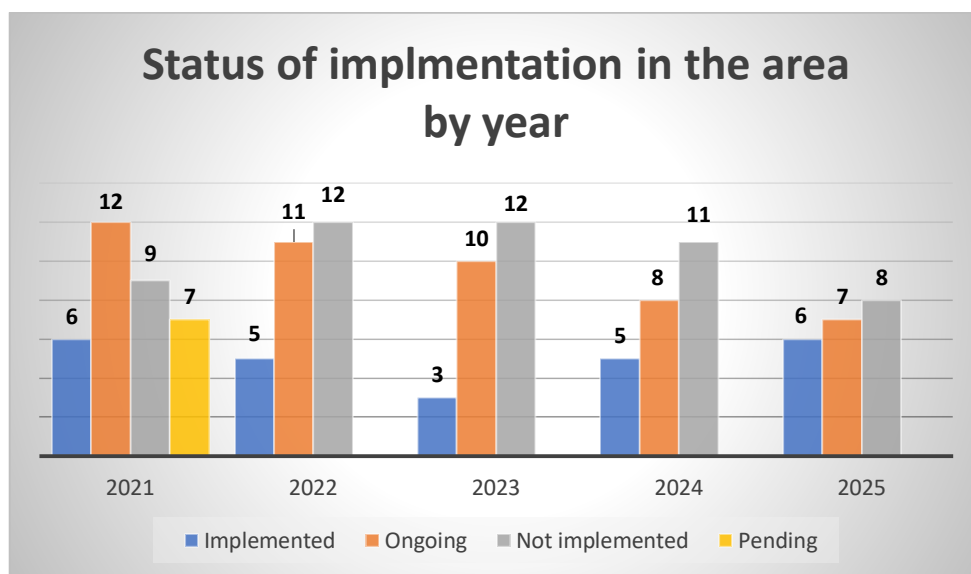


Figure 23: Status of activities by evaluation period

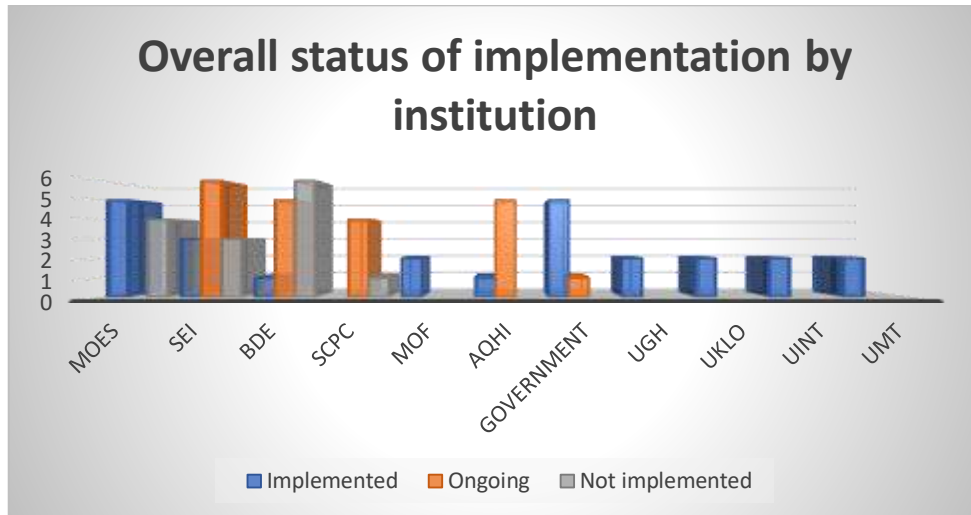


Figure 24: Overall status of activities, by Institution

- 9 activities have been foreseen for the MoES, of which 5 activities have been implemented and 4 have not been implemented.
- 13 activities have been foreseen for the SEI, of which 3 activities have been implemented, 3 activities have not been implemented, and 7 activities are ongoing.
- A total of 12 activities have been foreseen for the BDE, of which 1 activity has been implemented, 6 activities have not been implemented, and 5 activities are ongoing.
- 5 activities have been foreseen for the SCPC, of which 1 activity has not been implemented, and 4 activities are ongoing.
- There are two foreseen activities for the MoF and both have been implemented.
- 6 activities have been foreseen for the AQHI, of which 1 activity has been implemented and 5 activities are ongoing.
- 6 activities have been foreseen for the Government, of which 5 activities have been implemented, and 1 activity is ongoing.
- " The universities UGD, UKLO, UINT and UMT have two activities each, that is, a total of eight activities, of which all have been implemented.

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, to address one priority problem, 5 measures and 10 activities have been planned, of which 8 activities are intended to be implemented as one-off activities, while 2 activities are designated to be implemented continuously from 2021 to 2025, resulting in a total of 18 evaluated activities in the indicated five-year period. Based on the analysis of the annual reports, the status of implementation of the activities 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.

Measure 1: Establishment of a unified digitized central system for social insurance, includes two activities:

- **Activity 1.1: Amendment to the legal framework in the field of social insurance.** The deadline for the implementation of this activity is the **first half of 2022**, and falls under the competence of the **MLSP (MSPDY)**. This activity has been **“Implemented”** in the course of 2023.
- **Activity 1.2: Establishing a unified digitized central social insurance system.** The deadline for the implementation of this activity is the **second half of 2023**, and the competent institution is the **MLSP (MSPDY)**. The final status of the activity is **“Ongoing”**, considering that the activities related to the design of the ICT system for the Register of Mandatory Social Insurance are still ongoing, and it is expected to 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 measures:

- **Activity 2.1: Preparation of an analysis of the current process for assessing disability/work capacity.** The deadline for the implementation of this activity is the **second half of 2021**, and it falls under the competence of the **MLSP (MSPDY)**. The Ministry reported that the activity was **“Implemented”** in 2024, thereby informing that the analysis has been prepared with expert support within the Social Insurance Administration Project (SIAP).
- **Activity 2.2: Adoption of a legal solution for the establishment of the expert assessment body.** The deadline for the implementation of this activity is the **first half of 2022**, and it falls under the competence of the **MLSP (MSPDY)**. The final status of the activity is **“Implemented”** in 2023 through the adoption of a new Law on the System for Assessment of Persons with Disabilities (“Official Gazette of RNM” No. 209/2023), stipulating the establishment of a Central coordination body for the assessment of persons with disabilities.
- **Activity 2.3: Establishment of the expert assessment body.** The deadline for the implementation of this activity is the **second half of 2022**, and it falls under the competence of the **MLSP (MSPDY)**. The final status of this activity is **“Ongoing”**. 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 and stipulates the establishment of a Central coordination body for the assessment of persons with disabilities.

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, includes two activities:

- *Activity 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 selection of its members.* The deadline for the implementation of this activity is the second half of 2022, and it falls under the competence of the MLSP (MSPDY). This activity has been “**Implemented**” in 2023.
- *Activity 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.* The deadline for the implementation of this activity is the first half of 2023, and it falls under the competence of the MLSP (MSPDY). In the submitted report, the MSPDY informed that this activity has been “**Implemented**” in 2024.

Measure 4: Strengthening the oversight in procedures for exercising rights under pension and disability insurance includes two activities:

- *Activity 4.1: Adoption of a Methodology for conducting controls (regular and ad hoc) with an implementation deadline in the first half of 2022, under the competence of the MLSP (MSPDY).* The status of this activity is “**Not implemented**”, since the indicated methodology has not been adopted.
- *Activity 4.2: Conducting regular and ad hoc controls (not only based on complaints).* The deadline for the implementation of this activity is 2021 and continuously, and the competent institution is the MLSP (MSPDY). This activity is contingent on the adoption of the Methodology for conducting controls (regular and ad hoc) from Activity 4.1. under this measure, and is therefore marked as “**Not implemented**” for the fifth consecutive year.

Measure 5: Strengthening the oversight in procedures for exercising the right to assistance and care from another person, includes *Activity 5.1: Conducting regular and ad hoc controls (not only based on complaints)*, with an implementation deadline in 2021 and continuously, and it falls under the competence of the MLSP (MSPDY). In 2021 and 2024, this activity was assessed as “**Not implemented**”, while in 2022 and 2023, the status of the activity was “**Ongoing**”. Unlike previous years, in 2025, 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 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.

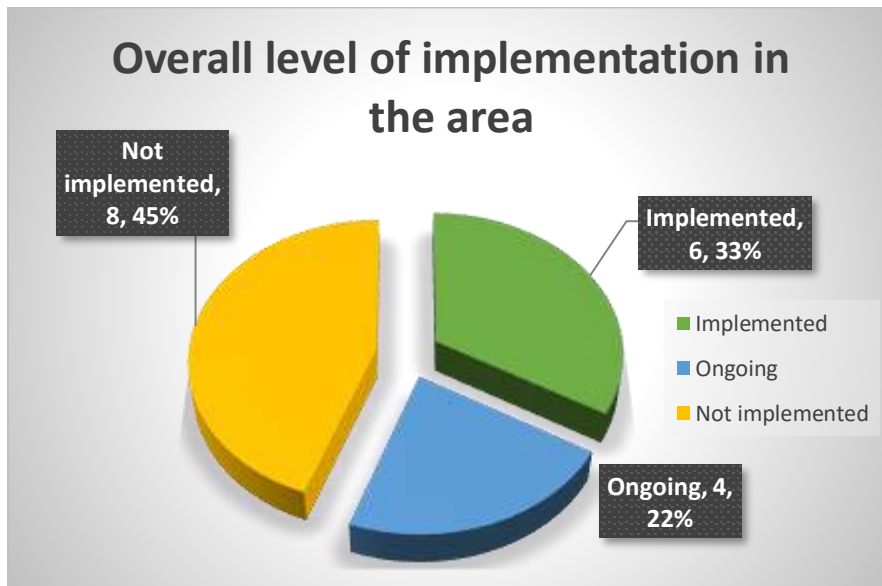


Figure 25: Overall level of Implementation within the sector

Out of a total of 10 activities planned to be implemented in this sector, 8 activities were intended to be implemented as one-off activities, while 2 activities were planned to be implemented continuously in the 2021-2025 period, resulting in a total of 18 evaluated activities in the indicated five-year period. Of these, 6 activities have been implemented (33%), 8 activities have not been implemented (44%), and 4 activities are ongoing (22%).

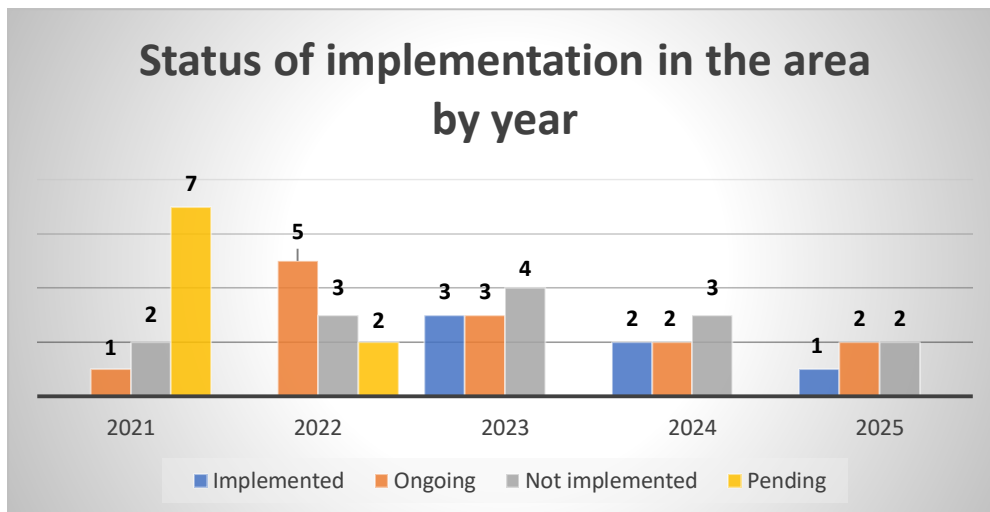


Figure 26: Status of activities by evaluation period

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

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) 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, designated to be implemented continuously in the period from 2022 to 2025, and resulting in a total of 4 evaluated activities in the indicated five-year period.

Based on the received data 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 was the **second half of 2022 and – continuously**, and the lead institution is the **MoTC (MoT)**. In the previous reporting periods, this activity was marked with “**Ongoing**” status, while it was implemented in 2025 through the adoption of the new 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. Specifically, the amendments to the law of 21 May 2025 introduced enhanced ex officio supervision (at least twice per year) by the MoT, with the aim of carrying out regular checks and establishing findings, and not only based on received complaints - in cases where a legal entity performing construction supervision prepares or certifies reports for specific construction phases containing findings that are not consistent with the works carried out, prepares or certifies a final supervision report containing findings that are not consistent with the work carried out, or prepares or certifies a report on a completed 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.

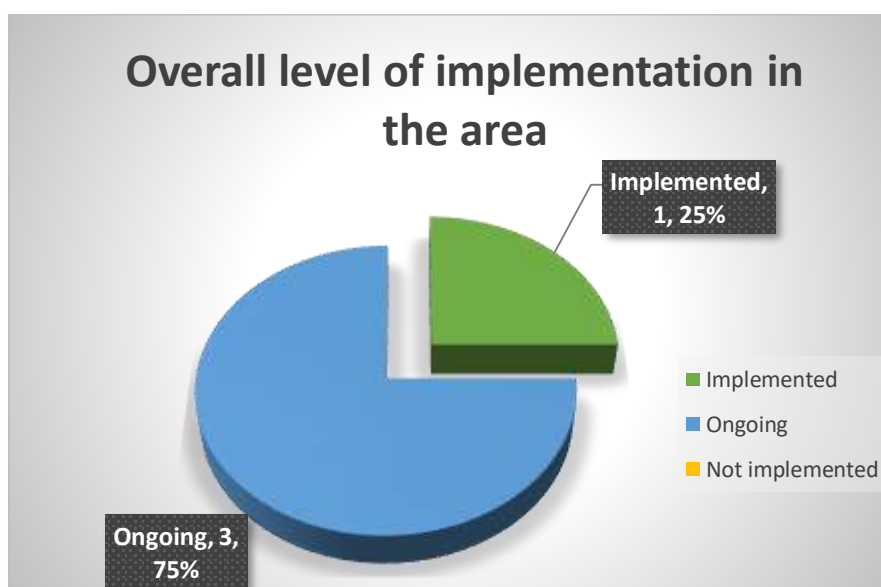


Figure 27: Overall level of implementation within the sector

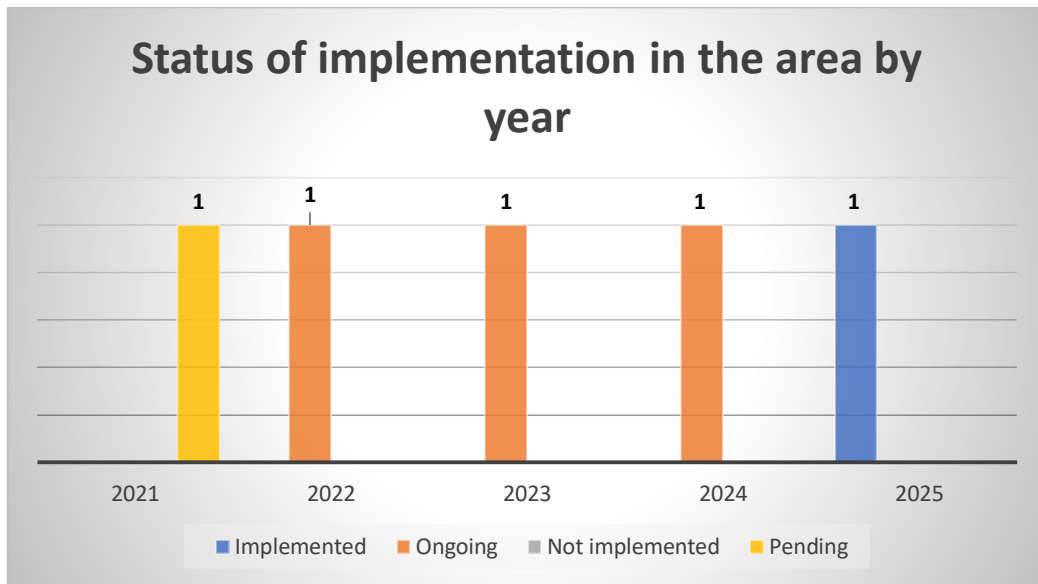


Figure 28: Status of activities by evaluation period

All activities planned in this sector are under the competence of the MoT.

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 environment sector, one problem has been identified, for which one measure and two one-off activities have been foreseen to be implemented. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

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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

Regarding 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 lead 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 project. 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 dumpsters for municipalities in the Pelagonija/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 an 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 exercise of municipal responsibilities and achievement of common interests and goals. This activity has been considered **“Ongoing”** in the past two years.

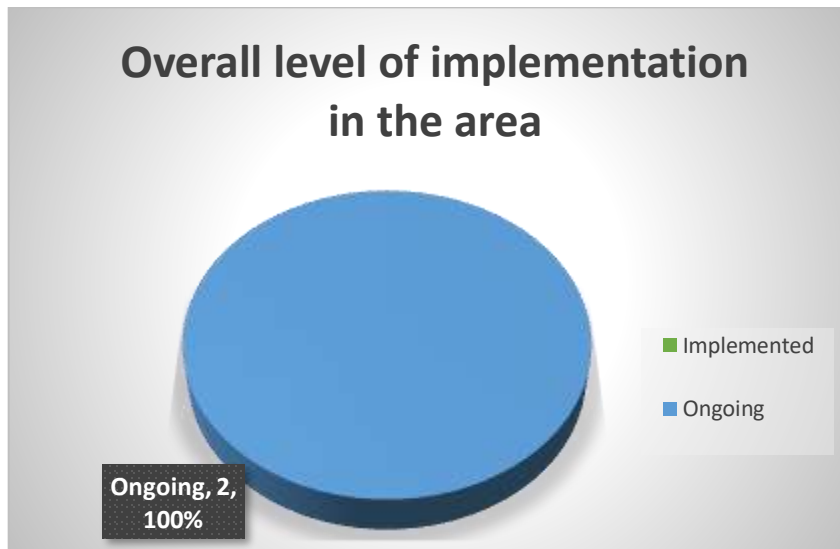


Figure 29: Overall level of implementation within the sector

Out of a total of 2 activities planned under the Strategy for the environment sector, both activities are still ongoing.

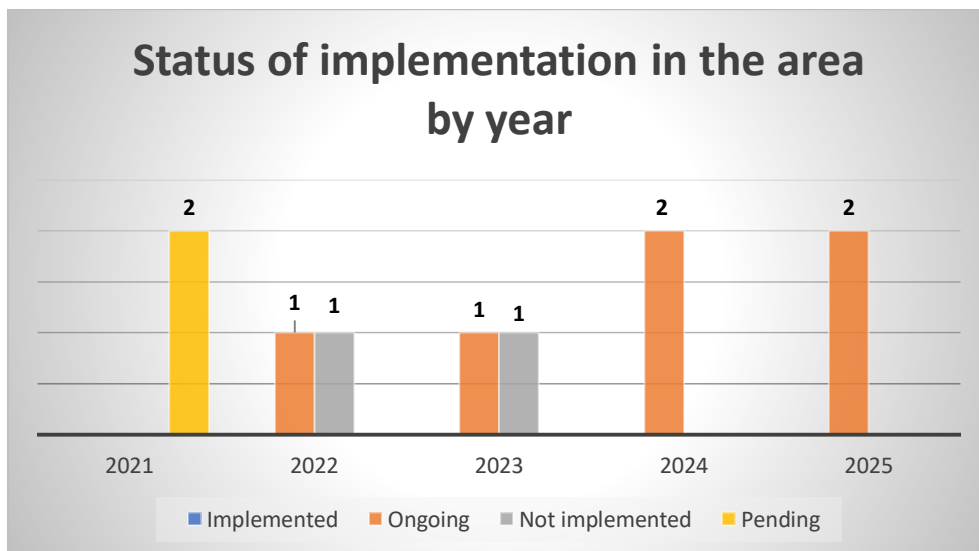


Figure 30: Status of activities by evaluation period

1 activity has been foreseen for the MoEPP which is ongoing;
1 activity has been foreseen for the LSGs which is ongoing.

SECTOR- AGRICULTURE

Sector description

The following five priority problems are identified in the Strategy regarding the agriculture sector:

- 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 agriculture sector, to address the five priority problems, 9 measures and 16 activities have been planned, of which 15 activities are one-off, while one activity is designated to be implemented continuously from 2021 to 2025, resulting in a total number of 20 evaluated activities for the five-year period. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

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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

Final Report on the Implementation of the 2021-2025 National Strategy for the Prevention of Corruption and Conflict of Interest for the period from 01.01.2021 – 31.12.2025

	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, along with 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 it falls under the competence of the **MoAFWE**. Unlike previous years, this activity has been finally implemented **“Implemented”** in 2025. 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 is the **second half of 2021**, and it falls under the competence of the **MoAFWE**. This activity has remained **“Not Implemented”** throughout the entire reporting period, given 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 *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.* This activity, which fall under the competence of the **MoAFWE** was supposed to be implemented in the **first half of 2021**. This activity remains **„Not implemented“** during the entire reporting period, 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 *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*, with an implementation deadline in the **first half of 2022**, and the **MoAFWE** as competent institution. This activity remains **“Not implemented“** during the entire reporting period, 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 entails two measures, along with three activities.

Regarding the **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 was the **first half of 2022**, and falls under the competence of the **MoAFWE**. The final status of this activity is **“Implemented”**. According to the submitted report in 2025, the 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 was the **first half of 2022**, and it falls under the competence of the **MoAFWE**. The final status of the activity is **“Implemented”** through the adoption of the National Strategy for Agriculture and Rural Development for the 2021-2027 period, which stipulates success indicators for monitoring the effects of financial support.

Measure 2: Establishing measurability of the effects of the implementation of measures for financial support in agriculture includes *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*, for which the implementation deadline was the **first half of 2022**, and the **MoAFWE** is the 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”** for the entire reporting period.

Problem 3: Insufficient number of employees and their training, inadequate assistance in guiding citizens, and lack of transparency in procedures includes two measures, along 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 is the **first half of 2021**, and it falls under the competence of the **MoF**. Unlike in 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 is the **first half of 2021**, and it falls under the competence of the **MoF**. During the entire reporting period, this activity has been assessed as **“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.
- *Activity 1.3: Adoption of a legal solution for establishing advisory services to provide assistance to potential beneficiaries regarding the allocation of financial support.* The deadline for the implementation of this activity was the **first half of 2022**, and the **MoAFWE** designated as competent institution. This activity has been **“Implemented”** in 2024. According to the submitted report, the Law on the Advisory System for Agriculture and Rural Development (**“Official Gazette of RNM”** No. 263/23) has been adopted.

Measure 2: Increasing the transparency of procedures and providing potential beneficiaries with relevant information for easier access to these funds, includes two activities:

- *Activity 2.1: Establishing procedures for transparency- informing potential beneficiaries about the conditions for granting financial support.* The deadline for the implementation of the activity was **2021**, and the competent institution is the **MoAFWE**. In 2021 and 2022, this activity was marked as **“Not implemented”**; however, it has been **“implemented”** in 2023.
- *Activity 2.2: Conduct training for employees to improve their knowledge and strengthen integrity.* The deadline for the implementation of the activity was **2021 - continuously**, and the competent institution is the **MoAFWE**. This activity was marked as **“ongoing”** only in 2023, when the submitted report indicated that MoAFWE had adopted an integrity policy and an annual corruption risk assessment plan for 2023; however, there is no evidence that specific training sessions for employees were conducted to improve their knowledge and strengthen integrity. In the remaining years of the reporting period, the activity is marked as **“Not implemented”**, as the MoAFWE training plan does not include specialized training aimed at enhancing 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 both activities was the **second half of 2021**, and the **MoAFWE** is the lead institution. The final status of these activities is **“Not implemented”**. However, it is important to note that with the changes and amendments to the Strategy adopted by the SCPC in 2023 and submitted to the Assembly of RNM (but not enacted), 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 includes:

Measure 1: Clear delineation of responsibilities across three segments: policy-making, exercise of professional competencies, and supervision, along 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 lead institution is the **MoAFWE**. These activities, like the previous ones have a final status **“Not implemented”**. However, it is important to note that with the changes and amendments to the Strategy adopted by the SCPC in 2023 and submitted to the Assembly of RNM (but not enacted), Problem 5 in the agriculture sector was removed, whereby the activities related to it were assessed as no longer applicable.

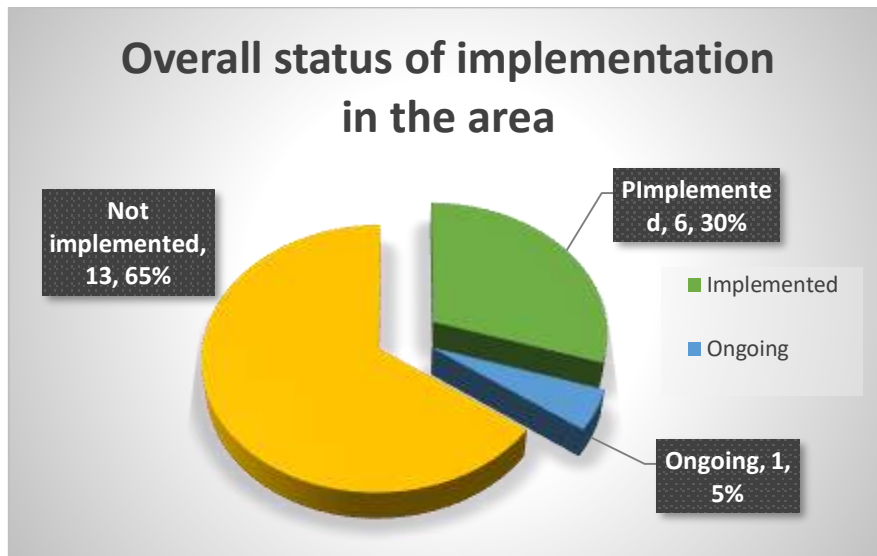


Figure 31: Overall level of implementation within the sector

Out of a total of 20 activities planned in the Strategy for the agriculture sector (with one activity planned to be implemented continuously from 2021 to 2025), 6 activities have been implemented (30%), 13 activities have not been implemented (65%), and 1 activity is ongoing (5%).

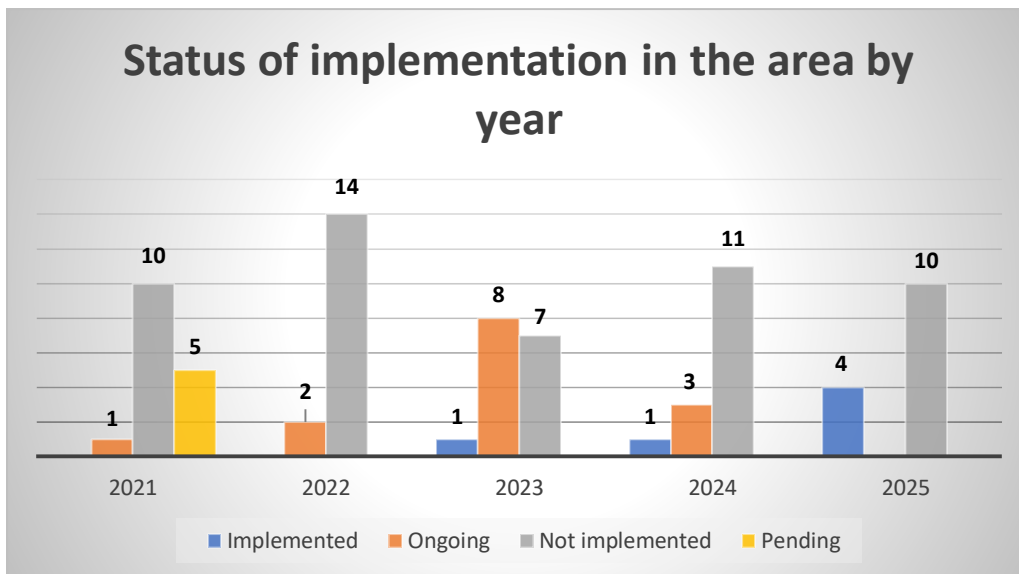


Figure 32: Status of activities by evaluation period

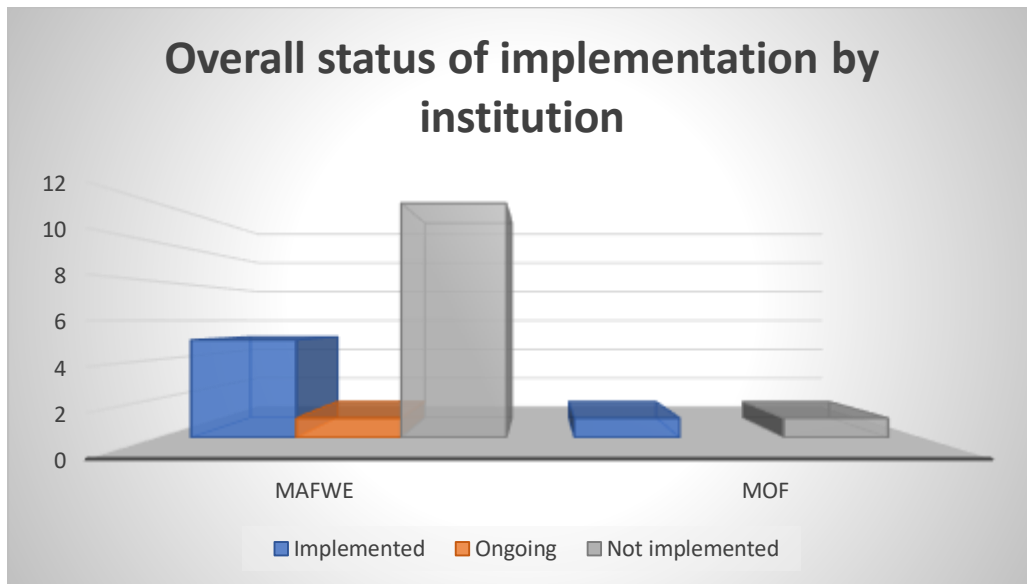


Figure 33: Overall status of activities, by institution

- 18 activities have been planned for the MoAFWE, of which 5 have been implemented, 12 have not been implemented, and one activity is ongoing.
- 2 activities have been planned for the MoF, of which 1 activity has been implemented, and 1 activity has not been implemented.

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 sport sector, to address the two priority problems, 6 measures and 15 activities have been planned, of which 11 activities are one-off, 3 activities are designated to be implemented continuously from 2021 to 2025, and one activity is designated to be implemented continuously from 2022 to 2025, bringing the total number of evaluated activities for the five-year period to 30. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

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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	AYS LSGs	Second half of 2022 - continuously	Pending	Not Implemented	Not Implemented	Ongoing	Ongoing

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	by the RNM and the LSGs							
	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	MoJ	First half of 2022	Pending	Not Implemented	Not Implemented	Not Implemented	Not Implemented

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	concerning the inspection oversight							
	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)**. The final status of this activity is **“Not implemented”**, and according to the MoS, it is due to the 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 it falls under the competence of the **AYS (MoS)**. The final status of the activity is **“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 is the **second half of 2022**, and it falls under the competence of the **AYS (MoS)**. This activity remained **“Not implemented”** during the entire reporting period.

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)**. This activity has not been implemented in the first three years of the reporting period, and has been assessed with the status **“Ongoing”** in 2024 and 2025. 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.
- **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 is the **first half of 2022 - continuously**, and it falls under the competence of the **AYS (MoS)**. This activity has not been implemented in the first three years of the reporting period, and has been assessed with the status **“Ongoing”** in 2024 and 2025 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)**. This activity has not been implemented in the course of 2021, 2022 and 2024, while in 2023 it was marked as “Ongoing”. According to the last report from 2025, it is marked as “**Implemented**”, based on the information that 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 both 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**” during the entire reporting period.

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)**. The final status of this activity is “**Ongoing**”, and the **MoS** informed 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.

Measure 1: Establishment of an independent inspection oversight in sports sector and sports facilities includes three activities:

- **Activity 1.1: Analysis of the current situation regarding inspection oversight in the sports sector and sports facilities.** The deadline for the implementation of this activity is **the first half of 2021**, and it falls under the competence of the **AYS (MoS)**. This activity has been “**Implemented**” in 2024. The **MoS** informed that an analysis has been prepared by the Department for inspection oversight, aimed at establishing independent oversight in sport sector and sports facilities, with the following content: analysis of the current state of inspection oversight in the sport sector and sports facilities; the functioning of the inspection service; competencies and legal framework; challenges faced by the inspection service – Department for inspection oversight in sport; as well as recommendations and conclusion.

- *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**, with the competent institution in the previous reporting periods being the **MoJ**, while since 2024, the competent institution is the **MoS**. The final status of this activity is **“Not implemented”**.
- *Activity 1.3: Establishment of a State Inspectorate for Sports.* The deadline for the implementation of this activity is the **second half of 2022**, with the competent institution in the previous reporting periods being the **MoJ**, while since 2024, the competent institution is the **MoS**. The final status of this activity is **“Not implemented”**, since the State Inspectorate for Sports has not been established.

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 the implementation of this activity is the **first half of 2021**, and the competent institution is the **AYS (MoS)**. The final status of this activity is **“Not implemented”**, considering the fact that the activity indicator is “an adopted training and education program”, and that for the fifth consecutive year it has been reported that such a program is still under preparation.
- *Activity 2.2: Implementation of trainings, workshops, round tables, and public media appearances on integrity and ethics.* The deadline for the implementation of this activity is the **first half of 2021**, and the competent institution is the **AYS (MoS)**. This activity was not implemented in 2021, it was ongoing in 2022 and 2023, as in 2023 a conference was held at Hotel Limak in Skopje, attended by all relevant sports media, as well as athletes, sports professionals, representatives of sports federations, and the academic community. However, the SCPC considers that this activity should be implemented based on an adopted training and education program on integrity and ethics for sports federations, clubs, administration, and sports professionals, which the AYS has not adopted throughout the entire reporting period. For this reason, in 2024 and 2025, the activity is considered **“Not implemented”**.
- *Activity 2.3: Preparation of promotional materials on integrity and ethics in sports.* The deadline for the implementation of this activity is the **first half of 2021**, and the competent institution is the **AYS (MoS)**. In 2021, this activity was not implemented, it was marked as **“Ongoing”** in 2022 and 2023, while in the course of 2024 and 2025 it was assessed as **“Not implemented”**.

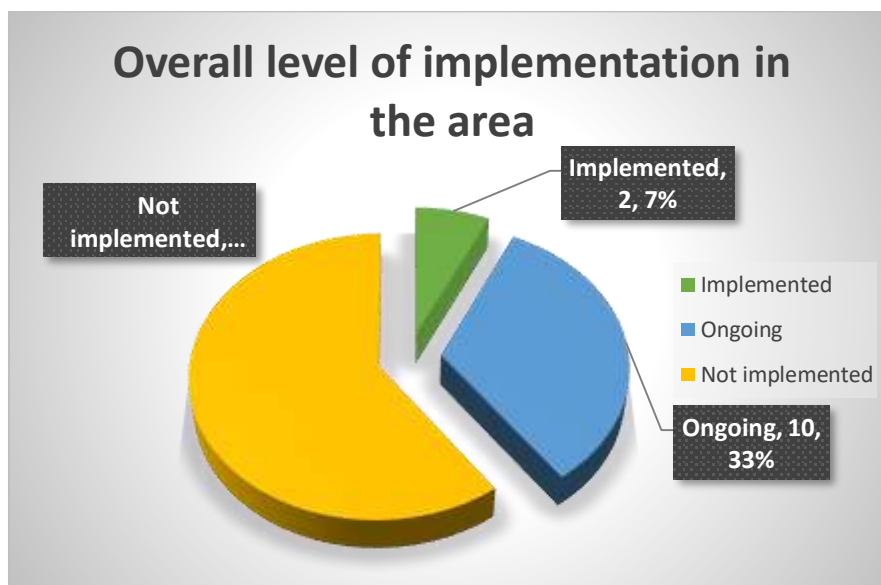


Figure 34: Overall level of Implementation within the sector

Out of a total of 15 activities planned in this sector, 11 activities are intended to be implemented as one-off activities, 3 activities are planned as continuous in the 2021-2025, while one activity is planned as continuous in the 2022-2025 period, resulting in a total of 30 evaluated activities in the indicated five-year period. Of these, 2 activities have been implemented (7%), 18 activities have not been implemented (60%), and 10 activities are ongoing (33%).

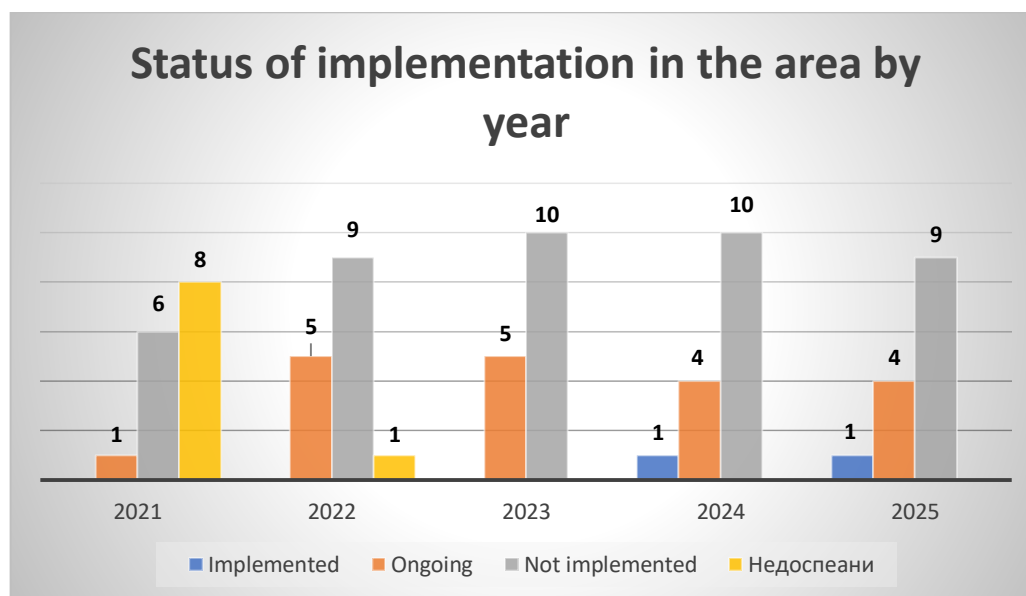


Figure 35: Status of activities by evaluation period

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

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, to address the four priority measures, 8 measures and 13 activities have been foreseen, of which 8 activities were intended as one-off activities, 3 activities are designated to be implemented continuously from 2021 to 2025, while 2 activities are designated to be implemented continuously from 2022 to 2025, resulting in a total of 31 evaluated activities in the indicated five-year period. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

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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	MoE	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Ongoing

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	determining a realistic concession fee							
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

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2. Establishment of a publicly accessible register of motor vehicles owned by public sector institutions and LSGs (except for vehicles intended for special purposes)	2.1 Upgrade the existing motor vehicle register maintained by the MoI to allow data to be publicly accessible and easily searchable by institutions	MoI	Second half of 2021	Not Implemented	Not Implemented	Not Implemented	Not Implemented	Ongoing
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 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**, along 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 is the **second half of 2022**, and it falls under the competence of the CPC. This activity remained **“Not implemented”** during the entire reporting period. The CPC stated that the activity has not been implemented due to lack of funding.

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. This activity was not being implemented in the previous years, and in 2025, the MoEMMR informed 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*, which was submitted and adopted by the Government in the course of the year.
- **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 is the **second half of 2022**, and it falls under the competence of the MoEMMR, in accordance with the Law Amending and Supplementing the LOWBSA. This activity was not being implemented in the previous years, and then 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 –continuously**, and it falls under the competence of the MoEMMR, in accordance with the Law Amending and

Supplementing the LOWBSA. In 2022, this activity was marked as ongoing because the Ministry started to publish concluded contracts. In 2023 and 2024, the activity was not implemented. In 2025, 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>), and therefore the activity is marked as **“Implemented”**.

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

- **Activity 3.1: Analysis and revision of the amount of the concession fee and the level of its collection**, foreseen to be implemented in **first half of 2021 - continuously**, used to be under the competence of the **MoE (MoEL)**, and since 2024 it falls under the competence of the **MoEMMR**. In 2021 and 2022, this activity was implemented, while in 2023 and 2024 it was not being implemented. In 2025, the MoEMMR informed that the 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, which provided for revision of 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**, foreseen to be implemented in the **second half of 2021**, used to be under the competence of the **MoE (MoEL)**, and since 2024 it falls under the competence of the **MoEMMR**. Unlike the past years when the activity was not being implemented, in 2025, the MoEMMR informed 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 is the **first half of 2021 and continuously**, and used to be under the competence of the **MoE (MoEL)**, and since 2024 it falls under the competence of the **MoEMMR**. The final status of this activity is **“Implemented”**. According to the last submitted report by the MoEMMR, 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 is 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”** during the entire reporting period.

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 is 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”** during the entire reporting period. 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 is the **first half of 2021 and continuously**, and it falls under the competence of the Real Estate Cadaster Agency (**RECA**). This activity had the status “Ongoing” only in 2022, while in the remaining years of the reporting period it is 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 MoI 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 **MoI**. The final status of this activity is “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)**. During the entire reporting period, this activity has had the status “**Not implemented**”. The MoPA informed that the activity is in progress. 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 relevant 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 - continuously**, and it falls under the competence of the **AES**. This activity has been “**Implemented**” in all reporting periods.

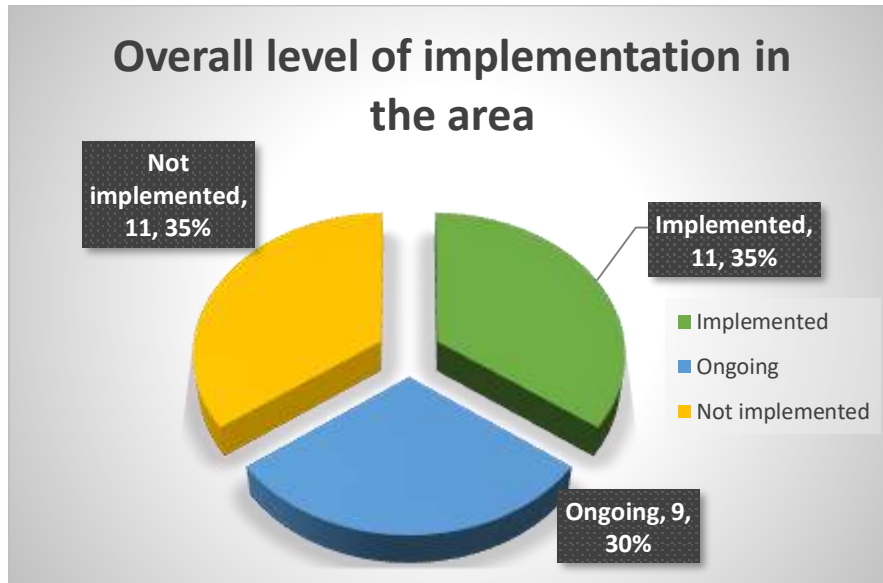


Figure 36: Overall level of Implementation within the sector

Out of a total of 13 activities planned for this sector, 8 activities are intended to be implemented as one-off activities, 3 activities have been planned as continuous activities in the 2021-2025 period, and 2 activities are intended to be continuous during the 2022-2025 period, resulting in a total of 31 evaluated activities in the indicated five-year period. Of these, 11 activities have been implemented (35%), 11 activities have not been implemented (35%), while 9 activities are ongoing (30%).

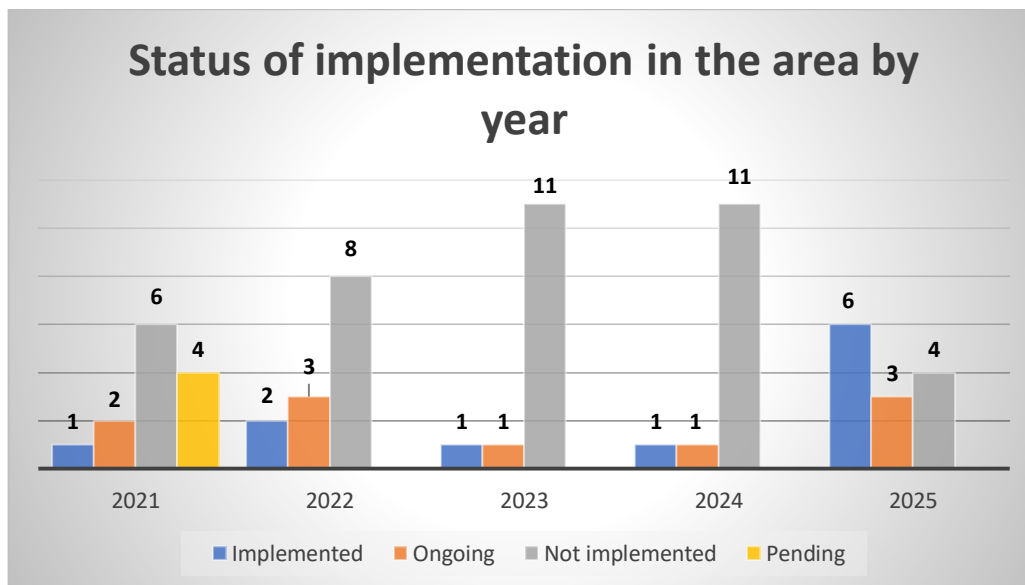


Figure 37: Status of activities by evaluation period

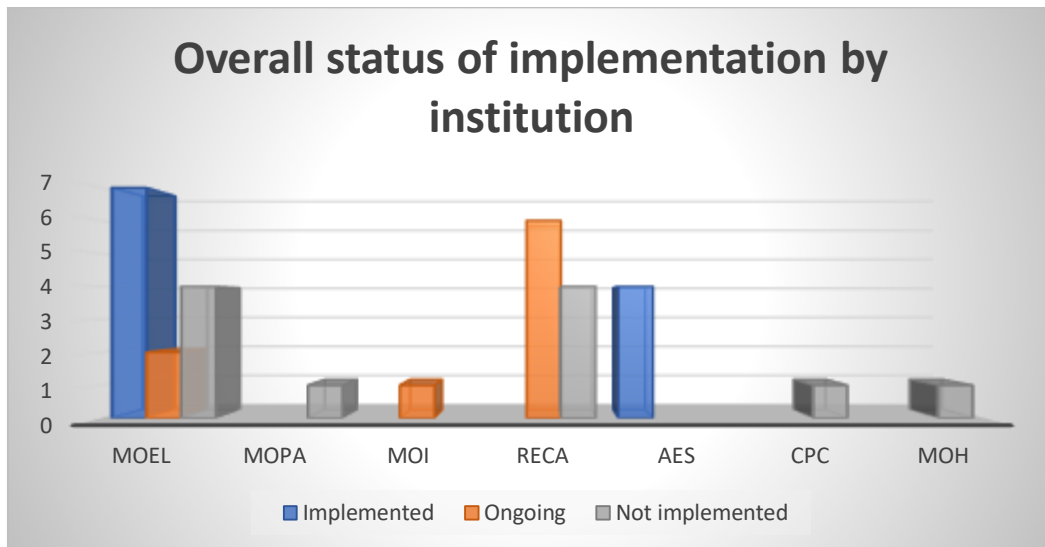


Figure 38: Overall status of activities, by institution

- 13 activities have been foreseen for the MoEL, of which 7 have been implemented, 4 have not been implemented, and 2 activities are ongoing.
- 1 activity has been foreseen for the MoPA which has not been implemented.
- 1 activity has been foreseen for the MoI which is ongoing.
- 10 activities have been foreseen for RECA, 4 of which have not been implemented, and 6 activities are ongoing.
- 4 activities have been foreseen for the AES which have 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.

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 PE and SC owned by the state and LSGs, to address the three priority problems, 3 measures and 6 activities have been foreseen, of which 5 are intended to be one-off activities, and 1 activity is designated to be implemented continuously in 2024 and 2025, resulting in a total of 7 evaluated activities in the indicated five-year period. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

Final Report on the Implementation of the 2021-2025 National Strategy for the Prevention of Corruption and Conflict of Interest for the period from 01.01.2021 – 31.12.2025

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 Trade 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

Final Report on the Implementation of the 2021-2025 National Strategy for the Prevention of Corruption and Conflict of Interest for the period from 01.01.2021 – 31.12.2025

1. Establishing a unified legal framework for the operation of trade 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 Trade Companies, in which the state and LSGs are owners or hold ownership shares, and *Activity 1.1: Establishment and updating of a register with data on ownership and financial performance of enterprises*. The deadline for the implementation was the **first half of 2022**, and it falls under the competence of the **MoE (MoEL)**. This activity remains **“Not implemented”** during the entire reporting period. 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 and three activities:

- *Activity 1.1: Development of an anti-corruption program for enterprises in dominant ownership of the state and LSGs*. The deadline for the implementation of this activity is the **second half of 2023**, and it falls under the competence of the **SCPC**. The activity was **“Implemented”** within the defined deadline and the program was submitted to the Government.
- *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 final status of the activity is **“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 - continuously**, and it falls under the competence of the **Government**. Given that the anti-corruption program was not adopted within the foreseen deadline, the final status of the activity is **“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 trade 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*, foreseen to be implemented in the **second half of 2022** and under the competence of the **MoEL**. According to the last submitted report, the final status of the activity is **“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 Trade 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 it falls under the competence of the MoEL. The final status of this activity is “Ongoing”, since the MoEL conducted a comparative analysis, after which a draft strategy and draft Law on Public Enterprises and Trade 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 trade companies established by the local self-government, that is, municipalities and the City of Skopje.

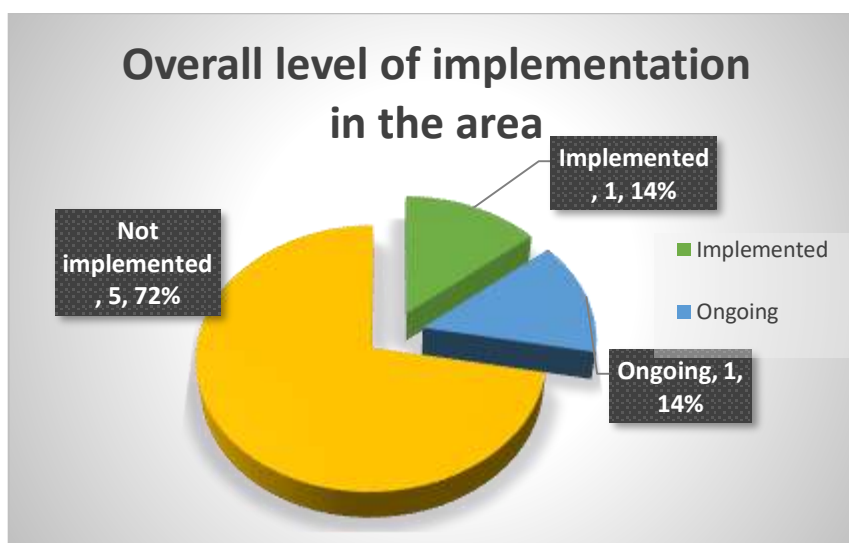


Figure 39: Overall level of Implementation within the sector

Out of a total of 6 activities planned for this sector, 5 activities are intended to be implemented as one-off activities, and 1 activity to be continuously implemented in the 2024-2025 period, resulting in a total of 7 evaluated activities in the indicated five-year period. Of these, 1 activity has been implemented (14%), 5 have not been implemented (72%), and 1 activity is ongoing (14%).

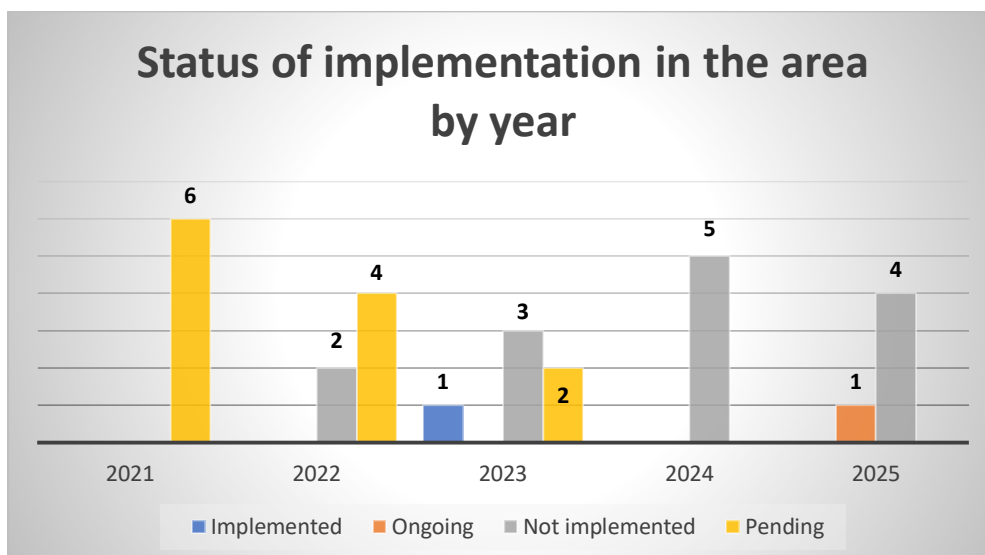


Figure 40: Status of activities by evaluation period

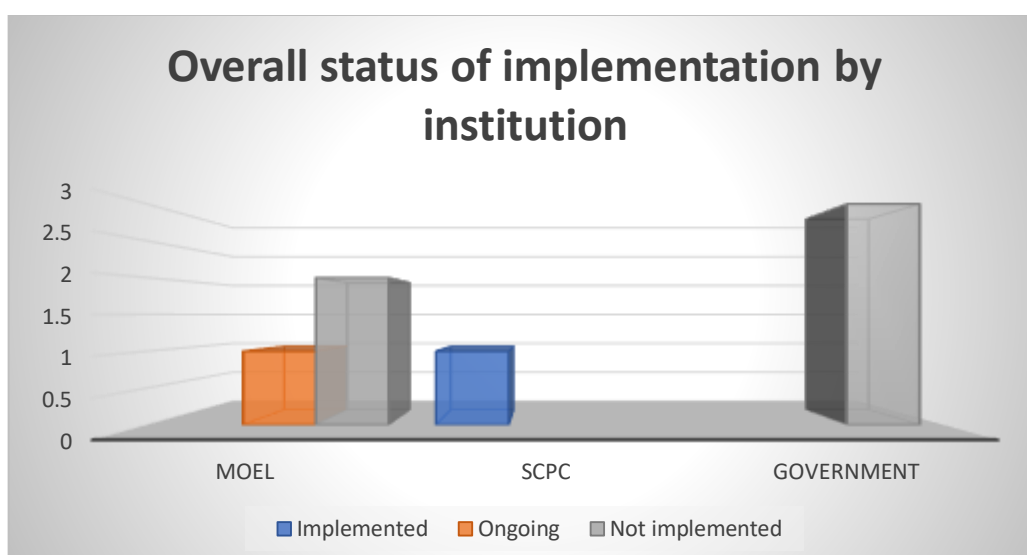


Figure 41: Overall status of activities, by institution

- 3 activities have been foreseen for the MoEL, of which 2 activities have not been implemented, and 1 activity is ongoing.
- 1 activity has been foreseen for the SCPC, and it has been implemented.
- 3 activities have been planned for the Government, which have not been implemented.

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, to address the three priority problems, 5 measures and 8 activities have been planned. Of these, 7 activities are intended to be implemented as one-off activities, and one activity is designated to be implemented continuously in the 2021- 2025 period, resulting in a total number of 12 evaluated activities during the five-year period. Based on the analysis of the annual reports, the status of implementation of the activities is as follows:

Final Report on the Implementation of the 2021-2025 National Strategy for the Prevention of Corruption and Conflict of Interest for the period from 01.01.2021 – 31.12.2025

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	MoJ MoF MISA	First half of 2022	Pending	Ongoing	Ongoing	Not Implemented	Ongoing

Final Report on the Implementation of the 2021-2025 National Strategy for the Prevention of Corruption and Conflict of Interest for the period from 01.01.2021 – 31.12.2025

	to regularly update the unified database							
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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 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*. The deadline for the implementation of this activity was Moel the **first half of 2022**, and it falls under the competence of the **MISA (MDT)**. The final status of the activity is “Not implemented”, given that, although in 2024, the adopted Law Amending and Supplementing the Law on Audio and Audio-Visual media Services (“Official Gazette of the Republic of North Macedonia“ No. 55/24), regulated the procedures for conducting state funded campaigns at national and local level, the obligation to amend the Law on Media remained, which would regulate the status and obligations of online media. Additionally, the MDT informed that in December 2025 it initiated the process of aligning the Macedonian legislation with EU legislation, within which a Strategy for the development of the media sector with an Action Plan will be prepared, as well as the European Media Freedom Act will be transposed into the domestic legislation. Furthermore, the process will take into account the recommendations, measures and activities contained under area 5.13 Media and civil society.

Measure 2: Improving the criteria for granting state aid to print media includes two activities:

- *Activity 2.1: Analysis of existing criteria for awarding state aid*. The deadline for the implementation of this activity was the **first half of 2022**, and it falls under the competence of the **Government**. This activity has been “**Implemented**” in 2024 through the adoption of the Law Amending and Supplementing the Law on Media (“Official Gazette of RNM” No. 63/24 and 74/24), stipulating the criteria for supporting print media.
- *Activity 2.2: Amendment of the decision on the program for support of print media and distribution of print media*, with an implementation deadline in the **second half of 2022**, and the competent institution being the **Government**. The final status of this activity is “**Implemented**”, through the adoption of the Law Amending and Supplementing the Law on Media (“Official Gazette of the Republic of North Macedonia“ No.63/24 and 74/24), pertaining to the support for print media (Article 28-a and 28-b).

Regarding the **Problem 2: Strengthening self-regulation in relation to online media**, the following

Measure 1: Strengthening self-regulation in relation to online media is foreseen, along with two activities:

- **Activity 1.1: Analysis of the situation of online media in terms of professionalism and integrity in their operations**, with an implementation deadline in the second half of 2021, under the competence of the **AJM**. The final status of the activity is **“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/>.
- **Activity 1.2: Establishing mechanisms to strengthen self-regulation of online media**, with an implementation deadline in the second half of 2021, under the competence of the **AJM**. This activity has been **“Implemented”** within the foreseen deadline, through the affirmation of the members of the Register of professional online media, the exclusion of those that violate membership criteria, as well as the organization of events/campaigns to promote self-regulation, educational events for the media, etc.

Measure 2: Upgrading the register of professional online media includes **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 **second half of 2021 - continuously**, and it falls under the competence of the **AJM**. This activity was assessed as ongoing in 2022, it was not implemented in 2023, while it was marked as **“Implemented”** in 2021, 2024 and 2025. 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 **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 **Measure 1: Strengthening the transparency of**

institutions in planning funds for financing CSOs, as well as accountability for the implementation and impact of projects, has been foreseen, including **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 both activities was the first half of 2022, and they both fall under the competence of the MoJ. The final status of both activities is “Ongoing”. According to the last submitted report, the MoJ informed 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.

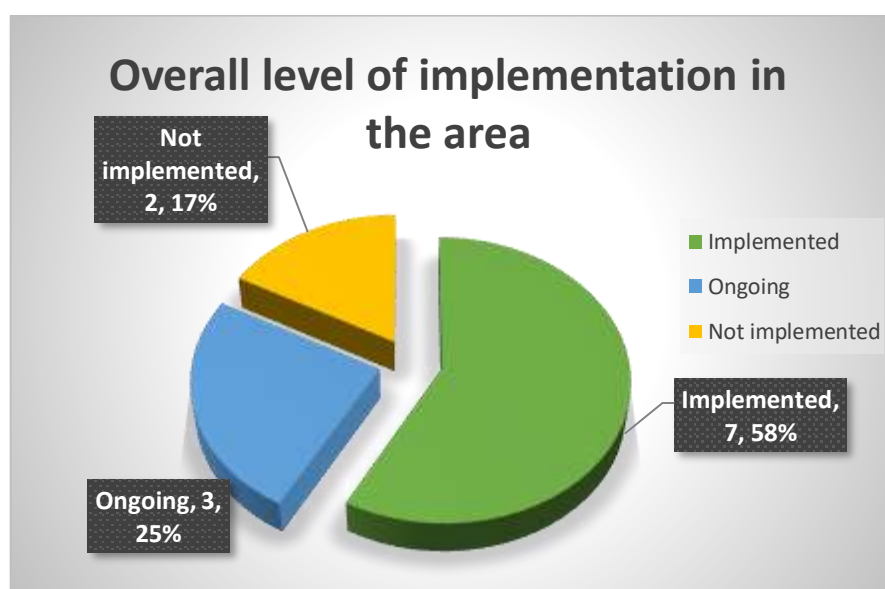


Figure 42: Overall level of implementation within the sector

Out of a total of 8 activities planned for this sector, 7 are intended to be implemented as one-off activities and 1 activity to be implemented continuously in the 2021-2025 period, resulting in a total of 12 evaluated activities for the indicated five-year period. Of these, 7 activities have been implemented (58%), 2 activities have not been implemented (17%), and 3 activities are ongoing (25%).

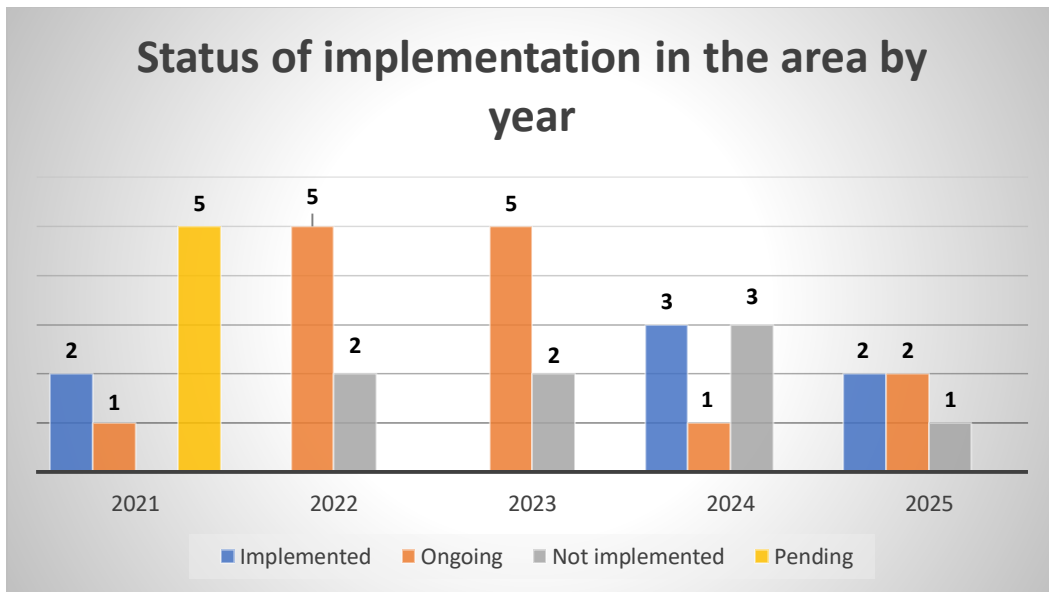


Figure 43: Status of activities by evaluation period

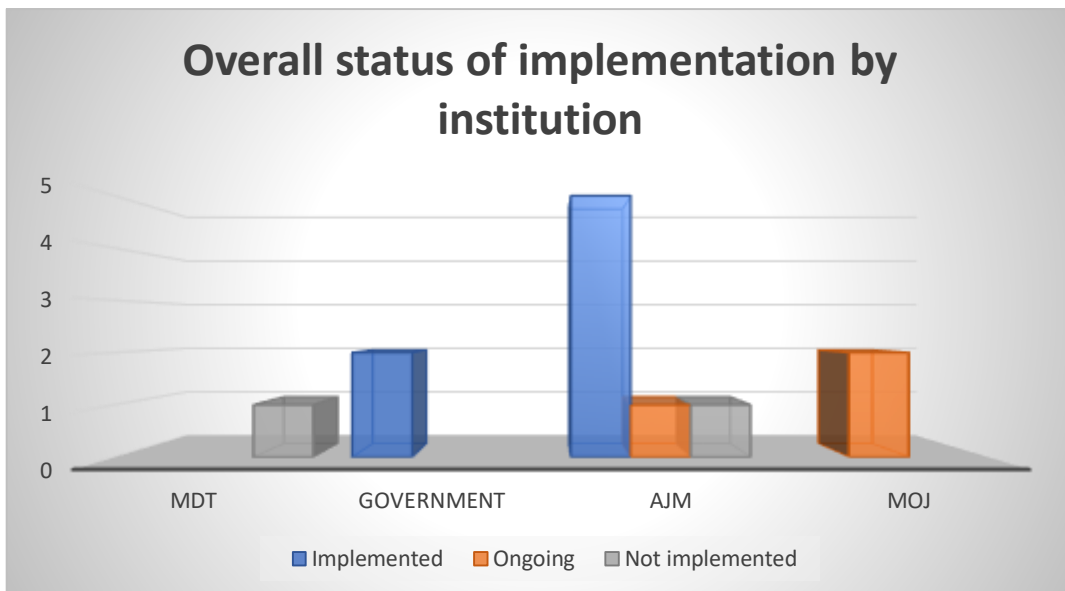


Figure 44: Overall status of activities, by institution

- 1 activity has been foreseen for the MDT, which has not been implemented.
- 2 activities have been foreseen for the Government, and both have been implemented.
- 7 activities have been foreseen for the AJM, of which 5 have been implemented, 1 activity has not been implemented, and 1 activity is still ongoing.
- 2 activities have been foreseen for the MoJ, and both activities are still ongoing.

CONCLUDING OBSERVATIONS

Taking into account the annual reports on the implementation of the Strategy in 2021, 2022, 2023 and 2024, as well as the persistently low level of activities' implementation, in January 2025, the SCPC conducted an Analysis of the factors influencing the level of implementation of the National Strategy 2021-2025.

The Analysis aimed to identify factors of structural, organizational, regulatory, and procedural nature that have influenced the level of implementation of the National Strategy for the Prevention of Corruption and the Conflict of Interest (2021-2025) and to provide recommendations for addressing weaknesses in the preparation of the new National Strategy for the Prevention of Corruption and the Conflict of Interest for 2026-2030.

Based on the Analysis, the SCPC concluded that several factors negatively influenced the implementation of the Strategy, that is:

- Use of insufficiently developed methodology for the preparation of the Strategy;
- Frequent changes of representatives of institutions during the preparation process of the Strategy, the nomination of representatives without adequate experience or mandate to decide on the commitments that the institution may undertake, or the absence of nominations by some stakeholders;
- Lack of systemic integration of the Strategy's activities into the strategic and operational documents of the Government and the relevant state administration bodies;
- An inefficient structure for inter-institutional coordination in the implementation of the Strategy;
- Insufficient use of the oversight function of the Assembly over the Government and by the Government over the state administration bodies **responsible for implementing the Strategy's activities;**
- Inadequate formulation and assignment of competencies for the implementation of activities;
- Non-adoption of a plan for monitoring the implementation process of the Strategy;
- Inadequate budget planning during the preparation of the Strategy, and subsequently by the entities responsible for implementing the activities;
- Lack of an appropriate organizational structure within the State commission for prevention of corruption and conflict of interest, as the Strategy is within its remit; and
- Existence of reform fatigue in the public sector.

Additionally, the Annual report on the implementation of the Strategy for the period from 01.01.2025 to 31.12.2025 reflects the same trend of low implementation. Specifically,

out of 137 evaluated activities for 2025, only 31 have been implemented (23%), 60 have not been implemented (44%), and 46 remained as ongoing activities (33%).

Regarding the overall level of implementation of the Strategy for the period from 2021 to 2025, out of a total of 318 evaluated activities, 118 have been implemented (37%), 109 have not been implemented (34%), and 91 remained as ongoing activities (29%).

An overview of the concluding observations by horizontal areas, i.e., sectors of the Strategy is given below:

In the horizontal area of **public procurements**, limited progress has been achieved in strengthening capacities and enhancing transparency. The activity related to training on the preparation of technical specifications and criteria for determining capacity was implemented in 2024 and 2025, indicating continuity in cooperation between the Public Procurement Bureau and the Institute for standardization. The activity is primarily carried out through trainings and institutional cooperation, without broad policy changes and systemic improvements in standardization in the field of public procurement. With regard to increasing institutional integrity and transparency in public procurements, partial implementation of the planned measures is observed, particularly those requiring legal amendments or additional institutional action. Also, there are differing interpretations among institutions regarding the application of legal provisions for sanctioning the non-publication of information related to public procurement. Although the legal framework stipulates an obligation to publish documentation related to public procurement, practical implementation and sanctioning remain limited. This points to the existence of obstacles in the implementation of existing rules, highlighting the need for further precision of the legal framework and strengthening of oversight and enforcement mechanisms.

In the course of 2025, the SCPC conducted a process for the preparation of the new National Strategy for the Prevention of Corruption and the Conflict of Interest for the period of 2026-2030, following a previously conducted corruption risk analysis. In the process of prioritizing areas and sectors to be covered by the new National Strategy, the SCPC determined that public procurement will remain a horizontal area with a high level of corruption risk in the next five-year period. As result, the risks that remained relevant during the preparation of the analysis on corruption risk assessment for the purposes of the new 2026-2030 National Strategy on Prevention of Corruption and Conflict of Interest were also addressed in the new National Strategy.

In the horizontal area of **Employment**, reforms aimed at reducing the risks of political influence, nepotism, cronyism and clientelism in the public sector recruitment processes show limited progress. Although certain activities have been undertaken with the adoption of the new Law on Administrative Servants in 2025, the risks related to the implementation and publication of functional analyses, monitoring of transparency, and employment through temporary employment agencies have not yet been fully addressed. In addition, the possibility of transforming labor relations without a regular

procedure remains unregulated, leaving space for potential irregularities. Additionally, although functional analyses are being prepared, monitoring to ensure the consistent implementation of the obligation to publish them on institutional websites has not yet been secured, nor has a mechanism been established for the systematic assessment of workload within institutions.

The **priority problem** “Insufficient leadership, management, and oversight in certain administrative bodies, agencies, public enterprises and joint-stock companies owned by the state” has not been fully addressed. Namely, most of the foreseen activities to tackle this issue have been initiated, but remain ongoing, i.e. have not been fully implemented.

Reforms aimed at improving governance and oversight in public enterprises and trade companies in state ownership show some progress, particularly with the adoption of legal amendments that limit the number of members in governing and supervisory boards. Some public enterprises have aligned their statutes with these amendments, indicating gradual implementation of the reform measures. However, the reform process is still not fully completed, as the alignment of statutes across all public enterprises and trade companies in state ownership has not yet been finalized. Furthermore, insufficiently precise criteria for education and competencies in the selection of directors and members of management bodies, as well as the absence of misdemeanor sanctions for untimely appointments or unlawful selection of management personnel, leave room for political influence and non-transparent appointments. The legal framework on recruitment and promotion processes in the public sector still does not provide a sufficiently developed and clear system for evaluating selection criteria. Although activities have been envisaged to establish transparent criteria and limit discretionary decision-making in candidate selection, their implementation is significantly delayed. In particular, by-laws establishing objective criteria and evaluation procedures in the sectors of health, education, culture and social protection have not yet been adopted, which slows down the establishment of more efficient and transparent recruitment and promotion procedures.

The horizontal area of Employment is not stipulated in the new National Strategy; however, within the individual sectors covered by the Strategy, risks related to employment that are specific to those sectors have been taken into account.

In the **Political System sector**, three of the six identified priority problems remained completely not addressed, the planned activities for two priority problems remain ongoing, while the activities for one problem were fully implemented.

The problem related to the adoption of a large number of laws under a shortened procedure without adequate justification for using this type of procedure remained unaddressed. Although the Assembly carried out a process of adopting a new Rules of Procedure, it does not include a definition that would regulate the complexity and scope of draft laws. Despite years of pointing to this problem by the SCPC, the civil sector and international partners, this systemic problem has not been tackled.

The measure “Regulating the Regulatory Impact Assessment (RIA) process, with a view of making it mandatory” which was intended to address the problem “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” also remained unaddressed. The non-adoption of a new RIA Methodology limits the effectiveness of impact assessment and corruption proofing of legislation, which are key for ensuring quality and responsive legislation.

The Problem “Insufficient involvement of high-level officials of the executive branch in educational programs in the field of ethics and integrity”, in the past five-year period, has not been tackled. Namely, although in several annual reporting periods it was noted that certain training sessions were also conducted for the for high-level officials of the executive branch, the identified problem of the absence of a mechanism ensuring systematic and measurable participation of high-level officials remains unresolved.

Despite the long-standing problem of non-sanctioning of refusal to submit declarations of assets and interests, the activities aimed at addressing it are still ongoing, as well as the activities aimed at addressing the problem of “The cost for advertising on Internet portals should not be paid from the Budget of the RNM”, which continues to pose a risk of irregularities, unequal conditions for participants, and potential abuse.

One successfully addressed priority problem is the “Unregulated interaction between lobbyists and representatives of the legislative and executive branches, as well as officials from local governments”, through the adoption of the Law on Lobbying.

In the **Judiciary** sector, with a view of strengthening integrity within the judiciary and the public prosecutor’s office, the planned measures and activities have been implemented, including the adoption of the amended Code of Public Prosecutors and the implementation of continuous training. The corruption risk analysis represents an important step toward improving transparency and accountability in the justice system. However, to ensure long-term effectiveness, continuous monitoring of the implementation of the results and further strengthening of ethical and integrity standards in the practice of judges and public prosecutors will be necessary. The implementation of measures to strengthen the capacities and efficiency of public prosecutor’s office shows uneven progress. While training for newly appointed public prosecutors is being carried out continuously, staffing remains limited due to insufficient budget support. A positive development is the establishment of two new investigative centers, which increases the investigative capacities of the prosecution offices. The establishment of an automated case allocation and tracking system is progressing with EU support, but its implementation has been delayed, affecting further activities such as training the staff. The preparation of the Draft Law on the State Attorney’s Office represents a significant step towards improving efficiency, accountability, and transparency in the institution’s work, as well as better regulating of its competencies and organization. However, since the draft wording is still under review within the Ministry of Justice, further institutional action is required for its finalization and adoption.

In the process of prioritizing areas and sectors to be covered by the new National Strategy for 2026-2030, the SCPC determined that the judiciary sector will remain in the focus in the next five-year period. In addition to newly identified risks, corruption risks that were not addressed through the previous Strategy have also been taken into account.

In the **Law enforcement** sector, regarding discretionary powers of responsible officials and the lack of transparency in recruitment and employment within the Ministry of Interior, partial progress has been observed with the adoption of the amendments to the Law on Internal Affairs in 2022. However, with regard to the transparency through the publication of acts on the organization and systematization of job positions within the Ministry of Interior on its website, except for positions covered by special legal provisions, this measure remains unimplemented, as the internal acts have not been aligned with the Law on Classified Information. This limits public scrutiny and increases the risk of clientelism, political influence and abuse of discretionary powers. The implementation of measures to improve the system for establishing professional responsibility within the law enforcement authorities shows limited and uneven progress. At the same time, the process of strengthening integrity and accountability mechanisms among customs officers is ongoing but has not yet been fully completed. This indicates that additional institutional efforts and better coordination among the competent institutions are required for full implementation of the planned measures. Unclear and overlapping competences among inspection services reduce the effectiveness of inspection oversight and create space for inconsistent and/or selective enforcement. Although the Inspection Council has carried out an initial analysis, the legislative amendments have not yet been adopted, which creates legal gaps, corruption risks, inefficient use of resources, and legal uncertainty for citizens and the business sector. Subjective decision-making by inspectors continues to pose a risk to the integrity of inspection services. Even though the reports indicate that the activity related to continuous inspection oversight by the State Administrative Inspectorate has been implemented, the problem of insufficiently functional inspection oversight in the local self-government remains unresolved. Formal compliance with oversight requirements does not mean that local inspection services are operating effectively. Significant systemic weaknesses on local inspection oversight still exist, such as insufficient and uneven distribution of the number of inspectors among municipalities, limited resources, and inadequate professional capacity of the services, as well as risks of local pressure and political influence over their work. Additionally, there is a lack of a detailed analysis of the effectiveness of oversight, as reports most often only state the implementation of controls, without assessing their results. This reduces the efficiency of the system and increases the risk of corruption and selective application of laws. Even though a new Law on the System of Internal Finance Control in the Public Sector has been adopted, the problem of non-implementation of audit recommendations remains. The main weaknesses include insufficient accountability of managerial staff, limited transparency in the implementation of recommendations, the failure to adopt the new Law on State Audit, and the absence of implementation of audit reports, which results in frequently unresolved identified problems.

In the **Health** sector, progress has been observed regarding the reforms aimed at improving health economics and financial management in healthcare institutions. The adoption of new rulebooks, methodologies for setting prices for healthcare services and medicines, and transformation of transparency in resource allocation processes represent significant steps towards improving planning and control within the health sector. Specific activities such as the publication of healthcare institutions' budgets, the establishment of new rules for determining reference prices for medicines, and the adoption of new criteria for determining contractual fees are a strong indication of the success of reforms. However, some activities have not been fully implemented, such as the establishment of an independent body for the allocation of the HIF of RNM budget or the establishment of an analytics department within the HIF of RNM, which indicates capacity weaknesses and staffing challenges.

The system for selecting medicines covered by public funds shows certain progress, particularly through improvements in the legal framework, the establishment of criteria for medicine selection, and the introduction of a health technology assessment methodology. These activities contribute to increased transparency and better application of evidence-based medicine. However, certain challenges remain, such as delays in the implementation of planned activities, insufficient transparency in some processes, and incomplete publication of the list of medicines covered by public funds. Additionally, processes related to medicines for rare diseases and medicines with a monopolistic market position indicate the need for greater transparency and consistent application of established rules.

The process of donations, clinical studies, and projects in the health sector faces significant challenges, particularly in terms of regulation and transparency. The by-law defining the conditions for receiving donations in public healthcare institutions has not yet been adopted, indicating insufficient regulation of the process. At the same time, the public register of donations has been established, but it functions in a limited form and is not updated regularly.

Regarding activities and measures aimed at regulating unethical practices in medicine marketing, some positive progress has been observed, but significant shortcomings have also been identified. The adoption of the Code of ethics for the marketing of medicines is an important step in regulating relations between pharmaceutical companies and healthcare professionals. However, further regulation of marketing practices is needed, with clearly defined procedures and obligations for all stakeholders in the sector. At the same time, the establishment of systems such as therapeutic communities and hospital medicine registers remains unimplemented, and concrete measures are required for their implementation.

Regarding the problem of transparency and objectivity in decision-making for treatment abroad, the measure on establishing reference hospitals through clearly defined criteria and a by-law has led to a significant progress in efforts to ensure fairness and transparency in the process. Through amendments to the acts defining the criteria for

selecting reference hospitals, a legal basis has been established for objective decision-making related to treatment abroad. However, given the specific nature of procedures for treatment abroad and the public interest associated with such cases, continuous monitoring of the application of the criteria and their improvement based on practice will be necessary, as well as increased transparency and accountability of the Health Insurance Fund.

This sector is also included in the new National Strategy for 2026-2030, due to high level of corruption risks identified in this sector. Accordingly, the risks that were not tackled by the previous Strategy and remained relevant during the preparation of the corruption risk assessment analysis for the purposes of the new National Strategy for the Prevention of Corruption and Conflict of Interest for 2026-2030, are also addressed in the new National Strategy.

In the **Education** sector, during 2025, significant progress has been observed in regulating certain processes, but key problems related to political influence and discretionary powers remain unresolved. On the positive side, measures to strengthen the State Education Inspectorate have finally been implemented (increased budget and new employments), new regulations and rulebooks have been adopted for the procurement of textbooks and for collecting funds from parents (such as for excursions and snacks, transparency within the Agency for Quality in Higher Education has significantly improved through the public disclosure of hundreds of decisions, and universities have successfully established anti-corruption policies. On the other hand, there is a serious and long-standing delay in the adoption of laws intended to prevent irregularities in employment of teachers and early dismissal of school directors, a lack of an effective mechanism for controlling the work of inspectors, a lack of rules for leasing school property, as well as in (complete) implementation of education programs on ethics and integrity for teaching staff due to insufficient funds.

Within the **Labor and social policy** sector, partial progress has been observed in the implementation of planned measures, whereby most activities related to the establishment of legal framework and analyses have been implemented, although with significant delays compared to the stipulated deadlines. Amendments to the legal framework on social insurance, the Law on Assessment of Persons with Disabilities, as well as analyses and amendments to by-laws related to the review commission have been successfully adopted. However, key infrastructural and operational activities, such as the full establishment of digitized central social insurance system and the formation of the expert assessment body, are still ongoing, with their completion postponed for 2027. The most significant delay has been observed in strengthening oversight, as measures for developing a methodology for controls and their regular implementation remain unimplemented, while oversight of rights to assistance and care for another person was only implemented in 2025.

In the **Urbanism and physical planning** sector, in 2025, the Law Amending and Supplementing the Law on Construction (“Official Gazette of the Republic of North

Macedonia“ No.101/25) was adopted, introducing an additional provision on the grounds for revoking licenses under this law. Specifically, this legal amendment introduced strengthened ex officio supervision (at least twice a year) by the Ministry of Transport, with a view of conducting regular inspections rather than relying solely on submitted complaints. Based on this amendment, the Ministry of Transport conducted a comprehensive review of the issued licenses and revoked 41 supervision licenses due to identified irregularities, which may be considered a positive signal of a non-selective approach to combatting corruption and illegal practices in construction activities.

Given the high-corruption risk in this sector, the SCPC, in the process of prioritizing the areas and sectors to be covered by the new National Strategy for 2026-2030, identified the need to include physical planning, urban planning, and construction as a separate sector for the next five-year period, as well.

In the **Environment** sector, to address the problem of the lack of an established integrated regional waste management system, a measure has been foreseen for the establishment of a regional waste management centers, which includes two activities: the publication of a call for the selection of concessionaires and the adoption of decisions on awarding concessions for waste management. Within both activities, certain steps have been taken, but it cannot be confirmed that they have been fully completed. It is positive that the MoEPP and LSGs are actively implementing the necessary preparatory and infrastructure steps through projects supported by EBRD and IPA as well as through the establishment of inter-municipal boards. However, the essential process of selecting the concessionaries who will operate the regional centers has not yet been implemented, and an additional challenge is the apparent shifting of responsibilities among institutions.

Given the above, as well as the analysis of corruption risk assessment, and following the principle of prioritization of sectors that generate a high level of corruption risk, the SCPC identified the need to include the environment, energy and natural resources sector in the new National Strategy for 2026-2030.

In the **Agriculture** sector, partial resolution of some priority problems can be observed. However, substantive systemic changes largely remain stagnant, while progress has been achieved in the areas of strategic planning and administrative capacity. On the one hand, key anti-corruption measures related to state agricultural land, such as the introduction of sanctions for misuse, revision of the sales methodology and the establishment of an independent body, remain completely unimplemented, with the exception of the prescribed oversight procedures. Also, the methodology for assessing the economic justification of subsidies has not been established, and the planned integrity training for employees has not been implemented. On the other hand, a positive step is the adoption of the National Agricultural Strategy 2021-2027 (through which activities related to new measures and performance indicators have been fulfilled), the increase in the number of employees in the Agency for Financial Support in Agriculture

and Rural Development and the adoption of the Law on the Advisory System for Agriculture and Rural Development. Although the activities aimed at addressing the priority problems 4 and 5 are formally marked as “**Not implemented**”, with the amendments and supplements to the National Strategy 2021–2025, adopted by the SCPC in 2023 and submitted to the Assembly of RNM, but not enacted, these activities have been assessed as obsolete.

In the **Sport** sector, a serious backlog and delay in the implementation of the Strategy can be observed, given that key systemic, strategic, and legislative solutions remain unimplemented even after several years. Although certain positive steps have been made – such as the completion of the analysis on inspection oversight, the first extraordinary inspection oversight conducted in 2025, as well as ongoing activities related to the inventory and the database on sports facilities (with data submitted only by 90% of municipalities) – the majority of substantive reforms have remained blocked. Specifically, the adoption of the new legal framework (Law on Sport and Law on Sports Facilities), the development of the Strategy for Sports Facilities, the establishment of an independent State Sports Inspectorate, and the adoption of the education and integrity program remain unimplemented, most often due to a lack of human resources or lengthy procedures for legislative amendments.

In the **Economy and business** sector, significant progress has been observed during 2025, particularly in the area of mineral resources and concessions management, where the MoEMMR successfully implemented key activities, including the adoption of a Strategy, the establishment of transparency through the publication of contracts, the adoption of a new Tariff Book for concession fees, and an increase in the number of inspectors. In contrast, there is a serious delay in the implementation of digital tools for systemic transparency. The state aid register is still completely unimplemented due to financial and coordination constraints, while the open search system for state property through the Cadaster Agency is not functional. The register of state vehicles is still in the phase of software procurement. Additionally, although there is continuous support for small enterprises, the substantive reform of the Regulatory Impact Assessment (RIA) methodology remains unimplemented.

Corruption risks in this sector related to mineral resources and concessions are also addressed in the new National Strategy for 2026-2030 under the Environment, energy and natural resources sector. To address them, a large number of measures and activities have been planned in the coming five-year period.

In the sector of **Public enterprises and stock-companies owned by the state and local government**, a very low level of implementation of anti-corruption measures is observed, with key reforms aimed at increasing transparency and accountability being implemented only partially and at a slow pace. The only implemented activity is the preparation of an anti-corruption program by the SCPC; however, it has not yet been adopted by the Government, which effectively prevents its implementation and monitoring. Additionally, substantial measures aimed at establishing transparency have

not been implemented or have deviated from the original objectives of the Strategy. The register of legal entities has not yet been established (while the new draft law does not foresee ownership data within it), and the process of adopting a unified legal framework is still ongoing.

In the **Media and Civil Society** sector, positive progress has been observed in defining rules for support and self-regulation; however, the key tools for transparency of public funding in these sectors have not yet been finalized. Measures to improve the criteria for state aid for print media have been successfully implemented (through amendments to the Law on Media in 2024), as well as most activities related to self-regulation of online media, established through the new Rulebook of the AAVMS from June 2025 on entry in the Register of Internet portals. However, the systemic problem of non-transparency in contracts between the public sector and media/marketing agencies remains unresolved, as the necessary legal amendments have not been implemented but are instead a part of a recently launched broader EU alignment process. Similarly, the establishment of a single database on financing of civil society organizations remains at the “Ongoing” stage, as the new Law on Associations and Foundations is still only a draft published on ENER.

RECOMMENDATIONS

Horizontal area - Public Procurements

Given that Public Procurements remain one of the horizontal areas in the new National Strategy for Prevention of Corruption and Conflict of Interest for 2026-2030, the SCPC considered it necessary in this final report to provide recommendations only with regard to those risks which, due to prioritization, are not covered by the new five-year National Strategy, and refer to the consistent application of the provisions of the Law on Free Access to Public Information, particularly in the area of publishing information related to public procurement, as well as to considering the possibility of introducing misdemeanor provisions that would sanction the non-publication of relevant public procurement data. Additionally, the Agency for Protection of the Right to Free Access of Public Information (ASPI) should establish more effective mechanisms for monitoring the publication of public information in the field of public procurement, with a view to ensure systematic tracking of the availability and accessibility of information, and to strengthen the system of sanctions for institutions that fail to publish data in a timely manner or do not comply with their legal obligations.

Horizontal area - Employment

Taking into account the final status of the implementation of the activities in the horizontal area of Employment as of December 2025, the SCPC found it necessary to provide recommendations for the implementation of activities that have not been completed or remain ongoing, in particular:

- The MoPA should consider the possibility of further amendments to the Law on Public Sector Employees in order to clearly define the conditions under which the transformation of employment from fixed-term to indefinite-term may be carried out.
- The MoPA should introduce appropriate amendments to the by-laws to more clearly define the type of higher education required for specific job positions, in order to reduce the possibility of arbitrary interpretation when determining employment requirements.
- The MoPA, in cooperation with the State Administrative Inspectorate, should take a more proactive role in establishing a monitoring mechanism over the provisions of the Law on Employees in the Public Sector related to the publication of functional analyses and annual workload assessments in public institutions, including the introduction of sanctions for institutions that fail to comply with these obligations.
- The ASPI should intensify monitoring of the publication of organizational and systematization acts, as well as information related to employment.
- The Government should ensure full harmonization of the statutes of all public enterprises and state-owned companies with the amendments to the Law on Public Enterprises and the Law on Trade Companies.

- The MoEL should introduce misdemeanor provisions for the founder in the Law on Public Enterprises and the Law on Trade Companies in cases of delayed appointment of management bodies or unlawful selection of management officials.
- The MoEL should consider further amendments to the Law on Public Enterprises and the Law on Trade Companies, establishing a clear obligation to define required educational background and professional competencies for all managerial and supervisory positions, as well as a transparent selection procedure.
- The MoH, MoES, MoS and MSPDY should accelerate activities for the adoption of by-laws establishing clear, objective, and transparent criteria and procedures for evaluation in recruitment and promotion processes.
- The MoPA should implement the recommendations from the analysis prepared by the SCPC, with the aim of limiting the discretionary powers of responsible persons in employment processes.

Taking into account that for certain activities in this area, the institutions designated as responsible in the Action Plan of the Strategy reported that they do not have the legal mandate to implement them, the SCPC recommends that the Government take these findings into consideration when designing anti-corruption policies, by involving the competent institutions accordingly.

Sector- Political System

- The Assembly should introduce amendments to the Rules of Procedure establishing clear criteria for determining the complexity and scope of draft laws, and defining the conditions under which the use of a shortened procedure is justified. In addition, for legislative initiatives submitted under a shortened procedure, an obligation should be introduced to provide a detailed explanation of the reasons for shortening the procedures, in order to ensure greater transparency, accountability, and the protection of the public interest in the law-making process.
- The Ministry of Public Administration (MoPA) should adopt a new Regulatory Impact Assessment (RIA) Methodology that will be mandatory in the preparation of all draft laws and by-laws in order to ensure a comprehensive and objective assessment of their effects. The Methodology should also provide for a mandatory corruption proofing of legislation, as well as a transparent assessment process involving relevant experts and stakeholders.
- The Ministry of Public Administration (MoPA), through its Academy for professional development and training of administrative servants, should stipulate training for administrative servants responsible for drafting regulations.

- The Ministry of Public Administration (MoPA) should establish a system of monitoring and regular reporting on the implementation of RIA, as well as analysis of the effects of adopted legislation.
- The Ministry of Public Administration (MoPA) should publish the results of RIAs and reports on conducted consultations, and provide feedback from the public consultation process. This would contribute to increasing trust in institutions and ensure that legislation is based on careful and comprehensive analyses, thereby protecting the public interest.
- The Ministry of Justice (MoJ) should accelerate the process of adopting amendments and supplements to the Law on Prevention of Corruption and Conflict of Interest, which should provide clear and effective provisions for sanctioning refusal to submit declarations of assets and interests. These legislative amendments should establish precise and enforceable mechanisms for determining responsibility and sanctions for persons who fail to comply with this legal obligation. Furthermore, mechanisms for monitoring and control of compliance should be strengthened, and activities should be carried out to raise awareness among public officials of the importance of declaring assets and interests.
- The State Commission for Prevention of Corruption (SCPC) should ensure consistent implementation of the Law on Lobbying through training and educational activities for lobbyists, elected and appointed officials, and civil servants, in order to ensure the proper application of the legal provisions.
- Transparent mechanisms should be established for reporting lobbying activities, along with regular monitoring and periodic reviews of the implementation of the Law on Lobbying and its effects.
- Cooperation among competent institutions and independent bodies in the implementation of the law should be strengthened, in order to ensure greater transparency and integrity in lobbying processes.
- The State Commission for Prevention of Corruption (SCPC) should continue activities aimed at raising awareness among the highest-level holders of office of the executive branch, with special emphasis on education on ethics and integrity. In addition, the SCPC, in cooperation with relevant institutions, should carry out an evaluation of the effects of the implemented trainings and workshops, in order to determine their impact on the practical implementation of the principles of integrity, transparency, and accountability in governance and decision-making processes.
- The Electoral Code should regulate advertising on Internet portals during election campaigns, in order to ensure greater transparency and clear rules on financing.
- A mechanism should be established for monitoring media representation through Internet portals.

- The Ministry of Justice (MoJ), in cooperation with the Ministry of Digital Transformation (MDT), should conduct consultations with relevant media and digital transformation experts, as well as public debate prior to the adoption of new legislation, in order to ensure a transparent process and broader support for regulating this area.

Sector- Judiciary

Given that the Judiciary sector remains one of the key sectors in the new National Strategy for the Prevention of Corruption and Conflict of Interest 2026–2030, the SCPC considered it necessary in this final report to provide recommendations only with regard to those risks which, due to prioritization, are not covered by the new five-year National Strategy, and which relate to the process of adopting the new Law on the State Attorney's Office, with the aim of improving efficiency, accountability, and transparency in the functioning of the institution, as well as better regulating its competencies and organization.

Sector- Law enforcement authorities

Taking into account the final status of implementation of the activities in this sector as of December 2025, the SCPC considered it necessary to issue recommendations for the implementation of activities that either have not been implemented or remain ongoing, in accordance with the new Law on Internal Affairs from 2025, and in particular:

- The Ministry of Interior (MoI), in cooperation with competent authorities for classified information, should complete the process of declassification of acts on organization and systematization of job positions.
- The Ministry of Interior (MoI) should regularly publish all documents and decisions related to recruitment and promotions and provide mechanisms for public scrutiny.
- The Ministry of Finance (MoF) should accelerate the process of adopting amendments to the Law on Financial Police, which would ensure the establishment of a department for internal control and professional standards, as well as appropriate harmonization of internal acts.
- The Ministry of Interior (MoI) should finalize the harmonization of internal acts with the Strategy for disciplinary proceedings 2020–2022, by establishing a mechanism for regular oversight and accountability, including the participation of external and independent bodies.
- The Customs Administration (CA) should initiate a process of professional and institutional debate on the need to introduce the status of judicial police within the Sector for professional responsibility within the Customs Administration (through amendments and supplements to the Criminal Procedure Law, Article 47 paragraph 2), with a view of striking a balance between efficiency and external oversight.

- The Customs Administration (CA) should consider alternative models of internal control, which would ensure independence and capacity to act in cases of internal corruption, should the amendments to the Criminal Procedure Law are not adopted.
- The analysis of legal competencies of inspection services should be finalized, so that all overlaps and ambiguities are clearly identified.
- Coordination should be established among the relevant ministries with a view of amending the relevant laws in order to clarify competencies and remove overlaps among inspection services.
- Improved coordination should be established among inspection services in order to ensure more effective implementation of inspection oversight.
- The Ministry of Public Administration (MoPA) should prepare a methodology specifically focused on the corruption risks within inspection services. The methodology should include clear criteria for identifying and assessing corruption risks across all inspectorates, not only selected ones.
- A standard protocol for the conduct of inspectors should be developed and made publicly available in order to prevent selectivity in inspection oversight.
- The Ministry of Finance (MoF) should introduce mandatory sanctions for managerial personnel who fail to implement audit recommendations, as well as fines, disciplinary measures, or reduction in budget allocations for their institutions.
- The annual report on the implementation of audit recommendations should be publicly available on the websites of the Ministry of Finance and the State Audit Office.
- The State Audit Office (SAO) should establish an online database to monitor the status of implementation of audit recommendations by institution.
- The Ministry of Finance (MoF) should consider the need for additional amendments and alignment of by-laws related to internal audit, in order to ensure greater independence and autonomy. Precise mechanisms should be defined to protect internal auditors from political or external pressures.
- The Ministry of Finance (MoF) should strengthen the capacities of internal auditors through professional development and training on new standards and methodologies.
- The Ministry of Finance (MoF) should define clear performance criteria for internal audit, including the number of implemented recommendations, speed of implementation, and impact on improving public policies and financial controls.

Given the fact that a large number of activities in the Action Plan of the Strategy for addressing corruption risks related to inspection services at local and national level, the conduct of inspection oversight, as well as activities concerning the adoption of a new Law on State Audit, are also covered by the new National Strategy 2026-2030, the SCPC does not provide recommendations on these matters in this report.

Sector- Health

The health sector is one of the key sectors in the new National Strategy 2026–2030. The corruption risk assessment in this sector also covered the risks that were addressed in the Strategy for the period 2021–2025, which had not been fully tackled as of December 2025. Namely, this sector will remain in focus of the anti-corruption strategic framework over the next five-year period, with 18 measures and 74 activities identified to address priority problems. These efforts are aimed at establishing a fair, transparent, accountable, and digitally connected healthcare system based on integrity, professionalism, and trust—one in which resources, decisions, and services are traceable, managed in the public interest, and serve citizens, supported by committed and valued healthcare professionals.

Sector- Education

- The MoES should adopt the new Law on Teachers and Professional Associates, introducing strict and objective scoring criteria for recruitment, as well as amendments to the Law on Education Inspection to ensure mandatory oversight and justification in cases of early dismissal of school directors.
- The MoES and the SEI should operationalize the mechanism for monitoring the work of inspectors (through full implementation of the E-Inspector application and the development of checklists), in order to prevent corrupt practices in the field.
- The necessary financial resources should be secured for the BDE and the SEC to finally begin implementing the planned training on ethics and integrity for school directors and teachers, as well as to issue a Guide for Preventing Corruption.
- The MoES should adopt the necessary by-laws and guidelines for leasing immovable property of educational institutions, thereby closing a significant space for corruption and unlawful enrichment at the local level.
- The SCPC should conduct a corruption proofing of the new Law on Textbooks (“Official Gazette of RNM” No. 3/25) to assess whether the new procedures effectively eliminate previous risks in the procurement and use of teaching aids.
- The Government should change its current practice and, when appointing or dismissing members of boards within the AQHI, should mandatorily publish a detailed justification for its decision.

Sector- Labor and Social Policy

- The MSPDY should intensify activities for the design and implementation of the ICT system for the Register of mandatory social insurance, in order to prevent further delays of the final deadline (2027).
- The MSPDY should accelerate the process of establishing the central coordination body for the assessment of persons with disabilities, including

staffing the necessary personnel and finalizing the Assessment Methodology before the new law enters into force.

- The MSPDY should proceed with the development and adoption of the Methodology for conducting regular and ad hoc controls, as it is a prerequisite for effective oversight.
- The MSPDY should ensure continuity in the implementation of regular and ad hoc controls (not only based on complaints).
- Based on the positive example from 2025, the MSPDY should secure the necessary resources (human and technical) for the Inspection oversight sector in order to continuously conduct extraordinary and control oversight.

Sector- Urbanism and Physical Planning

The physical planning, urban planning and construction sector is also one of the key sectors in the new National Strategy 2026–2030. The corruption risk assessment in this sector also covered the risks addressed in the 2021–2025 Strategy within the urbanism and physical planning sector, which had not been fully resolved as of December 2025. Namely, this sector will remain in focus of the anti-corruption strategic framework over the next five-year period, with 13 measures and 33 activities identified to address priority problems, aiming to protect the public interest in physical and urban planning and ensure compliance with professional standards across all phases of construction.

Sector- Environment

The environment component is part of the Environment, energy and natural resources sector within the National Strategy 2026-2030, in which unimplemented activities from the Action Plan of the Strategy from 2021 to 2025 have been fully taken over and adapted. Therefore, the SCPC does not provide additional recommendations in this report.

Sector- Agriculture

- The MoAFWE should renew the initiative for a substantial reform of the system for selling state-owned agricultural land, through a new methodology based on market conditions and by transforming the status of the competent Commission into an independent body, thereby reducing political influence.
- The MoAFWE should develop a Methodology for measuring the impact of subsidies, in order to prevent arbitrary allocation of funds and ensure that financial support leads to a real increase in agricultural production.
- The MoF and MoAFWE should implement the activity on transferring staff and establishing a single competent authority for submission of subsidy applications, thereby simplifying procedures for farmers and reducing space for manipulation.
- The MoAFWE should revise its Training Plan and include mandatory, specialized modules on recognizing and preventing corruption (integrity) for all employees involved in land allocation and subsidy procedures.

Sector - Sport

- The Government should finalize the procedure for amending the Law on Sports, as its non-adoption represents a direct obstacle to the implementation of a series of other strategic activities, such as the adoption of the Law on Sports Facilities and related by-laws, as well as the establishment of the State Sports Inspectorate.
- Legal mechanisms should be used to oblige the remaining 10% of municipalities to submit the required data, in order to finally complete the inventory and fully operationalize the information system for the registration of all sports facilities.
- The issue of insufficient human resources in the sports facilities department within the Ministry of Sport should be urgently addressed (through internal reassignment or new employment), in order to enable the preparation and adoption of the Strategy for sports facilities in state ownership.
- The MoS should establish a continuous inspection control plan to prevent unlawful or inappropriate use of state and municipal sports facilities.
- The MoS should adopt the Program for training and education on integrity and ethics.

Sector - Economy and Business

- The Government of RNM and the MoF should allocate budgetary fund and provide technical support to the CPC to finally establish the State Aid Register, **in order to prevent non-transparent and selective allocation of public funds.**
- The Real Estate Cadaster Agency should enable open access search of state property on its portal, while the Government should oblige all state bodies to regularly submit ownership decisions to ensure that the database remains up to date.
- The Ministry of Interior (MoI) should accelerate the tender procedure and implementation of the software for the Register of Vehicles owned by the public sector, ensuring that it is publicly accessible and easy to search.
- The competence for Activity 4.2 (Problem 2) should be revised, so that training related to control in the exploitation of raw materials is conducted by the appropriate institution.
- The MoEMMR should finalize the procedure for the new Law on Mining, enabling full implementation of the methodology for determining real concession fees.
- The MoPA should move from the phase of strategic planning to concrete steps for amending the Regulatory Impact Assessment (RIA) methodology, in order to ensure that the business community has a clear understanding of how new legislation will affect the economy (this recommendation is also included in the Political System sector).

Sector - Public enterprises and stock-companies owned by the state and local- self government

- The Government of RNM should ensure the implementation of activities defined in the Anti-corruption program for enterprises predominantly owned by the state and local self-government units, following prior alignment of the deadlines for their implementation.
- The MoEL should ensure that the future Register of public enterprises and trade companies **fully or partially owned by the state and local self-government units contains key ownership information**. If ownership data are planned to be included in another register, interoperability between the databases must be established, so that the public and institutions have easy and unified access to ownership information.

Sector - Media and Civil Society

- The MDT, within the initiated process of alignment with the European Media Freedom Act, should give top priority to the introduction of an obligation of public disclosure of all contracts concluded by public institutions and local self-government units with media and marketing agencies.
- The AAVMS should consistently conduct regular checks to verify whether online media outlets genuinely meet the criteria regarding ownership of their own domain, transparent ownership structure, minimum staffing requirements, etc.
- The procedure for adopting the new Law on Associations and Foundations should be accelerated.
- In anticipation of the adoption of the new Law on Associations and Foundations, preparatory activities should be initiated for the technical design of a unified database on funds allocated to CSOs, so that it can be operational immediately after the new law enters into force.
- The AJM and CMEM should continue regularly updating the Register of professional online media, excluding entities that violate ethical and professional standards.