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NATIONAL CONVENTION FOR THE EUROPEAN UNION OF THE REPUBLIC OF NORTH MACEDONIA

"FIGHTING CORRUPTION THROUGH TRANSPARENCY AND ACCOUNTABILITY:

RECOMMENDATIONS AND OPPORTUNITIES IN THE
REPUBLIC OF NORTH MACEDONIA THROUGH THE
PERSPECTIVE OF EUROPEAN PRACTICES"



NEWSLETTER

FIFTH SESSION OF WORKING GROUP 6

"ANTI-CORRUPTION"

- CHAPTER 5/18/32 -

The National Convention on the European Union in North Macedonia (NCEU-MK) convened the fifth session of Working Group 6 – Anti-Corruption on 28 April 2025.

The session brought together approximately fifty stakeholders, including institutional representatives, financial experts, anti-corruption specialists, members of civil society organisations, judges, prosecutors, and other relevant actors. The dialogue served as a platform for exchanging insights and formulating recommendations aimed at strengthening the national anti-corruption framework.

A general consensus emerged among all panellists that the fight against corruption must transcend short-term, ad hoc measures and instead be grounded in a comprehensive, long-term, and systemic strategy. Participants emphasised that sustained political will, institutional resilience, and public engagement are crucial for ensuring the effectiveness of anti-corruption efforts.



Among the strategic measures proposed were: improved and open access to business registers; further digitalisation of public services; the establishment of specialized research and analytical centres; and the creation of integrated platforms for tracking asset declarations and monitoring public expenditures. Particular concern was raised regarding public procurement, identified as a high-risk area for corrupt practices, thus requiring enhanced oversight mechanisms and greater professional capacity in conducting procurement procedures.

Moreover, the session emphasised the importance of public institutions operating with transparency, accountability, and openness to external scrutiny. In this context, the media and civil society were acknowledged as vital actors in detecting, denouncing, and preventing corruption.

The recent tragedy in Kočani serves as a stark reminder of the systemic risks posed by weak institutional control, issuing an urgent call to align domestic practices with European standards and reinforce internal monitoring mechanisms. Without restoring public trust in institutions and ensuring consistent implementation of anti-corruption policies, North Macedonia's progress toward European integration risks continued stagnation.



Mileva GJUROVSKA

National Coordinator of
NCEU-MK, Professor,
Faculty of Philosophy,
Skopje

Mileva Gjurovska, National Coordinator of the National Convention on the European Union in North Macedonia (NCEU-MK) and President of the European Movement in North Macedonia, emphasised that Working Group 6, following four cycles of work, has developed significant analytical and research capacity in addressing corruption-related challenges.

Gjurovska emphasised the crucial role of transparency, accountability, and democratic participation in the EU accession process, particularly in key sectors such as public procurement, statistical systems, and financial oversight. Gjurovska underscored the distinctive contribution of civil society in providing independent analyses, noting that the actual test of reform lies not in the formal harmonisation of legislation with EU standards, but in its consistent and effective implementation. Without implementation, reforms remain “mere words.”

Referring to the recent tragedy in Kočani, she drew a connection between such incidents and deeply rooted systemic corruption, calling for coordinated institutional and societal action to prevent similar occurrences in the future. She also acknowledged the longstanding support of key international partners, including the European Union Delegation, the French Embassy, the Slovak Ministry of Foreign and European Affairs and the Central European Initiative (CEI). In conclusion, she expressed appreciation to the Director of the Financial Police, Slobodan Ivanovski, for his continued cooperation and officially handed over the moderation of the session to the WG 6 co-president, Aleksandar Krzalovski.



Slobodan IVANOVSKI

Director, Financial Police
Office

Slobodan Ivanovski, Director of the Financial Police Office, emphasized the critical importance of transparency, accountability, and institutional cooperation in the fight against corruption and organized crime. He reaffirmed his commitment to participating in forums such as the NCEU-MK Working Group, recognizing them as essential platforms for dialogue on pressing societal challenges. Ivanovski firmly rejected the notion of institutional insularity, stressing that public bodies must remain open, communicative, and willing to report not only their achievements but also their challenges and shortcomings. In his view, transparency serves as both a deterrent to misconduct and a foundation for restoring public trust.

Ivanovski acknowledged the indispensable role of investigative journalism, civil society, and active citizenship in uncovering systemic irregularities. He noted that, in numerous instances, journalists act more swiftly and effectively than institutional mechanisms, often generating public pressure that compels official action and improves institutional responsiveness. He condemned selective justice and institutional inaction, describing them as “killers of justice,” and called for the consistent and impartial application of legal standards, irrespective of individuals’ status or political influence.

A central theme of his intervention concerned systemic abuses in public procurement processes. Ivanovski identified two prevalent forms of misconduct: first, the manipulation of tender documentation to favor predetermined bidders; and second, irregularities during contract implementation. While the former is comparatively easier to detect and prove, the latter requires extensive expertise and time-consuming investigation. He noted that a significant proportion of high-level financial crime in North Macedonia occurs through procurement-related fraud, which not only misappropriates public resources but also erodes citizens' confidence in institutions.

Furthermore, Ivanovski highlighted a critical internal deficiency within the Financial Police, the absence of a robust internal control mechanism. He underscored the urgency of addressing this gap to ensure that oversight institutions are themselves subject to effective accountability. In advocating for systemic reform, he called for the digitalization of institutional processes and improved inter-agency data sharing, implemented under strict security protocols to safeguard sensitive information and reduce the risk of corruption. Ultimately, he argued for the creation of a system that operates on the basis of institutional integrity and functional autonomy, rather than being dependent on the will or capacity of individual officeholders.



Dragan TILEV

**State Counselor,
Secretariat for European
Affairs**

Dragan Tilev, State Counsellor at the Secretariat for European Affairs, delivered a thoughtful and forward-looking address, underlining the enduring necessity of commitment, institutional maturity, and broad societal engagement in North Macedonia's EU integration process. Although formally retired, Tilev remains actively involved in mentoring younger colleagues at the Secretariat, driven by unwavering optimism and a deep commitment to the country's European future.

Tilev stressed that the responsibility for European integration cannot rest solely on a single institution but must be shared across all relevant governmental bodies, civil society organizations, and experts from diverse fields.

Tilev praised the National Convention on the EU (NCEU-MK) and its deliberations, commending the depth and quality of debate, which he noted significantly contribute to fostering transparency and accountability, core principles of both democratic governance and effective anti-corruption policy. He underscored that the fight against corruption must be continuous and holistic, rather than fragmented or campaign-based. Recognizing the entrenchment of corruption and organized crime within institutional structures, he called for sustained, systemic efforts that transcend sectoral boundaries.

In particular, Tilev advocated for a horizontal and cross-sectoral approach to the implementation of EU standards, especially technical ones, arguing that strict adherence to these standards could prevent incidents such as the recent tragedy in Kočani. A key message of his address was the importance of thoroughly reading, analyzing, and correctly interpreting EU documents. He criticized the prevailing tendency to overlook essential information in official reports, which often results in flawed implementation and missed reform opportunities.

Tilev emphasized that tangible progress, particularly within Chapters 23 and 24, covering judiciary reform, fundamental rights, and anti-corruption, is a prerequisite for advancement in the EU accession process. Under the revised negotiation framework, no chapter can be provisionally closed without demonstrable progress in the rule of law and the fight against high-level corruption. He highlighted the importance of screening reports and accession benchmarks, especially those within the "fundamentals cluster," as vital tools for planning, monitoring, and aligning national legislation with the EU acquis.



Dragan TEVDOVSKI

NCEU-MK Expert;
Professor, Faculty of
Economics - UKIM, Skopje;
International Expert

Dragan Tevdovski, university professor and long-standing expert within NCEU-MK, delivered a strategically oriented and practically grounded address on advancing the fight against corruption in the country. Like other speakers, he underscored the importance of open dialogue among institutions, academia, and civil society, as well as the public's role in monitoring the reform process.

According to Tevdovski, the fight against corruption must be anchored in functional institutional mechanisms and economically rational tools. Among the most important instruments, he highlighted increased transparency in public procurement and the introduction of the Open Treasury system, which ensures public access to all financial transactions from the state budget, from payments to suppliers to disbursements for public projects.

Tevdovski noted that this level of budgetary transparency represents a challenge even for EU member states, where such information is often either not fully disclosed or only made available in limited form. The core value of these tools, Tevdovski argued, lies in their ability to provide citizens, journalists, and civil society organisations with direct insight into the use of public funds, serving as a powerful mechanism for prevention and oversight.

A crucial condition for achieving greater transparency, according to him, is the enhancement of financial literacy among the population. It is not sufficient for information to be merely available; it must also be understandable and usable by the public. Only under these conditions can citizens become an integral part of the control mechanism.

Tevdovski proposed the development of an automated digital platform for tracking the assets of public officials, based on cross-referencing data from multiple institutions, such as the Public Revenue Office, the Real Estate Cadastre, and others. This, he argued, would enable regular and objective verification of asset declarations, thereby strengthening accountability and preventing hidden conflicts of interest.

He has consistently advocated, during this session as well, for limiting cash transactions, identifying them as one of the most common channels for unregistered and illicit financial flows.

On fiscal policy, Tevdovski expressed regret over the lack of progress since 2018 in establishing a consolidated view of public assets and liabilities. The state still lacks a complete, centrally managed system for recording all public resources (including buildings, land, and other assets) and financial obligations (such as debts, loans, and guarantees). In his view, this deficiency represents a major obstacle to the strategic management of public finances and creates space for inefficiencies and potential misuse.

Tevdovski rejected the overly simplistic narrative that places the blame for corruption solely on the public sector. Corruption is a relational problem, arising from interactions between public officials and private economic actors. In that vein, he called for the expansion of the OpenFinance platform to enable systematic tracking of companies receiving public funds, alongside the development of indicators that measure their dependence on government contracts. He also emphasised the need for increased transparency and open access to company data from the Central Registry, particularly regarding ownership structures and corporate linkages, to facilitate investigative research and identify potential conflicts of interest.

In conclusion, Tevdovski argued that the fight against corruption is not merely a technical task, but a broader societal and political responsibility. The necessary solutions and institutional tools already exist, but without clear political will, they remain dormant. Only through systemic transparency, digital innovation, and active civic participation can sustainable and long-term results in the fight against corruption be achieved.

She was particularly critical of the limited application of the transparency principle in key areas of legislation, especially concerning public administration, taxation, and social protection. Although the Open Finance platform was introduced in 2017 to provide public access to state budget expenditures by ministries and institutions, it still has not been regularly updated for an extended period, thereby diminishing its intended impact.



Biljana IVANOVSKA

**Former president of the
State Commission for the
Prevention of Corruption**

Biljana Ivanovska, former President of the State Commission for the Prevention of Corruption (DKSK), reaffirmed in her address the essential need for a sincere, consistent, and systemic approach to combating corruption, an effort which, in her view, must not be reduced to ad hoc measures or politicised campaigns.

She emphasised the direct correlation between transparency and the level of corruption: the lower the transparency, the higher the corruption. Conversely, greater transparency fosters institutional accountability and strengthens citizens' trust in public institutions, an essential precondition for democratic maturity and a credible European perspective.

Ivanovska reminded that the DKSK is equipped with a range of preventive tools, including the National Strategy for the Fight Against Corruption, which is founded on two main pillars: preventing the misuse of public funds and the abuse of official authority. Among the principal systemic risks she identified were political interference, a lack of institutional integrity, and insufficient transparency.

Impunity continues to fuel nepotism and clientelism in public sector employment, as well as covert management of state assets and weak oversight in public procurement processes. These persistent issues, Ivanovska asserted, could be mitigated through digitalisation. By reducing direct human contact between officials and citizens, who are treated as clients, opportunities for corrupt practices diminish, while digital footprints enhance traceability and control.

She also called for greater public dialogue on the establishment of a national register of state-owned assets, suggesting that more frequent discussion could catalyse concrete steps in that direction. Furthermore, she emphasised the need for increased transparency in the allocation of budgetary resources and for real-time inter-institutional data exchange as a prerequisite for efficient, automated oversight and the detection of misuse.



German FILKOV

President, Center for Civil Communications, Skopje

German Filkov, President of the Centre for Civil Communications, asserted that “information produced with public funds belongs to the citizens.” He highlighted that transparency constitutes the primary line of defence against corruption, warning that the democratic oversight tools already secured are under grave threat. Drawing on his 33 years of activism in promoting accountability and access to information, Filkov cautioned that today we face a new challenge, not only to advance our progress but also to safeguard the existing mechanisms of public scrutiny. His address served as both an alarm and a rallying cry against attempts at institutional closure.

Filkov underscored the pivotal role of transparency in ensuring democratic governance, noting that this is not merely a national concern but a global one. He highlighted significant advancements achieved through the collaboration of civil society organisations and investigative journalists, who together have exposed serious corrupt practices. Among the high-profile cases he cited were the public procurement scandal involving the national energy operator, the unlawful awarding of the motorway oversight contract to Bechtel-Enka, the deadly fire at the modular hospital in Tetovo, and the pre-paid yet unbuilt swimming pools in Bitola, Kičevo, and Štip. All of these revelations, he explained, were made possible by unfettered access to procurement documents under the Law on Free Access to Public Information, which has been in effect since 2005.

Expressing deep concern over recent initiatives aimed at restricting access to public procurement data, Filkov argued that such measures are far from innocuous; they represent a direct assault on transparency and open the door to new forms of abuse. He therefore called on stakeholders to resist this regression, particularly in light of the standards established by the European Union, the OECD, the United Nations, the G7, and the G20.

Aleksandar KRZALOVSKI

Director, Macedonian Center for International cooperation (MCIC)



Aleksandar Kržalovski, Director of the Macedonian Centre for International Cooperation (MCIC), co-chaired the first panel, addressing the key challenges related to corruption in North Macedonia and emphasising the urgent need for systemic reforms, institutional accountability, and active civic engagement in the fight against corruption.

Snezana KAMILOVSKA TRPOVSKA

Program coordinator, MCIC



“The political elite must demonstrate genuine political will. A clear stance against the instrumentalisation of institutions is essential. Without it, reforms will remain superficial, and systemic corruption will be normalised,” was the central message of the address delivered by Snežana Kamilovska Trpovska, researcher and analyst at the Macedonian Centre for International Cooperation (MCIC).

She underscored the erosion of accountability, the persistence of selective transparency, and the deepening politicisation of institutions, particularly in light of recent scandals involving the State Commission for the Prevention of Corruption (SCPC), allegations of political influence-peddling and controversial actions by the Ministry of Interior.

Within the framework of the European Union, transparency and public oversight in public procurement are governed by several foundational legal instruments that serve as benchmarks for both member states and candidate countries. Chief among these is Directive 2014/24/EU on Public Procurement, which mandates open, competitive, and non-discriminatory procedures, the compulsory publication of tender documentation and results, and the digitalisation of procurement processes. The EU Public Procurement Strategy (2017) further stresses the importance of integrity, accountability, and public participation in monitoring the use of public funds.

For North Macedonia, as a candidate country, these standards are particularly pertinent under Chapter 5 (Public Procurement) of the EU accession negotiations and are regularly evaluated through the European Commission's Annual Progress Reports. Multiple reports have identified deficiencies in transparency, the absence of electronic monitoring, and limited public access to procurement information urging national authorities to reinforce oversight mechanisms and expand the role of civil society in scrutiny.

According to Kamilovska, the process for appointing members of the SCPC has become deeply politicised, with civil society perspectives routinely ignored. This politicisation, she argued, undermines the institutional autonomy and erodes the public credibility of the anti-corruption body. She expressed concern over current attempts to revise the selection model for SCPC members, viewing such efforts as politically motivated attempts to align the Commission with partisan agendas.

Kamilovska maintained that the core issue does not lie in the model itself, which she described as sound in principle, but in its political misuse. Rather than altering the model, she called on political actors to refrain from manipulating the legal framework for self-serving purposes and to uphold institutional integrity as a cornerstone of an effective and independent anti-corruption policy.

She further noted that anti-corruption efforts in North Macedonia remain largely declarative, with the legal framework often ignored or reshaped to fit political interests. She drew attention to the limited implementation of the National Anti-Corruption Strategy, reporting that only about 30% of the envisaged measures have been realised thus far. Too often, she argued, the focus is on quantitative output rather than the quality and impact of actions taken.

Kamilovska cited the Law on Lobbying, which remains inactive in practice, and the Law on Civil Forfeiture, whose implementation has stalled due to legal ambiguities, as examples of dysfunctional legislation. These cases, she argued, illustrate a broader lack of political will to engage in meaningful and sustained anti-corruption reform.

While she acknowledged transparency initiatives such as Open Finance as positive developments, Kamilovska warned that the system remains highly vulnerable due to unresolved human resource challenges, raising serious concerns about the institutional resilience necessary for ensuring long-term functionality.



Tatjana MARKOVSKA

Private Sector Specialist,
World Bank

Digital systems reduce the space for corruption by promoting standardisation, enhancing monitoring capacities, and limiting discretionary power,” was the central message of the address delivered by Tatjana Markovska, Private Sector Specialist at the World Bank.

While not addressing anti-corruption measures directly, Markovska strongly underscored the transformative potential of digitalisation as a strategic instrument for increasing the efficiency, transparency, and accountability of public sector institutions.

She explained that digital transformation facilitates the redesign of outdated administrative procedures, fosters institutional interconnectivity, and reduces human interaction in public service delivery—factors that are critical in mitigating opportunities for corrupt practices. Of particular significance, she noted, is the ability of digital systems to automatically generate traceable digital footprints, enabling real-time auditing and monitoring of decisions, especially in processes involving tight deadlines and the allocation of public funds.

Markovska delivered a pointed critique of what she termed “false transparency”, the practice whereby institutions publish reports online in non-searchable or technically inaccessible formats, thereby severely limiting their usability. This, she warned, undermines meaningful transparency, particularly for journalists, watchdogs, and civil society organisations. In contrast, genuine transparency, she argued, entails not only the public availability of data, but also its clarity, accessibility, and functional relevance.

She further stressed the urgent need for digital tools to monitor the implementation of public contracts, an area that frequently suffers from weak oversight. In this context, Markovska presented the World Bank’s newly developed system for managing state aid in North Macedonia, which aims to centralise data, enable automated verification, and establish a unified registry of beneficiaries. This system represents a step forward in ensuring transparent allocation, preventing duplications, and detecting potential misuse of public resources.

Nevertheless, Markovska cautioned against viewing digitalisation as a panacea. Without sustained political will and institutional dedication, even the most sophisticated systems risk becoming ineffective formalities, or worse, tools for new types of misuse. When applied with integrity and commitment, however, digital technologies can serve as powerful enablers of structural reform and play a central role in advancing anti-corruption agendas.

Blagoja PANDOVSKI

Transparency
International – North
Macedonia



“Without a culture of integrity, accountability, and consequences, the fight against corruption will remain declarative and symbolic, rather than genuinely transformative,” was the key conclusion of the address delivered by Blagoja Pandovski from Transparency International – Macedonia. He provided a critical and analytical overview of the current state of anti-corruption policies in the country.

Referring to the recent controversy involving the President of the State Commission for the Prevention of Corruption (DKSK), he stressed that the institution’s silence and lack of transparent communication with the public contradict the fundamental principles of an entity mandated to prevent corruption.

Such conduct, he argued, significantly damages the legitimacy of anti-corruption institutions. The fight against corruption, he emphasised, cannot be effective without a high level of integrity and accountability, especially among the institutions tasked with enforcing anti-corruption measures. These institutions must serve as models of transparency, not sources of suspicion and controversy.

According to the National Integrity System Assessment, only 13 out of 73 recommendations have been fully implemented, a figure that clearly illustrates not only limited institutional capacity but, more importantly, a lack of political will to undertake meaningful reforms.

Pandovski directed sharp criticism at the Parliament, particularly regarding the expedited adoption of amendments to the Criminal Code, which effectively led to the statute of limitations expiring on key cases of high-level corruption. He described this move as a grave indicator of political immaturity and a lack of commitment to reform processes, seriously jeopardising efforts toward a compelling and credible anti-corruption agenda.

He also addressed the inefficiencies of the Public Prosecutor's Office and the Judicial Council in handling high-level corruption cases. The absence of transparent disciplinary proceedings and the Supreme Court's failure to initiate mechanisms for monitoring ethical standards were identified as particularly concerning weaknesses.

In support of previous recommendations, Pandovski also endorsed the systematic digitalisation of government decisions, audit reports, and anti-corruption measures, all of which, he argued, should be publicly available in user-friendly and searchable formats as a prerequisite for public accountability. Anti-corruption institutions, he reiterated, must set an example of transparency and accountability rather than being perceived as opaque or politically compromised.

The citizens expect not only the adoption of laws, but their consistent and principled implementation, accompanied by ethical and responsible behaviour from all relevant actors. Achieving systemic change, he concluded, requires a combination of clear political will, practical inter-institutional cooperation, and adequate resources. Without these fundamental elements, the fight against corruption risks becoming a mere "paper exercise", lacking real-world impact and failing to deliver tangible results for citizens.

Vladimir GEORGIEV

Former Member, State
Commission for the
Prevention of Corruption



Vladimir Georgiev, former member of the State Commission for the Prevention of Corruption (DKSK), focused on less frequently discussed but essential aspects, particularly transparency in lobbying and integrity as the foundation of institutional trust. Georgiev stressed that corruption stems not only from weak institutions but also from the individual integrity of public officeholders.

He highlighted specific cases in which the DKSK had filed criminal complaints against public officials, yet the Public Prosecutor's Office delayed proceedings until those individuals had left office, a practice he characterised as indicative of selective justice and political calculation.

Georgiev referred to recommendations from both GRECO (the Council of Europe's Group of States against Corruption) and the European Commission, noting that they have consistently identified the same structural weaknesses: lack of transparency, inadequate oversight of political party financing, and insufficient accountability within the judiciary. Although legal mechanisms formally exist, he argued, their implementation remains symbolic or entirely absent.

A particular focus of his intervention was the issue of lobbying transparency. Despite the adoption of a new Law on Lobbying in 2021, institutions such as the Parliament and Government continue to withhold meaningful information from the public. This creates a gap between the legal framework and actual practice, producing what Georgiev described as an illusion of compliance. In reality, the public remains excluded mainly from insight into decision-making processes and has limited influence over policy outcomes.

According to him, North Macedonia is facing a triple crisis: systemic corruption, a non-functional rule of law, and a moral deficit. Even the simplest recommendations are ignored, revealing a deeply entrenched resistance to reform.



Viktor MITEVSKI

**Coordinator of WG-6;
Executive Director, ZMAI**

Viktor Mitevski, Coordinator of Working Group 6 – Anti-Corruption and Executive Director of ZMAI, moderated the discussion, initially giving the floor to German Filkov, who immediately raised the issue of a long-standing but unfulfilled obligation to establish a comprehensive and publicly accessible register of state aid.

Filkov reminded participants that this obligation has existed since 2014, as part of the Open Government Partnership, yet successive governments have consistently failed to implement it. He criticised the current database an outdated Excel spreadsheet as incomplete, inaccurate, and fundamentally incapable of providing genuine transparency or enabling effective public oversight.

He further pointed out that certain municipal activities, such as distributing bicycles or air conditioners, are legally considered state aid and must therefore be subject to stricter regulation. Filkov called for urgent harmonisation with the EU acquis, including systematic documentation of the legal basis, disbursement methods, and all relevant supporting documentation.

Kostadin Kusivanov expanded on the discussion by questioning whether the new register under development with World Bank support is fully aligned with European legislation, specifically Articles 107–109 of the Treaty on the Functioning of the European Union (TFEU).

He highlighted the frequent confusion between state aid and subsidies and asked whether this distinction has been clearly integrated into the system's design. Additionally, he inquired whether the Commission for the Protection of Competition (CPC) is substantively engaged in the system's development.

Vladimir Georgiev reiterated concerns about the lack of transparency within the judiciary and prosecution services. Despite the existence of legal frameworks and internal regulations, he warned that opaque practices persist, particularly regarding the financing of political parties and electoral campaigns. While welcoming the adoption of the 2021 Law on Lobbying, Georgiev criticised its poor implementation: institutions formally maintain records but fail to publish substantive data, resulting in what he described as an illusion of transparency.

1. Bridging the gap between reforms on paper and implementation in practice remains a critical challenge.

Despite the adoption of anti-corruption strategies, laws, and mechanisms, their practical application remains fragmented, selective, or merely symbolic. Without strong political will and institutional accountability, existing instruments remain non-functional and undermine citizens' trust in the reform process.

2. Public procurement is a high-risk area for corruption and requires systemic intervention.

It is recommended to fully digitalize all stages of the public procurement process, from planning to execution, with automated checks and publication of contracts, annexes, payments, and audit findings. Particular attention must be given to contract implementation, not only to the awarding phase, in order to prevent abuse and improve the management of public resources.

3. The OpenFinance platform must become a functional and mandatory tool, not just a declarative obligation.

Instead of irregular updates and selective availability, the platform should provide daily, complete, and structured publication of all budgetary transactions from central and local institutions, in machine-readable and searchable formats. Data should clearly indicate recipients, amounts, and legal basis, enabling effective public and media oversight and restoring institutional trust.

4. Transparency, integrity, and accountability must become integrated institutional standards.

These principles must go beyond declarations and be reflected in the daily operations of all institutions, especially those responsible for anti-corruption, judiciary, prosecution, and public finance.

5. Corruption cannot be tackled through ad hoc campaigns but requires a long-term, systemic approach.

A coherent reform plan is needed, with clear timelines, measurable indicators, and active inclusion of all stakeholders, institutions, the media, business community, and civil society.

6. The institutional collapse has human consequences – the tragedy in Kočani is a warning.

Inadequate application of oversight mechanisms and institutional formalism contribute directly to avoidable tragedies. Prevention and accountability must be embedded in every public policy and process.

7. Civil society and investigative journalism are the “first line of defense” against corruption.

Institutions must treat these actors as partners, ensuring access to information and resisting attempts to limit the right to public oversight or restrict transparency.

8. Digitalisation must be approached systemically, not through fragmented pilot projects.

Digital tools can become powerful anti-corruption mechanisms only when designed for real-world use, with institutional interoperability, traceable digital records, personal data protection, and user education.

9. High-level corruption is the result of a dysfunctional system - not merely individual greed.

Closing legal loopholes, enforcing sanctions, and establishing mechanisms for asset verification, conflict of interest detection, and reducing political influence on institutions are essential steps toward structural integrity.





NATIONAL CONVENTION ON THE EUROPEAN UNION IN THE REPUBLIC OF NORTH MACEDONIA

Fifth Session of Working Group 6, “Anti-Corruption”

Chapter 5 – Public Procurement, Chapter 18 – Statistics, Chapter 32 – Financial Control

Topic: “Fighting Corruption Through Transparency and Accountability: Walls, Opportunities, and European Lessons for North Macedonia”

Date: 28.04.2025

RECOMMENDATIONS

1. Introduction of a multi-level access system to business registry data in North Macedonia

Basic company information – such as registration number, legal form, address, and management structure – should be available free of charge, through an open web portal and in a format suitable for download and further analysis. This can be achieved by introducing a multi-tier model of access to Central Registry data. For more detailed information, such as financial statements and ownership history, a paid access system should be introduced, based on fair and tiered subscription plans. This model would overcome current barriers caused by high fees and allow easier access for civil society organizations, journalists, researchers, academia, and SMEs, while at the same time ensuring sustainable revenue for maintaining and upgrading the database. Policy bearers should be the Central Registry and the Ministry of Economy, with clearly defined coordinating and regulatory roles.

EU Example: The Slovenian model of transparency and sustainability

Slovenia represents a relevant example of successfully combining transparency and financial sustainability in the management of business registries. Its business register (PRS), under the Agency for Public Legal Records and Services (AJPES), provides free public access to basic company data. For more detailed information, such as financial reports and ownership changes, a licensing system is offered at reasonable prices: daily licenses cost around 16 EUR, and annual subscriptions cost 320 EUR plus VAT for unlimited access to over 250,000 legal entities. The register is updated daily and also offers automatic notifications about changes in monitored company data.

Since the Slovenian model is already tested and proven in practice, it can serve as a reference for: defining fair and sustainable pricing; creating data packages based on user needs; and establishing Service Level Agreements (SLAs) to ensure quality, timely, and accessible services. This approach balances public interest in transparency with financial self-sustainability of registry institutions.

2. Integration of North Macedonia into the European Business Registers Interconnection System (BRIS)

Joining BRIS will provide fast, reliable, and cross-border access to company data for citizens, institutions, and businesses. To achieve this, legislative harmonization with EU standards must be carried out first, ensuring that the Central Registry provides a unified, standardized, and regularly updated data set in real time. Parallel to this, technical adaptation is required: mapping domestic databases to BRIS templates, developing a secure API for automated data exchange, and implementing validation mechanisms. Implementation requires staff





training and system testing, which could be carried out in cooperation with experienced EU member states such as Slovenia and Croatia. Policy bearers: Central Registry and Ministry of Economy.

EU Example: BRIS (Business Registers Interconnection System)

The European Commission established BRIS to provide simple and efficient cross-border access to corporate data directly from national registers. It relies on harmonized technical standards, a unified dataset, and secure real-time information exchange. Once a country joins BRIS, any EU citizen can access certified information about foreign companies via the European e-Justice Portal. This significantly simplifies due diligence, mergers, and cross-border branch registrations.

3. Establishment of a Research Data Center (RDC) within the State Statistical Office

The proposal includes setting up a Research Data Center (RDC) within North Macedonia's State Statistical Office (SSO), that would provide safe, controlled, and confidential access to micro-data for scientific, analytical, and evaluation purposes. Access would be possible either in a secure lab at the SSO or through an encrypted virtual platform hosted on government servers. Researchers would apply with a detailed methodology and sign confidentiality agreements, while in-house statisticians would check results before publication to prevent disclosure of individual or sensitive data. The RDC would function in line with EU Regulation 2015/759, ensuring harmonization with the European Statistical System.

Policy bearers: SSO (as coordinator) and the Ministry of Digital Transformation (for technical support).

EU Example:

In 2001, Germany introduced a similar model through the Federal Statistical Office (DESTATIS), which allows accredited researchers to analyze anonymized administrative and survey data in a secure environment with strictly controlled remote or physical access.

In 2022, Austria established the Austrian Micro-data Center (AMDC), through which researchers gain access using two-factor authentication and can only export verified results that do not contain sensitive data. These models have successfully balanced the principle of data confidentiality with the need for analytical access for scientific and professional research.

4. Introduction of an integrated anti-corruption framework for both public and private sectors

It is proposed to establish a comprehensive anti-corruption framework that would equally obligate both the public and private sectors, with a particular focus on companies that receive public funds through public procurement and tenders. According to this framework, legal entities that cooperate with the state will have a legal obligation to prepare their own integrity plans, apply mechanisms like Integrity Pacts, and establish efficient internal systems for reporting irregularities and protecting whistleblowers. Supervision over the implementation of these obligations would be carried out by a joint team composed of representatives from the relevant institutions and the business community. This model positions the private sector as an active and responsible partner in the fight against corruption and significantly raises the standard of transparency and accountability. As a result, the state will send a clear message that dealing with corruption is a priority, regardless of where it originates. The main bodies responsible for this initiative are the State Commission for Prevention of Corruption (SCPC), the Ministry of Finance, and the chambers of commerce.





Examples from the Region: Slovenia and Croatia

Slovenia established a model where companies that cooperate with the state are obliged to prepare "integrity plans". These plans are reviewed by an independent institution, which has the authority to request improvements if the assessment shows that they are not strong enough to prevent corrupt practices. On the other hand, Croatia focused on the protection of whistleblowers, introducing an obligation for companies to establish secure systems for internal reporting of irregularities by employees.

The combination of these two practices, proactive integrity planning and strong protection of whistleblowers, would enable the establishment of a complete and comprehensive anti-corruption framework for North Macedonia.

5. Automated System for Monitoring the Asset Status of Public Officials

It is necessary to establish an automated digital system that will enable regular, objective, and independent verification of the asset status of public officials. This system should cross-reference data from the Public Revenue Office, the Cadastre, the Central Register, and other relevant institutions, and be under the jurisdiction of the State Commission for Prevention of Corruption (SCPC). The goal is to reduce the human factor, enable a realistic assessment of asset increases or disproportionate wealth relative to declared income, and prevent conflicts of interest and the concealment of assets. Such a system will significantly improve the accountability of officials and strengthen public trust in institutions.

EU Example: Electronic Asset Declaration System in Estonia

Estonia introduced a platform for the electronic declaration of assets and income as early as 1995, with continuous upgrades in accordance with the Law on the Prevention of Corruption. The system collects data on the real estate, financial assets, and debts of public officials, and cross-references them through the integrated e-governance infrastructure.

X-Road and the RIHA catalogue for registry connectivity. The authority that oversees it has a legal obligation to perform an automated check for initial risks, and the results are publicly available, which increases transparency and serves as an effective mechanism for preventing corruption.

6. Full Transparency and Regular Updating of the Open Finance Platform

The *Open Finance* platform should be a strategic tool for fiscal transparency, with the full and regular publication of all budget transactions, payments to suppliers, projects, contracts, and institutional expenses. The Ministry of Finance and the Ministry of Information Society and Administration (MISA) are responsible for its maintenance, while the Public Procurement Bureau should ensure integration with tender data. Such a system allows citizens, the media, and the CSO sector to conduct effective oversight of the spending of public money. To fulfill the mission of the transparency system, updates should be weekly or monthly, not delayed by several months. True transparency is not just about publishing data, but about its availability, comprehensibility, and functionality.

7. National Register of State Property and Liabilities

The lack of a single and functional record of state property and liabilities represents a serious weakness. The Ministry of Finance, the Cadastre, and the Ministry of Transport and Communications should urgently establish a central register that will include data on real estate, land, debts, loans, public guarantees, and contracts. This





register must be digital, accessible to all institutions, and partially to the public. Through such a central system, the state will be able to better plan, manage resources, and reduce the scope for abuse. Separate, fragmented databases create chaos, an incomplete picture, and an absence of strategic management of public goods.

8. Digitalization with Appropriate Forms for Easy Monitoring of Public Procurement

The public procurement process should be fully digitized, from the publication of tenders and the electronic submission of bids to the monitoring of contract implementation. The Public Procurement Bureau and the Ministry of Finance should develop an integrated system, in coordination with the SCPC and the State Audit Office. The system should enable easy monitoring of procurements in real-time, as well as automated alerts for potential risks (for example, tenders awarded to recurring companies, significant changes to contracts).

EU Example: France – Directorate for State Real Estate

France established an institution called the Directorate for State Real Estate (Direction de l'immobilier de l'État), which, under the Ministry of Budget, manages state property. This involves approximately 200,000 properties with a total area of about 100 million m². This system enables: centralized registration of state-owned properties; strategic management (sale, rental, development); and the creation of public policy to reduce costs through sales and the rationalization of the use of unnecessary properties.

While there are no direct EU directives mandating such registers, there are initiatives for a European Asset Register to combat illegal financial flows. This proposal insists on the interconnection of national central registers of assets, bank accounts, and ultimate beneficial owners, creating a network that allows EU institutions to immediately access data at the EU-wide level. This register would be under the jurisdiction of a European Authority for Anti-Money Laundering and Countering the Financing of Terrorism, which would enable interception and efficient completion of investigations against closed networks of corruption and financial crime.

9. Transparency of the Lobbying System

Although the Law on Lobbying was adopted in 2021, its implementation is weak and formal. The Parliament and the Government need to establish a register of lobbyists, publish regular reports on meetings with lobbyists, and disclose documents that influence decision-making. The SCPC should have a monitoring role. Only through transparency in lobbying can a fair and open policy-making process be ensured, free from hidden influence from private or partisan interests. Lobbying must be separated from illegal influence, and this is only achieved with clear and accessible information.

EU Example:

Many European countries have their own laws or specific laws or binding lobbying registers (Germany – Lobby Register Act, France – Law on Transparency in Public Life, Austria, Lithuania, Ireland, Slovenia). The example of Germany, which with a law valid from January 1, 2022, established a binding national register of lobbyists (Lobbyregistergesetz), along with a Code of Conduct, is a good one. It covers all persons and organizations that seek to influence legislation or political processes, including contact with MPs and government representatives. The register requires the publication of detailed data, names, areas of interest, and the nature of the contacts, and provides for sanctions for non-compliance.

Since 2011, the European Union has established the EU Transparency Register, an electronic platform intended to register all entities that carry out activities of influence on EU institutions (lobbying). The register initially functioned on a voluntary basis, but since September 2021, it has become a mandatory condition for anyone who wants to gain access to the European Commission, the European Parliament, and the Council of the EU. All registered entities, including organizations, non-governmental bodies, law firms, and trade associations, must report data on their budget, areas of





interest, contact persons in offices, and activities undertaken. The validity and accuracy of the data are regulated through an Inter-Institutional Agreement (IIA), which sets strict rules for their confirmation, monitoring, and updating.

10. Public Register for State Aid

North Macedonia still lacks a functional state aid register aligned with EU regulations (Articles 107–109 of the Treaty on the Functioning of the European Union-TFEU). The Commission for the Protection of Competition, in cooperation with the Ministry of Finance and MISA, should establish a digital, transparent register where all forms of state aid—grants, subsidies, tax reliefs—will be recorded with a precise legal basis and final recipients. This is essential for protecting market competition, for public oversight, and for alignment with the European Acquis. Part of the data must be publicly available and organized for easy searching.

EU Example: National Registers for State Aid within the Transparency Award Module

In accordance with the Treaty on the Functioning of the European Union (with Articles 107–109), the European Commission requires member states to publicly disclose information on state aid higher than 100,000 Euros through the specific platform known as the Transparency Award Module (TAM). Through this module, states publish detailed data on each aid awarded, the recipient, amount, sector, and purpose, available to the public in an accessible format. Some member states have their own national digital registers, such as Estonia, which maintains a central, online-accessible register for all forms of state aid (except for agriculture), with an obligation to publish data in a timely manner.

11. Improving the Accountability of the State Commission for Prevention of Corruption

The State Commission for Prevention of Corruption (SCPC) must restore and strengthen its public credibility through transparent, professional, and politically independent work. To this end, a revision of the existing procedures for the election of its members is necessary, a process that should be supported by the Parliament and include substantial participation from the civil sector. The Commission should regularly hold public sessions, publish comprehensive and clear reports on its work, and be a positive example of institutional accountability and integrity. The anti-corruption strategy cannot yield results if the institution that is supposed to implement it is itself an object of suspicion. Citizens expect not only the existence of bodies to fight corruption but also their effectiveness, integrity, and resistance to political influence.

EU Example: Slovenia

The Slovenian Commission for the Prevention of Corruption is an independent body established by the Integrity and Prevention of Corruption Act of 2010 (with amendments in 2011), with broad powers, from supervising the asset status of officials to regulating lobbying and protecting whistleblowers. The members of the Commission are elected through an open public competition, conducted by a selection board that also includes representatives from the civil sector. After the selection is completed, the President of the country appoints the members based on the proposal of the board. The President of the Commission has a six-year term, and the Deputy has a five-year term, with the possibility of a maximum of one more term. Members cannot be recalled without a special parliamentary procedure, which ensures institutional stability. This model guarantees staff integrity, high transparency, political independence, and public oversight, which is an essential prerequisite for an effective fight against corruption.

12. Accountability and Ethical Standards in the Judiciary

The judicial system has a key role in the prevention, detection, and sanctioning of corruption and should act as a driver of legal certainty, transparency, and public trust. To fulfill this function, a functional and inter-institutionally coordinated system for monitoring and sanctioning ethical violations is necessary. The Judicial Council, the Ministry of Justice, the Public Prosecutor's Office, and the Supreme Court should publish annual





reports on ethical standards and disciplinary violations, with public access to relevant data. Analyses of court decisions in high-corruption cases should be regular and accessible. The role of the Judicial Council in maintaining a register and implementing sanctions based on clear and consistently applied criteria is particularly important.

13. Monitoring of Companies Receiving Public Funds

It is necessary to establish a central monitoring system for companies that receive public funds through tenders, subsidies, or concessions. The system should contain indicators of their economic dependence on public contracts (e.g., the percentage of revenue that comes from the state), data on ownership structure, connections with elected or appointed persons, and the dynamics of concluded contracts by year. The Central Register, the Public Procurement Bureau, and the Ministry of Economy should provide open access to this data through an integrated digital platform. Such a system would enable timely detection of clientelistic and corrupt links, better public control, and fair market competition.

14. Independent Audit of the Implementation of the Anti-Corruption Strategy

The SCPC and the Ministry of Justice should establish a mechanism for a regular, external audit of the National Anti-Corruption Strategy, in partnership with the civil sector and academia. The oversight must focus not only on the number of measures implemented but also on their real impact. The reports should be publicly available, with concrete recommendations and an assessment of the political will to implement them. A strategy without implementation is meaningless.

EU Example: Romania

In 2016, the Romanian Ministry of Justice, in cooperation with the Faculty of Law at the University of Bucharest, the National Anti-Corruption Directorate (DNA), and representatives of civil society associations, conducted an independent external study to evaluate the anti-corruption strategy. The evaluation was carried out through so-called peer review missions, in which independent experts, representatives of the civil sector, and international organizations participated. The audit was based on evidence and specific indicators, such as the reduction of corruption cases in public procurement, and was followed by public debates and consultations with academia, NGOs, and relevant institutions. As a result, public reports were prepared and published with concrete recommendations and an assessment of the political will for their implementation.