

**Comments by the Government of the Republic of North Macedonia on the
“Memorandum on the human rights of Roma and on issues related to the right to a clean and healthy
environment in North Macedonia”**

**by Michael O’Flaherty, the Council of Europe Commissioner for Human Rights,
following his visit to North Macedonia from 22 to 25 April 2025**

General comment

North Macedonia highly values its membership in the Council of Europe in which this year we will celebrate our 30th anniversary. We remain committed to the values and standards of the Organization, its mission to promote democracy, human rights and the rule of law, as well as to the obligations arising from the membership. North Macedonia attaches great significance to the institution of the Commissioner for Human Rights and the visit to North Macedonia of the Commissioner O’Flaherty from 22 to 25 April 2025 was highly appreciated. We are thankful for his kind acknowledgement of the cooperation received during his visit. We also welcome the Commissioner’s initiative to publish a Memorandum on the human rights of Roma and on issues related to the right to a clean and healthy environment in North Macedonia, and the opportunity to submit comments regarding the Memorandum. North Macedonia affirms that the recommendations made by the Commissioner will be given careful attention by the relevant authorities. We remain open for constructive dialogue and continued cooperation with the Commissioner for Human Rights and the Council of Europe in general.

The Ministry of Education and Science of North Macedonia

In relation to paragraph 16 of the Memorandum, in addition to the already highlighted commitment of the Ministry of Education and Science to increase access to education for Roma, the Ministry of Education and Science wishes to inform the Commissioner that it is the first ministry that has succeeded in introducing all measures from the National Roma Strategy and Action Plans for education as sustainable Roma educational policies, by embedding them within the Law on Education.

The Ministry of Interior of North Macedonia

In relation to the statements in point 1.3 of the Memorandum and in the context of improving the position of Roma and protection from discrimination, the Ministry of Interior of the Republic of North Macedonia (MOI) and its Bureau for Public Security are undertaking several activities, some of which are initiated independently, and some in cooperation with international organizations, institutions and the civil sector. The measures and activities for the protection of Roma rights and the fight against discrimination that are being implemented are the following:

- **Training for the police - human rights and non-discrimination**

The Bureau for Public Security organizes regular and specific trainings for police officers with a focus on respecting human rights, preventing racial, ethnic and social discrimination and working with vulnerable groups, including Roma. The trainings are often organized in cooperation with the OSCE, UNDP, the European Union and civil non-governmental organizations.

➤ **Strategic documents and institutional measures:**

- **Police Reform Strategy** (developed by the Ministry of Interior in cooperation with the OSCE and other partners)

Key goals are the professionalization of the police, respect for human rights in police actions, and improvement of police relations with communities (including Roma). Although not explicitly focused on Roma, the document contains guidelines for working with vulnerable and marginalized groups and provides for trainings for police officers in ethnic sensitivity and anti-discrimination.

- **National Strategy for Improving the Situation of Roma in North Macedonia (2022-2030)**

The Government of the Republic of North Macedonia is the implementing body for this strategy, but the Bureau for Public Safety is directly involved in several areas where it has jurisdiction, such as:

- Access to justice – increasing awareness among Roma about their rights in contact with the police;
- Security without discrimination – the police should provide fair and equal protection for all citizens;
- Training of police officers – in the area of ethical and non-discriminatory treatment of Roma.

Planned action measures include: periodic trainings for police officers on issues related to the Roma community and the inclusion of Roma as mediators in communication between the police and the community.

- **National Human Rights Action Plan**

Coordinated by the Ministry of Justice, with the participation of the Ministry of Interior. The main activities and measures are aimed at preventing torture, inhuman and degrading treatment, building institutional capacities to deal with discrimination and trainings for police officers on issues of racial, ethnic and religious discrimination.

- **Work Program of the Ministry of Interior (annual plans)**

The Ministry of Interior adopts an Annual Work Program every year, which includes the following objectives:

- Protection of human rights in police action;
- Strengthening cooperation with communities and
- Reducing ethnic profiling and abuse of force.

- **Protocols and internal procedures for dealing with vulnerable groups**

Within the Ministry of Interior, there are internal protocols for dealing with minors, victims of human trafficking and marginalized communities, including Roma. These are standardized procedures for recognizing discrimination and respecting cultural differences.

➤ **Plans for gender and ethnic equality in employment**

As a part of the reforms, an ethnically balanced approach to employment is recommended, with the aim of representing members of all communities, including Roma, in the police.

➤ **Public information and campaigns**

Through social networks and media, the Ministry of Interior publishes messages against discrimination and hate speech.

Regarding the allegations in point 1.3, subsection 32 of the Memorandum - that arbitrary arrests of young Roma and the use of excessive force during their arrest and police interrogation are observed in the Republic of North Macedonia - we clarify that any citizen may file a complaint against illegal or unprofessional behaviour, verbal or physical abuse and racial discrimination by police officers to the Ministry of Interior, specifically to its Department for Internal Control, Criminal Investigations and Professional Standards.

Complainants are not obliged to state their ethnicity, unless they wish to do so. Statistics on complaints based on ethnicity are not kept; therefore, there is no data on how many citizens belonging to the Roma ethnic community have filed complaints concerning illegal treatment by police officers. However, we note that the Ministry, through the aforementioned Department, acts equally and takes appropriate measures in response to each complaint filed by citizens, regardless of their ethnicity, religion, race or any other affiliation.

With regard to the allegations of disciplinary and criminal proceedings against police officers for violence motivated by racial grounds, and considering the above comments on point 1.3 sub-point 32, the Ministry of Interior does not maintain statistics on how many disciplinary proceedings have been initiated, nor how many criminal charges have been filed against police officers for unlawful actions against citizens of Roma ethnicity.

The MOI and its Department for Internal Control, Criminal Investigations and Professional Standards actively cooperate with the Ombudsman and non-governmental organizations that are part of the National Preventive Mechanism, and act on every complaint submitted by them regarding alleged illegal or unprofessional conduct by police officers towards citizens of Roma origin.

In relation to the recommendation given by the Commissioner regarding the need to constantly emphasize a zero-tolerance stance towards police violence, the Ministry of Interior and its Department for Internal Control, Criminal Investigations and Professional Standards, in their work, also devote attention to preventive activities. These include measures that promote the Department's work by distributing flyers and displaying posters in all languages spoken by members of all ethnic communities in the country. The aim is to familiarize the citizens of the Republic of North Macedonia with the Department's competencies and the ways in which they can submit complaints to the MOI if they believe that certain human rights, established by the Constitution and guaranteed by international documents, have been violated by police officers.

At the same time, we remain open to further cooperation with all relevant stakeholders, in order to improve the position of members of the Roma community, build trust between the police and citizens, as well as to provide an equal approach to all citizens.

The Ministry of Internal Affairs, i.e. the Bureau of Public Security, is committed and will continue in the future to ensure impartial and objective application of laws and other regulations in the

performance of its tasks, thus enabling citizens to protect and exercise their rights, regardless of gender, race, skin colour, political and religious beliefs, and national origin.