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FIFTH EVALUATION ROUND

Preventing corruption and promoting integrity in
central governments (top executive functions) and
law enforcement agencies

ADDENDUM TO THE SECOND COMPLIANCE REPORT

NORTH MACEDONIA



Adopted by GRECO
at its 99th Plenary Meeting (Strasbourg, 17-19 March 2025)



Group of States against Corruption
Groupe d'États contre la corruption

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I. INTRODUCTION

1. GRECO's Fifth Evaluation Round deals with "Preventing corruption and promoting integrity in central governments (persons entrusted with top executive functions - PTEF) and law enforcement agencies (LEA)".
2. This Addendum to the Second Compliance Report assesses the measures taken by the authorities of North Macedonia to implement the recommendations issued in the Fifth Round Evaluation Report on North Macedonia, which was adopted at GRECO's 82th Plenary Meeting (22 March 2019) and made public on 27 June 2019, following authorisation by North Macedonia. The corresponding Compliance Report was adopted by GRECO at its 87th Plenary Meeting (25 March 2021) and made public on 27 April 2021, following authorisation by North Macedonia. The Second Compliance Report was adopted by GRECO at its 94th Plenary Meeting (9 June 2023) and made public on 18 October 2023, following authorisation by North Macedonia.
3. As required by GRECO's Rules of Procedure¹, the authorities of North Macedonia submitted a Situation Report on measures taken to implement the recommendations. This report was received on 16 September 2024 and served as a basis for the Addendum to the Second Compliance Report.
4. GRECO selected the Czech Republic (with respect to top executive functions in central governments) and Azerbaijan (with respect to law enforcement agencies) to appoint Rapporteurs for the compliance procedure. The Rapporteurs appointed were Helena KLIMA LIŠUCHOVÁ, on behalf of the Czech Republic, and Elnur MUSAYEV, on behalf of Azerbaijan. They were assisted by GRECO's Secretariat in drawing up the Addendum to the Second Compliance Report.

II. ANALYSIS

5. GRECO, in its Fifth Round Evaluation Report, addressed 23 recommendations to North Macedonia. In the Second Compliance Report, GRECO concluded that recommendations i, ii, iii, v, vi, xi, xii, xiii, xiv, xvi, xviii, xix and xxiii had been implemented satisfactorily, recommendations iv, vii, viii, x, xv, xvii, xx, xxi and xxii had been partly implemented and recommendation ix had not been implemented. Compliance with the outstanding 10 recommendations is examined below.

Preventing corruption and promoting integrity in central governments (top executive functions)

Recommendation iv

6. *GRECO recommended amending government rules to ensure that the names and function of all attendees of government sessions, sub-committees and working groups, including any third parties, are publicly accessible online.*

¹ The Compliance procedure of GRECO's Fifth Evaluation Round is governed by its Rules of Procedure, as amended: Rule 31 revised bis and Rule 32 revised.

7. It is recalled that this recommendation was considered by GRECO as remaining partly implemented in the Second Compliance Report. Although GRECO had welcomed the authorities' intention to provide for a clear obligation to publish the list of invitees and attendees of sub-committees and working groups, amendments to the Government's Rules of Procedure still needed to be effectively adopted to provide for immediate online publication of these lists.
8. The authorities report that new Rules of Procedure of the Government have been adopted on 17 December 2024. Article 92 (2) of these new Rules provides that *"Proposals for the agenda of the Government's sessions are published on the Government's website before the start of the sessions of the General Collegium, the working bodies of the Government and the Government, with a list of invited members and third parties, as well as the minutes of the sessions held, after their adoption, with a list of present members and third parties."*
9. GRECO welcomes the new Rules of Procedure of the Government, which provide the obligation to publish the list of all persons invited to and present at the sessions of the working bodies (sub-committees and working groups) and the list of all persons present at the sessions of Government. These lists will be published on the Government's website immediately after the end of working group and Government sessions. With the adoption of these new Rules of Procedure of the Government, this recommendation is considered fully implemented.
10. GRECO concludes that recommendation iv has been implemented satisfactorily.

Recommendation vii

11. *GRECO recommended that the existing rules on the acceptance of gifts by persons entrusted with top executive functions be simplified and that advice on how to manage such situations be provided.*
12. It is recalled that this recommendation was considered by GRECO as remaining partly implemented in the Second Compliance Report, pending the effective adoption of dedicated guidance on gifts for PTEFs (which preparation was underway) as well as the operability of a register of gifts.
13. The authorities report that the Cabinet of the Deputy Prime Minister in charge of Good Governance has prepared an information paper containing draft guidelines on reporting and managing gifts and other benefits, which were submitted to the Government and adopted on 20 February 2024. The adopted *Guidelines on Reporting and Processing Gifts* were distributed to all institutions concerned. A catalogue on gifts was foreseen by the SCPC in 2023 as part of the Project against Economic Crime in North Macedonia (AEC-MKD)². This project supports the development of software for the catalogue, which will be developed in line with existing software owned by the Commission for the Prevention

² This project falls within the joint European Union and Council of Europe programme "Horizontal Facility for the Western Balkans and Türkiye" ([Horizontal Facility III, 2023-2026](#)).

of Corruption of Slovenia. So far, technical specifications have been drawn up on the basis of which tender documents will be prepared and published that will, in turn, allow an IT company to be hired to create the catalogue. The completion of this project is foreseen for 2025.

14. GRECO welcomes that *Guidelines on Reporting and Processing Gifts* for PTEFs have now been adopted. GRECO notes that the gift register is yet to be set up.
15. Pending operability of the gift register, GRECO concludes that recommendation vii remains partly implemented.

Recommendation viii

16. *GRECO recommended that the oversight in respect of declarations of interests and assets of persons entrusted with top executive functions in the government be strengthened by (i) providing the State Commission for the Prevention of Corruption (SCPC) with human and financial resources, competences, methodologies and tools that are proportionate to the proper and effective performance of its duties; (ii) establishing an appropriate verification mechanism and conducting investigations when necessary and (iii) making its results public, as appropriate.*
17. It is recalled that this recommendation was considered by GRECO as remaining partly implemented in the Second Compliance Report. GRECO had welcomed that the State Commission for the Prevention of Corruption (SCPC) had boosted its capacity to verify statements of interest and assets, that electronic tools had been developed connecting databases of state bodies and that of the SCPC and was looking forward to receiving updates. GRECO had also encouraged the authorities to continue reinforcing the SCPC's resources until the institution achieves its full operational capacity (staffed at 48 employees out of 64 planned at the time).
18. The authorities report that, as regards parts (i) and (ii) of the recommendation, the Secretariat of the SCPC now has 49 employees out of the 64 planned. Under the "Partnership against Corruption" project, which was financed by USAID, the SCPC was to prepare a new functional analysis to identify the institution's real needs in view of changing its internal organisation and redefining existing jobs. As the USAID project has been put on hold, the working group established under the SCPC Secretariat will prepare and finalise this analysis. An electronic database has also been developed for the registration (since January 2024) and the verification (since March 2023) of asset declarations of elected and appointed public officials and their family members. This has been achieved by entering into a data-exchange agreement with the Real Estate Cadastre Agency, the Central Registry, the Central Securities Depository, the Public Revenue Office and the Ministry of the Interior³. This means that, since 1st January 2024, public officials, who have the obligation to submit a declaration of assets (and any

³ Since September 2024, the SCPC has signed memorandums of cooperation and protocols for work and data exchange with four banks and a Memorandum of Understanding with one bank.

changes thereto), must do so through the SCPC's Electronic System⁴ (Articles 82 and 85, Law on the Prevention of Corruption and Conflict of Interest) as well as submit a printed copy of this declaration to the Registry of the SCPC.

19. The authorities also report that, at the beginning of 2024, within the framework of the EU IPA 2020 Rule of Law (Component 3), an analysis was carried out to assess the processes and practices of the Department for Monitoring of Property Status in the SCPC. The goal of this analysis was to determine which areas needed to be improved and what the current status of interoperability relating to the control and verification of asset declarations was within the SCPC. In August 2024, a plan was drawn up on the basis of the recommendations made in this analysis. The IT structure of the SCPC has set up a Working Group on the implementation of several projects, notably: (1) the EU IPA III – Enhanced Digitalisation of State Institutions in the Field of Justice and the Fight Against Corruption – Component 8: Electronic Provision of Data for the State Commission; (2) the EU IPA 2020 – Rule of law – Component 3: Preventing and Fighting Corruption and (3) the USAID project Partnership against Corruption – Component 3: Reduced Opportunities for Corruption through Digital Transformation.
20. The authorities further indicate that a report is being prepared on the state of the interoperability of the SCPC with other institutions. Its aim is to exchange information for the good functioning of the Register of Elected and Appointed Officials. It will form the basis for determining the future support and implementation of the procedure for selecting an IT company through the EU project IPA III.
21. As regards part (iii) of the recommendation, the authorities report that SCPC continuously processes and updates the newly submitted asset declarations on its website (see www.dksk.mk). In February 2025, 2,136 asset declarations of public officials were published on the site through the new Electronic System. The asset declarations of public officials published under the previous system of the SCPC remain publicly available in the old system, which contains the declarations of 9 645 elected and appointed officials.
22. GRECO takes note of the information received showing that progress has been made. Some of the information, however, repeats what was already mentioned in the previous report. As regards parts (i) and (ii) of this recommendation, progress has been made notably with the creation of an electronic database for the registration and verification of asset declarations of elected and appointed public officials. In addition, an analysis to assess the processes and practices of the SCPC's Department for Monitoring of Property Status was carried out. In this respect, much remains in the pipeline. For example, the analysis of processes and practices provides recommendations, which have led to a plan drawn up in August 2024, the results of which have not yet been reported. Then, the SCPC's preparation of a new functional analysis to identify its real needs may lead to changing its internal organisation and redefining existing jobs – which need to be identified. In this context, GRECO notes that although the SCPC staffing levels have been maintained (with one additional recruitment since the last reporting exercise), the institution has not yet reached full staffing levels. GRECO understands that, pursuant to

⁴ <https://imotnasostojba.dksk.mk/>

the aforementioned assessments underway, further improvements may occur in this area, including, regarding the functioning, resources, and expertise of the Department for Monitoring of Property Status. A report is also being prepared on the state of the interoperability of the SCPC with other institutions in order to ensure the good functioning of the Register of Elected and Appointed Officials. All of this is to be welcomed, however more is required to consider parts (i) and (ii) to be implemented. In this respect, GRECO is looking forward to receiving updates on any progress made with the above.

23. As regards part (iii), GRECO welcomes that progress has been made with a new Electronic System in place. In February 2025, 2,136 of the asset declarations of public officials were published on the SCPC's site through this new system. For the time being, the rest of the declarations of public officials are available in the old system, which contains the declarations of 9,645 elected and appointed officials. This part of the recommendation will be considered as implemented when the new system is fully operational.
24. GRECO concludes that recommendation viii remains partly implemented.

Recommendation ix

25. *GRECO recommended analysing the practical application of the system of sanctions in respect of violations of conflicts of interest, integrity and anti-corruption legislation/regulation and ensuring that the sanctions are effective, proportionate and dissuasive.*
26. It is recalled that this recommendation was considered by GRECO as remaining not implemented in the Second Compliance Report. GRECO had reiterated the concern it had already expressed in the Compliance Report, that the Fifth Evaluation Report had identified several deficiencies inherent in the sanctioning regime foreseen for the violation of conflicts of interest, integrity and anti-corruption rules. No adequate analysis of the practical application of the system of sanctions had been carried out and the sanctioning regime had not been revised to address its shortcomings e.g. that sanctions were not provided for all violations established by law, and monetary fines were assessed as not meeting the prerequisites of effectiveness, proportionality, and dissuasiveness.
27. The authorities report that with the support of the Project against Economic Crime in North Macedonia (see above, [Horizontal Facility III, 2023-2026](#)), an analysis (technical paper) of the sanctioning regime under the Law on the Prevention of Corruption and Conflict of Interest had been carried out, providing 40 recommendations. The Working Group in charge of preparing draft amendments to this Law has set, as a priority, the implementation of these recommendations, which aim to improve the system of sanctions. The draft amendments to this Law are being prepared and will be published for public consultation. The deadline for their adoption by Parliament is December 2025.

28. GRECO welcomes the progress made with the analysis carried out of the sanctioning regime under the Law on the Prevention of Corruption and Conflict of Interest. It also welcomes the setting up of the Working Group in charge of preparing draft amendments to this Law, which should be adopted by December 2025. GRECO is looking forward to receiving information on the finalisation and adoption of these draft amendments.
29. GRECO concludes that recommendation ix has been partly implemented.

Regarding law enforcement agencies

Recommendation x

30. *GRECO recommended that (i) sufficient operational independence of the police vis-à-vis the Ministry of the Interior be provided and ensured in practice, and (ii) pertinent measures be taken in order to ensure individual police officers' duty to comply with the existing rules on integrity and impartiality in order to carry out their functions in a politically neutral manner in practice (e.g. through awareness, training, sanctions etc.).*
31. It is recalled that this recommendation was considered by GRECO as partly implemented in the Second Compliance Report. GRECO had welcomed the new regulatory measures aimed to depoliticise the police. These measures were at the initial stage of their implementation, and it was therefore too early to assess their impact.
32. The authorities report that from 19 April 2023 onwards, when the new Law on Amendments and Supplements to the Law on Internal Affairs came into force, the Department for Internal Control, Criminal Investigations and Professional Standards of the Ministry of the Interior carried out, in application of Article 168 of this Law⁵, inspections in seven cases after having received complaints about the political activities of certain employees of the Ministry of the Interior (exerting political pressure on employees, participation in political gatherings, publishing of content on social networks with political and party connotation). In three out of the seven reported cases, disciplinary procedures were initiated against the employees, and in four cases, insufficient evidence was established.
33. The authorities report that the Ministry of the Interior intends to continue with the reform process to depoliticise its institution. In this context, all organisational units will receive instructions that their employees must submit an annual written statement on whether or not they are members of a political party. In addition, in the future, the Ministry of the Interior will address political parties in writing in cases where there is a doubt on whether or not an employee of the Ministry is a member of a political party.

⁵ Under Article 168 of the Law on Internal Affairs, which stipulates that: “an employee in the Ministry of the Interior may not be a member of a political party, establish, manage, advocate and represent a political party or be a member of organs and bodies of a political party and may not wear or display party symbols in the official premises or official vehicles of the Ministry of the Interior, organise or act as a party in the Ministry of the Interior”.

34. GRECO takes note that the Law on Amendments and Supplements to the Law on Internal Affairs, relevant for both parts of this recommendation, has been in force since 19 April 2023. As regards part (i) of the recommendation, as already mentioned in the previous report, operational orders within the police are now issued by the Director of the Public Security Bureau (which is the head of Police), no longer by the Minister of the Interior⁶. As regards part (ii) of the recommendation, since the entry into force of the Law on Amendments and Supplements to the Law on Internal Affairs, seven cases with respect to political activities of employees of the Ministry of the Interior have led to inspections, leading in turn to disciplinary procedures in three of them. This shows that the law is being implemented and that there are applicable sanctions in place. Training was already in place and GRECO welcomes and encourages the authorities on their continued path towards depoliticising the police.
35. GRECO concludes that recommendation x has been implemented satisfactorily.

Recommendation xv

36. *GRECO recommended (i) ensuring that recruitment to the police, including direct recruitment and transfer from other institutions, is competitive and based on objective and transparent criteria and procedure; and (ii) introducing integrity checks and testing of persons entering the police.*
37. It is recalled that this recommendation was considered by GRECO as partly implemented in the Second Compliance Report. GRECO took note of the legislative changes made to restrict direct recruitment and to provide for open recruitment as a general rule. However, to sufficiently substantiate that material improvements had been made, details were required with respect to the procedure that applies to direct recruitment and on the criteria and procedure governing transfers from other institutions to determine whether the relevant processes were indeed competitive, objective and transparent. GRECO also took note of the introduction of integrity testing – however, this was a recent legislative development, the efficiency of which still needed to be tested in practice. In this respect, particular attention was to be paid to the possibility for the Minister of the Interior to carry out an integrity test in respect of individual officers, as this could impinge on the operational independence of the police. To that end, GRECO noted that the Rulebook on Implementation of Integrity Test did not sufficiently describe integrity testing proceedings, which could open the possibilities for misuse.
38. The authorities report that the analysis made so far of the provision regulating integrity checks on recruitment to the police in the Law on Internal Affairs has shown that its implementation is subject to the fulfilment of several prerequisites: technical and human capacities; special equipment; appropriate training etc. This provision will therefore need to be revised in order to address GRECO's recommendation which, in turn, will affect the bylaw on this issue. To that end, a working group in the Ministry of the Interior has prepared a draft Law on Internal Affairs (currently in the inter-ministerial consultation phase). The draft provides that the Ministry will conduct professional

⁶ Article 2 of the Law on Amendments and Supplements to the Law on Internal Affairs.

integrity tests through an electronic form or through a simulated situation, both of which will be conducted on the basis of a plan that may only be adopted by the Head of the Department for Internal Control, Criminal Investigations and Professional Standards. This will replace the previous legal provision, according to which professional integrity tests are conducted on the initiative of the Minister of the Interior or the Director of the Public Security Bureau. This will also eliminate the possibility of political influence on the implementation of integrity testing. Bylaws will then further develop the method of testing the professional integrity of employees of the Ministry of the Interior.

39. GRECO takes note that new amendments to the Law on Internal Affairs are currently in the inter-ministerial consultation phase and will address the outstanding issues of this recommendation, i.e. clarifying integrity testing proceedings. GRECO looks forward to receiving information on these positive developments.
40. GRECO concludes that recommendation xv remains partly implemented.

Recommendation xvii

41. *GRECO recommended (i) to introduce objective and transparent criteria and procedures for periodical reviews of the integrity of police staff; and (ii) to use the results of such reviews in the promotion procedures.*
42. It is recalled that this recommendation was considered by GRECO as partly implemented in the Second Compliance Report. GRECO took note that police officers were now required to undergo regular professional integrity checks, the negative results of which could affect future promotions (i.e. trigger disciplinary action). However, GRECO noted that more had to be done to meet the broader aim pursued by the recommendation regarding objectivity and transparency of periodical appraisals.
43. The authorities report the same developments as for recommendation xv above, notably that the relevant provision in the Law on Internal Affairs will need to be reconsidered to properly address the issue of integrity testing as well as the evaluation of the results of such testing. Depending on the changes introduced, this could impact the career development of employees of the Ministry of the Interior in a positive manner.
44. GRECO takes note that the Law on Internal Affairs needs to be further amended in order to properly reconsider the issue of integrity testing and the evaluation of such testing. This is being considered. GRECO looks forward to receiving information on this development.
45. GRECO concludes that recommendation xvii remains partly implemented.

Recommendation xx

46. *GRECO recommended securing the autonomy and independence from undue influence of the internal control mechanism of the police and providing it with an appropriate mandate, resources and expertise.*
47. It is recalled that this recommendation was considered by GRECO as partly implemented in the Second Compliance Report. GRECO welcomed the establishment of a dedicated unit in charge of discipline (replacing the former ad-hoc commissions established by the Minister of the Interior), which could assure a more systematic approach and greater consistency in disciplinary procedures. Training activities on integrity matters were already in place, contributing to strengthening staff's expertise. However, GRECO considered that further work was needed to reinforce the capacity of the Department for Internal Control, Criminal Investigations and Professional Standards (DICCIPS) of the Ministry of the Interior. The Fifth Evaluation Round Report described worrying flaws in its operation that included political influence exerted on its decision-making processes, insufficient resources, limited powers and a lack of expertise and tools. GRECO received no substantiation that these shortcomings had been addressed.
48. The authorities report that, in addition to the broader shift in operational command – where police operational orders are now issued by the Director of the Public Security Bureau (which is the head of Police)⁷ rather than the Minister of the Interior, the Department for Internal Control, Criminal Investigations and Professional Standards (DICCIPS) of the Ministry of the Interior is no longer located on the same premises as the Ministry. This is to allow citizens who report unprofessional or illegal behaviour and acts by employees of the Ministry, to do so without having to enter the building of the Ministry. The DICCIPS is currently in a prefabricated building that has recently been renovated to improve working conditions. Further improvements are planned over a period of two years (2024-2025).
49. The authorities also report that, in the Systematisation Act of Job Positions in the Ministry of the Interior, a total of 73 jobs have been foreseen for the DICCIPS, of which 53 have already been filled (72.6% of occupancy). The following categories of employees are foreseen for the DICCIPS:
- management positions: assistant to the minister, 3 heads of department and 6 heads of unit (all filled);
 - chief and independent inspectors (27.4% of these positions still need to be filled);
 - technical staff (all filled).

The DICCIPS is doing its utmost to fill the vacant positions and expects to do so in the near future, through internal advertisements.

50. GRECO takes note that changes in police command – where operational orders are now issued by the Director of the Public Security Bureau (i.e. the head of Police) instead of the Minister of the Interior – provide an important safeguard for the independence not only of the police force but also of the Department for Internal Control, Criminal Investigations and Professional Standards (DICCIPS) of the Ministry of the Interior. In addition, the DICCIPS is now located on different premises from the Ministry itself. The

⁷ Article 2 of the Law on Amendments and Supplements to the Law on Internal Affairs (see recommendation x).

authorities have therefore taken the necessary regulatory and logistical measures to address concerns raised in the recommendation. GRECO also notes that additional positions providing independent and technical expertise have been created within the DICCIPS, the majority of which have now been filled (72.6%), addressing the concern of insufficient resources and expertise being allocated to the DICCIPS. These are positive steps, which represent concrete progress towards securing the autonomy and independence of the DICCIPS from undue influence while also increasing its resources. GRECO trusts that the remaining vacant positions will be filled in the near future, that existing training will strengthen the DICCIPS' oversight powers and that its current location will be further improved into a more permanent and suitable facility, ensuring that it continues to maintain its autonomy and independence. In the light of these developments, GRECO considers this recommendation implemented satisfactorily.

51. GRECO concludes that recommendation xx has been implemented satisfactorily.

Recommendation xxi

52. *GRECO recommended that the available mechanisms of external supervision of the police force, including those of Parliament, the Ombudsman Office and the Public Prosecutor's Office be subject to an appropriate level of transparency in respect of cases dealt with and that related statistics be provided at regular intervals.*
53. It is recalled that this recommendation was considered by GRECO as remaining partly implemented in the Second Compliance Report. GRECO welcomed that the competent departments of the Ombudsman and the Public Prosecutor's Office had developed operational arrangements for communication and feedback. However, regarding the external oversight performed by Parliament in this domain, no new information had been reported⁸. In this respect, GRECO had noted previously that this recommendation is mainly concerned with providing public transparency to cases that had been dealt with and to the disclosure of statistics at regular intervals, on which nothing was reported.
54. The authorities clarify that Parliament's supervision of the security services is carried out by three parliamentary committees, which also cover the police to the extent that their activity falls within their mandates: (1) the Committee on Defence and Security, (2) the Committee on Oversight of the Work of the National Security Agency and the Intelligence Agency, and (3) the Committee on the Supervision of the Implementation of the Interception of Communication Measures. These committees, within their respective responsibilities, work in accordance with the relevant provisions of the Constitution, the Law on the Assembly⁹, the Rules of Procedure of the Assembly¹⁰ and

⁸ GRECO had reiterated its concern about the passivity of the relevant parliamentary committees despite there being enough evidence of police ill-treatment. In this respect, see the progress made in addressing this issue in the on-going supervision by the Committee of Ministers of the Council of Europe with respect to [Kitanovski v. The former Yugoslav Republic of Macedonia App. No. 15191/12](#) (ECtHR, 22 January 2015) (Department for the Execution of Judgments of the European Court of Human Rights).

⁹ Official Gazette No. 104/2009, 14/20, 174/21, 298/21, 67/22 and 65 /23.

¹⁰ Official Gazette No. 248/2023.

the Law on Members of Parliament¹¹. Their competences also evolve as a result of legal developments following reforms in the security-intelligence sector.¹² In addition to the regular committee sessions and within the framework of their competences, during the mandate of 2020-2024, the committees have also made several supervisory and work visits¹³.

55. The authorities explain that under the Law on the Interception of Communications, the Committee on the Supervision of the Implementation of the Interception of Communication Measures submits an annual report to Parliament for the previous calendar year, no later than the end of February of the current year. This report is available on the Parliament's website¹⁴. The effective and efficient implementation of supervisory visits (in addition to the knowledge and skills of the members of this Committee) also requires the participation and support of technical experts in this area, as well as the establishment and functioning of the Council for Civilian Supervision. The last amendments and supplements to the Law on the Interception of Communications¹⁵ were made to address this issue and provide further regulation on the hiring method of

¹¹ Official Gazette No. 84/2005, 52/2006, 161/ 2008, 104/2009, 51/2011, 109/2014, 140/2018; 27/2019 and 51/2024.

¹² Namely:

- Law on the interception of communications (Official Gazette No. 71/18, 108/19 and 154/2023);
- Law on the Operational - Technical Agency (Official Gazette No. 71/18 and 98/2019);
- Law on Classified Information (Official Gazette No. 275/2019);
- Law on the National Security Agency (Official Gazette No. 108/2019);
- Law on the Intelligence Agency (Official Gazette No. 21/2021);
- Law on the coordination of the security-intelligence community in the Republic of North Macedonia (Official Gazette No. 108/2019);
- Defence Law (Official Gazette No. 42/2001; 73/2002; 78/2002; 5/2003; 58/2006; 110/2008; 51/2011; 151/2011; 185/2011; 215/2015 and 42/2020); and
- Law on Public Procurement in the Field of Defence (Official Gazette No. 180/2019 and 176/2021).

¹³ These include:

- The Committee on Oversight of the Work of the National Security Agency and the Intelligence Agency carried out four supervisory visits to the National Security Agency and the Intelligence Agency, of which two supervisory visits took place in 2021 and two supervisory visits in 2022. After carrying out the visits, this Committee prepared a statement published on the Parliament's website (https://www.sobranie.mk/2020-2024-aktivnosti-ns_article-prva-nadzorna-poseta-na-komisijata-za-nadzor-na-rabotenjeto-na-anb-i-ar.nspj).
- In 2021, the Committee on the Supervision of the Implementation of the Interception of Communication Measures carried out two supervisory visits and one working visit to the authorised interception of communications authorities. After carrying out the supervisory visits, this Commission prepares a statement which is published on the Parliament's website (there is no information for these visits on the Parliament's official website due to the fact that it is a completely new website and the old data has not fully been transferred). The reports and conclusions, on the other hand, are classified information and are treated in accordance with the Law on classified information (Official No. 275/2019).
- The Defence and Security Committee exercises its supervisory powers in accordance with the Rules of Procedure of the Assembly, and it had several requests for data and information from the Ministry of the Interior and the Ministry of Defence on issues of wider interest to the public, which it discussed at its sessions. The reports and conclusions of this Commission are classified information and are treated in accordance with the Law on classified information (Official Gazette No. 275/2019).

¹⁴ <https://www.sobranie.mk/detali-na-materijal.nspj?param=abdb823a-69f6-4d80-8e97-7c07111458f8>

¹⁵ Official Gazette No. 154/2023.

technical experts for this Committee as well as on the establishment and the functioning of the Council for Civilian Supervision (not yet operational).

56. The authorities reiterate that external supervision of the police force is carried out mainly by the [Ombudsman Office](#) (the [Civil Control Mechanism](#)) and by the [Basic Public Prosecutor's Office for Prosecuting Organised Crime and Corruption](#). The latter was specifically mandated to investigate and prosecute offences¹⁶ committed by officers with police authorisations and members of the prison police. Information on cases dealt with and statistics are available on their respective websites.
57. [GRECO](#) takes note that the three parliamentary committees responsible for the supervision of security, defence and intelligence services also cover the police to the extent that their activities fall within the committees' mandates. GRECO notes that these committees have, beyond their sessions, carried out several supervisory and working visits between 2020 and 2024 and that statements prepared by the relevant committees after such visits are published on the Parliament's website (except for those subject to the Law on Classified Information). GRECO takes note that the main mechanisms of external supervision of the police force are those of the Ombudsman's Civil Control Mechanism and of the Basic Public Prosecutor's Office for Prosecuting Organised Crime and Corruption, both of which produce information on cases dealt with and statistics on a regular basis on their respective websites.
58. GRECO concludes that recommendation xxi has been implemented satisfactorily.

Recommendation xxii

59. *GRECO recommended strengthening substantially the measures for the practical implementation of the Law on the Protection of Whistle-blowers within the police and making related information accessible to the public.*
60. It is recalled that this recommendation was considered by GRECO as partly implemented in the Second Compliance Report. GRECO took note of the new developments to support the implementation of whistleblowing legislation and that amendments were in the pipeline on the whistleblowing law to enhance its effectiveness. GRECO recalled that this recommendation was prompted by the absence of data on the practical application of the law and on the impression within the police force that the lack of disclosure could be explained by multiple factors including a corporatist police culture, partisanship, lack of trust in the functioning of the system etc. The authorities had dealt with one whistleblowing case within the Ministry of the Interior leading to the dismissal of the wrongdoer, which was considered an encouraging development. However, one single case cannot determine that the issue is resolved and therefore more information was required on internal disclosures within the police.

¹⁶ Criminal offences committed in the performance of official duties, criminal offences committed outside official duties using serious threat, force or means of coercion resulting in death, serious bodily injury, bodily injury, unlawful deprivation of liberty (false imprisonment), torture and other cruel, inhuman or degrading treatment and punishment if the law provides for criminal prosecution *ex officio*.

61. The authorities report that since June 2023, no whistleblower report has been received. However, regular trainings on the “Protection of whistleblowers – internal and external reporting” are held for the employees of the Department of Internal Control, Criminal Investigations and Professional Standards, and the Department for Integrity, Prevention of Corruption and Protection of Human Rights. This is done within the framework of the Action Plan for the implementation of the Integrity Plan for 2023-2025. This resulted in 170 employees of the Ministry of the Interior receiving training on this topic. The training continued in 2024. In addition, the organisational units of the Ministry of the Interior received a communication (Telegram) informing all employees about the Law on the Protection of Whistleblowers, the Rulebooks on Protected Internal Reporting and Protected External Reporting and the Instructions on the Procedure for Protected Internal and External Reporting in the Ministry of Interior. This Telegram informed employees about reporting practices regarding crimes, misdemeanours or breach of rules and regulations by another employee. The information also included how to use the protected reporting channel to report certain irregularities in the work processes, i.e. that the whistleblowing should be seen as a corrective measure in the work of the Ministry.
62. GRECO welcomes that training on whistleblower protection (internal and external reporting) has continued and that employees are informed about the laws, rules and instructions in place for internal and external reporting procedures. This is a positive development in increasing awareness among police officers in this sensitive area. That said, GRECO still lacks concrete information on how whistleblower protection operates in practice, including whether any additional measures are being considered by the authorities to foster an open organisational culture where employees are encouraged to report wrongdoing, in light of the observation made in the Fifth Round Evaluation Report regarding the absence of cases (which remains relevant). Further multifaceted action, beyond the training being provided, appears necessary in this area.
63. GRECO concludes that recommendation xxii remains partly implemented.

III. CONCLUSIONS

64. **In view of the foregoing, GRECO concludes that North Macedonia has satisfactorily implemented 17 of the 23 recommendations contained in the Fifth Round Evaluation Report.** Of the remaining recommendations, six have been partly implemented.
65. More specifically, recommendations i, ii, iii, iv, v, vi, x, xi, xii, xiii, xiv, xvi, xviii, xix, xx, xxi and xxiii have been implemented satisfactorily or dealt with in a satisfactory manner, and recommendations vii, viii, ix, xv, xvii and xxii have been partly implemented.
66. With respect to top executive functions (PTEFs), a number of positive developments have been noted. Public accessibility online of persons invited to, and present at, sessions of government sub-committees and working groups has been included in the new Rules of Procedure of the Government, which have been adopted. New Guidelines on reporting and processing gifts for PTEFs have also been adopted, the catalogue on

gifts providing online details including on gifts received by PTEFs is under preparation. An electronic database for the registration and verification of asset declarations of elected and appointed public officials has been created and an analysis to assess the processes and practices of the State Commission for the Prevention of Corruption (SCPC)'s Department for Monitoring of Property Status was carried out. However, the results of the implementation of recommendations made in this analysis are still in the pipeline. The progress made with the analysis carried out of the sanctioning regime under the Law on the Prevention of Corruption and Conflict of Interest is welcomed, as is the setting up of the Working Group in charge of preparing draft amendments to this Law, which should be adopted by December 2025.

67. With respect to law enforcement agencies (police), progress can also be recorded. Implementation action has followed to strengthen the operational independence of the police, including through inspection activity and training of officials on the new provisions and bans. Additional substantiation has been provided regarding internal and external oversight mechanisms of the police. In this connection, more efforts can be made regarding objectivity and transparency of periodic appraisals, as well as the practical application of whistleblower protection legislation.
68. In accordance with Rule 31 revised bis, paragraph 10 of GRECO's Rules of Procedure, the adoption of this Addendum to the Second Compliance Report terminates the Fifth Evaluation Round compliance procedure with respect to North Macedonia. The North Macedonian authorities may, however, wish to inform GRECO of the developments concerning the implementation of recommendations vii, viii, ix, xv, xvii and xxii, which remain incomplete.
69. GRECO invites the authorities of North Macedonia to authorise, as soon as possible, the publication of this report, to translate it into the national language and to make the translation public.