



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”

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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.