

What are the
Citizens interested in?



RAPORT
ON THE IMPLEMENTATION
OF THE LAW ON
FREE ACCESS TO
PUBLIC INFORMATION



CONTENT

SUMMARY	3
INTRODUCTION	6
CONTEXT	8
METHODOLOGY FOR MONITORING THE APPLICATION OF THE LAW REGARDING FREE ACCESS TO PUBLIC INFORMATION	11
ANALYSIS OF THE LAW REGARDING FREE ACCESS TO PUBLIC INFORMATION	13
MONITORING OF PUBLIC INFORMATION HOLDER WEBSITES	19
ANALYSIS OF MONITORING DATA ON THE VOLUME AND CONTENT OF REQUESTED PUBLIC INFORMATION	23
Requests and appeals to holders for 2019, 2020 and 2021	23
REQUESTS	23
COMPLAINTS	26
Data on the content of the most frequently requested information from the holders of public information	30
RECOMMENDATIONS	34
APPENDIX I	36
APPENDIX II	42

SUMMARY OF KEY FINDINGS AND CONCLUSIONS

In the Republic of North Macedonia, according to the latest information, there are a total of 1,445 holders of public information. Compared to the total number of institutions in the public sector, which is 1,346, the number of holders of public information is greater by 99 entities, because apart from the institutions of the public sector, holders of public information are also political parties and legal entities with public occupations.

The consistent application of the Law regarding Free Access to Public Information is a key prerequisite for the accountable and transparent operation of the holders of public information, primarily public institutions.

The analysis of the regulation, websites and available information regarding the application of the Law on Free Access to Public Information, which was made within the framework of this Report, showed that:

- There is a lack of an efficient mechanism for supervising the application of the Law, as well as an incompleteness of the misdemeanor provisions. Although Article 10 of the Law prescribes an obligation for active transparency, the Law does not regulate who will be charged to control the application of this legal provision, nor does it prescribe any sanction for non-compliance with this obligation.
- Although the Law establishes the owners' web pages as a basic mechanism and tool for their active transparency, there is no obligation to establish a register of web pages, which is the first prerequisite for consistent implementation of the Law.
- There is no legal obligation to control the websites of the institutions, which have the duty to publish the information from the list established in Article 10. Without such control, as well as without appropriate sanctions, the Law will never become fully implemented.
- The Law lacks a chapter that will refer to the supervision of the application of the provisions of the Law.
- Public sector institutions, with the exception of most ministries, do not have a unified way of publishing public information.
- Very few institutions fully respect the obligation to publish public information on their websites, that is, in a large number of cases, this obligation is occasionally or not respected at all, which is the main reason for the volume and list of requested information from institutions being very long.

- Most of the owners only partially comply with the legal obligation by publishing part of the necessary information, while the web pages lack uniformity, the method of accessing the information is different, which can further confuse the applicants.
- There are a number of holders of public information that do not have websites at all. Almost all kindergartens, health centers, cultural centers, museums, libraries (more than 200 institutions) do not have their own web pages. This means that these institutions do not have the ability to comply with the Law Regarding Free Access to Public Information.
- The websites of the courts are an example of non-compliance with the Law, because almost none of the information that is required to be published according to the law can be found on their websites.
- The research showed that in the past three years (2019, 2020, 2021) the majority of requests for access to public information addressed to the holders of information refer to issues related to: public procurement; the financial operation of the institutions (travel expenses, daily expenses, use of official vehicles, etc.); COVID-19 measures; the number of employees in public sector institutions and persons engaged on other grounds, and data on elected and appointed persons (biographies, management contracts, salaries, expenses, etc.).

In order to overcome the ascertained inconsistencies, to advance the application of the law and to ensure active transparency of the institutions, it is necessary to make amendments and additions to the Law in the direction of determining the explicit competence of the Agency for the Protection of the Right to Access Public Information, to supervise the application of the provisions of the Law, especially on the part of active transparency of the institutions through the publication of information on their official websites. In the direction of the full application of the Law, the powers of the Agency should also be re-examined, that is, whether it should have the authority to conduct criminal proceedings or whether that authority should be transferred to the courts, and the Agency should only have supervisory powers.

When amending the Law, it is necessary to reconsider whether the obligation for active transparency is fully applicable to all holders of public information and what are the financial implications if it remains as an obligation for all institutions. Considering the fact that the creation, maintenance and updating of a website requires technical and human resources, which some of the owners do not have, nor do they have enough resources to realize it, the possibility of a centralized presentation of the information from Article 10 should be considered for certain types of institutions.

For the sake of simplified monitoring of the application of the Law, it is necessary to update the form of the annual reports in the direction of obtaining not only quantitative, but also qualitative data and to establish an automated system for collecting and processing the annual reports of the holders.

Human capacities are one of the key factors for the application of the Law, which is why it must continue with the strengthening of human capacities and with regular training of the persons employed in the institutions, in charge of processing and publishing the data of the information holders.

Regular monitoring and follow-up, as well as such reports, should become a regular practice, at least annually, in order to build a culture of accountability and transparency, and as a result, the list of public information based on the processed qualitative data from the annual reports of the holders in the direction of publishing the information for which the citizens show the greatest interest.

However, overall, the Law greatly improves the system of access to public information, and with the aforementioned additions, it can represent a solid long-term basis for increased transparency and accountability for holders of public information.

INTRODUCTION

This monitoring report was prepared within the framework of the project "Encouraging Good Governance and Reforms in Public Administration" funded by the National Endowment for Democracy (NED). The monitoring report has as its subject a specific area - the application of the Law Regarding Free Access to Public Information, which is part of the Government's commitment in the field of good governance and the measures foreseen in the current Public Administration Reform Strategy 2018-2022 (PARS 2018-2022). The report focuses on the activities related to the improvement of the transparency of the institutions, foreseen in Priority Area 3: responsibility, accountability and transparency of the PARS 2018-2022.

The project "Encouraging Good Governance and Reforms in Public Administration" generally focuses on monitoring the fulfillment of the commitments of the Government of the Republic of North Macedonia to put good governance at the top of its political agenda, by including measures for good governance in all strategic policies, and with particular interest in the reform of the public administration as a prerequisite for creating a basis for good management. The project monitors and analyzes the dynamics, effects and existing problems related to the implementation and efficiency of the PARS 2018-2022, in order to assess its success and impact in terms of promoting good governance practices, but at the same time it contributed by developing specific recommendations and new measures to improve management in institutions.

Considering the importance of open institutions and the importance and potential of the data and information that the institutions possess, the Center for Change Management (CCM) within the mentioned project, initiated a process of monitoring the application of the mentioned Law Regarding Free Access to Public Information character with a purpose:

- To analyze the most frequently requested data and information from the institutions in the last three years;
- To encourage the institutions to proactively open the data and information for the citizens, according to the priorities and interests of the citizens and the media, according to the requests they make to the institutions;
- To indicate which data and information is the responsibility of the individual, areas of activity and to give guidelines to the institutions as to which data

should be collected and published for inspection, in accordance with legal obligations;

- To reduce the administrative burden of the institutions to constantly respond to information requests sent by the information seekers, which will also strengthen the transparency of the institutions and increase the confidence of the citizens in the administration;
- To increase public awareness of the importance of proactive transparency and its significance for building a responsible, efficient, professional and service-oriented administration.

The report is the result of the monitoring and analysis carried out by CCM, in cooperation with the Cabinet of the Deputy Prime Minister in charge of Good Governance Policies and the Agency for the Protection of the Right to Free Access to Public Information. The report identifies challenges in the implementation of legal obligations, but also the application of specific measures and activities related to access to public information, provides recommendations for improving the transparency, responsibility and accountability of institutions, but at the same time encourages citizens, the civil sector, the academic community, the private sector and all other stakeholders in society,

CONTEXT

Free access to public information implies the possibility to search, obtain and use the information produced by the institutions of the public sector, as well as other holders of public authority. **Access to public information is extremely important in every country with a democratic form of government, because:**

- It increases the transparency of institutions;
- It increases the trust of citizens and businesses in the institutions themselves;
- It has a preventive impact in relation to corrupt practices;
- It provides easier monitoring of public policies, and
- It reduces the administrative burden.

In the Republic of North Macedonia, the transparency of institutions and the importance of free access to public information was recognized more than a decade ago. Namely, in 2006, the first Law regarding Free Access to Public Information was adopted, which represents the first legal attempt to regulate the right of citizens to receive information produced by public institutions. Based on the 13-year experience of applying this law, in 2019 a completely new Law regarding Free Access to Public Information (hereinafter: the Law) was adopted, which significantly improved this regulation, both in terms of scope, as well as in terms of regulating the procedures that guarantee free access to public information .

In the new Law Regarding Free Access to Public Information¹, as public information is defined as that information which in any form was created or with which the holder of the information disposes in accordance with his competences, and as holders of information he defines the bodies of the state government and other bodies and organizations established by law, the bodies of the municipalities, the City of Skopje and the municipalities in the City of Skopje, institutions and public services, public enterprises, legal and private persons exercising public powers established by law and activities of public interest and political parties in the area of income and expenditure. In addition, the number of institutions covered by the new law is much greater than before. All this means a qualitatively improved approach to the regulation of this matter.

¹[Law Regarding Free Access to Public Information,https://aspi.mk/wp-content/uploads/2020/09/LAW-FOR-SPI-PDF.pdf](https://aspi.mk/wp-content/uploads/2020/09/LAW-FOR-SPI-PDF.pdf)

Although there is a regulation for access to public information, the biggest problem is its implementation, that is, the "silence of the administration". It actually means that, although there is a regulation that regulates the obligations in this area, the administration, state authorities and other holders of information still behave with indignation towards the obligations defined in the Law, they are unresponsive and do not provide the information that the citizens according to the Constitution and the Law have the right to receive. Another significant challenge is the way and the format through which the obligations of the Law are implemented, that is, the opening of the data collections by the institutions in a processable format. Only 72 institutions have published datasets on the open data platform. And the few data that are available on the web pages of the institutions are mostly in raw format, and it is not always easy to get to them. According to the Principles of Public Administration² at OECD-SIGMA there are certain standards that institutions have to meet, including the standard "with 3 clicks to the requested information". The standard is considered to be met if public sector institutions, i.e., information holders, provide up-to-date, freely available information in all official languages of the country, displayed in a user-friendly way (with no more than three clicks from the institution's main website), which are also published in an open format (HTML, PDF, or Open Document Format [ODF]).

Monitoring the application of the Law Regarding Free Access to Public Information is extremely important in order to be able to see the positive aspects of the application of this legal solution, but also to locate possible shortcomings both from a normative, as well as from a personnel and technical point of view, and the overcoming of which will have to be worked on, in order to be able to ensure its full implementation. The subject of this report is the presentation of the current situation with the application of the Law Regarding Free Access to Public Information, based on the data obtained from monitoring the work of the Agency for the Protection of the Right to Access to Public Information (hereinafter: the Agency) and the holders of public information , and it will represent the initial basis for the future monitoring of the application of the Law.

Any legal solution, the application of which is not followed in practice, usually does not give the desired results. Based on the received information and data from monitoring the application of the Law, the report also provides recommendations for

²<https://www.sigmaweb.org/publications/Principles-of-Public-Administration-2017-edition-MK.pdf>

further improving the transparency of institutions from the public sector, by improving both the legislation itself and its implementation.

METHODOLOGY FOR MONITORING THE APPLICATION OF THE LAW REGARDING FREE ACCESS TO PUBLIC INFORMATION

The subject of this report is the presentation of the available data and information resulting from monitoring the application of the Law Regarding Free Access to Public Information. **The monitoring of the application of the Law within the framework of this report is based on:**

- analysis of the Law Regarding Free Access to Public Information,
- monitoring the websites of the holders of public information,
- analysis of the reports of the Agency for Protection of the Right to Access to Public Information, and
- analysis of the data received from the holders of public information about the content of the most frequently requested information by citizens.

Through desktop research, an analysis of the provisions of the Law was made through the prism of their practical applicability and the competences of the Agency for consistent and complete implementation of the Law itself.

The websites of public sector institutions are monitored and analyzed randomly, based on data on public sector institutions published in the 2021 Public Sector Employees Register Report³ of the Ministry of Information Society and Administration. In doing so, ten websites from different types of public sector institutions were analyzed, according to the classification in this report.

Within this report, in addition to the analysis of the statistical data on the number of requests submitted to the holders of public information, a qualitative presentation of the most requested public information is also provided, and it is suggested that it be the initial starting point for future annual qualitative monitoring the application of the provisions of the Law. Namely, until now all analysis and reports have concentrated on statistical data regarding the number of submitted requests, accepted and rejected requests, submitted appeals, accepted and rejected appeals, statistical data on imposed misdemeanor measures and statistical data on initiated

³ https://www.mioa.gov.mk/sites/default/files/pbl_files/documents/reports/finalen-izveshtaj_2021_rabotna_30.03.2022.pdf

administrative disputes. In this report, for the first time, an overview of the content of the requests for which complaints have been submitted to the Agency and the most requested information in the various administrative areas is given. The large number of requests in a certain area is an indicator that the holders are not actively publishing all the data on their web pages, or they are publishing them, but they are not easily accessible. Therefore, in future qualitative analyses, the reduction of the list of the most requested public information in a certain area will be one of the indicators for greater transparency of the respective institutions.

ANALYSIS OF THE LAW REGARDING FREE ACCESS TO PUBLIC INFORMATION

The law regarding free access to public information was adopted for the first time in the Republic of North Macedonia in February 2006, and began to be applied in September of the same year⁴. A completely new Law on Free Access to Public Information was adopted in 2019 and was published in the "Official Gazette of the Republic of North Macedonia" no. 101/2019 of May 22, 2019, and has been in force since November 22 of the same year.

The current legal solution regulates the conditions, the method and the procedure for exercising the right of free access to public information that is available to the bodies of the state government and other bodies and organizations determined by law, the bodies of the municipalities, the City of Skopje and the municipalities in the City of Skopje, institutions and public services, public enterprises, legal and natural persons exercising public powers established by law and activities of public interest and political parties in the area of income and expenditure.

The law systematically regulates free access to public information, and has the widest possible scope. The law regulates a very broad concept of public information i.e., according to the law "public information is information in any form created or with which the owner of the information disposes in accordance with his competences".

Article 10 of the Law contains a whole list of information that holders must publish on their website. Holders of information are obliged to inform the public through their website by publishing the following data:

- the data on the competences that he performs i.e., they are determined by law,
- the basic data for contact with the owner of the information, primarily: name, address, telephone number, fax number, e-mail address and website address,
- the data of the official or the responsible person of the holder of the information (biography, contact data and others),
- the basic data for contact with the official person for mediating information, primarily: first and last name, e-mail address and telephone number,
- the basic data for contact with a person authorized for protected internal reporting, primarily: first and last name, e-mail address and telephone number,

⁴The law regarding free access to public information adopted in 2006 undergoes several changes and they are published in the following editions/issues of the Official Gazette of the Republic of Macedonia: number 13/2006, 86/2008, 6/10, 42/14, 148 /15, 55/16 and 64/18.

- list of persons employed by the holder of the information with position, official e-mail and official phone number,
- the laws that refer to the competence of the holder of information, related to the register of regulations published in the official gazette,
- the regulations that the owner of the information adopts within his competence in the form of a by-law: regulations (regulations for internal organization, regulations for systematization of workplaces, regulations for protected internal reporting and others), decrees, orders, instructions, plans, programs, decisions and other types of acts for the execution of laws and other regulations, when they are authorized by law,
- organogram for internal organization,
- strategic plans and strategies for the work of information holders,
- annual work plans and programs, -annual Budget and final account,
- annual financial plans by quarters and programs for the implementation of the budget, - audit report,
- types of services provided by the holders of information (information on the physical availability for the realization of the services and information on the e-services, the data on the legal bases, the name of the services, the documents and the data required for the realization of each of the services, the mechanisms for legal protection and others relevant data), - tariffs for fees for issuing real acts,
- the method of submitting a request for access to information (method of submitting an oral and written request for access to information, as well as a request submitted electronically),
- the entire documentation for public procurements, for concessions and for public-private partnership agreements,
- proposal of programs, programs, views, opinions, studies and other similar documents that refer to the acts of the authority of the holder of information announcements to the public about things taken from their website in accordance with the legal competences, information bulletins, official gazettes if they are an obligation according to law and otherwise,
- work reports that they submit to the authorities responsible for implementing control and supervision,
- statistical data on the work, as well as other information, acts and measures that affect the life and work of citizens and that result from the competence and work of the holder of the information,
- other information resulting from the competence and work of the owner of the information.

The law, in article 10, regulates the minimum standards that information holders should publish on their web pages. However, this does not prevent the institutions

from proactively acting and publishing more information and data that they produce, process or dispose of, within their competences, and which may be of interest or need to citizens, civil society organizations, businesses or the academic community and the like. In principle, all the information and data that the institutions possess within the scope of their work competence, are public information. What's more, public information also represents who manages and decides on how the institution's budget is spent with regard to the realization of their competences, especially due to the fact that it is public money.

The only exception to free access to public information is the following information:

- information that, based on the law, is classified information with an appropriate degree of classification;
- personal data, the disclosure of which would mean a violation of the protection of personal data;
- information, the provision of which would mean a violation of the confidentiality of the tax procedure;
- information acquired or compiled for investigation, criminal or misdemeanor proceedings, for the implementation of administrative and civil proceedings, the provision of which would have harmful consequences for the course of the proceedings;
- information that threatens industrial or intellectual property rights (patent, model, sample, trademark and service mark, mark of product origin).

Even this information becomes public information when the reasons for its unavailability cease.

The law provides the possibility for the holders of information to approve access to information that is not of a public nature, after the mandatory "harmfulness test"⁵ with which it will be determined that with the publication of such information the consequences for the interest that is being protected is less than the public interest established by law that would be achieved by the publication of the information. The harmfulness test is an obligation and an instrument for assessing whether the public interest in the availability of information prevails over the need to limit access to information for the purpose of protecting certain rights prescribed by law. In that sense, the harm test represents a decision of the highest degree and discretion, made by a public authority when deciding on a request for free access to public information. Thus, if it is possible to separate the part of the document that is not of a public nature without compromising its security, the information holder separates that

⁵<https://vlada.mk/sites/default/files/dokumenti/priracnik-za-sproveduvanje-na-test-na-shtetsnots-1.pdf>

information from the document and informs the requester about the contents of the remaining part of the document.

Chapter V of the Law systematically regulates the procedure for exercising the right to free access to public information. Moreover, in the event that the holder does not act on the request for free access to public information, a quick and efficient procedure is allowed upon appeal to the Agency.

The Agency is the leading institution for consistent application of the law. However, the competences of the Agency are too heterogeneous and require the engagement of a larger number of human resources. Namely, according to Article 30 of the Law, the Agency performs the following tasks:

- conducts administrative proceedings and decides on appeals against the decision by which the owner of the information refused or rejected the request for access to information of the applicants,
- takes care of the implementation of the provisions of this law,
- prepares and publishes a list of information holders,
- gives opinions on proposals for laws regulating free access to information,
- develops policies and provides guidelines regarding the exercise of the right to free access to information,
- conducts misdemeanor proceedings through the Misdemeanor Commission, which decides on misdemeanors in accordance with the law,
- undertakes activities related to the education of the holders of information about the right of free access to the information they have,
- cooperates with the holders of information regarding the realization of the right of access to information,
- prepares an annual report on its work and submits it to the Assembly of the Republic of Macedonia,
- carries out works of international cooperation related to the execution of the international obligations of the Republic of Macedonia, participation in the implementation of projects of international organizations and cooperates with the authorities of other countries and institutions in the field of free access to public information,
- promotes the right to free access to public information and
- performs other tasks determined by this and other laws.

From the aspect of the structure of the competent work for monitoring the application of the Law, as can be seen from the listed competences, the Agency at the same time represents:

1. Policy maker in the field of free access to public information,
2. Authority that takes care of the implementation of the Law,
3. First-instance authority in misdemeanor proceedings, and
4. Secondary authority that decides on the complaints of those seeking public information.

There is no other example of a public sector institution in which competences from first- and second-level administrative procedures are concentrated in this way. All these competences could be realized with a sufficient number of human resources in the Agency.

From the perspective of the efficient application of the provisions, the biggest shortcoming of the Law is the absence of an efficient mechanism for supervising the application of the Law, as well as the incompleteness of the criminal provisions. Namely, as stated above, in Article 10 of the Law there is a complete list of information that all holders should publish on their website. At the same time, Article 10 of the Law states that the holder **is obliged** to publish this information. However, nowhere in the Law is it regulated who will be competent to control the application of this legal provision, and in addition, Article 39 lacks a misdemeanor sanction for an imperative legal provision, which also represents a legal gap.

Given the duty to publish a minimum of information by the owners of their web pages, there is also a lack of a **single register of web pages** that will be a key tool for monitoring the application of Article 10, which is the main pillar of the Law. Also, nowhere in the Law is there a legal obligation **to control the websites** of the institutions, which have the duty to publish the information from the list established in Article 10. Without such control, as well as without appropriate sanctions, the Law will never be able to be fully implemented. in practice.

Taking into account the structure of the substantive laws in the country, the Law lacks a chapter that will refer to the **supervision** of the application of the provisions of the Law.

However, overall, the Law greatly improves the system of access to public information, and with the aforementioned additions, it can represent a solid long-term basis for increased transparency and accountability of holders of public information.

Additional shortcomings of the existing legal solution are the following:

- Absence of qualitative data in the form of the Annual Report submitted by the holders to the Agency in accordance with Article 36 of the Law on Free Access to Public Information ("Official Gazette of RNM No. 101/2019"),
- Absence of an electronic and automated way of submitting annual reports supplemented with qualitative data through the portal for free access to public information established by the Agency,
- The impossibility of automated processing of the obtained quantitative and qualitative data for the application of the Law, which creates an unnecessary administrative burden for the Agency,
- Absence of regular monitoring of the websites of the holders of public information, and
- The impossibility of initiating appropriate procedures within the competences of the Agency for the institutions that do not respect the Law.

MONITORING THE WEBSITES OF HOLDERS OF PUBLIC INFORMATION

As stated in the section of this report that refers to the analysis of the legal regulation, Article 10 of the Law is the main mechanism that, by providing for the duty to actively publish public information on the websites of the holders, this would ensure increased transparency and openness of public institutions. This should also reduce the number of individual requests for public information, which will represent a reduction of the administrative burden for the institutions and certainly a relief for the persons in charge of free access to public information in every public institution.

In terms of scope, the law has the widest possible scope, that is, it applies to all institutions from the public sector, institutions exercising public powers, but also political parties. In fact, such a broad scope seeks to include in the obligation to publish public information all institutions whose operation in a certain way affects the quality of life of citizens or certain groups in society, but also all those entities that are in some way financed by the taxes that citizens pay to the state treasury.

Thus, according to the Annual Reports from the Agency for the Protection of the Right to Access to Public Information, the total number of information holders varies from year to year, so the 2021 Report has defined a List of Information Holders totaling 1,445 subjects. This differs from 2020 when there were a total of 1,440 holders on the list⁶ and from 2019 when there were a total of 1,257 information holders.

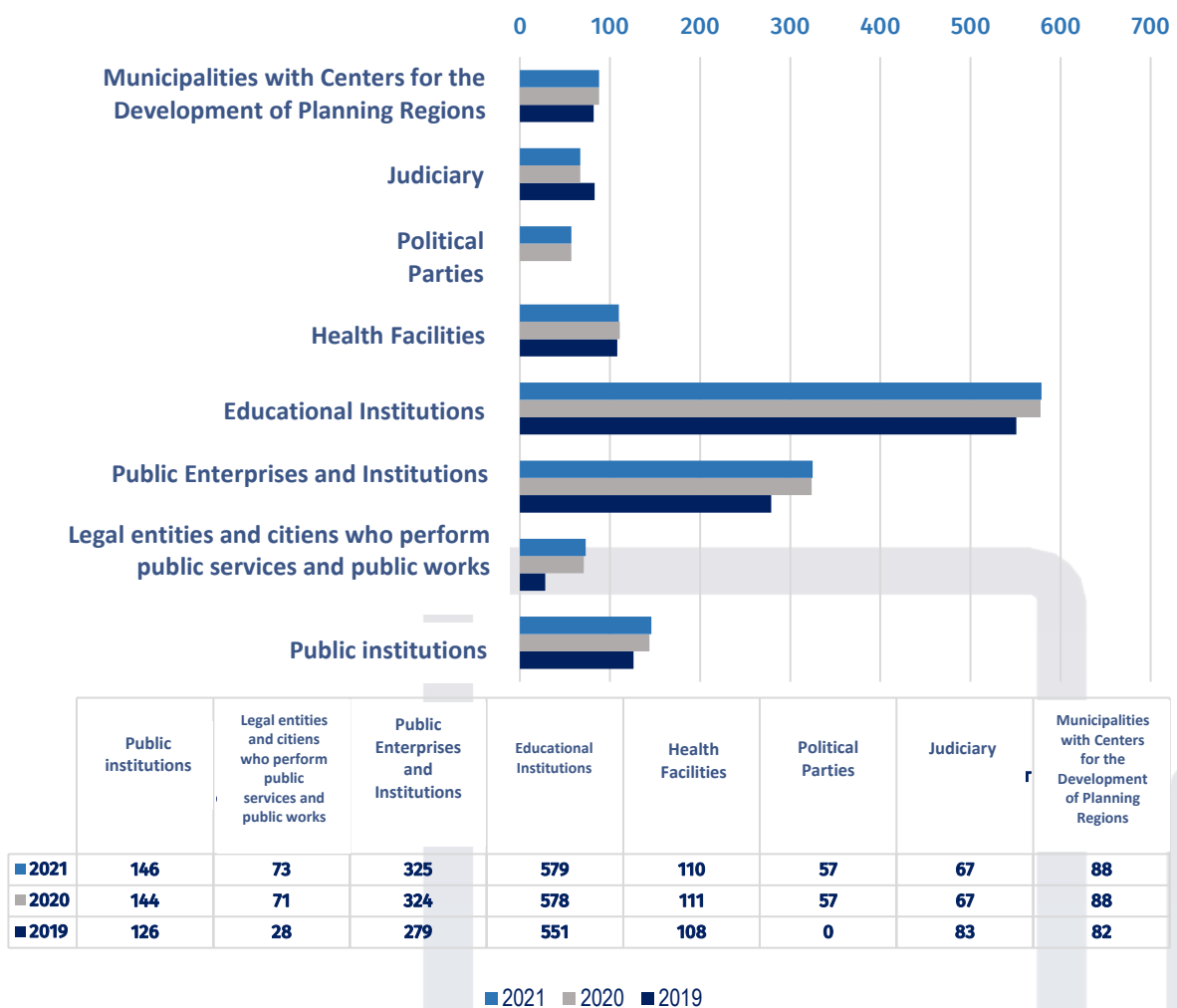
Out of all 1,445 holders in 2021, a total of 146 are from state institutions, 73 are legal entities and citizens exercising public powers and activities of public interest, 325 are public enterprises and institutions, 579 are educational institutions, 110 are from health institutions, 57 are political parties, 67 are institutions of judicial authority and 88 holders of public information are local self-government units with the Centers for the Development of Planning Regions.

Out of a total of 1,440 holders, in 2020, in total 144 are from state institutions, 71 are legal and natural persons exercising public powers and activities of public interest, 324 are public enterprises and institutions, 578 are institutions from the educational activity, 111 are health institutions, 57 are political parties, 67 are institutions from the

⁶ In 2021, new holders were registered who, according to the Report of the Agency for the Protection of the Right to Access to Information of a Public Character, submitted data for their institutions on their own initiative. There are newly registered holders at state institutions, legal and natural persons performing activities of public interest, public enterprises and institutions and at educational institutions, or a total of 8 new holders, while from the previous reporting period three holders have ceased to exist, i.e. have stopped working for various reasons.

judicial authority and 88 holders of public information are units of local self-government with Centers for the Development of Planning Regions. Out of a total of 1,257 holders, in 2019 a total of 83 are institutions of judicial authority, 28 are legal and natural persons exercising public powers, 82 are units of local self-government, 551 are educational institutions, 279 are public enterprises and institutions, 108 are health institutions and 126 are state institutions.

Graph Number 1. List of holders of information under the jurisdiction of APRFAPI for the years 2019, 2020 and 2021



Considering the broad scope of the Law, for the purposes of this monitoring report, a representative sample of institutions from different sectors of activity (state administration, local self-government, regulatory bodies, education, labor and social policy, health, justice, public enterprises, etc.) was selected, whose web pages were monitored from the aspect of functioning according to the provisions of Article 10 of the Law.

The general impression is that public institutions (with the exception of most ministries that have a special banner on their websites with the title - 22 categories of documents - public information) do not have a unified way of publishing public information in accordance with Article 10 of the Law. Namely, although some of the institutions have published some or most of the information provided for in the mentioned article of the Law, it is not easy to get to them in a simple and quick way. Sometimes this information can be found grouped in one place and marked with a special banner on the website of the institution, sometimes it can be found under the field – “Public Information” from the menu of the website, sometimes in the field – “Documents”, and sometimes they can only be accessed using the Search tool.

Unfortunately, the monitoring of the web pages of holders of public information shows that very few institutions fully adhere to the requirements of Article 10, that is, that in a large number of cases there is a lack of adherence if there is any at all, which is the main reason as to why the scope and list of requested information from the institutions is very long.

Despite the fact that the Agency's website has fully complied with Article 10 of the Law, and that it promotes it as a positive example that other institutions should follow in the manner of publishing public information under their jurisdiction, it is ascertained that no other holder of public information fully respects this example. Namely, the inspection of the web pages of the owners shows that most of them only partially comply with the legal obligation by publishing only part of the necessary information, while the web pages lack any uniformity, the method of accessing the information is different, which in turn can additionally confuse the claimants.

Most worrying, however, is the fact that there are a large number of public information holders who do not have websites at all. So, for example, almost all kindergartens, health centers, cultural centers, museums, libraries (more than 200 institutions) do not have their own web pages. This means that these institutions do not have the opportunity to comply with the Law on Free Access to Public Information.

Court websites are also an example of non-compliance with the Law, because almost none of the information from Article 10 of the Law can be found on their official websites.

What all this means is that it is necessary to review the applicability of Article 10 of the Law, that is, whether it is applicable to all holders of public information. Namely, the creation, maintenance and updating of a website requires technical and human resources, which these institutions in large numbers do not have, nor do they have

enough funds. For those reasons, the possibility of a centralized presentation of the information from Article 10, for certain types of institutions should be considered.

ANALYSIS OF THE TRACKING DATA ON THE SCOPE AND CONTENT OF THE REQUESTED PUBLIC INFORMATION

This part of the report was prepared based on the analysis of the Reports of the Agency for Free Access to Public Information for the years 2019⁷, 2020⁸ and 2021⁹, but also the data received from the Agency, which, in turn, acting on the Conclusion adopted at the Sixty-third session of the RNM Government held on 20.07.2022, has requested it from all 1445 holders of information. Namely, according to the mentioned Conclusion, the Agency asked the holders of information to submit a list of information that was requested during 2020, 2021 and the first half of 2022, as well as the annual reports on the work of the agency.

Requests and appeals to holders for 2019, 2020 and 2021

REQUIREMENTS

The number of requests for access to public information, which are submitted to institutions on an annual basis, is high, due to non-compliance with the obligation from Article 10 of the Law.

The annual report for 2019, regarding the processing of reports submitted by the holders, refers to data on 8,752 requests received, of which officials responded positively 8,299 times. 163 requests were rejected and rejected based on the exceptions prescribed in Article 6 (of the old Law which is currently out of force), or according to other legal regulations. The reports also contain data on 283 unanswered requests. According to the clarification contained in the subject report, 125 of them remained unanswered due to non-compliance with the time period specified in the requests of the Association of Citizens - requester of the information. Seven requests received before the very end of 2019, by the holders, have been transferred for action in 2020. A total of 4054 of the requests have been submitted to state institutions,

⁷ <https://aspi.mk/wp-content/uploads/2020/09/%D0%93%D0%9E%D0%94%D0%98%D0%A8%D0%95%D0%9D-%D0%98%D0%97%D0%92%D0%95%D0%A8%D0%A2%D0%90%D0%88-2019-PDF.pdf>

⁸ <https://aspi.mk/wp-content/uploads/2021/04/%D0%93%D0%9E%D0%94%D0%98%D0%A8%D0%95%D0%9D-%D0%98%D0%97%D0%92%D0%95%D0%A8%D0%A2%D0%90%D0%88-2020.pdf>

⁹ https://aspi.mk/wp-content/uploads/2022/04/%D0%93%D0%BE%D0%B4%D0%B8%D1%88%D0%B5%D0%BD-%D0%B8%D0%B7%D0%B2%D0%B5%D1%88%D1%82%D0%B0%D1%98_MK.pdf

In the Annual Report for 2020, it is noted that in the calendar year 2020, 7,163 requests were submitted to the holders, of which 6,790 requests were given a positive response. A total of 225 requests were rejected. In their reports, the Agency perceives that the holders as justification for the refusal or rejection of access to 225 requests are the exceptions to the free access prescribed in Article 6, or other legal regulations. Also, the reports contain data on 120 unanswered requests, that is, on 28 transferred requests for action in the current year 2021. The reason for that is that they were received before the very end of the 2020 calendar year.

The largest number of requests, i.e., the greatest interest of the applicants, were submitted to the state institutions or a total of 2,658 requests, followed by local self-government units with 1,820 requests, the judicial authorities with 1,010 requests, public enterprises and institutions with 683 requests, health facilities with 546 requests, educational institutions with 296, legal and natural persons exercising public powers and activities of public interest with 146 requests and finally political parties with 4 requests. The total number of claims for 2020 is 7,163.

The Agency's annual report for 2021 notes that out of all the received and processed annual reports from the holders of information (1,334 in total), a total of 8,910 requests were submitted to the holders, of which 8,540 were answered positively within the legal deadline.

The largest number of requests, or the greatest interest of the requesters, were submitted to the state institutions, or a total of 3,000 requests. With 760 received requests among the state administration bodies, the General Secretariat of the Government of the Republic of North Macedonia is in first place, followed by the Ministries of Justice and the Ministry of Internal Affairs with 354 received requests from applicants. The units of local self-government and planning regions show 2,298 requests received, and the applicants showed increased interest in the health facilities to which 847 requests were submitted, which is largely due to the COVID situation, according to the analyzed types of complaints submitted by the applicants. Applicants showed interest in the work of educational institutions by submitting 363 requests, 1,197 requests were submitted to the judicial authorities,

The general conclusion is that the number of requests for access to public information, which are submitted to the institutions on an annual level, is high.

Chart 2: Comparative Display of the number of received requests for free access to public information divided by sector for the years 2019, 2020 and 2021.

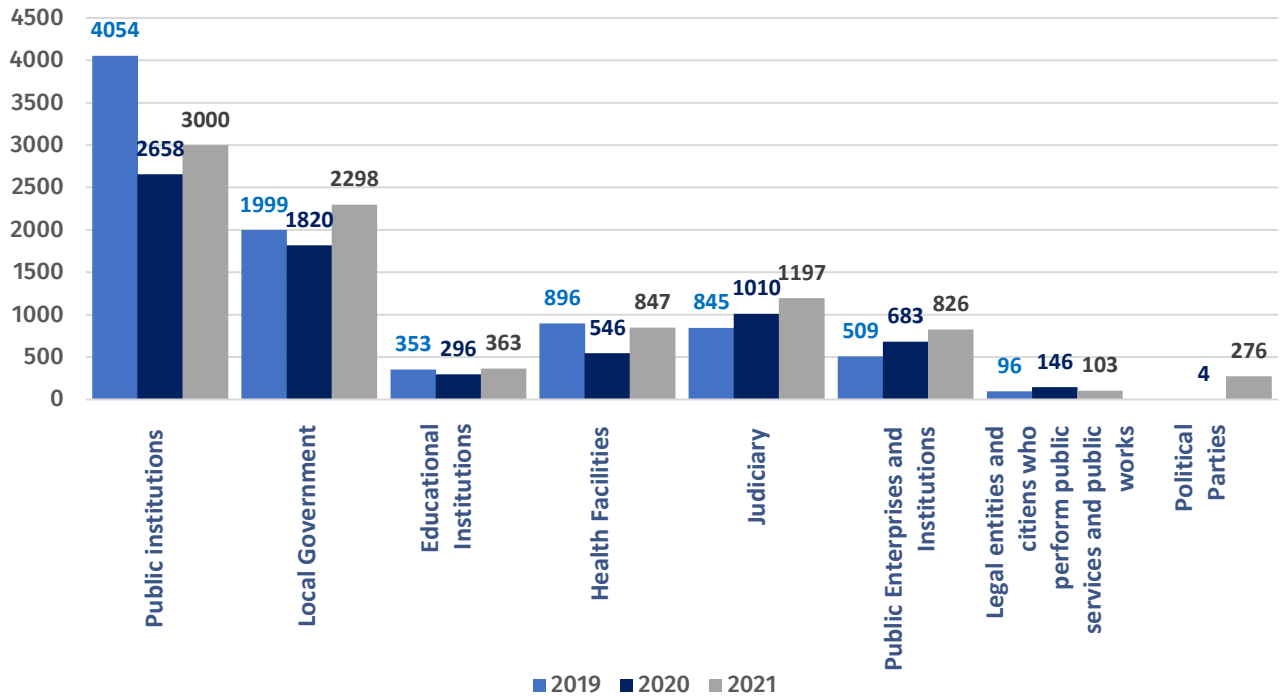
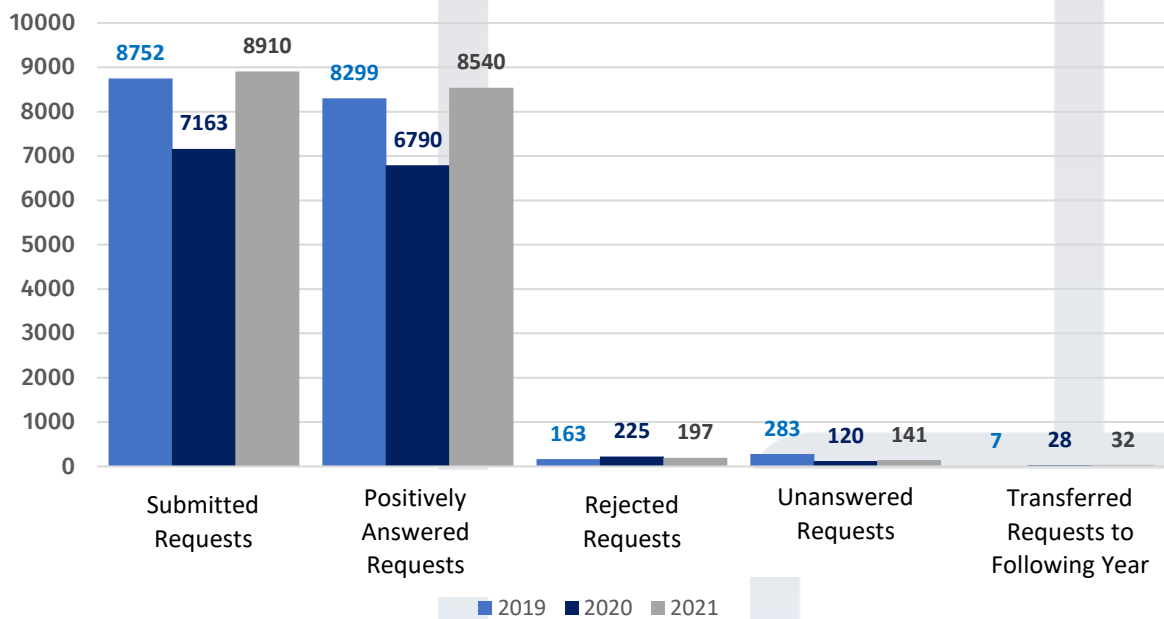


Chart 3: Comparative Display of handling of requests submitted by information holders for 2019, 2020 and 2021



COMPLAINTS

The Agency's annual report for 2019 notes that 755 complaints were submitted. Due to objective reasons, the Report in the section of the appeal procedure refers to the only session held in February 2019, at which 457 appeals that were transferred as unresolved during 2018 and 14 cases from 2019 were dealt with. The newly submitted 741 complaints, submitted after February 13-14, 2019, have been transferred to the competence of the Agency for its handling during 2020. As many as 677 of the total number of complaints were submitted due to the "silence of the administration"

The majority of complaints were submitted by legal entities, that is, by citizens' associations and foundations (621), and 134 complaints were submitted by natural persons. The largest number of complaints (411) were filed against health organizations by the same association of citizens, within the framework of the implementation of its project activities. 130 complaints were filed against state institutions, 97 against municipalities, 43 against public enterprises, 38 against the judiciary, 20 complaints were directed against legal and natural persons exercising public authority, and 15 against educational institutions. According to the total number of complaints submitted to the Agency in 2019, and addressed to the holders, it is established that the largest number of complaints were submitted to:

- 411 complaints against health institutions,
- 130 against state institutions,
- 97 against municipalities,
- 43 against public enterprises and institutions,
- 38 against the judiciary,
- 20 against legal and natural persons exercising public powers,
- 15 against educational institutions and
- 1 on the lack of information.

In 2020, the reports show that the applicants, 741 cases that were not acted upon during 2019 were transferred to the Agency, and another 752 complaints were received during 2020, i.e., a total of 1,493 cases. Out of 752 complaints against administrative and acts of the authorities of the first instance, 611 complaints or 81% are against the failure of the first instance authority to act on requests for access to public information. Due to dissatisfaction with the response received from the holders of information, 84 complaints were filed, and 57 complaints were filed against the Decisions made by the holders. The statistics regarding the submitted complaints against the holders of information show the following:

- the largest number of complaints or 231 were filed against state institutions;

- 14 complaints were filed against educational institutions;
- 109 complaints are against local self-government units;
- a total of 60 complaints were filed against public enterprises and institutions;
- 35 complaints against the judiciary;
- 42 against legal or natural persons exercising public powers and
- 261 complaints against health institutions, all filed by the same public information seeker.

The annual report for 2021 shows that a total of 798 cases, i.e., appeals, were submitted against administrative and real acts of the first instance authorities, or because of the so-called "silence of the administration". The agency acted on a total of 788 of them, while 10, due to the legal deadlines that refer to the judgment of the holders of the appeals in question, as well as due to the observance of the deadlines for the action of the secondary authority, were transferred for resolution during 2022. From the structure of complainants to the Agency, it can be noted that most of the complaint cases, or a total of 608 (76.19%) were submitted by legal entities, i.e., from citizens' associations and foundations, while 190 complaints were submitted by natural persons.

In addition, it is important to note that out of the total number of complaints, as many as 359 (44.99%) are due to non-action on submitted requests by the institutions within the legally prescribed deadlines (20 days after the submitted request or 30 days if extensive information is required), that is, the "silence of the administration" has significantly decreased in the last year. A total of 356 complaints are against decisions by information holders (44.61%), 82 complaints are against response/notification from information holders (10.28%) and 1 complaint against non-information holder. Complaints submitted in 2021 show that they go to the holders of information in the following order:

- 458 cases following complaints against state institutions at the central level,
- 167 against local self-government units,
- 35 against public enterprises,
- 30 against the judiciary,
- 37 against legal and natural persons exercising public authority,
- 15 against educational institutions,
- 31 against health institutions,
- 21 against political parties,
- 1 against public institutions,
- 2 against penitentiaries and
- 1 against non-holder of information.

Chart 4: Comparative Display of submitted complaints to APRFAPI divided by sector for 2019, 2020 and 2021

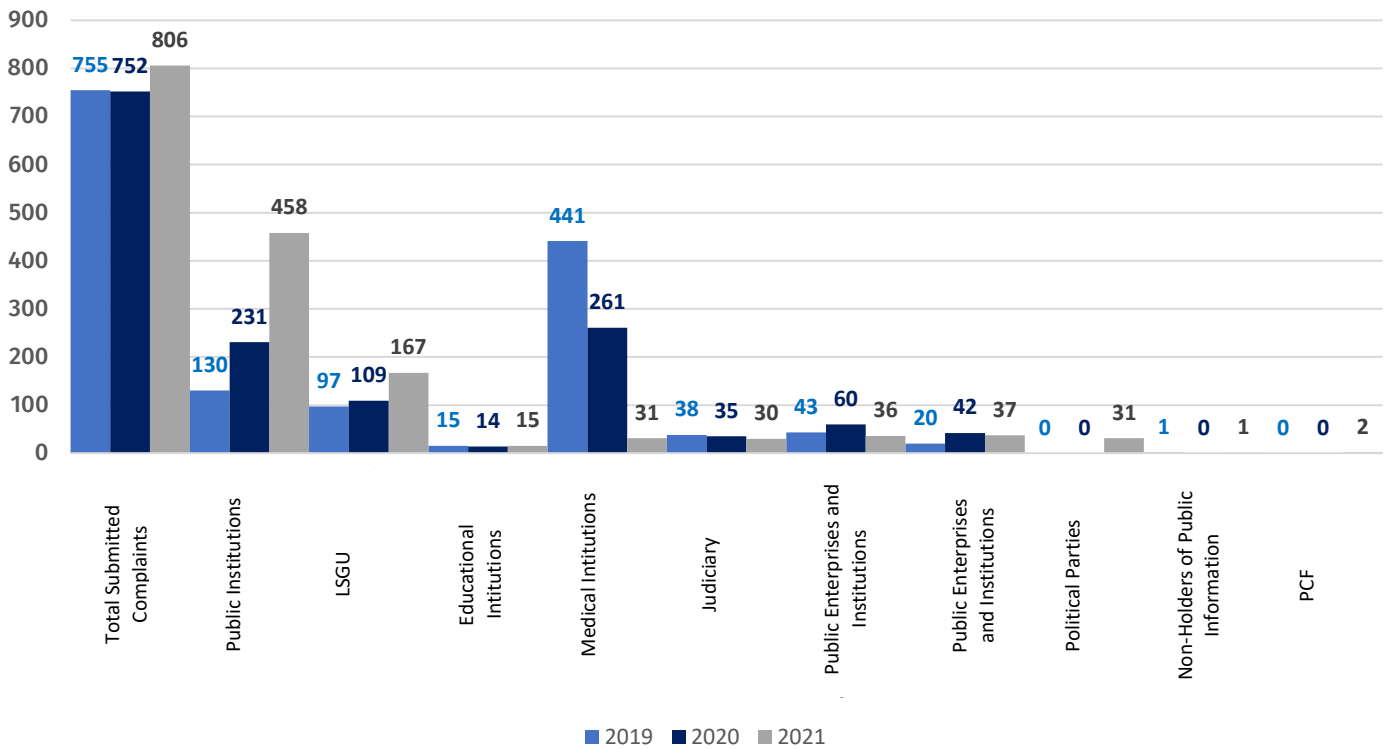
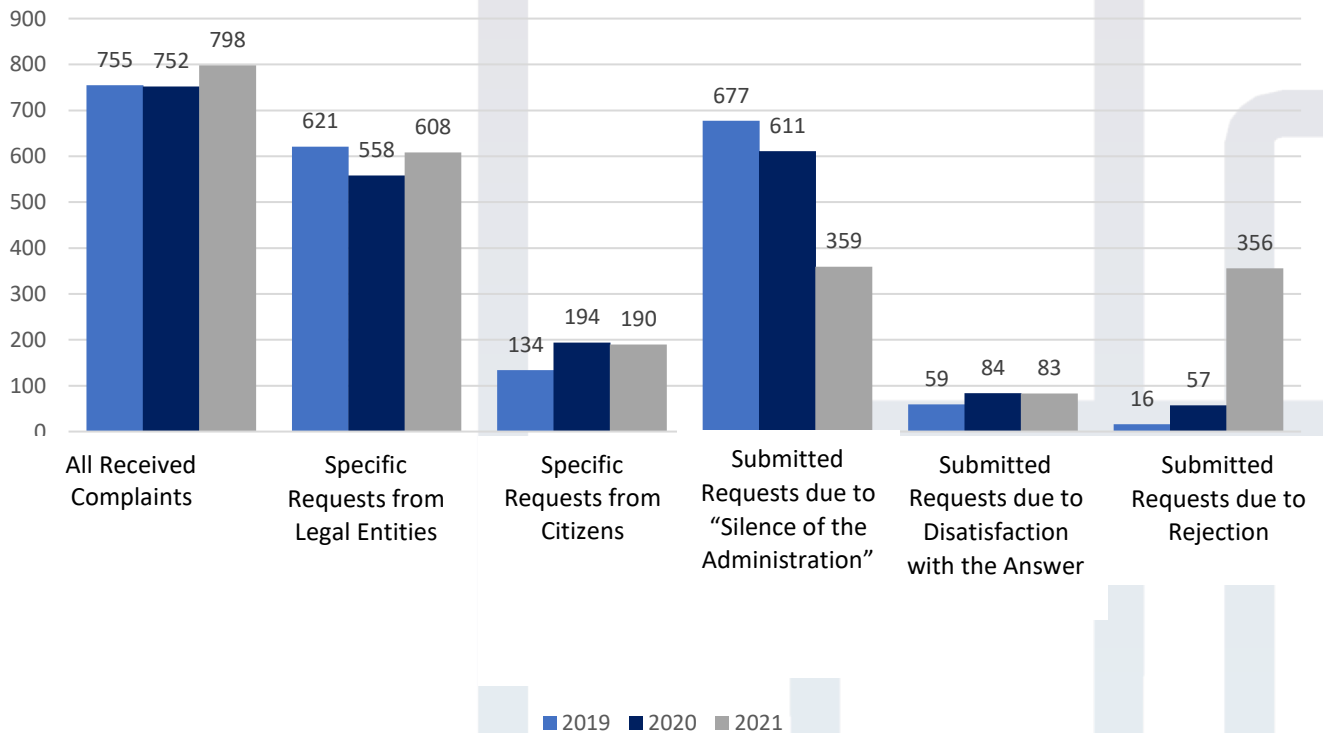


Chart 5: Comparative Display of the type of applicant and basis for conduct of a complaint to ASPI for 2019, 2020 and 2021



Among state institutions, the Ministry of Health and the Ministry of Transport and Communications stand out in terms of the total number of complaints submitted, and at the local level the largest number of complaints were submitted to the municipality of Ohrid.

The most common reason for submitting complaints to the Agency is the **failure to act according to the provisions of the Law** by the holders of public information, or rather the failure to act on the Requests by the first instance authority within the legally stipulated period. Complaints have been filed due to the requesters' dissatisfaction with the answers received from the information holders and against the received decisions for denying access to the requested information. In the report, the most common reasons for initiating a complaint against the holders of information are related to requests that refer to: records and reports on conducted public procurements; information on received and spent budget funds according to programs that treat specific diseases, treatments of certain categories of persons; biographies of members of supervisory and management boards and the amount of fees; information on advertisements and employment procedures; copies of necessary evidence in court proceedings and others.

Given the fact that the Agency's Reports do not contain data on the content of answered or rejected requests for information by citizens, but only on the content of those requests for which a complaint was filed against the holder, in Appendix I of this monitoring report the data on the type and nature of the requests for which complaints have been submitted to the Agency by the requesters are presented, and are noted in the Agency's Reports, by area.

Data on the content of the most frequently requested information from the holders of public information

According to the monitoring findings that resulted from the analysis of the regulation on access to public information, the analysis of the content of the Reports of the Agency for the protection of access to public information and the monitoring of a sample of the web pages of the institutions and the way they apply the provisions from the Law, as well as the quality of the published information, CCM saw the need for an analysis of the type and content of the information that citizens require from the institutions. The goal was to see which data represent the key interest of the citizens in the last period and what the institutions should proactively publish in order to meet the needs and interests of the citizens. In fact, the aim was to underline the importance of development towards an inclusive and transparent society, In that direction, CCM in cooperation with the Office of the Deputy Prime Minister in charge of good governance policies and the Agency for the Protection of the Right to Access to Public information, and in accordance with the observed shortcomings in the law and the by-law governing the notification of the holders of the information to the Agency and the situation with the volume, manner and quality of the published information by the owners of their websites, initiated an analysis of the type and content of the most frequently requested information from the institutions by the citizens.

Thus, according to information prepared by the Cabinet of the Deputy President of the Government, at the Sixty-third session of the RNM Government held on 20.07.2022, it was concluded that the Agency should ask all 1445 holders of information to submit a list of the information and data that were requested during 2020, 2021 and the first half of 2022, as of June 30, 2020. The purpose of this intervention was to conduct an analysis of the most frequently requested information with the intention of improving the transparency and accountability of information holders for free access to public information.

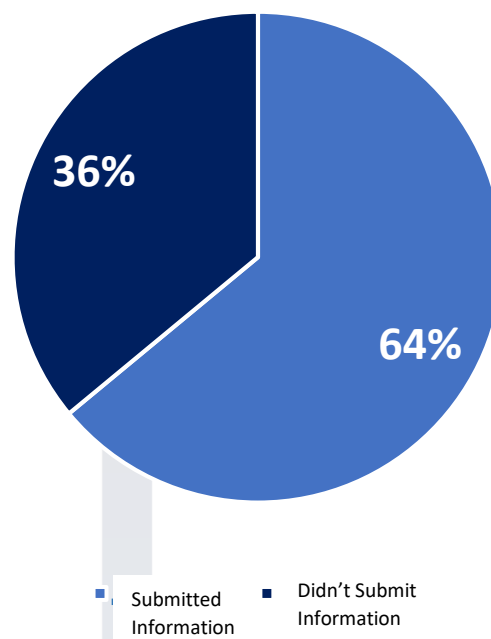
The findings of this part of the monitoring report were obtained based on the information that was requested by the institutions in the mentioned period, and which was delivered to the Agency to the holders of public information.

The non-systematic and non-continuous collection and processing of information on the type and content of the requests addressed to the institutions leads to the absence of data on what is the central interest of the citizens in a certain period. The collection and processing of information on the type and content of requests for free access to public information "ad hoc" (as in this case, when the Agency requested data from the holders for a period of two and a half years) is a complex task and

requires the engagement of a large number of human resources both with the holders themselves and with the Agency. Also, processing paper reports from 1455 holders of public information is a very complex and inefficient process with the possibility of errors in processing such reports. Additionally, on the website, the Agency has also established a special portal for submitting requests for free access to public information, which is not fully used. Currently, only 75 requests have been submitted through this portal.

Out of a total of 1455 holders of public information, at the request of the Agency, 918 entities acted and submitted a list of the information and data that were requested during 2020, 2021 and in the first half of 2022, as of June 30, 2020, and 527 holders did not submit a response to the request despite the fact that a reminder was sent and the deadline was extended until 08/26/2022.

Chart 6:
Percentage of holders who submitted information



As can be seen, 36% of the total number of holders did not act upon the request of the Agency at all, which is alarming, considering that the Agency is the key institution for monitoring the implementation of the law, so if the holders do not comply with its requests, then the demands of the citizens will be less respected. In such circumstances, it is obvious that an additional mechanism is needed to sanction those who do not comply with the legal obligations, as well as to strengthen the

control and supervisory function of the Agency so that such massive non-compliance with its requirements does not occur in the future.

Otherwise, from the analysis of the information received from those 918 holders who provided information, it can be concluded that most of the information that was requested refers to data and documents related to:

- Public procurement,
- The financial operations of the institutions (travel expenses, daily expenses, use of official vehicles, etc.),
- COVID-19 measures,
- The number of employed persons in the public sector and persons engaged on other grounds and
- Selected and appointed persons (biographies, management contracts, salaries and allowances, etc.).

If the data is considered by area, it can be concluded that the most requests are in the following areas:

- finance,
- culture,
- economy,
- Social protection, local self-government,
- healthcare,
- Construction, etc.

From the analysis of the type of information that was requested by the holders, the general conclusion is that, most information is requested on topics that are of current interest in society, and that is currently public finances, COVID-19 measures, biographies of officials, etc. These results also coincide with the data on the type of information resulting from the content of the complaints submitted to the Agency for non-compliance with the provisions of the Law, which actually show that almost the same areas of information were of greatest interest to the applicants during the analyzed period. This means that with a change in current events in the country, the information that will be requested most often will also change, which is why it is necessary to constantly monitor the frequency and type of requests for information from the holders.

What is of essential importance is that a large part of the most frequently requested data by applicants falls under point 18 of paragraph 1 of article 10 of the Law - "other information arising from the competence and work of the holder of the information" for which there is no clear direction, what is that information and how it should be

published. In accordance with these findings, from this monitoring report arose the need to prepare **Guidelines for improving the transparency of institutions from the public sector**, which will provide information holders with guidance on what data and information are contained in the mentioned paragraph of Article 10 of the Law, who have the obligation to publish them on their web pages. The instruction prepared by CCM in cooperation with the Agency for the Protection of the Right to Free Access to Public Information and the Cabinet of the Deputy Prime Minister in charge of good governance policies, contains the most requested public information that was sent to the holders in the past period (1.1.2020-30.06.2022), but also other public information that the institutions should publish in accordance with their competence and the relevant legislation, systematized by sector. The guidelines can be found on the website of CCM. But also, other public information that the institutions should publish in accordance with their competence and the relevant legislation, systematized by sector.

RECOMMENDATIONS

The proactive transparency of the institutions reduces the administrative burden, contributes to increasing the awareness of the holders of information about their role and responsiveness to the demands of the citizens, reduces the possibilities of corruption and enables the creation of policies based on facts.

The new Law Regarding Access to Public Information from 2019 not only expanded the scope of information and information holders, but also contributed to improved application of the regulation by transforming the previous form of the body in charge of monitoring the application of the Law into the Commission in the Agency. This certainly contributed to greater efficiency and promptness in the implementation of procedures.

In addition, the progress is due to the commitment of the government, as well as the institutions, to open the data through open data sets, which is the prevailing trend on a global level. All this facilitates the work of institutions and improves their perception among citizens. It must be mentioned that in the area of open finances, great progress has been noted, considering that by opening the data from public procurements, it is possible for citizens to monitor, make analysis and get a picture of the spending of budget money.

However, from the monitoring of the application of the Law, certain key shortcomings and challenges have also been noted that must be addressed in order to achieve the commitments of PARS in the area of Responsibility, accountability and transparency of the institutions. The recommendations are grouped into recommendations regarding the improvement of the regulation and recommendations regarding the practices for publishing public information:

Recommendations regarding the improvement of the regulation:

1. To amend and supplement the Law Regarding Free Access to Public Information in the direction of :

- Regulation of supervision and sanctions regarding compliance with the duty from Article 10 of the Law on active publication of information;
- Establishing a register of web pages of the holders of public information, which will be managed by the Agency;

- Provision of a legal obligation for the Agency to control the web pages of the owners for the purpose of checking compliance with Article 10 of the Law;
- Anticipating the possibility of centralized publication of mandatory public information for certain groups of holders; and
- Editing, that is, unifying the format of publication of public information, which should be easily processed.

Recommendations regarding practices for application and monitoring of the application of the Law:

- 2. Agency to update the form** the annual reports in the direction of obtaining not only quantitative, but also qualitative data;
- 3. To establish an automated system** for collection and processing of the annual reports of the holders;
- 4. To increase internal control** the transparency and quality of the institutions' published data;
- 5. To continue regular training** to the persons employed in the institutions, in charge of processing and publishing the data for which the holders of information are responsible by law;
- 6. To build a culture of open data** and publishing them in a workable format;
- 7. Continuously (at least once a year) to update the list of public information** based on the processed qualitative data from the annual reports of the holders in the direction of publishing the information for which the citizens show the greatest interest.

EPILOGUE I

List of data on the type and nature of requests for which complaints have been submitted to the Agency, by year and by area

FOR 2019

1. Information from the health district

- data on the situation with several infectious diseases,
- documentation for generated medical waste, by type and origin and its handling,
- information on the number of medical vehicles purchased on lease, donated or received for use by another institution according to brand, model and purchase value,
- data on the number of people suffering from addiction diseases by gender and age in certain regions,
- number of doctors referred to specialization,
- health tables with indicators of the rate of violence against children.

2. Information under the authority of the LSGU

- conditions in the area of urbanism and the communal sphere,
- requests for issued or adopted documents, permits and decisions, spent funds for project and promotional campaigns,
- requests for lists of inhabited places, information on the name of the lessor and the amount of rent paid for work premises used by individual units of local self-government,
- criteria according to which streets are built, extended, reconstructed and rehabilitated,
- number of firefighting vehicles, by brand, type and year of production,
- documents for the ownership of the working premises of the municipalities.

3. Information from the area of good management

- records and reports on conducted public procurements, annual plans for public procurements, etc.
- biographies of members of supervisory and management boards and the amount of their fees;
- information on advertisements and employment procedures;
- official contacts with public enterprises (telephone, e-mail of the enterprise and the director);
- documents for the rolling stock of public enterprises;
- documents for total costs from the final account to the budget and others

- business plans to support self-employment and entrepreneurship.

4. Information from the area of transport

- documentation for the legalization of facilities.

5. Information from the area of justice

- copies of necessary evidence in court proceedings

FOR 2020

1. Information from the health district

- requirements for the number of members of the Roma community infected with COVID-19
- requirements for the number of surgeries
- number of doctors from general medicine, occupational medicine, pediatrics and number of dentists in the territory of the municipality of Tetovo
- the number of people suffering from diabetes mellitus and asthma
- list of activities that are carried out to monitor the sanitary and hygienic condition of surface water quality
- number of patients cared for in the COVID centers of individual medical centers
- Transcript notes and minutes of Government sessions and minutes of sessions of the Main Coordinating Crisis Staff on the basis of which measures were adopted against the introduction and spread of the corona virus.

2. Information under the authority of the LSGU

- requirements for released harmful substances in the territory they cover
- requests for concluded agreements with sister municipalities
- number of issued permits for green areas
- information on the construction of roundabouts or mini-roundabouts
- information about zones and real estate prices
- annual transfers of funds to non-governmental organizations
- requests for the total value of issued decisions for property tax
- forms of direct participation of citizens in decision-making processes
- information from the field of urbanism, traffic, reconstruction and construction of communal infrastructure
- released harmful substances in the territory they cover
- number of systematic reviews of pupils and students conducted according to the program for 2019
- Information on epidemiological surveys carried out as a result of food poisoning.

3. Information from the area of good management

- data on the number of persons in individual institutions who are on the transfer list of possible downloads,
- data on the stability of the banking and financial system, as well as information on the movement of deposits of the population and the rights of depositors in compensation
- number of employees with terminated employment due to negative evaluations,
- information about (not) owning an electronic document storage system
- the fate of facilities and buildings that are used or that are abandoned and not used by certain state authorities
- data regarding the use of funds from the central budget (COVID 19)
- list of newly established businesses in the mentioned years
- Information on the number of small hydroelectric power plants
- data on the total number of newly established legal entities as a result of the support measure for self-employment entrepreneurship in 2018 and 2019
- decisions on selection and appointment of members of management and supervisory boards
- requests for the total number of certificates issued for exemption from work obligations (of parents) for the care of a minor child, in accordance with the measures to prevent the spread of the corona virus
- public procurements and implemented procedures for the realization of public announcements for employment
- number of employees in institutions and establishments segregated by gender and ethnicity.

4. Information from the area of transport

- Contract for the purchase of 33 buses
- decision on service and maintenance of computers for buses and repair of other sensitive parts for them.

5. Information from the area of justice

- the number of held and postponed hearings during COVID-19
- action plans for the work of judges in domestic conditions
- decisions on executive selection of jury judges in separate courts
- number of dismissed judges (taxative) due to unprofessional and negligent behavior and due to committed criminal acts
- the number of appellate judges who have undergone training in the application of the law on criminal procedure
- number of selected judges from candidates who completed initial training at the Academy for Judges and Prosecutors
- minutes of the Commission for ranking candidates for the selection of judges in higher courts

- Information on the total number of criminal cases in which a higher court overturned or confirmed judgments of basic courts
- number of active cases based on a request for confiscation of property, as well as the number of employed persons with disabilities, i.e., invalidity and the number of hired sign language interpreters in separate institutions from the judicial sphere.

6. Information from the field of education

- data on the number of enrolled children with disabilities in the educational process,
- Information on the number of students who graduated, master's degree and doctorate in the direction (group) of the Albanian language from 2001 until today,
- number of enrolled students at the Department of Turkish Language and Literature at the Skopje State University in the period from 1991 to the present.

7. Information from the field of culture and environment

- data on the activities and measures taken to preserve the world heritage status of the Ohrid region in UNESCO
- procurement of equipment and devices to replace non-ecological heating systems in public facilities

FOR THE YEAR 2021

1. Information from the health district

- Number of hospitalized patients with COVID-19;
- what and how many drugs, which are intended for the treatment of rare diseases, are registered in the RNM (how many funds were spent on such drugs)
- Total number of hospital days of patients with COVID-19
- Number of deceased patients from COVID-19
- Number of patients on oxygen support
- Number of patients on ventilatory (respiratory) support
- Number of hired medical personnel;
- Consumed amount of Enoxaparin (Clexan) drug for patients with COVID-19
- Oxygen consumption for patients with COVID-19
- Number of masks used for oxygen support for patients with COVID-19 and number of devices for ventilatory support (respirators) used.
- Number of people who received two doses of vaccines, according to vaccine manufacturer Sinopharm, Sinovak, Sputnik, Pfizer, Astra Zeneca, according to age groups

- number of infected persons from COVID-19 who received two doses of vaccine according to the vaccine manufacturer
- number of hospitalized persons due to COVID-19, vaccinated with two doses of vaccines, number of deceased persons due to COVID-19, vaccinated with two doses of vaccines, number of hospitalized persons who were reinfected with COVID-19, number of deceased persons who were reinfected with COVID-19
- information on the procedure for public procurement of "new medical equipment intended for the appropriate implementation of health treatment of patients sick with COVID-19, for the needs of public health institutions in the area of the City of Skopje
- laboratory analyzes and super analyzes of food samples made in all accredited laboratories, taken by the inspectors of the Food and Veterinary Agency.

2. Information under the authority of the LSGU

- in the (specified) period, how many and which detailed urban plans have been adopted by a certain municipality, how many and which DUPs are in the process of being adopted and in which specific phase each of them is currently
- copies of decisions on the removal of illegally built buildings in the municipalities of Ohrid, Struga and Debarca, which have been fully acted upon and the buildings have been removed, as well as those which have not been acted upon and the buildings have not been removed and for which legal proceedings have been initiated
- planning documentation for the reconstruction project of Quay "Macedonia" Ohrid
- how many inspections have been carried out on the territory of the Municipality of Ohrid by the local environmental inspector
- final accounts for the budget of a municipality ... for the years: 2015, 2016, 2017, 2018, 2019 and 2020 at an analytical level (subset) of 6 digits
- announcement of the municipality of Struga for the alienation of undeveloped land for construction, with Minutes from a committee that decides on the alienation of undeveloped land for construction and contracts for the alienation of undeveloped land for construction
- in accordance with the Program for solving the problem of homeless animals in the territory of a municipality... to provide us with the annual reports for 2019, 2020 and 2021 on the number of trapped and treated homeless animals
- a complete list of immovable property owned by the City of Skopje, for each property it should be indicated individually whether and in what way it is used
- Open data information.

3. Information from the area of good management

- how many funds have been requested from the state budget for assistance and protection of children in conflict with the law?
- minutes of sessions of the Government of the Republic of North Macedonia

- total number of employees, with names, surnames, biographies and monthly incomes of all state advisers in the Ministry of Political System and Inter-Community Relations
- invoices for the purchase of furniture and art paintings for decorating the interior of the Ministry of Political System and Inter-Community Relations
- for the needs of comparative regional research within the project "Balkan tender botch", financially supported by the European Union, the public procurement plan for 2020 with all its amendments and additions
- biographies of members of supervisory and management boards and the amount of their fees.

4. Information from the area of transport

- a copy of the Qafasan-Struga highway solution
- a copy of the finished project for the railway Corridor 8 in the western part of the country, with a new section from Kicevo to Lin
- announcement of the municipality of Struga for the alienation of undeveloped land for construction, with Minutes from a committee that decides on the alienation of undeveloped land for construction and contracts for the alienation of undeveloped land for construction

5. Information from the area of culture

- copies of the quarterly reports on the progress in the implementation of the measures and activities contained in the Action Plan of the Plan for the Management of World Natural and Cultural Heritage in the Ohrid Region

6. Information from the area of justice

- copies of necessary evidence in court proceedings and others

7. Information from political parties

- a list of movable and immovable property owned by a political party, as well as a list of movable and immovable property that the political party leases from individuals and legal entities (provide us with information from whom the real estate is leased and the amount that the political party pays on a monthly basis the leased space).

Appendix II

List of data on the type of requests that applicants requested from institutions in 2020, 2021 and the first half of 2022 (as of June 30, 2022) by area

Area – DEFENSE:

No data

Area – SECURITY:

No data

Area – JUSTICE

- Annual reports on the work of the courts,
- Information on the selection of judges,
- Information on conducted evaluation of judges,
- Information on the degree of accessibility of court facilities for persons with disabilities,
- Decisions in court cases,
- Data on the number of appeal procedures in Courts of Appeal,
- Data on the number of public prosecutors,
- Data on the number of criminal reports to the public prosecutor's offices on different grounds
- Data on the number of submitted, approved and rejected proposals for determining the detention measure,
- Data on the number of procedures in which citizens were granted free legal aid,
- Data on the number of realized public sessions by courts,
- Data on the number of investigative procedures carried out by the public prosecutor's offices on various grounds,
- Data on the number of judges,
- Data on the number of requests for the exemption of judges,
- Data on the number of obsolete cases in the courts,
- Data on the number of accused and convicted persons,
- Data on the number of lawsuits received,
- Data on received performances and
- Data on court cases, case status, court case area, case judge.

District - INTERNAL AFFAIRS

- List of all persons employed in the institution with data on the title, i.e. the title of the position to which they are assigned, official e-mail and official phone number,
- Procedure for obtaining travel documents, with necessary documents, request form, address for submitting the request
- Procedure for issuing and registering weapons, with necessary documents, request form, address for submitting the request
- Procedure for acquisition, termination and determination of RNM citizenship, with necessary documents, request form, address for submitting the request
- Statistical data regarding the number of registered crimes, violations of public order and peace and in the field of traffic
- Statistical data regarding illegal migration, migrants and
- asylum seekers
- Statistics regarding domestic and gender-based violence.
- Statistical data on the number of issued ID cards
- Statistical data on the number of issued travel documents
- Statistical data on the seizure of drugs and other intoxicating substances
- Statistical data on disciplinary measures and sanctions taken and imposed on police officers.
- Statistical data on registered vehicles and driver's licenses and
- Complete documentation for conducted public procurements.

Area - EXTERNAL AFFAIRS:

No data

Department – FINANCE

- Number of full-time and fixed-term employees, broken down by gender and nationality
- Procedure, necessary documents, fee and giro account for payment of the fee for privatization
- Method of initiation, condition and compensation in the expropriation procedure,
- Income data based on excise duty for cigarettes, tobacco and tobacco goods and alcohol
- Information on the number of employees by institution in the IPA structures
- Data on budgets and execution of budgets by units of local self-government
- Overall documentation for public procurement
- Data on monetary awards paid to administrative officers
- Data on the amount of debt by units of local self-government
- Realized employment by periods
- Data on consumer loans of financial companies
- Data on solutions following the denationalization procedure

- Representation cost data
- Income balances according to final accounts
- Data on total realized incomes and expenses in RNM
- Data on realized income based on turnover of cannabis processing
- Data on the number of approved employments (budget approvals)
- Amounts of gold and other precious metals that are managed as foreign exchange reserves
- Information related to the last census
- Data from realized customs revenues separately: revenues from VAT, customs duties, excise taxes and other revenues.
- Data on total direct investments in the Republic of North Macedonia
- Statistical data on the movement of the exchange rate of the denar over a period of time
- Statistical data on basic interest rates of the National Bank over a period of time
- Data and biography of members of management and supervisory boards
- The entire documentation from the public procurement procedure from the SEC
- Data on the movement of financial assets on the account of the Deposit Insurance Fund
- Data on the stability of the banking and financial system in the Republic of North Macedonia
- Information on rights of depositors in compensation
- Information on the movement of deposits of the population
- Number of natural persons who used tax incentives for donations according to the Law on Donations and Sponsorships from Public Activities by the IRS
- Number of legal entities (associations and foundations registered according to the Law on Associations and Foundations) that requested tax benefits (exemptions) for donations according to the Law on Donations and Sponsorships from Public Activities
- Number of filed appeals and lawsuits against a tax administrative act of the IRS by taxpayers
- Data on unpaid claims from the IRS and in what amount were the same from different legal entities
- VAT revenue data over time
- Number of requests for wage subsidies (minimum or gross salary) and number of approved requests
- Number of requests for subsidized loans and number of approved requests
- Statistical data on beneficiaries of financial support for the payment of salaries
- Statistical data for users covered by the payment card
- Data on legal entities that received financial support as part of the package of measures taken by the Government in response to the COVID-19 pandemic,
- Opinions given on the alienation and on the procedure for the privatization of construction land owned by RNM by the State Attorney's Office
- Number of amicably resolved cases in which the State Attorney's Office is involved

- Data on procedures for the alienation of construction land owned by RNM in which the State Attorney's Office is involved and
- Number of fiscal invoices issued - total, over a period of time.

Area - ECONOMY

- Number of subsidies paid out by type by ME over a period of time,
- Information on the measures for gender equality and women's empowerment that are foreseen in the programs and sub-programs of the MoE,
- Information on concessions and international agreements,
- Information on the number of employees in the ME, by gender, position,
- Information on employee salaries,
- List of companies that were beneficiaries of the private sector support measure for new markets, competitiveness and modernization from the third package of support measures in dealing with the pandemic,
- Information about members, biography and fees in management and supervisory boards
- Decisions of the CPC,
- Data on planned funds as a permanent and current reserve, as a result of the COVID-19 pandemic,
- Data on realized public procurements related to the COVID-19 pandemic,
- Data for incurred costs related to the COVID-19 pandemic,
- Data on decisions issued by the CPC for the approved allocation of state aid from the package of measures to deal with COVID-19,
- List of companies (micro, small and medium) that used the measure for interest-free loans and loans with a low interest rate and value of loans taken per company,
- Data on the companies that used financial support according to the Law on Financial Support and the amount of financial support and
- Statistical data on gender criteria used in granting and using loans from the Development Bank.

Area – TRADE:

No data

Area – INVESTMENTS

- Data on the amount of regional investment state aid granted to foreign investors individually by basis,
- Data on the total number of foreign companies in Rs. North Macedonia by industrial zones,
- Number of foreign companies receiving state aid and
- Reports on granted state aid submitted to the Commission for the Protection of Competition.

Area – ENERGY

- Information on implemented public procurement related to the COVID-19 pandemic,
- Overall documentation for public procurement,
- Data on management contracts concluded,
- Data on termination of employment of employees, by title, education, years of work experience and basis for termination of employment,
- Data on new hires over time,
- Data on employees hired for a fixed period of time, copyright agreement and/or another basis,
- Data on import and export of natural gas in RNM,
- Average prices of electricity on the free market (from small hydropower plants) over a period of time,
- Data on the use of the permanent budget reserve and in what amount,
- Data on the use of the current budget reserve,
- Data on the price of the so-called engaged power (fixed part) for 1m² of heating surface,
- Minutes from the held regular sessions of the EWSRC,
- Number of complaints received in EWSRC from consumers over a period of time, based on the complaint, and the decisions made after the complaints,
- Data on quantities of imported extra light fuel over a period of time,
- The average reference price of fuel oil (M1-HC) over a period of time,
- List of authorized engineers who hold a license to supply heat energy,
- Data on total import of natural gas in terms of value,
- List of importers of natural gas,
- Data for natural gas users,
- Natural gas consumption data by types of users and
- Data on licenses issued by EWSRC.

Area - INDUSTRY:

No data

Area - TOURISM

- Information on issued tourism vouchers, including users, entities offering such services, amount of realized tourism vouchers,
- Statistical data on the number of tourists separated by location,
- Statistical data on registered households for rural tourism,
- Data on the number of users for support with tourist salaries
- guides,
- Individually allocated funds through the Agency for the Promotion and Support of Tourism to end users - non-governmental organizations,
- Data for the employees of the Agency for Support and Promotion of Tourism.

Area - CRAFT:

No data

Area - AGRICULTURE

- Detailed data on disbursed funds and beneficiaries of financial support in agriculture and rural development, including gender-disaggregated data,
- Information on measures to support farmers,
- Information on the work of the sectoral working group for agriculture and rural development, including the participation of the civil sector,
- Data on accredited laboratories for quality control of food products,
- Data on performed inspections,
- Data on performed laboratory analyzes from quality control of food products,
- Data on planned and realized funds under programs for financial support in agriculture and rural development,
- Data on calls for the allocation of funds for citizens' associations, conditions, evaluation criteria, members of evaluation committees, citizens' associations that have been allocated funds and selection,
- Statistical data on the number of agricultural holdings that receive subsidies by agricultural crops,
- Statistical data on agricultural holdings,
- Statistical data on purchase prices of agricultural crops,
- Statistical data on purchase prices of all agricultural crops,
- Statistical data on the production of agricultural crops in volume and value,
- Statistical data on trade in agricultural products,
- Expenses for official vehicles and
- The entire documentation for public procurement.

Area - FORESTRY

- Biography and remuneration of the members of the management and supervisory board of PE National Forests,
- Forest fire reports,
- Reports on the implementation of programs and measures,
- Data on issued permits for movement through forests,
- Data on issued permits for the collection of other forest products,
- Data on issued logging permits,
- Data on forest areas,
- Procedure and necessary documents for obtaining permission for logging and
- Statistical data on firewood prices,

Area - WATER SUPPLY

- Biography of the members of the administrative and supervisory bodies,

- Data on storage facilities,
- Data on the available water supply network
- Data on water pollutants,
- Data on performed inspections,
- Data on drinking water quality,
- Data on the method of wastewater treatment,
- Data on the degree of water supply network coverage for households,
- Expenses for members of the management and supervisory bodies and
- Overall documentation for public procurement.

Area - HUNTING AND FISHING:

No data

Area - FOOD AND VETERINARY

- Information about animal shelters,
- Information on import and export of products of animal origin and
- Procedure and necessary documents for importing animals.

Area - HEALTH

- Biography and remuneration of the members of the administrative and supervisory bodies of the health facilities.
- Information on the implementation of the Program for Active Health Care of Mothers and Children,
- Information on the implementation of the Program for Early Detection of Malignant Diseases,
- Information on the implementation of the Program for Systematic Examinations of Pupils and Students,
- Information on the degree of accessibility in facilities and equipment for persons with disabilities,
- Data on employed medical personnel by category,
- Data on implemented programs for the professional development of the medical staff.
- Data on the treatment of patients suffering from COVID-19 (number of patients on oxygen and ventilatory (respiratory) support, number of engaged medical personnel, drugs used, other funds used, expenses incurred),
- Statistical data on the number and type of performed medical services,
- Statistical data on the number of patients/deaths from COVID-19,
- Statistical data on the number of patients/deceased from malignant diseases,
- Statistical data on the number of patients, their age, gender and disease,
- Statistical data on employment, the number of employees, salaries in health institutions,
- Statistical data on performed systematic reviews,

- Statistical data on patient hospitalization facilities and the number of hospitalized patients,
- Mortality statistics on various grounds,
- Statistical data on the average number of hospital days per patient and
- Overall documentation for public procurement.

Area – EDUCATION AND SCIENCE

- Data from the area of textbook purchases,
- Data on implemented public procurements in education,
- Data on investments made in educational institutions,
- Data from the field of human resources, number of employees, type of staff in educational institutions,
- Minutes from inspections carried out by the State Educational Inspectorate,
- Data on the new Concept for Gender Sensitivity and its content, composition of the working group that developed the concept,
- Data on employees whose employment has ended, new hires, takeovers, hired under copyright contracts listed by title and education in educational institutions,
- Data on students enrolled in primary and secondary schools, number, display by ethnic and gender basis,
- Number of graduates of undergraduate, postgraduate and doctoral studies in the past,
- Number of students with disabilities,
- Number of students with disabilities,
- Data on the method and conditions for implementing the COVID protocols for the work of educational institutions,
- Information about digital devices available in schools, digital learning platforms,
- Information on the equipment of classrooms in primary and secondary schools,
- Status of schools with internet connection,
- Information about the degree of use of an e-diary,
- Data from the field of public procurement in scientific and higher education institutions,
- Data from the field of human resources, number of employees, type of staff in higher education and scientific institutions,
- ASAM reports and
- Information about the competences of ASAM and the organizational structure.

Area - SPORTS

- Biography and fees of the members of the administrative and supervisory bodies in the PE for managing sports facilities,
- Reports on the implementation of individual programs and measures by the Agency for Youth and Sports
- Reports from inspections carried out in the Agency for Youth and Sports,

- List of holders of sports pensions,
- List of sports federations,
- Overall documentation for public procurement in the Agency for Youth and Sports and
- Prices of services in sports facilities.

Area - YOUTH:

No data

Area - LABOR

- Minutes and decision from the inspection performed by the labor inspectors,
- Statistics on workplace accidents,
- Documents from a procedure for an administrative dispute and a decision to execute a judgment,
- Number of Roma employees,
- Data on adequate and fair representation of community members and data on the gender structure and level of education of employed persons,
- Number of unemployed persons by municipality,
- Requirements for beneficiaries of active measures and their utilization, · Beneficiaries of rights from a special employment fund.
- Number of employees at business entities by municipality
- Information on the conditions for the implementation of an internship contract,
- Information on the conditions for implementing admission to insurance,
- Number of submitted requests for the implementation of the purchase of seniority,
- Information on conditions for exercising the right to an old-age pension,
- Information on the conditions for recording data on insurance experience in the records of the Fund,
- Information on the way to fill in the data in the MCIB form for the insurance experience that is considered to have an increased duration (information about the code system),
- Information on changing the data on the working hours after which the admission to the insurance was carried out,
- Number of pensioners, average amount of pension and average age by municipalities,
- Number of disabled people at work by municipalities,
- Data on the amounts of salaries in the PIOM Fund,
- Rulebook that regulates workplaces where insurance experience is considered to be of increased duration,
- Data on the business space available to the PIOM Fund,
- Statistical data on children beneficiaries of family pension by time periods
- Number of pension beneficiaries by gender and amounts of pensions received,

- Information on the method of calculating the pension basis for determining the amount of pension for employees of the Ministry of the Interior and the Armed Forces, Statistical data on the number of recipients of the minimum pension,
- Statistical data on the average amount of paid pensions divided by gender,
- Number of pensioners and disabled workers for whom the PIOM Fund withholds part of the pension for membership fees and death benefit, · Overall documentation for public procurement,
- Information on the method of calculation of the highest amount of pension and
- Information on the number of persons allocated according to the K-5 program in the PIOM Fund.

Area - SOCIAL PROTECTION

- Number of beneficiaries of social assistance by gender,
- Number of elderly people who need carers,
- Number of persons with disabilities who need personal assistance,
- Number of persons/families from socially vulnerable groups who were granted a humanitarian package during a state of emergency,
- List of persons from socially vulnerable families from the Roma community who have not received assistance,
- Information on procedures for exercising the right to permanent financial assistance,
- Number of cases awaiting decisions and number of submitted appeals based on negative decisions for Care by another person, Guaranteed minimum assistance, Child allowance and social assistance,
- Information on submitted and accepted requests for rights to financial assistance from social protection for all parties and especially for persons from the Roma community,
- Information / data about asylum seekers, their number in shelters, appointed guardians, how many of them are minors and the impact of COVID-19 in accommodation facilities,
- Information on social rights and services used by foreigners with regular residence in the country,
- Information and number of visas granted for humanitarian reasons to enter the RNM on the basis of - asylum seekers and family reunification,
- Information and number of cases related to the crime of human trafficking and child trafficking (number of victims and perpetrators, gender, age),
- Information for single parents and single-parent families on rights to financial assistance from social protection and services from social protection,
- Information on the procedure and necessary documents for placing under guardianship a person who is placed in a geriatric institution, Information from the Service for Social Inclusion of Persons at Risk, for guardians of unaccompanied children - foreigners,
- List of Services in IPIMCSA and their number,
- Information on the number of people who applied and received

- Decision to exercise the right to interpretation,
- Information on the procedure for exercising the right to Guaranteed Minimum Assistance,
- Information on how many people have received consent to independently perform social protection work as a professional activity,
- Statistical data on the number of cases of violence against women, persons with disabilities and emotional abuse,
- Information on received donations,
- Information on exercising the right to Guaranteed Minimum Assistance from the Services in the municipalities under the IPIMCSA,
- Information on committed gender-based and family violence, registered victims and imposed measures for the protection of victims,
- Statistical data on social pension,
- Number of persons - women victims of domestic violence,
- Number of persons with disabilities - victims of domestic violence,
- Data on the situation of unregistered persons in the Office for Management of Registries,
- Data for users of the national kitchen,
- Number of reports of domestic violence,
- Number of days per week for realized meals for citizens,
- Data on single-parent families,
- Number of prepared solutions for quarantine accommodation of asylum seekers and
- Data on the number of children by age placed in state institutions, foster families, placed in a small group home

Area - CHILD PROTECTION

- Information on how much money has been spent on helping and protecting children in conflict with the law and child victims,
- Information on the protection and education of children and young people,
- Information about kindergartens and COVID-19 measures,
- Information on children in state care, children in institutions with disabilities, children in educational, disciplinary and correctional homes, by age,
- Total number of children in foster families, in small group homes,
- Data on street children,
- Number of children separated from their parents as a result of court decisions based on and
- Total number of certificates issued for exemption from work duties (absence from work) of parents for the sake of child care, issued in accordance with the measures adopted by the Government of R. North Macedonia for the prevention of the spread of the disease COVID19 (coronavirus).

District - LOCAL SELF-GOVERNMENT AND REGIONAL DEVELOPMENT

- Budget of the municipality and final account,
- Annual and quarterly financial reports of the municipality,
- Civil budget,
- Detailed Urban Plan,
- Minutes and decisions from the Council of the Municipality,
- Reports from the implementation of project activities,
- Reports from completed inspections,
- Information on contracts for alienation of construction land,
- Information on allocated financial resources to support sports clubs,
- Information about consultative meetings held with citizens and the civil sector,
- Information on consultations held during the preparation of strategic and program documents of the municipality,
- Information on property tax procedure,
- Information on the procedure for submitting a civil initiative,
- Information about the procedure and the entire documentation for applying for financial support from the municipality,
- Information on measures taken by the municipality to protect against COVID-19,
- Information on measures taken to deal with homeless dogs in the municipality,
- Information on the degree of accessibility for persons with disabilities in the facilities of the municipality,
- List of legal entities that possess a B integrated permit in the municipality,
- List of councilors of the municipality with their biography,
- Data on the number of civic initiatives held,
- Data on the number of inhabitants connected to a public water supply system,
- Data on adopted decisions for approval of cutting and trimming of urban greenery,
- Data on pollutants and pollution on the territory of the municipality,
- Data on sister municipalities,
- Data on issued building permits in municipalities
- Data on issued approvals for the installation of urban equipment,
- Data on the payment of funds to the media,
- Data on public enterprises established by the municipality,
- Air quality data,
- Data on the current debt of the municipality,
- Data on costs incurred for holding events in the municipality,
- Data on realized income from tax collection,
- Data on wages and benefits by category,
- Data on property legalization cases,
- Data on youth support programs and measures,
- Data on average prices for construction and agricultural land,
- Data on registered catering establishments,
- Contracts concluded after public procurement,
- Statistical data regarding the number of employed persons during the year,

- Statistical data on the number of inhabitants on the territory of the municipality,
- Statistical data on the number of certificates issued by the DUP,
- Statute of the municipality,
- Strategic plans and program documents of the municipality,
- Overall documentation for public procurement.

Area - CULTURE

- Statute of institutions in the field of culture,
- Budget and financial reports of institutions in the field of culture, • Number of employees divided by different categories
- Data on salaries of employees in institutions in the field of culture,
- Information about the equipment available to the institution,
- Information about implemented projects in cultural institutions,
- Information about donor projects in cultural institutions,
- Procedure and documentation related to the selection of directors of institutions in the field of culture,
- Documents related to the work of the National Commission for the Management of World Natural and Cultural Heritage in the Ohrid Region,
- Data on spent budget funds for cultural events,
- Prepared reports relating to monuments, memorials, sculptural compositions and sculptures made by the Working Group for the preparation of an Analysis on the realization and consequences of the so-called "Project Skopje 2014",
- Information about the procedure, criteria, evaluation and results of conducted competitions in the field of culture,
- Overall documentation for public procurement in institutions in the field of culture,
- List of persons hired as external collaborators, with data on their financial payments by the Film Agency,
- Data on concluded contracts of the Film Agency with production companies,
- Minutes of sessions of management and supervisory boards of institutions in the field of culture,
- Method of conducting the re-audition for the actors,
- Information about members, biographies and fees of management and supervisory boards in institutions in the field of culture,
- Total number of employees and hired artists,
- Information regarding the Program for the construction of new facilities and for the reconstruction, rehabilitation and adaptation of existing facilities used by national institutions in the field of culture,
- Information on the method of determining the salaries of cultural workers,
- Fund of books by libraries,
- Report on activities undertaken in relation to cultural heritage in the UNESCO region,

- Plan for undertaking activities for the protection of cultural heritage in the UNESCO region,
- Overall documentation for public procurement in institutions in the field of culture,
- Data on the number of visitors to cultural institutions,
- Data on the number of visitors to cultural events and
- Information about prices in cultural institutions.

Area - INFORMATION SOCIETY:

No data

Area - PUBLIC ADMINISTRATION

- Cadastral data for the headquarters and regional offices of
- The State Administrative Inspectorate
- Information on competencies and powers of administrative inspectors
- Data on employees age, gender, education, seniority, employment, termination of employment, union membership,
- Data for managers
- Reports on completed inspections
- Motivational letters and biographies of officials

Area - COMMUNICATIONS

- Number of active subscribers,
- Number of disputes between users,
- signal level,
- Number of calls to the number 190,
- Type of training for employees,
- Number of visits to web pages,
- Number of submitted objections,
- Overall documentation for public procurement,
- List of deleted online groups and
- Reports of computer incidents that have occurred.
- In the direction of the consistent implementation of the law, in the area of communications, apart from the data that is the legal minimum and that must be published on the web pages, at least the following information should be published:
 - Electronic Communications Agency:
 - Statistical data on the commission's work, fees charged and funds spent,
 - Procedure, required documents, fee and giro account for paying the fee for choosing a universal service provider,
 - Documentation for concluding a contract with a universal service provider,
 - Agreement with the universal service provider,

- Plan for allocation of radio frequency bands,
- Plan for allocation and use of radio frequencies
- Procedure, required documents, fee and giro account for payment of fee for obtaining approval for the use of radio frequencies
- The numbering plan of the numbers used by the operators,
- Procedure, required documents, fee and giro account for payment of fee for assignment of numbers and/or series of numbers used by operators and
- Other information and data arising from the competences and work of the institution.

Area - MEDIA:

No data

Area - CONSTRUCTION

- Minutes of an inspection carried out relating to construction,
- Information about the legal situation (legality) with specific objects,
- Decisions from inspections carried out in specific facilities,
- Solutions for the removal of specific objects,
- Data regarding SICU employees,
- Data regarding the procedure for the election of the director of SICU,
- Legal and by-laws in the field of urban planning and construction and their amendments,
- List of issued Building Permits in a certain period at the municipality level,
- Contracts for alienation of construction land at the municipality level,
- Request for building permits at the municipality level,
- Information on submitted requests to determine the legal status of an illegally built facility at the municipality level,
- Solutions for the removal of buildings at the municipality level
- Request for construction permits at the municipality level
- Information on submitted requests to determine the legal status of an illegally built facility at the municipality level
- Project documentation and documentation or part of the documentation for the legalization of illegally built buildings at the municipality level and
- Construction permits issued at the municipality level.

Area - URBANISM

- Information on current construction and communal activities at the level of the Municipality,
- Minutes from the Commission for Urbanism and information related to the Commission at the municipality level,
- Documentation from legalization cases at the municipality level,
- Decisions issued for legalization at the municipality level,

- Number of issued statements from the DUP for a certain period at the level of municipality,
- Information on current construction and communal activities at the municipality level,
- Information on whether cadastral plots according to the Urban Plan occupy a protected belt,
- Published Detailed urban plans and all changes,
- Information related to the creation, modification and adoption of urban plans,
- Has a participatory body for urban planning been established and who are the members?
- List of all buildings that are owned or used by public institutions with data on Property List, Cadastre Municipality, Cadastre Plot, area, legal act on the basis of which the building is used and a note on whether it is abandoned or not in use,
- Report on the comparison of the digital cadastral plan from the electronic database,
- Internal record books of the institutions for the real estate over which they have user rights, submitted to RECA,
- Data on registered infrastructure facilities,
- Questions about the application of the Tariffs for the calculation of fees and
- Consent issued for use of public space.

Area - TRANSPORT

- Data on travel orders for the management of official vehicles,
- Information on the degree of realization of passenger transportation contracts concluded with legal entities.

Area - ENVIRONMENT

- Reports, studies and other documentation for assessment and strategic assessment of environmental impacts,
- Reports and other documentation for small hydro power plants,
- Ambient air monitoring data,
- Protected Areas Management Report,
- Waste Management Report,
- Report on the state of the environment in a municipality,
- Statistics on carried out environmental inspections,
- Reports from performed environmental inspections,
- Statistics on environmental criminal proceedings,
- Statistics on imposed fines related to the environment,
- Program for the environment from the municipalities/Local action plan for the environment, as well as a report on the realization of the program/planning and strategic documents from the environment,
- Plan and program for waste management, list of entities responsible for waste management,

- Report on the implementation of the World Natural and Cultural Heritage Management Plan for the Ohrid Region. - I don't know if it can be plural in order to generalize and not be about Ohrid, but maybe it is also specific,
- Information on planned and realized felling of trees, information on removed trees,
- Decisions issued for cutting old trees,
- Prepared/planned specific projects for environmental protection,
- Statistical data on pollution in the municipality,
- Minutes of carried out environmental inspections,
- Are there small hydropower plants on the territory of the municipality?
- Total amounts of received medical waste and method of treatment – Drisla,
- Information on costs for environmental protection, specifically realized costs for waste,
- Information about who receives and processes the waste that is sent for recycling, how it is reused, with photo and video documentation (paper, plastic, glass, metal) - municipalities,
- Information from the municipalities/public enterprises about the plan for interventions on green belts/areas (to inform the public in advance, before the interventions start),
- Information on appropriate waste disposal and collection points, terms, prices for waste collection and transportation - public enterprises,
- Report on waste management, including number of users,
- Information on landfills, locations and cleanup,
- Information on whether protective zones have been established at water supply sources,
- Report on the work of treatment plants,
- Data on the quality of drinking water in the municipality,
- Review/cadastral of air, water, soil pollutants,
- Report on the emissions of polluting substances in the air, water and soil – Drisla
- Schedule, price for collection and treatment, incineration of medical waste and other specific waste – Drisla i
- Environmental impact assessment studies.

Area - SPATIAL PLANNING:

No data

Area - COMMUNITY COOPERATION AND APPROPRIATE AND FAIR REPRESENTATION

- Data on the ethnic structure of employees,
- Data on the ethnic structure of the management bodies (management positions, management and supervisory boards),
- Data on ethnic structure of users of the institution's services,
- Were there calls for civil society organizations and how much funds were allocated for the implementation of projects for cooperation between communities and adequate and fair representation,
- Information on the total number of registered churches, religious communities and religious groups, their contact numbers and addresses,
- Report on the implementation of the Law on the Use of Languages according to the Inspectorate for the Use of Languages,
- Information on which institutions have more shortcomings in the application of the Law on the Use of Languages and information on imposed fines and
- Information about complaints received to the Inspectorate for non-respect of the Albanian language by institutions.

Area – EUROPEAN AFFAIRS:

No data.