



An Roinn Gnóthaí Eachtracha
Department of Foreign Affairs



BEYOND THE PROMISES: THE REFORM AGENDA UNDER SCRUTINY



MONITORING THE IMPLEMENTATION OF THE REFORM AGENDA: STEPS, CHALLENGES AND CITIZEN'S PARTICIPATION

BEYOND THE PROMISES:
THE REFORM AGENDA UNDER SCRUTINY

**MONITORING THE IMPLEMENTATION
OF THE REFORM AGENDA:
STEPS, CHALLENGES AND CITIZEN'S PARTICIPATION**

June 2025

PRESPA INSTITUTE

Skopje

BEYOND THE PROMISES: THE REFORM AGENDA UNDER SCRUTINY

Monitoring the implementation of the Reform Agenda: Steps, Challenges and Citizen's Participation

Methodology

How is the Reform Agenda being implemented?

Which Institutions are responsible for implementing the reforms and what are their challenges?

How does Civil Society contribute to the reform process?

Publisher: PRESPA Institute - Skopje

About the publisher: Andreja Stojkovski, Executive Director

Editor: Andreja Stojkovski, PRESPA Institute - Skopje

Authors: **Ivana Petkovska**, Coalition „All for a Fair Trial“;
Kristina Doda and **Stefan Kocovski**, Institute for Human Rights;
Andrijana Ristovska Kostovska and **Liljana Dinev**,
Institute for Good Governance and Environmental and Climate Change Policies;
Ana Sofeska and **Gjorgji Hadzi-Vasilev**, Institute for Democracy „Societas civilis“;
Aleksandra Savevska and **Fanija Ivanovska**, Macedonian Centre for International Cooperation;
Maria Bashevska and **Viktor Andonov**, Institute for Economic Research and Policies „Finance Think“;
Mila Josifovska Danilovska and **Marijana Jancevska Ugarkovic**, Metamorphosis Foundation;
Vesna Poposka, **Beti Delovska** and **Andreja Stojkovski**, PRESPA Institute.

Design and preparation: Brigada Design dooel

Skopje, June 2025

This publication is part of the Civic Alliance for Reform and Growth – CARGrow project supported by the Embassy of Ireland through the EU Enlargement and European Fundamental Values Fund of the Government of the Republic of Ireland. The views, findings and conclusions or recommendations arising from the publication or project are the responsibility of the authors and do not necessarily reflect the views of the donor.

Content:

1	INTRODUCTION	5
1.1	ACCESSION OF NORTH MACEDONIA TO THE EU	5
1.2	REFORM AGENDA OF THE GOVERNMENT OF NORTH MACEDONIA	6
1.3	CARGROW – CIVIL SOCIETY RESPONSE AND MONITORING METHODOLOGY DEVELOPMENT	6
2	METHODOLOGY FOR MONITORING THE IMPLEMENTATION OF THE REFORM AGENDA 2024-2027	7
2.1	OBJECTIVES AND SCOPE	7
2.2	ANALYTICAL FRAMEWORK	7
2.3	DATA SOURCES AND VERIFICATION	9
2.4	MONITORING PROCESS AND INSTITUTIONAL SET-UP	10
2.4.1	<i>Institutional set-up</i>	10
2.4.2	<i>Monitoring process</i>	11
2.5	MONITORING TIMEFRAME	12
2.5.1	<i>Prior monitoring (ex-ante phase)</i>	12
2.5.2	<i>Monitoring the expiration of the established deadline</i>	12
2.5.3	<i>Post-implementation monitoring and evaluation (ex-post phase)</i>	12
2.6	MONITORING TOOLS AND REPORTING FORMAT	13
2.7	RISKS AND THEIR MITIGATION	14
2.8	VISUAL COMMUNICATION AND REFORM MAPPING	15
2.9	INTEGRATION WITH EU EVALUATION AND PAYMENT	16
2.10	DIGITAL INFRASTRUCTURE AND ACCESSIBILITY	16
2.11	CONCLUSION	17
3	ANALYTICAL ASSESSMENT OF CURRENT CONDITIONS	18
3.1	GOVERNANCE, PUBLIC ADMINISTRATION REFORM AND PUBLIC FINANCIAL MANAGEMENT	18
3.1.1	<i>Introduction</i>	18
3.1.2	<i>About measures</i>	18
3.1.3	<i>Institutional challenges</i>	19
3.1.4	<i>Findings from the European Commission</i>	20
3.1.5	<i>Methodological mapping</i>	20
3.2	GREEN AND ENERGY TRANSITION	21
3.2.1	<i>Introduction</i>	21
3.2.2	<i>About the measures</i>	21
3.2.3	<i>Institutional challenges</i>	22
3.2.4	<i>Findings from the European Commission</i>	23
3.2.5	<i>Methodological mapping</i>	23

3.3	DIGITAL TRANSITION	24
3.3.1	<i>Introduction</i>	24
3.3.2	<i>About the measures</i>	24
3.3.3	<i>Institutional challenges</i>	25
3.3.4	<i>Findings from the European Commission</i>	26
3.3.5	<i>Methodological mapping</i>	26
3.4	HUMAN CAPITAL	27
3.4.1	<i>Introduction</i>	27
3.4.2	<i>About the measures</i>	27
3.4.3	<i>Institutional challenges</i>	28
3.4.4	<i>Findings from the European Commission</i>	28
3.4.5	<i>Methodological mapping</i>	29
3.5	BUSINESS ENVIRONMENT	30
3.5.1	<i>Introduction</i>	30
3.5.2	<i>About the measures</i>	30
3.5.3	<i>Institutional challenges</i>	31
3.5.4	<i>Findings from the European Commission</i>	31
3.5.5	<i>Methodological mapping</i>	32
3.6	FUNDAMENTAL RIGHTS AND THE RULE OF LAW	33
3.6.1	<i>Introduction</i>	33
3.6.2	<i>About measures</i>	33
3.6.3	<i>Institutional challenges</i>	34
3.6.4	<i>Findings from the European Commission reports</i>	35
3.6.5	<i>Methodological mapping</i>	35
4	ANNEXES	36

1

INTRODUCTION

The implementation of far-reaching reforms under the Growth Plan for the Western Balkans and the Reform Agenda of the Government of North Macedonia comes at a time of heightened expectations for regional integration, democratic consolidation, and economic modernization. With the European Union's Reform and Growth Facility providing both strategic guidance and financial incentives, a credible monitoring methodology is essential—not only to ensure compliance but also to support learning, adaptation, and trust-building among stakeholders.

North Macedonia stands at a crossroads. While notable progress has been made toward EU alignment, persistent challenges—such as limited institutional capacity, weak public accountability, and political volatility—continue to influence the pace and sustainability of reforms. The milestone-based disbursement mechanism introduced under the Growth Plan requires a monitoring system that is proactive, responsive, and capable of identifying both achievements and emerging risks.

This methodology is designed as a practical and analytical tool to connect reforms with measurable results. It goes beyond compliance reporting by generating insights to support timely decision-making, policy refinement, and meaningful stakeholder engagement. It is compatible with existing national reporting system while remaining flexible enough to enable civil society oversight, public communication, and international validation.

Structured around a unified monitoring matrix and anchored in the Reform Agenda and its Annex 1, the methodology aims to provide data-driven assessments and sustain reform momentum throughout the 2024–2027 period. It is complemented by the Civic Alliance for Reforms and Growth (CARGrow), a civil society initiative that developed this methodology through collaborative engagement and sectoral expertise. The approach is intended to benefit a wide range of users—from government institutions and EU bodies to civil society actors and engaged citizens.

1.1 ACCESSION OF NORTH MACEDONIA TO THE EU

The path towards EU membership of North Macedonia has been shaped by complex political and regional dynamics, often marked by bilateral disputes that have prolonged the process. A candidate country since 2005, North Macedonia officially opened accession negotiations in July 2020 under the revised enlargement methodology. The First Intergovernmental Conference followed in July 2022 after agreement on the Negotiating Framework. In 2023, the country completed the screening of the EU acquis, structured around thematic clusters, with the European Commission publishing regular bilateral screening reports since July 2023.

Accession is not merely a negotiation process—it is a long-term transformation anchored in structured dialogue, legal harmonization, and institutional development. The National Programme for the Adoption of the Acquis (NPAA) serves as the roadmap for aligning national legislation and strengthening capacities. Regular dialogue is also maintained through the Stabilisation and Association Agreement (SAA), including its Subcommittees and the Stabilisation and Association Council.

Financially, the process is supported by the Instrument for Pre-Accession Assistance (IPA), which funds sectoral reforms and infrastructure aligned with EU priorities. Complementing this, the Growth Plan introduces a milestone-based disbursement mechanism linked to the implementation of the Reform Agenda. Despite this comprehensive framework, progress remains uneven—particularly in the areas of judicial independence, administrative reform, and anti-corruption efforts.

1.2 REFORM AGENDA OF THE GOVERNMENT OF NORTH MACEDONIA

The Growth Plan for the Western Balkans, presented by the European Commission in November 2023, was developed to close the socio-economic gap between the region and EU member states. By offering early access to parts of the Single Market and incentivizing structural reforms, it aims to deliver tangible benefits ahead of accession. Central to this is the €6 billion Reform and Growth Facility, providing funding conditional on time-bound reform milestones.

In response, the Government of North Macedonia adopted the 2024–2027 Reform Agenda on 17 January 2024. This document translates structural reform commitments into a concrete, time-bound roadmap aligned with EU standards and requirements. Endorsed by the European Commission, it serves as both a technical tool for implementation and a political signal of the country's commitment to transformative change.

The Reform Agenda is structured around five thematic areas—Fundamentals and Rule of Law, Governance and Public Finance Management, Green and Digital Transitions, Human Capital, Private Sector Development and Business Environment—reflecting key EU priorities and the regional need for competitiveness. It sets out priority actions, institutional responsibilities, financial allocations, and measurable indicators, aligning with the Growth Plan's conditionality framework.

1.3 CARGROW – CIVIL SOCIETY RESPONSE AND DEVELOPMENT OF MONITORING METHODOLOGY

The Civic Alliance for Reforms and Growth (CARGrow), coordinated by the PRESPA Institute and supported by the Government of Ireland, was established to strengthen civil society's role in monitoring the implementation of the Reform Agenda and Growth Plan. Formed in response to the exclusion of civil society from the Reform Agenda's development, CARGrow acts as a bottom-up platform to channel civic expertise into structured oversight.

Its development followed a two-phase process: capacity building and methodology co-creation. More than a dozen civil society organizations participated, receiving targeted training on EU instruments, reform monitoring, and policy analysis. This was followed by six sector-specific workshops that resulted in the co-development of a unified monitoring framework.

CARGrow adds value through its inclusive, participatory design. It serves not only as a mechanism for independent oversight but also as a contributor to institutional learning and democratic accountability. Its outputs include the tailored monitoring methodology presented here, along with complementary tools such as stakeholder engagement strategies and communication formats (e.g., podcasts, briefs, and forums).

2

METHODOLOGY FOR MONITORING THE IMPLEMENTATION OF THE REFORM AGENDA 2024-2027

2.1 OBJECTIVES AND SCOPE

The monitoring methodology is designed to support the effective implementation of the Growth Plan for the Western Balkans and the Reform Agenda of the Government of North Macedonia by focusing on four primary objectives. **First**, it enables *systematic tracking of reform progress under each pillar* of the two frameworks, ensuring that reforms are advancing in accordance with the planned milestones. **Second**, it *assesses the alignment of reform efforts with the EU acquis, regional benchmarks, and bilateral screening commitments*, helping to anchor reforms in the broader EU integration process. **Third**, the methodology aims to *detect and analyse implementation bottlenecks*, offering timely recommendations to address delays or institutional challenges. **Fourth**, it *reinforces accountability and transparency by making performance data publicly accessible* and encouraging scrutiny by stakeholders.

The scope includes all five pillars of the Reform Agenda:

1. Fundamentals and Rule of Law
2. Governance and Public Finance Management
3. Green and Digital Transitions
4. Human Capital, and
5. Private Sector Development and Business Environment.

The methodology accommodates both quantitative and qualitative indicators and provides flexibility to use alternative data sources when official government or EC data is unavailable.

2.2 ANALYTICAL FRAMEWORK

The methodology is structured around a three-tiered analytical framework that captures the full spectrum of reform performance—from legal alignment to tangible societal outcomes.

At the **policy level**, the focus is on evaluating whether the country's laws, regulations, and strategic documents align with EU requirements and policy objectives. This involves a detailed review of legislative acts, national strategies, and institutional mandates to determine the extent to which reform priorities are embedded in the country's legal and policy frameworks.

At the **implementation level**, the methodology assesses the delivery of reforms in practice. This includes tracking the execution of planned measures, monitoring compliance with deadlines, and examining the allocation and absorption of financial resources. It helps determine whether commitments made on paper are being fulfilled in action.

Finally, at the **impact level**, the emphasis shifts to measuring the real-world effects of reforms. This includes identifying improvements in institutional performance, service delivery, public trust, and broader socio-economic indicators. Impact-level analysis ensures that reform success is not just measured by inputs or outputs, but by meaningful and sustained outcomes for citizens.

Each reform area is monitored using a **uniform monitoring matrix** to ensure consistency and comparability across pillars. The standardized matrix includes the following fields:

Field	Description
Reform Area	Pillar or thematic cluster (e.g., Fundamentals, Connectivity)
Reform Name	Title of the reform as defined in the Reform Agenda
Measure	Specific measure/action under the reform
Deadline	Implementation deadline (as per Annex 1)
Budget Allocation (€)	Amount allocated (if applicable)
Indicator	Output, outcome, or impact indicator used for assessment
Baseline	Starting point (often from 2022–2023 or as defined in Annex 1)
Target	Expected value by milestone or final deadline
Status	Current state of implementation (e.g., Not started, In progress, Completed)
Scoring	Traffic light or numerical (0–5) rating
Source of Verification	Source as listed in Annex 1 (e.g., Gov reports, websites)
Responsible Institution(s)	Government body designated to implement and report
Milestone Reference	Reference to specific step or payment condition in Annex 1
Notes	Additional comments, risks, or contextual information

All indicators, baselines, targets, and payment-related conditions will be based directly on the Reform Agenda of the Government of North Macedonia and its accompanying Annex 1, which outlines specific reform milestones, associated deadlines (June and December from 2024 to 2027), and disbursement conditions under the Reform and Growth Facility.

2.3 DATA SOURCES AND VERIFICATION

A reliable and transparent monitoring process depends on the integration of high-quality, verifiable data drawn from both institutional and independent sources. This section outlines how the methodology leverages official records, civic monitoring, and analytical tools to ensure that reform progress is assessed rigorously and fairly, while maintaining alignment with the structure and content of the Reform Agenda.

The methodology distinguishes between **primary** and **secondary** sources of information. Primary sources are those directly produced by the institutions responsible for implementing and reporting on the Reform Agenda. These sources provide the most authoritative and aligned information, as they correspond directly to the reform milestones, indicators, and verification mechanisms set forth in Annex 1. They form the backbone of the monitoring matrix and enable direct tracking of policy commitments, implementation deadlines, budgetary allocations, and institutional accountability.

Primary data sources include:

- Government reports and official monitoring dashboards
- EC documents, including annual reports and IPA assessments
- State Statistical Office and Eurostat
- Reports from international organizations (e.g., OECD, World Bank, etc.)
- Annex 1 of the Government's Reform Agenda, including baseline data, payment triggers, and institutional responsibilities

Secondary sources complement the official data by offering independent perspectives, sector-specific analysis, and contextual insight that may not be captured in government reports. These sources are critical for verifying official claims, identifying reform bottlenecks, and introducing voices from civil society and the expert community. While they may not have the same level of formality or frequency as institutional data, they enhance the quality and breadth of analysis, especially in areas where access to official data is delayed, incomplete, or lacks disaggregation.

Secondary data sources include:

- Civil society monitoring and shadow reports
- Expert interviews and stakeholder consultations
- Media analysis and OSINT (Open-Source Intelligence)

All data points will be cross-checked for consistency, timeliness, and credibility. Priority is given to sources that provide verified or triangulated data consistent with the benchmarks in Annex 1, while ensuring the methodology remains open to alternative perspectives and complementary insights.

2.4 MONITORING PROCESS AND INSTITUTIONAL SET-UP

2.4.1 Institutional set-up

The implementation of this monitoring methodology is coordinated by a central monitoring team housed within the CARGrow framework. This team is responsible for managing the monitoring cycle, ensuring methodological consistency, verifying data quality, and facilitating stakeholder engagement. It acts as a hub connecting civil society actors, institutional counterparts, and technical experts.

Following the completion of the initial capacity-building phase, participating civil society organizations (CSOs) and CSO nominees were grouped according to their expertise and preferences into thematic clusters corresponding to the five pillars of the Reform Agenda and the Growth Plan. These pillar-level groups are responsible for monitoring implementation within their area of focus, applying the agreed methodology, collecting and validating data, and contributing to the preparation of reports.

The participating CSOs take the lead in the monitoring exercise, applying the jointly developed methodology and contributing to the evidence base for reform evaluation. The PRESPA Institute, in addition to participating actively in specific thematic areas, performs a facilitative role by serving as an information and coordination node within the Alliance. It ensures coherence across pillar groups, maintains common methodological standards, facilitates the exchange of information, and supports communication and engagement with institutional and international partners. While not positioned as the lead, PRESPA supports the functioning of the Alliance as a shared platform, contributing to both horizontal and vertical coordination and reinforcing collective ownership of the monitoring process.

Coordination between participating CSOs occurs both at the pillar level—where thematic expertise drives in-depth monitoring—and at the macro level across the entire Alliance. This two-tiered coordination structure enables collective deliberation, narrative coherence, and strategic alignment with institutional developments and EU priorities.

Institutional engagement is structured around the reform-by-reform responsibilities defined in Annex 1 of the Government's Reform Agenda. These include focal points from the Prime Minister's Office, the Secretariat for European Affairs, and the line ministries assigned to each thematic pillar. The central monitoring team works closely with these institutions to collect and verify data, resolve discrepancies, and ensure shared ownership of results.

Additionally, coordination is established with the EU Delegation and development partners to align the methodology with the EU's monitoring expectations and to ensure complementarity with the Reform and Growth Facility's disbursement mechanism. Civil society organizations and expert contributors form an extended monitoring network that supports validation, advocacy, and public communication efforts.

This institutional setup is designed to balance technical rigor with participatory inclusiveness, while maintaining strategic alignment with EU priorities and domestic reform commitments.

2.4.2 Monitoring process

The monitoring process follows a structured, recurring cycle designed to track progress against reform milestones, engage key stakeholders, and produce timely, evidence-based assessments. It is aligned with the June and December deadlines of the Reform Agenda and enables both forward-looking planning and retrospective accountability.

The process is organized into the following five steps:

1. Data collection and validation
2. Drafting of progress assessments and initial scorecards
3. Stakeholder consultation through peer review and thematic discussions
4. Finalization of monitoring reports
5. Public dissemination and policy advocacy

1) Data collection and validation: This step includes regular engagement with institutional focal points, updates from official dashboards and data repositories, and collection of open-source information. It ensures that the monitoring team has a comprehensive dataset for each reform measure.

2) Drafting of progress assessments and initial scorecards: Based on the validated data, preliminary findings are developed for each reform measure. These findings include performance status, milestone fulfillment, timeline adherence, and scoring based on predefined indicators. Traffic light or numerical scoring (0–5) may be applied.

3) Stakeholder validation and consultation: The methodology offers two complementary options for validation and consultation, depending on the reform area, stage of implementation, and stakeholder availability. The **first option** involves *peer review and thematic discussions*. Draft outputs are shared with a network of experts, institutions, and civil society actors. Feedback is gathered through written peer reviews and thematic consultations focused on specific reform areas (e.g., judiciary, green transition). This process enhances quality while promoting inclusion. The **second option** involves stakeholder validation through in-person or hybrid *workshops and expert panels*. These sessions are designed to promote joint interpretation of reform progress, foster mutual understanding between institutions and civic actors, and generate concrete suggestions for improvement.

The two options are not exclusive. Once the Alliance builds a critical level of constituency within each of the five pillars of the Reform Agenda, it will seek to implement both approaches simultaneously. This dual-track process will enhance the validity of findings and strengthen the collective reform narrative used in strategic communication and policy advocacy.

4) Finalization of monitoring reports: Once inputs have been integrated, comprehensive reports are compiled, including reform-by-reform narratives, scorecards, visual data representations, and clear policy recommendations.

5) Public dissemination and policy advocacy: Monitoring results are communicated through presentations, media briefings, digital platforms, and policy dialogues. This ensures the findings reach institutional decision-makers, civil society, and the wider public.

The monitoring entity will coordinate with government focal points, particularly from the Prime Minister's Office, Ministry for European Affairs, and relevant line ministries. Reform-by-reform institutional responsibilities will be based on the designated institutions listed in Annex 1. Cooperation with EU Delegation and local civil society is integral to the process.

2.5 MONITORING TIMELINE

The monitoring timeline is designed as a continuous loop that mirrors the implementation and disbursement schedule of the Reform Agenda, with deadlines in June and December. This cyclical approach enables both forward-looking planning and retrospective accountability, while providing opportunities for strategic public engagement, policy influence, and learning across cycles.

The methodology distinguishes between two main types of reporting: **ex-ante** and **ex-post**. The ex-ante reporting, released shortly before the official deadlines, is intended to alert institutions and the public to upcoming milestones, encourage timely action, and provide early warnings about potential risks or missteps. It also offers a space to highlight possible corrective actions. The ex-post reporting, on the other hand, documents actual results, assesses the fulfillment of reform milestones, and presents conclusive evidence of progress or lack thereof. These two formats are mutually reinforcing: one drives anticipation and preparedness; the other provides accountability and lessons for the next cycle.

To better organize the flow of activities, the monitoring cycle is grouped into three overarching meta-phases:

2.5.1 Pre-deadline Monitoring (Ex-ante Phase)

- **Data Gathering and Early Observation (January–March / July–September):** Internal consultations, updates from responsible institutions, and preliminary data collection.
- **Validation and Indicator Assessment (April / October):** Triangulation of data with official indicators and civil society inputs.
- **Ex-Ante Reporting (May–Early June / November–Early December):** Publication of concise, forward-looking reports that flag key trends and risks.

2.5.2 Deadline Moment Tracking

Follow-Up Monitoring (June / December): Final round of real-time updates on implementation, capturing last-minute developments.

2.5.3 Post-deadline Evaluation (Ex-post Phase)

- **Ex-Post Assessment Preparation (Late June / Late December):** Synthesis of documentation, indicator completion, and institutional feedback integration.
- **Ex-Post Publication (Early July / Early January):** Publication of comprehensive reform-by-reform assessments, accompanied by recommendations and visual scorecards.

This meta-phase structure complements the micro-level steps already embedded in the monitoring process and allows the methodology to maintain a clear internal rhythm while responding dynamically to reform developments. It also ensures that monitoring is not limited to isolated reporting events, but becomes part of a continuous process that builds institutional memory and public engagement over time.

2.6 MONITORING TOOLS AND REPORTING FORMAT

The methodology builds upon a structured monitoring matrix that tracks each reform measure across multiple parameters—reform name, deadline, budget, indicators, responsible institutions, and sources of verification. It is designed to support cross-cutting comparisons and coherent tracking across all pillars.

To assess reform implementation, two complementary scoring systems are provided:

- **Traffic Light System:** A simplified, high-level visual scorecard using green (on track), yellow (delayed), and red (stalled) indicators. This system is particularly useful for broader audiences and decision-makers who seek an at-a-glance understanding of progress.
- **Numerical Rating (0–5):** A more granular scoring mechanism that captures both the extent and the quality of reform implementation. This system allows for evaluating not just compliance with deadlines but also institutional performance, effectiveness, and public relevance of the measures undertaken.

These tools are not intended for mere 'box-ticking' exercises. Rather, they aim to stimulate reflective and evidence-based assessments that focus on the transformative power of reforms. The flexibility of using both systems—together or separately—ensures that each reform measure can be evaluated based on the data available and the maturity of the process.

The monitoring outputs are structured around the biannual reporting rhythm, with two key reporting formats:

- **Ex-ante short reports:** Published in **late May/early June** and **late November/early December**, these forward-looking briefs serve as early-warning mechanisms. They highlight pending deadlines, flag possible delays, and offer short-term recommendations. Their core function is to prompt action, foster institutional responsiveness, and engage the public before formal deadlines are reached.
- **Ex-post comprehensive assessments:** Released in **early July** and **early January**, these reports serve as formal records of reform performance for each semester. They document completed measures, analyze achievements across indicators, and present reform-by-reform scorecards. These assessments will incorporate institutional feedback, civil society perspectives, and horizontal observations.

Each report will follow a consistent structure:

- Executive summary
- Horizontal findings (e.g., transparency, coordination, financing)
- Pillar-by-pillar analysis
- Reform-specific scorecards and evaluations
- Conclusions and strategic recommendations

This format allows the monitoring exercise to address systemic trends and bottlenecks while still maintaining detailed thematic insights at the level of each reform area. Reports will be published and shared through stakeholder events, media briefings, and the Alliance's digital channels.

2.7 RISKS AND MITIGATION

Successful implementation of this monitoring methodology requires anticipating and addressing a range of operational, institutional, and political risks. These risks can affect the availability and quality of data, the functionality of stakeholder engagement, and the ability to generate credible findings. By proactively identifying and mitigating these risks, the methodology remains agile, reliable, and useful for both institutional and civic actors.

The table below outlines the main risks and proposed mitigation strategies:

Risk	Likelihood	Impact	Mitigation
Inaccessibility of government data	Medium	High	Use alternative sources; establish MoUs for data sharing; maintain transparent data logs
Political or institutional resistance	Medium	High	Build trust through transparent engagement; diversify institutional entry points
Timeline slippages	High	Medium	Maintain real-time tracking; allow rolling updates; integrate grace periods
Inconsistent application across reform pillars	Medium	Medium	Use shared templates and cross-pillar coaching; regular peer exchanges among CSOs
Public disinterest or low engagement	Low	Medium	Use visual storytelling, interactive dashboards, and periodic civic outreach campaigns
Misinformation or manipulation of findings	Low	High	Secure data verification process; publish detailed methodology; apply open data standards

2.8 VISUAL COMMUNICATION AND REFORM MAPPING

To facilitate both internal analysis and external communication, the methodology supports the development and use of **methodological reform maps** that visually link reforms, institutions, milestones, and relevant data points. These maps are designed to capture the complexity of the Reform Agenda while making it accessible and actionable.

Each methodological map is anchored in the official structure of the Reform Agenda and Annex 1. It identifies each reform, its associated measures and steps, implementation deadlines, budgets (where applicable), responsible and supporting institutions, relevant documents, and data sources. Where relevant, the maps also highlight potential partners, overlapping mandates, or cross-cutting reforms.

This approach enables a reform-by-reform and pillar-by-pillar visualization of progress, allowing users to:

- Understand the institutional architecture and horizontal interlinkages between reforms
- Identify bottlenecks, overlapping mandates, or underused synergies
- Track budgets and resource flows where applicable
- Pinpoint which reforms are connected to disbursement milestones

The visual tools are structured using a modular, layered format:

- **Nodes** represent reform measures or milestones
- **Connections** illustrate institutional roles, budget lines, deadlines, or thematic interdependence
- **Layers** allow for focus on institutions, budgets, sources of verification, or indicator status

This form of reform mapping improves the clarity and usability of the monitoring process and enables both expert and public audiences to engage with the Reform Agenda. Visual maps will be integrated into monitoring reports, digital dashboards, and presentations. They serve not only as a technical tracking tool, but also as a medium for public understanding, advocacy, and storytelling.

2.9 INTEGRATION WITH EU EVALUATION AND DISBURSEMENT

This monitoring methodology is designed to complement and reinforce the EU's evaluation and disbursement mechanisms under the Reform and Growth Facility. All indicators and milestones are aligned with Annex 1 of the Reform Agenda, which forms the operational basis for both national implementation and the European Commission's disbursement decisions.

The timing of ex-ante and ex-post monitoring reports has been synchronized with the EU's internal calendar to ensure that independent assessments are available ahead of key payment decisions. By triangulating institutional data with civil society reporting and EU documentation, the methodology can serve as an early-warning mechanism and a source of credible validation.

In doing so, it contributes to improving trust between national institutions, civil society, and EU counterparts. It also ensures that funding delays caused by unclear implementation or missing data can be mitigated through transparent reporting and documented progress.

CARGrow's participatory methodology allows for a narrative-based, indicator-informed review of progress that goes beyond formal compliance. This adds analytical depth to milestone tracking and can help inform both Commission reports and peer learning across countries.

In the long run, the methodology may serve as a reference model for civil society alignment with EU-driven reforms in the broader Western Balkan region, promoting regional coherence and reinforcing the value of transparent reform implementation.

2.10 DIGITAL INFRASTRUCTURE AND ACCESSIBILITY

While the full development of a digital platform is currently aspirational and contingent upon future funding, the methodology envisions such infrastructure as a key enabler of transparency, usability, and citizen engagement. The aim is to eventually create an interactive and publicly accessible online platform that allows reform stakeholders and the wider public to access, visualize, and analyze reform progress in real time.

This digital component would include:

- A searchable and layered digital reform map visualizing individual measures, responsible institutions, and deadlines
- Interactive dashboards displaying scorecards, progress updates, and reform milestones
- Downloadable datasets and reports linked to reform indicators and Annex 1

The platform would adhere to open data principles, ensure accessibility for various user groups, and support interoperability with existing government portals.

Although currently not financed, this component remains a strategic goal of the monitoring framework, and will be actively pursued as funding opportunities emerge.

2.11 CONCLUSION

This methodology establishes a solid foundation for systematic, transparent, and participatory monitoring of North Macedonia's reform journey under the Growth Plan and Reform Agenda. It integrates diverse data sources, builds on existing indicator frameworks, and offers practical tools for evidence-based advocacy and strategic steering. The Reform Agenda and its Annex 1 form the backbone of this methodology, guiding the sequencing of reforms, verification of delivery, and linkage to financial support from the EU.

Beyond compliance, this approach aims to generate shared understanding, drive reform quality, and foster civic ownership. The participatory design—shaped through CARGrow—ensures that civil society actors are not only observers but co-creators of accountability. Methodological rigor is balanced with adaptive learning, ensuring the process evolves with new data, institutional feedback, and citizen engagement.

The next phase includes piloting the methodology in selected reform areas (e.g., Fundamentals), refining indicators based on practical application, and testing validation methods. As capacity and funding allow, efforts will also focus on building a digital interface and developing long-term mechanisms for comparative, cross-pillar, and regional learning.

Success will depend on continued collaboration among government institutions, civil society, the EU Delegation, and reform beneficiaries. By maintaining consistency in reporting and deepening the quality of analysis, this methodology can help sustain the credibility of North Macedonia's reform path and contribute to a broader culture of evidence-based policymaking and transparent EU integration.

3

ANALYTICAL ASSESSMENT OF CURRENT CONDITIONS

3.1 GOVERNANCE, PUBLIC ADMINISTRATION REFORM AND PUBLIC FINANCIAL MANAGEMENT

3.1.1 Introduction

Sustainable progress in EU Accession depends on **a stable Institutional Framework and functional Governance Mechanisms**. Areas such as Governance, Public Administration Reform and Public finance Management constitute **a basis of the reform process** and are a key part of the First Cluster in the Accession Negotiations with the European Union, “Fundamentals.” It is these areas that have a direct impact on legal certainty, trust in the institutions and the capacity of the state to provide quality services to citizens.

This assessment aims to analyse the current state of affairs in these areas, focusing on horizontal trends, hindering factors and needs for improvement, in order to provide a basis for further formulation of recommendations and guidelines for advancing reform processes.

3.1.2 About the measures

The measures in the field of **Public Finance Management** are structured around four key objectives: *fiscal discipline, effective budgeting, increased transparency and efficient management of public expenditures and investments*. The Reform Agenda envisages the implementation of a new **Organic Budget Law**, which introduces *medium-term budgeting, program budgeting and fiscal rules*, as well as *the development and introduction of IFMIS – Integrated Public Finance Management Information System*. The focus is also on improving the **planning mechanisms, implementing, and monitoring of public investments**. The establishment of *a central register of capital projects* is envisaged, as well as *a methodology* for their prioritization. **Public procurement** is subject to additional regulation, with the aim of increasing competition, transparency and preventing corruption through more efficient supervision and review of procedures. In addition, measures are envisaged to strengthen independent institutions such as the **Fiscal Council** and the **State Audit Office**, as well as to increase the role of the Parliament in fiscal oversight. It is also planned to increase the capacities for *analysis of the costs and benefits of public expenditures*, as well as develop indicators for measuring the *efficiency of budget programs*.

Public Administration Reform is based on four pillars: (1) **professionalization and depoliticization of the administration**; (2) **standardization and integration of human resources processes**; (3) **digital transformation and quality of services**; and (4) **institutional coordination and monitoring of results**. Within the first pillar, the key measures are related to the adoption of the new *Law on Administrative Servants*, the establishment of *a performance- and competency-based evaluation and promotion system*, as well as *a clear distinction between political and administrative functions*. The second pillar envisages the establishment of an integrated *human resources management information system*, which will enable *standardization, monitoring and accountability of recruitment, training, and evaluation processes*. In the third pillar, the measures are aimed at *expanding*

the availability of electronic services, improving interoperability systems between institutions, and developing user-oriented services. The fourth pillar includes mechanisms for monitoring the implementation of the Public Administration Reform Strategy 2023–2030, through the establishment of performance indicators, regular reporting, and external evaluation.

The reform efforts also envisage an increased role for the institutions responsible for inspection and administrative audit, as a tool for early detection and correction of weaknesses in management. In parallel, the measures include capacity-building activities, engagement of young professionals and fostering an administrative culture focused on services and results.

3.1.3 Institutional challenges

The **Ministry of Finance** has been positioned as the key driver of reforms in the area of Public Finance Management. However, this institution faces serious *staffing and technical challenges*, especially in the implementation of the new Law on Organic Budget and the development of IFMIS. The internal structure is still oriented towards *classical administration*, with limited analytical capacities and insufficient intersectoral coordination. A key problem is the *absence of clear mechanisms for integrating policies, budget, and program results*. The **Fiscal Council**, although legally established as an independent body for oversight of fiscal policy, operates with a *limited number of employees and limited influence on the budget adoption process*. Its staffing and methodological strengthening is needed, including the establishment of a formalized link with parliamentary oversight.

The **State Audit Office** plays a key role in oversight of spending of public funds. However, due to insufficient staff and the absence of ICT tools, *the capacity for timely and quality audits is severely limited*. Also, feedback mechanisms for monitoring the implementation of audit recommendations are poorly developed.

The **Public Procurement Bureau** and the institutions responsible for public investments lack sufficient capacity for effective supervision and analysis. There is a lack of *systematic control of exceptions to standard procedures*, as well as coordination between supervisory and executive bodies in the implementation of procedures.

The **Ministry of Information Society and Administration** (MISA) has central responsibility for leading and coordinating public administration reforms. However, its role is often limited by *weak resources, lack of institutional authority, and inter-ministerial support*. The human resources management system remains decentralized and fragmented, with different practices and criteria across institutions.

Inspection services and administrative inspectorates do not have sufficiently trained staff and technical support for systemic supervision. Their intervention is most often reactive, not preventive. In addition, a fully functional system for monitoring the effectiveness of public administration has not yet been established. Institutionalized performance measurement mechanisms are lacking, *including developed tools for monitoring individual and institutional results*. Recruitment is often not based on objective criteria, and training is irregular and not linked to professional development. An additional challenge is the absence of a single *platform for digital services and interoperability standards*. Some institutions develop their own solutions without coordination, which leads to overlaps, costs, and poor user functionality. Finally, despite the existence of a strategy and action plan, the monitoring of reforms is administrative, without a substantive evaluation of the impact of the measures.

3.1.4 Findings from the European Commission

The European Commission has made similar findings in the area. For the Commission, *the reform processes are formally moving forward, but substantive results are limited*. In the Country Report of 2022, the Commission notes the lack of transparency in political decision-making and the need to strengthen the role of the Parliament. While, in 2023 and 2024, it particularly emphasizes the need to limit shortened procedures in adopting laws and establish an inclusive consultation process. The Commission also notes the lack of binding mechanisms for the involvement of civil society organizations in policymaking.

In the area of **Public Administration Reform**, the Commission notes that no significant progress has been made in reducing political influence in recruitment and recommends the development of a fully functional human resources management system, with an emphasis on performance evaluation and accountability. On **Public Finance Management**, the Commission expresses concern about the slow implementation of the Organic Budget Law, the lack of effective medium-term budgeting and weaknesses in the supervision of public investments.

From the **Bilateral Screening** reports, we can also draw the same conclusions, including the need for a deeper *functional analysis of institutions, harmonization of the fiscal frameworks* with European standards, and strengthening of *internal and external audit*.

Conclusion

There is clearly **a continuing gap between reform commitments and reality**. Although strategic documents identify the right priorities and are based on European values, their implementation is often limited by institutional fragmentation, the political context and administrative capacity.

It is necessary to establish horizontal coordination mechanisms, strengthen cross-sectoral cooperation and an integrated approach to planning and implementation. The focus should be on creating a professional, accountable, and service-oriented administration, a transparent system of public finances and a functional decision-making system that will be resistant to political pressures.

Only by operationalizing reforms and ensuring a link between planning, resources, and results can North Macedonia strengthen its credibility in the accession process and increase citizens' trust in institutions.

3.1.5 Methodological mapping

To download the methodological mapping spreadsheet, use the following QR code:



3.2 GREEN AND ENERGY TRANSITION

3.2.1 Introduction

The **Green Transition** in North Macedonia has been set as a *strategic priority within the framework of accession, economic development, and environmental protection*. It is an essential component of the Reform Agenda 2024–2027 and a direct response to the obligations arising from the **European Green Deal**, as well as the country's engagement within the framework of the **Regional Single Market** and the **Green Agenda for the Western Balkans**.

In conditions of increased energy instability and climate risks, as well as under pressure from growing European and international standards, the **Green Transition is no longer an option, but a necessity**. The reforms being implemented in this area aim to *reduce greenhouse gas emissions, increase energy efficiency, exploit the potential of renewable energy sources, and gradually introduce emissions trading mechanisms*. At the same time, they are focused on modernizing the economy and improving the quality of life of citizens, through a cleaner environment and more efficient public services.

The country has already established basic strategic documents, such as the **National Energy and Climate Plan (NECP)**, the **Energy Strategy 2040** and the new **Roadmap for a Just Transition**. The Reform Agenda groups the measures into five sub-areas: **market reforms, decarbonization, development of renewable sources, establishment of an ETS system** and promotion of **energy efficiency** with a parallel **fight against air pollution**. Each of these sub-areas contains specific objectives, expected results and deadlines for implementation.

In this section, the report offers a narrative assessment of the current situation with a focus on implemented and planned measures, the institutional set-up, key weaknesses, and the assessments of the European Commission.

3.2.2 About the measures

The Green Transition measures in North Macedonia are organized into **five key sub-areas**, each with specific interventions, expected results and a timeline for implementation. These measures reflect the commitment to align with European legislation and create the basis for a sustainable energy system.

Liberalization of the electricity market is moving forward, primarily through the establishment of a *day-ahead market* and preparing for its coupling with the markets of the EU Member States. Although the electricity market has been functional since May 2023, the full transposition of the electricity integration package and the implementation of market connection measures are still to be implemented. The new **Law on energy**, which will finalize the transposition of European legislation, was planned for the end of 2024, and finally adopted in May 2025. After the adoption of the law, *the coupling to the Greek electricity market* is expected to be realized in January 2026. In addition, the law will contribute to the alignment of electricity prices with market conditions, which will be implemented through the introduction of a *block tariff system*, in order to rationalize consumption and reduce the fiscal burden. However, **measures to protect energy-poor households** are still in the phase of conceptualization, and the Working group for defining indicators for energy poverty which was supposed to be established by January 2025 follows the fate of the new law.

The National Energy and Climate Plan (NECP), adopted in 2022, is a key document for the **decarbonization** of the sector, but it is being revised to include new recommendations from the Energy Community. The adopted **Just Transition Roadmap** of June 2023 foresees *interventions for private investment, green infrastructure, clean energy, and skills development*. The Annual Implementation Plan for 2025 was adopted in December 2024. The share of **renewable energy sources** in the final

consumption for 2023 is 20.2%, with North Macedonia remaining below the target set by the National Energy and Climate Plan, 38%, but also far below the European average, 45.3%. The reform agenda foresees *the installation of new 0.8 GW of renewable capacities by 2027*. However, the legislation is still not harmonized with the Directive for Renewable Energy, and the procedures for issuing of permits remains complicated. There is obvious need for investment in hydropower that will be completely aligned with environmental legislation.

The Reform Agenda envisages the establishment of a **national emissions trading system by 2030**, with the first step being the establishment of a *monitoring, reporting, and verification (MRVA)* system. The draft Law on Climate Action has been in the final stages of preparation for adoption for three years now, and the implementation of MRVA and administrative capacity building are in the initial phase.

Although there is legal base for promoting **energy efficiency**, there is a problem of limited implementation. The Law on Energy Efficiency is only partially aligned with the EU directives. The development of *a renovation plan for public buildings is also lacking*, and the system for issuing energy certificates for newly constructed buildings is not operational. *Air pollution* remains a chronic problem, especially in urban areas, and the measures taken have had a marginal effect due to weak local implementation. Overall, the legislative framework is partially in place, but implementation is hampered by insufficient administrative capacity, insufficient involvement of local authorities and the absence of systematic monitoring and evaluation.

3.2.3 Institutional challenges

The Green Transition is conditioned not only by the existence of appropriate strategies and laws, but also by institutional readiness at all levels of government. Currently, the institutional set-up is characterized by several systemic challenges that hinder progress and reduce the effectiveness of reforms.

At the central level, the **Ministry of Environment and Physical Planning** and the **Ministry of Economy** have primary responsibility for the implementation of climate and energy policies. However, *their staffing and technical equipment remain limited*. There is a systemic *lack of trained personnel*, especially in the areas of *energy modelling, emissions analysis, project management and policy monitoring*. The **Energy Agency**, although formally existing, has a limited operational role in political and regulatory guidance. **Local governments** are key to the implementation of many measures (especially in the areas of energy efficiency, waste management and urban pollution), but they face *limited budgets, weak professional staffing, and a lack of planning documentation*. Fiscal decentralization has not been accompanied by a transfer of capacities and resources, which makes municipalities **dependent on projects supported by international donors**, without lasting institutional sustainability. In addition, *coordination between institutions remains unstructured*. In the absence of a strong inter-ministerial body for the green transition, responsibilities overlap and processes are slowed down by the need for inter-ministerial agreements. Although several working groups have been established, they lack permanence, formal mandate, and sufficient political weight. There is no national body that systematically monitors climate action and decarbonization indicators.

In the field of **financing**, *public investments in green projects are insufficient and not comprehensive*. European Union instruments (IPA III, WBIF) are a basic source of financial support, but their use requires strong application and project capacity, which is currently lacking in some key institutions. Finally, *the involvement of the public and the civil society in the processes is limited*. Consultation mechanisms are poorly developed, and the availability of data is incomplete. Universities, research institutes and professional associations are still not included enough in the creation and monitoring of policies. This weakens legitimacy of the process and limits its expert foundation.

These institutional challenges require a serious approach, strategic staffing, establishment of permanent coordination mechanisms, and building a culture of intersectoral and public cooperation.

3.2.4 Findings from the European Commission

Despite the ambitious agenda, progress has been uneven, and implementation often faces serious institutional, technical, and political challenges. The European Commission, in its Country Reports, consistently points to the need to **strengthen administrative capacity, policy coordination, complete legislative reforms** and **actively involve all stakeholders** in decision-making – from institutions, through municipalities, to the business community and civil society. In the three consecutive reports, North Macedonia's progress in the Green Transition has been assessed as moderate and uneven, with constant emphasis on the need to **strengthen implementation, coordination, and institutional capacity**.

Although the country has adopted an Energy Strategy until 2040 and a National Energy and Climate Plan (NECP), their operationalization is weak, and alignment with the European legislation, especially around renewable sources, energy efficiency and climate policies, is limited. The Commission has long emphasized that the **Law on Climate Action has not been adopted**, and the mechanisms for monitoring emissions are dysfunctional in conditions of insufficient implementation of existing regulations and strategies.

The latest report from 2024, prepared and presented after the completion of the bilateral screening for Cluster 4, confirms that North Macedonia has **a moderate level of preparation** in the field of **environment and climate change**, and progress is limited. It indicates that the laws on **energy efficiency** and **renewable energy** are only *partially aligned* with EU directives, and the **systems for monitoring, reporting, and verification** of emissions (MRVA) are not *yet operational*. The involvement of municipalities and civil society in the formulation and monitoring of policies is weak. The Commission recommends **strengthening administrative capacities, better coordination of green policies** and **more efficient use of EU funds**, as well as **improving transparency in investments in renewable sources and waste management**.

The common message in all three reports is that North Macedonia must move from strategic planning to implementing concrete measures with measurable results, based on data, with clear responsibility and accountability of institutions.

3.2.5 Methodological mapping

To download the methodological mapping spreadsheet, use the following QR code:



3.3 DIGITAL TRANSITION

3.3.1 Introduction

The digital transition of North Macedonia is one of the strategic priorities, not only in the accession process, or as part of the Reform Agenda 2024–2027, but as a key element for economic strengthening, administrative modernization, and security resilience of the state. With the approach to the European Union, digital transformation gains higher political significance, and its complexity requires institutional maturity, normative compliance, and operational functionality in the public and private sectors. Moreover, the progress achieved is not an isolated process – but is driven by **the Roadmap for Digital Transformation**, EU programs such as “**Digital Europe**”, the urgent digitalization of administrative services due to the pandemic, as well as geopolitical security changes that make the topic of cybersecurity topical.

By accessing funds from **the EU Reform and Growth Instrument**, North Macedonia has gained a direct opportunity to strengthen its **digital capacities**, improve **data management**, ensure **interoperability between institutions**, and establish **digital identity** as a basis for a digital society. However, for the implementation of these reforms, clearly defined measures, institutional capacities, and compliance with the recommendations of the European Commission are crucial. In the following part of this publication, we will analyse the current situation in this area, as well as the measures, key challenges in the institutional framework and the findings of the relevant reports of the European Commission.

3.3.2 About the measures

The digital transition process is taking place across two main reform areas: **cybersecurity** and **digitalization**. While digitalization has broader horizontal application in the public and private sectors, cybersecurity is inextricably linked to the long-term stability and resilience of the state.

Although **cybersecurity** has been formally defined as a priority in several strategies, it has long been considered an “**area of long-term winter**”. However, the changed security circumstances and the digital transformation caused by the pandemic have forced institutions to take concrete steps. The main reform in this sub-area is **the establishment of a national framework for cyber resilience**, including: 1) **alignment with the NIS2 Directive** through the preparation of a new Law on Networks and Information Systems; 2) adoption of the National **Cybersecurity Strategy 2024–2028**; 3) **establishment and training of a government CERT and a national centre MKD-CIRT**; and 4) **adoption of the Law on Critical Infrastructure Protection**, which has not yet been submitted to the Parliament.

Cybersecurity capacities remain limited. **MKD-CIRT**, although a member of ENISA and formally integrated into the European Incident Response Network, *operates with modest human and technical resources*. The legal framework for **critical infrastructure** *It is not fully standardized*, and **interoperability** between actors *is poorly developed*.

Institutionally, the role of the **Operational Technical Agency** (OTA) and the **Cybersecurity Institute** at the Military Academy is significant, but still marginalized in the wider public politics. No exist standards for providers on services for cyber security, a human capital in the area no is systematically treated in The National frame on qualifications, which it limits development on study programs and certifications.

In the area of **digitalization**, the focus is on the development of **digital infrastructure**, **digital identity**, and the improvement of **public electronic services**. The state will implement digital transformation activities through: 1) **harmonization with the European Electronic Communications Code** with a new Law on Electronic Communications; 2) **adoption of legal solutions**

for digital identity, electronic documents and trusted services in accordance with eIDAS²; 3) **establishment of SuperApp – ELI** (electronic personal identity) and digital wallet; 4) **expansion of the government e-platform** in order to increase the number and availability of e-services; as well as 4) **development of a National Document Management System (DMS)** and new archiving rules.

These activities are accompanied by the improvement of the interoperable platform, but challenges remain: public services are often outdated, not updated, and with a small number of real users. The digital literacy of the administration is at a low level, and several institutions still require the submission of documents in paper form, in parallel with the digital application.

A significant element is the announcement of amendments to the **Media Law**, aimed at harmonizing with the Digital Services Directive, but there are no announcements of systemic changes in public procurement or technical standards for digital infrastructure.

3.3.3 Institutional challenges

Although formally there is a solid framework of strategic documents and planned activities, the practical implementation of the digital transition in North Macedonia faces serious institutional constraints. These challenges not only slow down reform progress, but also compromise the credibility of the processes in the eyes of citizens, the business community, and international partners.

The digital agenda is under the responsibility of the newly established **Ministry of Digital Transformation**, which succeeded the Ministry of Information Society and Administration. While this represents an institutional recognition of the importance of the digital transition, **vertical coordination with other ministries, independent regulators and local governments is limited**. Registries and information systems operate in parallel and are often not interoperable, which duplicates responsibilities, creates errors and fragments processes.

Many institutions lack sufficiently trained staff, and in some cases, the responsibility for implementing digital tools is assigned to officials without appropriate expertise. Although ad hoc trainings are conducted, they rarely include an assessment of the effects or a systematic upgrade of knowledge, and there is no *centralized system for training public administration in the use of digital services*. Additionally, from a cybersecurity perspective, the capacities of MKD-CIRT, OTA, the Ministry of Defence and other relevant bodies remain limited. In this case, a *lack of specific budget lines for infrastructure development* is also identified, which often leads to improvisation or reactions only in emergency situations.

Although there are officially over 130 e-services available through the National Portal, the number of actual users remains low. The reasons cited are:

1. *Distrust in the security and functionality of systems,*
2. *Inapplicability of e-services in a legal or administrative sense (hard copy documents must still be submitted),*
3. *Poor user experience and dysfunctional forms and portals.*

Additionally, the public is not sufficiently informed about existing tools and the benefits of using them, as **the communication component of the digital transition is marginalized**.

Working groups for drafting laws, strategies and technical solutions **are mostly closed** and include representatives of the state administration, **without the active involvement of experts, civil society organizations or the ICT chamber**. Public hearings are limited in duration and often published late or incompletely. In addition, there are no mechanisms for regular monitoring and reporting on the implementation of measures – some of the reforms, although announced, are not followed up with reporting data on their status or impact.

Digital investments largely *depend on donor programs and projects* of international partners. Implementation budgets are often not linked to specific indicators, nor are they part of medium-term programming frameworks. The lack of stable funding makes the digital agenda vulnerable to changes in political will and institutional memory.

3.3.4 The findings of the European Commission

In its annual reports, the European Commission consistently states that the digital transition in the country is a structural need, but is not showing the necessary pace of progress. The Commission assesses the country as **moderately prepared** in this area, pointing to a number of **challenges and recurring systemic limitations**. Although there are some improvements in the normative framework and digital infrastructure, implementation, especially in terms of the practical use of e-services and the management of digital resources, remains limited.

The Commission identifies **fundamental weaknesses in the sector in the limited use and quality of e-services, fragmented and outdated registries, and weak institutional capacity** for digital literacy. In addition, digital administration operates with poor interoperability and without effective coordination, which calls into question the foundations of digital transformation as a systemic process. **Cybersecurity**, although recognized as a priority, is underdeveloped, with **weaknesses in the capacities of investigative and security authorities** and the absence of functional incident management mechanisms.

Later assessments have noted some momentum – primarily through **the improvement of the National Portal for e-services**, increased institutional use of the interoperable platform and announcements for the establishment of a digital identity. However, **reforms often remain at the level of infrastructure upgrades, without a substantial systemic step forward**. The use of e-services remains low, data in registers is inconsistent, and some institutions still require parallel submission of documents in paper and digital form. The legal framework for cybersecurity is incomplete, and harmonisation with European directives is slow and fragmented.

Recent observations **confirm efforts for institutional restructuring, through the establishment of a dedicated ministry and the formalization of strategic documents**, such as the Reform Agenda. However, their implementation is hampered by political polarization, delayed adoption of key laws, lack of qualified personnel and ineffective coordination between competent bodies. Systems such as ACCMIS do not function as expected, and cooperation between institutions in the area of data protection and digital security remains limited. Although a new **cybersecurity strategy has been adopted**, *in practice there is a lack of human resources*, dysfunctional coordination during incidents and limited access to budgetary funds to deal with digital crime.

The general conclusion is that North Macedonia's **digital transition does not suffer from a lack of vision, but from limitations in institutional capacity, coordination, and political stability**. The European Commission has consistently called for a more substantive approach: from infrastructure to services, from regulations to implementation, and from declarative commitments to measurable and sustainable transformation.

3.3.5 Methodological mapping

To download the methodological mapping spreadsheet, use the following QR code:



3.4 HUMAN CAPITAL

3.4.1 Introduction

Educational skills are an essential element in building *competitive human capital*, which in its term is crucial for economic growth, social cohesion, and the successful approximation of North Macedonia to the European Union. In the Reform Agenda, in the area of human capital, the focus is on improving the connection between education and the labour market. The main goal is to encourage the development of market-oriented educational programs, based on competencies that respond to the real needs of the economy.

3.4.2 About the measures

The concept of **lifelong learning**, strengthening **digital and practical skills**, as well as the establishment of **regional vocational education centres** are part of the systemic approach to this transformation. However, the ambitious goals cannot be realized without an appropriate legal framework, institutional coordination and active involvement of the private sector and local communities. Therefore, the Reform Agenda sets *the improvement of educational skills* as a priority direction, in order to establish *a more flexible, inclusive, and market-oriented education system*. The main goal is to overcome the mismatch between the supply of skills and the needs of the labour market, through the modernization of curricula, strengthening practical teaching and improving the institutional infrastructure.

In this context, it is envisaged to adopt a new **Law on Vocational Education and Training**, which for the first time will systematically integrate career guidance, digital competences, verification of acquired qualifications and coordination with the economy. The legislative package should establish a basis for the reform of secondary education, for which a new **Law on Secondary Education** is also planned, as well as a new **Concept for Secondary Education** that will define national competence standards. All these processes aim to enable a complete revision of curricula in accordance with the European educational frameworks.

One of the strategic priorities is the establishment of **a network of seven Regional Vocational Education and Training Centres**, which will be distributed in all planning regions. These centres, which are expected to be functional by the end of 2027, will need to provide *modern practical training*, based on European models, through *cooperation with companies* and the use of new *technological equipment*. It is envisaged that these centres will strengthen the integration of theory and practice, but also to strengthen the connection of local communities with the educational process.

In parallel, the reforms envisage the development of a new **methodology for financing education**, based on established standards and transparent criteria. The aim is to overcome the existing *imbalance in the distribution of budgets between municipalities and schools*, as well as to ensure *a more efficient use of public funds*. The implementation of this new model should start first in secondary education, and then in primary education.

Finally, the reform also envisages activities to **promote inclusiveness, prevent discrimination, digitalize quality assurance agencies, and optimize the school network**. These interventions, although clearly defined, are mostly in preparation and require further specification, resources, and time dynamics for implementation. The success of the reform steps by 2027 will depend on continued political commitment, sustainable financing, and the administrative capacity to implement the reforms at all levels of the system.

3.4.3 Institutional challenges

Although reforms to improve educational skills are strategically set, their implementation on the ground faces significant institutional weaknesses. The **Ministry of Education and Science, the Bureau for Educational Development, and the Centre for Vocational Education and Training** are *insufficiently coordinated with each other* and burdened with administrative tasks, with each institution operating with *limited human and technical capacities*. A *functional mechanism for strategic planning, development of curricula linked to the real sector, and effective implementation of reforms* is lacking. Contact with teaching staff, schools, and the economy is fragmented, resulting in limited impact of reforms on the quality and **relevance of the education system**. The **Agency** for Quality Assurance in Higher Education is not fully institutionalized, with slow and non-digitalized accreditation processes and without a single evaluation system. This makes it difficult to monitor the quality and integrity of higher education.

The implementation of new financing models has been slowed down by weak analytical preparedness and lack of coordination between central and local governments. **Municipalities** have different capacities, leading to *inequalities in access and quality of education services*. In addition, monitoring and evaluation mechanisms are poorly developed, and reforms are mainly reduced to formal reports without a clear function for improvement. There is also a lack of *a stable platform for cooperation with the economy*, which limits the relevance of curricula and widens the gaps between education and employment.

Overcoming these challenges requires building a functional and connected system that will enable consistent implementation, monitoring, and adaptation of reforms to the real needs of students, teachers, and the labour market.

3.4.4 Findings from the European Commission

The European Commission has consistently recognized education reform in North Macedonia as one of the key pillars of long-term development. However, it points to **limited progress, weak institutional capacity, and slow implementation**. The observed shifts in individual segments have not yet resulted in a substantial improvement in quality, inclusiveness, and compliance with European standards.

The reports highlight that several key laws, including the **Law on Vocational Education and Training** and the **Law on Secondary Education**, have not yet been adopted or are in a too long procedure. This hinders the development of regional vocational education centres and limits the introduction of practical and dual education. However, *the expansion of dual education, with over 500 classes and over 8,000 students, is positively assessed*, as is the enhanced cooperation with chambers of commerce and local communities. **Education financing** has been identified as a key weakness – *public spending is below the European average, amounting to 3.17% of GDP in 2024, with a downward trend in the overall budget*. This negatively affects the availability and quality of educational services, especially in the pre-school and rural contexts. The Commission also points to **systemic challenges** in access – *only 46% of children aged 3–6 attend licensed preschools*, far below the European average. Demographic changes and emigration are contributing to a continuous decline in the number of students, especially in rural and small municipalities.

The results of international tests, such as **PISA**, remain worrying – *over 65% of students do not achieve basic literacy in reading, mathematics, and science*. The Commission calls for **the full implementation of the Bologna Process, improving digital literacy and modernizing accreditation and evaluation systems**. **Although North Macedonia's participation in Erasmus + and other European programs** is positively assessed, it points to the need for a systematic assessment of digital competences among young people.

In conclusion, the European Commission calls for *coordinated, long-term and funded policies that will transform the education framework* towards inclusiveness, results, and resilience of the system.

3.4.5 Methodological mapping

To download the methodological mapping spreadsheet, use the following QR code:



3.5 BUSINESS ENVIRONMENT

3.5.1 Introduction

A competitive and inclusive **business environment** is a *fundamental prerequisite for long-term economic growth, innovation, and increased employment*. For North Macedonia, reforms in this area are essential to strengthen the role of the private sector as a driver of productivity and to reduce dependence on state-led initiatives. Within the Reform Agenda, this area is structured through **a set of measures** aimed at: 1) **improving regulatory predictability, reducing administrative barriers**, 2) **professionalizing inspection services**, 3) **reforming public procurement** and 4) **encouraging innovation and investment**.

At the same time, the approach to improving the business climate is *integrated with reforms in other areas* such as the rule of law, public administration, and human capital, with the interconnectedness of institutions emerging as a key factor for success. The reform agenda recognizes the need to change the perception of economic entities towards institutions, by ensuring a transparent, efficient, and predictable regulatory environment, based on dialogue, data, and trust. At the same time, the development of the private sector is treated not only as an economic, but also as a democratic need. In this sense, the implementation of the measures represents one of the best tests of the political will and institutional maturity of the state.

3.5.2 About the measures

The reform vision for private sector development and improvement of the business environment in North Macedonia is based on **promoting competitiveness, supporting small and medium-sized enterprises, digital and green transformation**, as well as **building an efficient, transparent, and predictable institutional system**. The framework relies on a series of national strategies – from *the Industrial Strategy* and *the SME Strategy*, to *the Accelerated Economic Growth Plan* and *the Smart Specialization Strategy* – which jointly aim to create the preconditions for sustainable private sector-led growth.

The measures covered relate to several key domains. **First**, *the improvement of the regulatory framework* is envisaged through the simplification of administrative procedures, the digitalization of services and the standardization of inspection supervision. Special emphasis is placed on the functional integration of inspection services and the creation of an electronic coordination system, in order to reduce the burden on companies and increase predictability. **Second**, *the strengthening of the public procurement system* is treated as a priority with a clear dynamic of interventions: reducing the excessive use of electronic auctions, expanding the use of the e-market, and introducing the most economically advantageous tender (MEAT) criteria as the basis for awarding contracts. These measures should contribute to higher transparency, increased competition, and more efficient use of public funds.

In the area of **state aid** and **anti-corruption mechanisms**, the reforms include *the development of a transparent and predictable support regime*, which will enable equal access for economic operators. At the same time, it is proposed to *strengthen supervision and monitoring of the allocation of funds* and *cooperation with anti-corruption institutions*. In addition, it is envisaged to *strengthen mechanisms for access to finance*, with a special focus on the development of new instruments to support SMEs, such as guarantee schemes, funds for technological development and innovation, as well as facilitating access to funds through the banking and non-banking financial sector. These instruments should be linked to the **Smart Specialization Strategy**, which positions innovation as a horizontal priority of economic policy.

Finally, the measures also have a structural component that refers to **the formalization of the informal economy**, through *enhanced inspection activities, effective implementation of the Law on the Prohibition of Unregistered Activities, and encouraging access to formal services for micro and small businesses*. The reforms are designed not only to create better conditions for doing business, but also to encourage fair competition and reduce the shadow economy.

3.5.3 Institutional challenges

Despite the efforts, the institutional structure that is supposed to implement the reforms continues to face serious weaknesses that affect the speed, efficiency, and trust in the reform process.

The **Ministry of Economy**, as the competent institution, remains with *limited capacities for coordination, implementation and monitoring of key policies*, especially in the area of **parafiscal charges, inspection supervision and investment support**. Although it is assigned to lead the process of rationalization of parafiscal charges, its administrative and analytical resources are insufficient to lead systemic reform, resulting in slow and fragmented implementation of the measures.

The Law on Inspection Supervision, although adopted in 2019, is still inconsistently implemented, and the procedures are non-transparent. In general, **inspection services** face *a lack of coordination of competencies, a lack of qualified staff, and weak mutual coordination*. In addition, there is no operational information system for interoperability, which leads to overlaps or gaps in supervision, especially at the local level.

In the area of **public procurement**, although a strategic framework is in place and an electronic system is in place, *the quality of documentation, the limited capacity of procurement units and the low application of the most economically advantageous tender (MEAT) criteria* remain weaknesses. **Local authorities**, in particular, show *limited ability to manage the entire public procurement cycle*, and the number of tenders with only one bid indicates *low competition and a risk of unproductive spending of public funds*.

When it comes to **access to finance**, state support for SMEs through existing instruments (FITR, Development Bank) is implemented, but is *insufficiently structured and strategically disconnected from long-term policies for green transition and smart specialization*. The establishment of specific instruments for **female entrepreneurship** and internationalization is a positive step, but their sustainability depends on institutional coordination and medium-term financing. Finally, the formalization of the **informal economy**, despite the existing strategy, remains limited due to slow implementation, weak inspection control and unresolved legal and institutional obstacles. A large part of the activities is implemented without a stable system for measuring results, without clearly defined indicators or responsible monitoring units.

3.5.4 Findings from the European Commission

The European Commission assesses North Macedonia as **moderately prepared** in the area of industrial and entrepreneurial policy, with **limited progress**. Despite implemented anti-crisis measures, the country faces *long-standing structural weaknesses – an unclear regulatory framework, weak institutional coordination, a significant informal economy, and insufficient strategic focus of state support*.

state aid system remains opaque, with multiple bodies granting funds but *no central registry or impact assessment system*. The **Commission for Protection of Competition** has *limited powers* and coordination between institutions is weak. Regarding **parafiscal charges**, there has been progress in identification and standardization, but rationalization is slow. The **Law on Inspection Supervision** has not been consistently implemented, and inspection procedures remain opaque. **Electronic public services** are used only to a limited extent by the business community, while a new **Bankruptcy Law**

has not yet been adopted. The **informal economy**, which according to the IMF accounts for around 38% of GDP, remains a major challenge. Although a formalization strategy has been adopted, its implementation is slow, and monitoring and institutional coordination are weak. In terms of **investments**, a clear strategy for technological-industrial zones is lacking, as well as a system for evaluating the support provided. **Subsidies** are not sufficiently linked to productivity and innovation. Despite attempts to engage **SMEs** through chambers and clusters, legal uncertainty, administrative barriers, and limited access to finance continue to hamper reforms. There is a lack of a comprehensive strategy to promote innovation and foreign investment, which limits the transformation towards a higher value-added economy.

3.5.5 Methodological mapping

To download the methodological mapping spreadsheet, use the following QR code:



3.6 FUNDAMENTAL RIGHTS AND THE RULE OF LAW

3.6.1 Introduction

Key measures in **the Reform Agenda 2024–2027** include conducting free and fair elections, increasing the independence and efficiency of the judiciary, increasing capacities to fight corruption and organized crime, as well as increasing convictions and confiscations for organized crime.

The Reform Agenda, as a strategic document adopted by the Government under the auspices of the European Union, is a roadmap for the overall modernization of the political, judicial and economic system of the country. In the context of the **Growth Plan**, the area of “**Fundamental Rights and Rule of Law**” is the most significant, as it determines the receipt of almost **20%** of the planned **750 million euros**, which further increases its weight and importance in the integration process.

3.6.2 About the measures

In the domain of **electoral reforms**, measures that should result in an improved legal framework for ensuring free and fair elections include: 1) amending the Electoral Code and 2) aligning it with OSCE/ODIHR recommendations, with a focus on the transparency of the electoral process and strengthening oversight of political campaign financing.

Regarding **the reform of the judiciary**, through the implementation of several specific measures, such as filling the vacant positions for judges and prosecutors, legal amendments to their salaries, adoption of an Action Plan for the Prevention of Corruption in the Judiciary, introduction of mechanisms for monitoring the integrity of judicial officials, digitalization of the judiciary, and strengthening the functionality of the **AKMIS** system, it will contribute to improving the *independence*, *quality* and *integrity* of the judiciary. In this area, the Reform Agenda envisages **the adoption** of a new **Law on the Judicial Council** and a new **Law on Public Prosecution Service**, which will be aligned with European standards and the opinion of the Venice Commission. In addition, the working group for amending the Law on the Judicial Council has already been established and is actively working, although the adoption of the law by **June 2025** is assessed as unrealistic, with a more realistic scenario for its adoption in **September 2025**. On the other hand, the working group for the new Law on Public Prosecution Service is in its initial phase and there are no clearly defined deadlines for it. In the reform of the judiciary, a key aspect is **the financial independence of the judiciary**, which implies an increase in the budget to 0.8% of GDP for the judiciary and 0.4% for the prosecution. Currently, the budget for the judiciary amounts to approximately 0.3% of GDP, and for the prosecution around 0.2% of the state budget – which is far below the legal minimum. This funding gap not only undermines the financial independence of the institutions, but also limits their operational functionality and capacity to implement reforms. The Reform Agenda also provides for measures to improve the functioning of the **Judicial Council**, through *the adoption of a new law, the election of new members*, as well as *guarantees for a fair trial in disciplinary proceedings*. Considering that the mandate of the current members of the **Judicial Council** expires at the end of 2025, there is a real risk that the process of appointing new members will be subject to political influence, which could further undermine the perception of the independence of this body.

The fight against corruption, as well as **the fight against organized crime**, is based on measures to *equip the prosecution with qualified personnel, specialized prosecutors, financial and digital forensics experts*. In addition, *an increase in the number of investigations, indictments and convictions for corruption is envisaged, including in high-level cases, and amendments to the Criminal Code and the Criminal Procedure Code in accordance with EU law*. In the area of the fight against organized crime, in addition to the measure to *increase the number of investigations, indictments, convictions and confiscations for organized crime*, measures are also envisaged to *amend the Law on Weapons, establish a functional early warning system and increase the number of employees in the National Observatory for Drugs and a list of psychoactive substances harmonized with the EU*.

Considering the established deadlines, the end of 2025, it is clear that the Reform Agenda sets ambitious goals in the area of **Fundamental Rights and the Rule of Law**.

3.6.3 Institutional challenges

In implementing the reforms of the Reform Agenda 2024–2027, a key role will be played by the institutions of the **Judiciary**, the **Public Prosecution Service**, the **State Commission for the Prevention of Corruption**, the **Financial Police**, the **Asset Recovery Agency** and other competent institutions. Although some positive steps have been noted in all of the listed institutions, institutional weaknesses and limited resources remain a significant challenge.

The Judicial Council is the key institution that should protect the independence of the judiciary. In the past, the Judicial Council has been criticized for incomplete transparency in the processes of *appointment, evaluation and dismissal of judges*, as well as for *influences on its work*. Even the European Commission notes that disciplinary procedures are often delayed, and the decisions taken are not transparent and not always consistent. This undermines trust in the judiciary and reduces the effectiveness of accountability mechanisms. Therefore, the Reform Agenda provides for amendments to the legal framework in line with the recommendations of the Venice Commission to strengthen the integrity of the institution.

For the judiciary, there is also a lack of financial support for specific measures related to the development of human resources and its modernization, as well as the long duration of court proceedings and the dysfunctional AKMIS system. Therefore, in the implementation of the Reform Agenda, the measures are related to *the reorganization and optimization of the court network, the establishment of a single judicial statistics in accordance with EU standards, the improvement of the spatial conditions of the Academy for Judges and Public Prosecutors*, as well as *the improvement of the status of the judicial and prosecutorial service*. With regard to the judiciary, **the Academy for Judges and Public Prosecutors** has a crucial role in the process of selection and training of new judges and prosecutors, which represents the only entry point into the system. Therefore, it is more than clear that its capacity for professional development remains a key element for the long-term professionalization of the judicial staff.

The **Public Prosecution Service** and in particular the **Basic Public Prosecution Office for Prosecution of Organized Crime and Corruption (BPOPOCC)** play a central role in the fight against organized crime and corruption. In the past period, its institutional capacities have been strengthened by increasing the number of prosecutors, investigators, and financial experts. However, there is still a need for additional resources, especially in the area of *digital forensics* and *financial investigations*. In addition, it is noted that high-level corruption investigations continue to proceed at a slow pace, and the number of final convictions remains low. This indicates the need for enhanced coordination between the OBOC, courts and police structures, in order to improve efficiency and results in dealing with high-profile cases.

Within these reforms, the **State Commission for the Prevention of Corruption (SCPC)**, the **Office for Asset Recovery** and the **Financial Police Directorate** are also important. Although the SCPC has experienced an increase in both its competence and capacities, its investigative power is limited, making it dependent on cooperation with other institutions. When talking about the Office for Asset Recovery, the Reform Agenda indicates that its full operational functioning requires: *establishing an electronic database; improving international cooperation; increasing personnel and technical capacities*. Finally, as a key institution, the Reform Agenda envisages *an increase in the number of independent financial investigations* conducted by the Financial Police Directorate.

It turns out that the aforementioned institutions face a lack of resources, staffing capacities and technical support, which reduces their effectiveness in preventing corruption and fighting organized crime. To achieve real progress, the Reform Agenda identifies the need for *increased financial autonomy, better staffing, better inter-institutional cooperation* and *greater transparency* in the work of key bodies.

3.6.4 Findings from the European Commission reports

The previously identified institutional challenges in the implementation of reforms have been confirmed by **the European Commission** in three consecutive **progress reports (2022–2024)**, as well as in **the bilateral screening report for the first cluster**. These documents consistently point to *structural weaknesses in the rule of law, limited independence of the judiciary and stagnation in the fight against corruption*.

Key remarks from the European Commission in the progress reports and in the bilateral screening report for the first cluster speak of:

1. The need for revision of the **electoral legislation**;
2. A **Judiciary** free from political influences and pressures, whose functionality and efficiency have been improved in order to protect the rights of citizens;
3. Strengthening investigations, but also increasing the number of convictions in cases of **corruption** and **high-level corruption**;
4. Improved capacities of the **Asset Recovery Agency**.

In all areas, the European Commission recommends accelerated implementation of reforms, in order to ensure real and sustainable results within the Reform Agenda.

V. Judicial Reform Strategy 2024–2028

The reform agenda not only builds on the priorities set out in the Judicial Reform Strategy 2024–2028, but also provides for additional funding for certain more precisely defined measures, or identifies a source of funding. It undertakes the essential commitment to **strengthening the independence of the judiciary, increasing the efficiency of judicial institutions, fighting corruption** and **recovering illegally acquired assets**.

Both documents envisage **improving the financial independence of the judiciary, automated case management** through ACCMIS, as well as **strengthening investigative capacities**.

The focus is on the transparency and accountability of judicial institutions, especially through targeted interventions in the reform of the Judicial Council and the Public Prosecutor's Office, which indicates the systematic approach of the strategic documents.

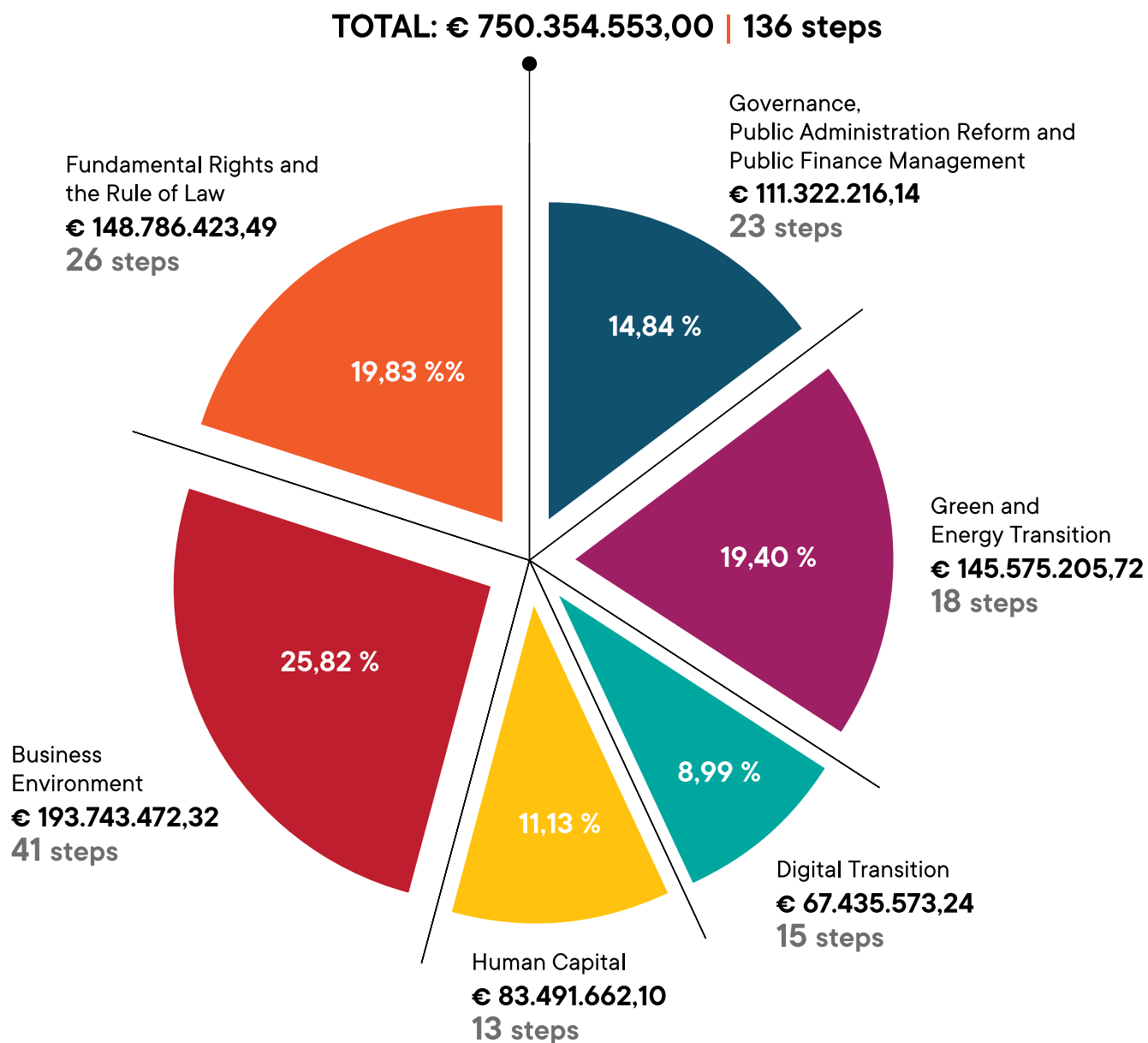
3.6.5 Methodological mapping

To download the methodological mapping spreadsheet, use the following QR code:



4

ATTACHMENTS



REFORM AGENDA – POLICY AREAS, SUB-AREAS, REFORMS AND STEPS

5 POLICY AREAS for the purposes of simpler monitoring and understanding, the project identifies 6 areas, dividing the area ENERGY AND DIGITAL TRANSFORMATION into GREEN AND ENERGY TRANSITION and DIGITAL TRANSITION);			
18 policy sub-areas		18 policy sub-areas	
37 reforms	37 reforms	37 reforms	37 reforms
136 reform steps	136 reform steps	136 reform steps	136 reform steps

GOVERNANCE, PUBLIC ADMINISTRATION REFORM AND PUBLIC FINANCE MANAGEMENT				
Public Finance Management			Public Administration Reform	
Public Internal Financial Control	Public Procurement System	Budget Law of 2022 - Public Investment Management	Reforms for reorganization	Reform of the Civil Service
4	3	6	5	5

GREEN AND ENERGY TRANSITION					
Market Reforms		Decarbonization	Renewable sources	Adoption of an Emissions Trading System (ETS)	Energy Efficiency
Electricity Integration Package - EU and North Macedonia Electricity Market Coupling - Daily Electricity Market	Market level of Electricity prices - Measures to address Energy Poverty	Climate and Energy Policies - National Energy and Climate Plan (NECP)	Renewable Energy sources	Establishing the ETS - Monitoring, Reporting and Verification (MRV) Package	Energy Efficiency and Energy Performance of Buildings
5	2	3	3	1	4

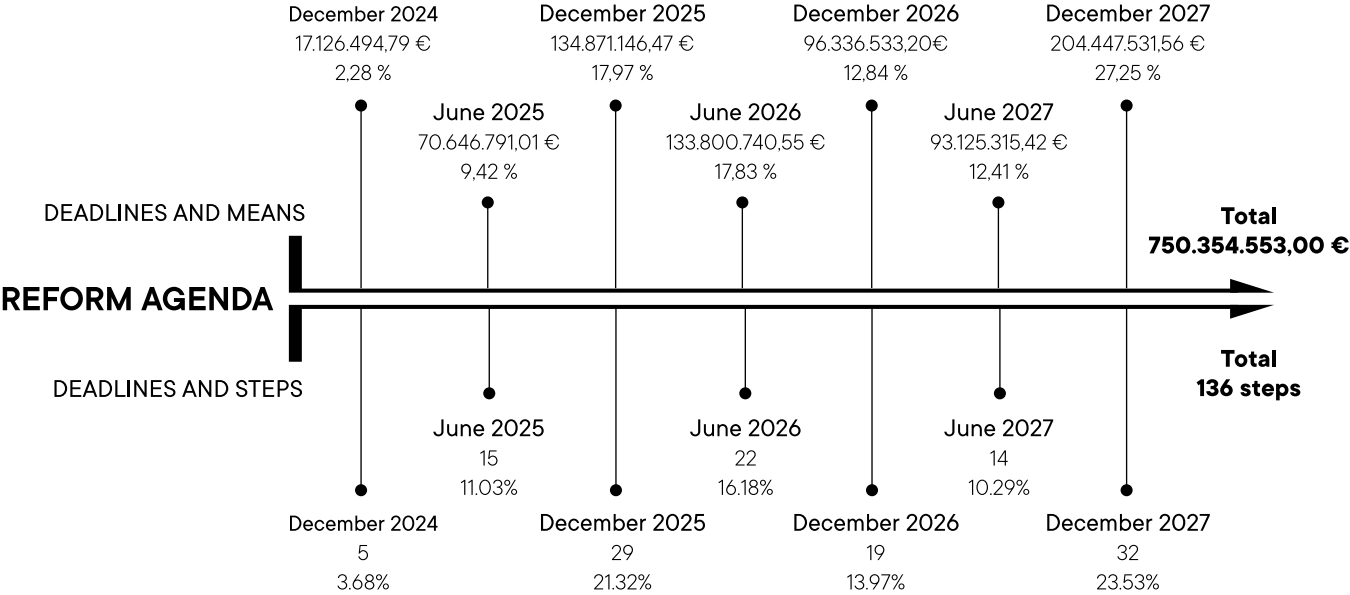
DIGITAL TRANSITION			
Cyber Security	Digitalization		
Cyber Resilience Framework	Secure Digital Infrastructures	Digital Public Services	Expanded offer of Public e-Services
4	3	6	2

HUMAN CAPITAL				
Education and Skills				
Access and quality of Vocational Education and Training (VET) – Work-based approach and dual education	Adult Education - Non-Formal Education and Learning	Quality of Secondary and Higher Education	Digital Transformation of Education	Network of Primary Schools - „Smart“ Primary Schools
5	2	2	2	2

BUSINESS ENVIRONMENT						
Business Environment						
Strategy for formalizing the Informal Economy	Transparent and efficient State Aid regime	SME Development	The Smart Specialization Strategy	Management of State-owned Enterprises – Railway and Postal Services	E-Customs for economic operators	Intelligent Transport Systems (ITS) – Digitalization of Freight Transport
7	7	6	2	11	3	5

FUNDAMENTAL RIGHTS AND RULE OF LAW									
Democ- racy	Independence, Qual- ity, and Integrity of the Judiciary		Consol- idation of the function- ing of the Judicial Council	Efficiency of the judiciary	Fight against corruption			Fight against organized crime	Property restitu- tion
Electoral legislation according to the rec- ommen- dations of the OSCE/ ODIHR and the Venice Commis- sion	Review of the proce- dures for recruit- ment, se- lection, ap- pointment, evaluation, promotion, trans- fer and dismissal of judges and public prosecu- tors	New Action Plan for Preventing Corruption in the Judiciary 2026-2029	Improved regulatory framework of the Judicial Council - Disci- plinary and appeal proce- dures of judges	Functional automated infor- mation systems for case manage- ment in the courts and the Public Prosecu- tor's Office	Basic Pub- lic Pros- ecutor's Office for Organized Crime and Corruption - Special- ized Pros- ecutors, Financial Experts and Digital Forensic Analysts	Investiga- tions, pros- ecutions, final con- victions, seizures, and final confisca- tions for corruption, including high-level corruption	Capacities of the In- vestigative centres within the Public Prosecu- tor's Office	A targeted approach in the fight against serious and organized crime	Capacities for confis- cation and recovery of assets
1	4	2	5	2	1	3	1	4	3

REFORM AGENDA – DEADLINES AND MEANS



REFORM AGENDA – INSTITUTIONS AND MEANS

Responsible institution		Means	Measures
Agency for the Management of Seized Property		4.281.623,70 € 0,57 %	1
Commission for the Protection of Competition		7.492.841,47 € 1,00 %	5
Customs Administration		29.971.365,88 € 3,99 %	4
Fund for Innovation and Technological Development		2.140.811,85 € 0,29 %	1
Judicial Council		9.633.653,32 € 1,28 %	2
Judicial Council - Council of Public Prosecutors		6.422.435,55 € 0,86 %	1
Ministry of Digital Transformation		67.435.573,24 € 8,99 %	15
Ministry of Economy and Labor		68.505.979,16 € 9,13 %	18
Ministry of Education and Science		92.054.909,50 € 12,27 %	14
Ministry of Energy, Mining and Mineral Resources		139.152.770,17 € 18,54 %	20
Ministry of Environment and Physical Planning		6.422.435,55 € 0,86 %	1
Ministry of Finance		70.646.791,01 € 9,42 %	16
Ministry of Finance - Public Procurement Bureau		23.548.930,34 € 3,14 %	3
Ministry of Finance; Ministry of Economy and Labor		17.126.494,79 € 2,28 %	2
Ministry of Interior		14.985.682,94 € 2,00 %	3
Ministry of Justice		74.928.414,71 € 9,99 %	13
Ministry of Public Administration		34.252.989,58 € 4,56 %	6
Ministry of Transport		42.816.236,98 € 5,71 %	9
Public Prosecutor's Office		38.534.613,28 € 5,14 %	6

