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GOVERNMENT MIRROR ANNUAL REPORT FROM MONITORING ENER 2025



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GOVERNMENT MIRROR: ANNUAL REPORT FROM MONITORING ENER 2025

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Macedonian Centre for International Cooperation (MCIC)
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FOR PUBLISHERS

Aleksandar Krzhalovski, Director of MCIC
Valentina Velichkovska, Executive Director of CRC

AUTHOR

Valentina Velichkovska
Data collection and processing support: Nikola Klekovski

CONTACT

MCIC - address: st. "Nikola Parapunov" no. 41 a; mail box 55, 1060 Skopje;
e-mail: mcms@mcms.mk; website: www.mcms.mk
Scribd: <http://www.scribd.com/people/documents/2996697>;
SlideShare http://www.slideshare.net/mcms_mk
Facebook: <http://www.facebook.com/mcms.mk>; Twitter: http://twitter.com/mcms_mk

CRC - address: st. "Nikola Parapunov" no. 41 a; mail box 55, 1060 Skopje;
e-mail: info@rcgo.mk; website: www.rcgo.mk

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INTRODUCTION

The active, timely and transparent involvement of citizens and civil society organisations in the processes of policy-making and preparation of legal regulations is one of the basic prerequisites for a functional democratic society based on transparency, accountability and responsible governance. Public participation allows stakeholders to influence the content of policies and regulations that affect them, and institutions to gain access to different perspectives, expertise, experiences and suggestions that can improve the quality of proposed solutions. In this way, consultations also contribute to strengthening trust between institutions and the public.

The legal and institutional framework in the Republic of North Macedonia provides for multiple opportunities for public involvement in the preparation of laws and policies. The basis for such participation stems from the Constitution of the Republic of North Macedonia, the Law on Referendum and Other Forms of Direct Expression, the Law on Government, the Law on Organisation and Work of State Administration Bodies, as well as other relevant regulations. Additionally, this issue is regulated through a series of by-laws and strategic documents, including the Rules of Procedure of the Government, the Code of Good Practices for Civil Society Participation in the Policy-Making Process, the Government Strategy for Cooperation with and Development of the Civil Society, the Methodology for Regulatory Impact Assessment and other acts.

Electronic consultations on draft laws are enabled through the Single National Electronic Register of Regulations - ENER. The Ministry of Public Administration is responsible for the development and maintenance of ENER, while each ministry is responsible for the timely publication of the contents within its competence, including draft laws and accompanying documents. Through ENER, each interested party has the opportunity to provide opinions, comments and suggestions on the published draft laws. According to the Rules of Procedure of the Government, ministries are obliged to publish draft laws on ENER even during the preparation phase, in order for them to be available for public consultations for at least 30 days. Although there are several legal and institutional opportunities for consultations, ENER in practice remains almost the only systematic tool for public insight into draft laws, which imposes the need for its continuous monitoring.

Since 2013, we have been regularly monitoring the practice of publishing draft laws on ENER. This report presents the results of monitoring the fulfillment of the minimum standards for public participation in the preparation of laws in 2025, i.e. the publication of draft laws of ENER and the observance of the prescribed deadline for public consultations. The report also indicates the good practices of the ministries in fulfilling the obligations for publishing draft laws and accompanying materials.

The aim of the report is to provide relevant information for civil society organisations, civil servants, institutions and the general public regarding the openness of state administration bodies in the policy-making process. Additionally, the report aims to contribute to improved representation and more active participation of civil society in the preparation of public policies, by monitoring and informing about the implementation of ENER as an existing mechanism for public consultations.

Building open, inclusive and trustworthy policy-making processes is a long-term process that requires continuous improvement of opportunities for meaningful public involvement. Timely and quality consultations contribute to better draft laws, their more effective implementation and greater trust in institutions.

1 Methodology and approach

The analysis monitored the practice of publishing draft laws on ENER, respecting the minimum consultation period for published draft laws, as well as publishing the necessary documents and the practice of commenting and providing feedback.

The sample includes draft laws published on ENER during 2025, as well as draft laws adopted at a Government session and submitted to the Parliament of the Republic of North Macedonia in 2025. The sample included only draft laws, while by-laws were not subject to monitoring, since the legal framework does not provide for an obligation to publish them for public consultation. The sample also includes laws proposed by members of parliament in the Parliament of the Republic of North Macedonia.

In the monitoring period from 1 January to 31 December 2025, a total of **53** notifications on the beginning of the law drafting process, **42** Regulatory Impact Assessment (RIA) draft reports and **44** draft laws were published on ENER. During the period, a total of 67 draft laws were adopted at Government sessions and submitted to the Parliament, while it was monitored how many of the draft laws, for which there is an obligation, were published previously on ENER, how many were passed with shortened procedure, and how many with regular procedure, as well as how many draft-laws were proposed with EU flag indication.

The analysis also covered to what extent the statuses actually correspond to the stage of the draft law, because the statuses of the draft laws on ENER aim to offer users information about the phase in which the preparation process of a certain draft law is. Thus, the status "Open" should indicate that the draft law is open for consultation by the public, while the status "Closed" should inform that the draft law has already been adopted at Government session.

In order to find out the date of passing a certain draft law by the Government, we monitored the Parliament website (www.sobranie.mk), where the proceedings of the sessions of the Government are published. The processed results are presented in tables expressed in absolute numbers and percentages, followed by an appropriate comment and derived conclusions and recommendations.

2 Regulatory Impact Assessment Process and Publishing Draft Regulations on ENER

According to the Rules of Procedure of the Government of the Republic of North Macedonia¹ and the Methodology for Regulatory Impact Assessment², ministries are obliged to conduct a regulatory impact assessment (RIA) for the law proposals, except for laws adopted under an urgent procedure, laws on ratification of international agreements, laws that carry out terminological harmonization with other laws, the draft Budget of the Republic of North Macedonia, the Law on the Execution of the Budget of the Republic of North Macedonia, the laws on borrowing of the Republic of North Macedonia and the laws on guarantees of the Republic of North Macedonia. Ministries are required to publish proposals for the adoption of laws, drafts and proposals of laws on ENER and they must be available for public comments 30 days from the date of publication. Any interested party may submit opinions, remarks and suggestions regarding the published proposals of laws to ENER. The competent ministry should provide an overview of the opinions received in the regulatory impact assessment report, stating the reasons why the comments and suggestions were not accepted, and publish it on its website and on ENER.

¹ Rules of Procedure of the Government of the Republic of North Macedonia, "Official Gazette of the Republic of North Macedonia" no. 276 /24)

² The Methodology for Regulatory Impact Assessment, Official Gazette of the Republic of Macedonia No. 118/2025

The Parliament has no legal obligation to publish for consultation the regulations proposed by the Members of Parliament. For this reason, they are not an integral part of the ENER. These draft regulations are published only on the website of the Parliament. These draft regulations are subject exclusively to the procedure for adopting laws in accordance with the Rules of Procedure of the Parliament. The Rules of Procedure of the Parliament do not provide for a consultative process for this type of draft regulations, but only an opinion from the Government. In addition, even if the Government does not submit an opinion, the draft regulation will be reviewed by the Parliament.

2.1 Practice of Publishing on ENER Draft-Laws Submitted to the Parliament

Although ministries are obliged to publish draft laws on ENER adopted under regular and abbreviated procedures, there is still a practice of not publishing draft laws on the ENER and not making them available for public consultation. According to data published on the website of the Parliament, in the period from 1 January to 31 December 2025, a total of **290** draft laws were submitted to the Parliament, of which **160** (55.17%) were proposed by members of the Parliament and are not subject to the obligation for their prior publication on ENER and the implementation of RIA. The remaining **130** submitted draft laws were proposed by the Government and the line ministries and **67** of them are subject to the obligation for the implementation of RIA, i.e. their prior publication on ENER. **63** draft-laws are not required to be placed on ENER because 39 are terminological harmonization with the Law on Amendments and Supplements to the Law on Organisation and Work of State Administration Bodies, 16 were draft laws for ratification of international agreements, three relate to the adoption or amendment of the Budget of the Republic of North Macedonia, two are laws on guarantees and three are draft laws on state borrowing. **Regarding the draft laws for which there is an obligation to be published on ENER for consultations (67), it was determined that for 37.31% (25 draft laws), the text of the draft law was previously published on ENER.** There is a slight improvement in the situation compared to the previous year, but it is still a regression compared to the period before 2024 (2024: 34.65% (35 draft laws); 2023: 51.4% (37 draft laws); 2022: 37% (24 draft laws); 2021: 41% (48 draft laws); 2019: 49.6%).

Table 1 provides an overview of how many of the laws submitted to the Parliament were previously published on ENER. **Ministry of Interior, Ministry of Public Administration, The Ministry of Education and Science and the Ministry of Local Self-Government are the four ministries that have no deviations regarding the publication of draft laws on ENER,** i.e. all draft laws submitted by these four ministries to the Parliament in 2025 have been previously published on ENER and the 30-day consultation period has been respected. The Ministry of Education and Science has fully complied with the obligation to publish draft laws on ENER for the third year in a row. The other ministries on ENER published a smaller number of laws submitted to the Parliament in 2025. The Ministry of Transport published only one draft law on ENER out of a total of 14 draft laws submitted to the Parliament in 2025. In April 2025 alone, this ministry submitted seven draft laws to the Parliament, all under a shortened procedure, and none of them were placed on ENER for public consultations. This list of draft laws includes the draft laws amending the Law on Construction; the Law on Public Roads; the Law on Working Hours of Mobile Workers in Road Traffic and Recording Devices in Road Traffic; the Law on Road Transport; the Law on Urban Planning; the Law on Public Cleanliness, etc.

Table 1. Draft laws proposed by the Government and ministries, submitted to the Parliament in 2025

Ministry	Draft laws submitted to the Parliament	Draft laws published on ENER	
		Number of draft laws	Percentage of the total number of draft laws
MD	0	0	/
MFAFT	1	0	0%
MAFWE	4	0	0 %
MT	14	1	7%

MF	4	0	0 %
MEPP	2	1	50 %
MJ	3	2	66.7 %
MES	2	2	100 %
MCT	3	1	33%
MH	1	0	0%
MI	5	5	100%
MPA	4	4	100 %
MDT	9	6	66.67%
MEMMR	4	2	50 %
MEL	3	0	0%
MSPDY	6	0	0%
MLSG	1	1	100%
MICR	1	0	0%
MEA	0	0	/
MS	0	0	/
Total	67	25	37.31 %

According to Article 170 of the Rules of Procedure of the Parliament of the Republic of North Macedonia, the harmonization of a law may be done using an abbreviated procedure. In general, the need to consider a law using an abbreviated procedure is used when complex and extensive laws or adaptations are not required, for the termination of the validity of a certain law or its parts, or when complex or extensive harmonization of the law with the law of the European Union is not in question. The conditions for proposing laws are the same, regardless of the procedure by which it is intended to be voted, i.e. the law may be proposed by 10,000 voters, any MP or the Government (Article 132).

Table 2 provides an overview of the number of laws adopted under the abbreviated procedure and how many of them were published on ENER. According to the Rules of Procedure, ministries are also obliged to RIA for laws adopted under the abbreviated procedure. In 2025, **15 (22.39%)** of the draft laws submitted by ministries to the Parliament were under the abbreviated procedure. Of these, **1 (6.67%)** was published on ENER. It can be seen from the table that the majority of ministries (11) did not submit a draft law to the Parliament under the abbreviated procedure at all. On the other hand, the largest number of draft laws submitted to the Parliament under the abbreviated procedure is with the Ministry of Transport (9) and none of them were placed on ENER for public consultations.

Table 2. Draft laws proposed by the Government and ministries to the Parliament under the abbreviated procedure in 2025

Ministry	Draft laws submitted to the Parliament	Draft laws under the abbreviated procedure		Draft laws under the abbreviated procedure published on ENER	
		Number of laws	Percentage of total number of laws	Number of laws	Percentage of laws under the abbreviated procedure
MD	0	0	/	0	/
MFAFT	1	0	0%	0	/
MAFWE	4	0	0%	0	/
MT	14	9	64.29%	0	0%
MF	4	1	25%	0	0%
MEPP	2	0	0%	0	/
MJ	3	0	0%	0	/
MES	2	0	0%	0	/
MCT	3	0	0%	0	0%
MH	1	0	0%	0	/
MI	5	0	/	0	/
MPA	4	1	25%	1	53%

MDT	9	1	11%	0	0%
MEMMR	4	1	25%	0	0%
MEL	3	0	0%	0	/
MSPDY	6	2	33.3%	0	0%
MLSG	1	0	0%	0	/
MICR	1	0	0%	0	/
MEA	0	0	/	0	/
MS	0	0	/	0	/
Total	67	15	22.39%	1	6.67%

Compared to previous years, there has been a significant decrease in the percentage of draft laws adopted under the abbreviated procedure, i.e. 56.4% (2024), 64.8% (2023), 61.5% (2022), 34% (2021) and 29% (2019). Regarding the publication on ENER of draft laws proposed under the abbreviated procedure, out of a total of 15 draft laws under the abbreviated procedure, only one draft law under the abbreviated procedure was previously placed on ENER for public consultations, i.e. 6.67%, which represents a deterioration compared to previous years 2024 (22.8%), 2023 (36.2%), 2022 (15%) and 2021 (12.5%).

Additionally, we reviewed the figures not only by ministries but also by months, noting that in the period April - July, ministries submitted about 60% of the draft laws to the Parliament. Additionally, in April, the largest percentage of draft laws were submitted to the Parliament under an abbreviated procedure (7 out of a total of 15).

In the report, we also monitor whether the draft laws submitted by the Government to the Parliament are marked with the EU flag, i.e. the draft law harmonises our legislation with the legislation of the European Union. These draft laws should have (*) in the title at the end, which signals that the draft law is marked with the EU flag. Total **18 draft laws** out of 67 draft laws submitted to the Parliament by the Government and ministries in 2025 **were submitted with the EU flag**, with only two of them being submitted under the abbreviated procedure. Furthermore, of these 18 draft laws with the EU flag, 13 (72.22%) draft laws were previously placed on ENER for public consultations. Compared to the data from 2024, we have an improvement, i.e. out of a total of 16 draft laws with the EU flag, 11 (68.75%) draft laws were previously placed on ENER for public consultations.

This analysis also covered the manner of adopting laws proposed by Members of Parliament and/or authorized proposers of laws. According to the data, **a total of 160 laws (55% of all draft laws submitted to the Parliament) were proposed by Members of Parliament and this represents a continuous increase in the number of draft laws proposed by Members of Parliament (105 in 2024; 78 in 2023; and 86 in 2022)**. Of these 160 draft laws proposed by Members of Parliament, 134 (83.75%) were proposed in a shortened procedure. No consultative process was conducted for these proposed laws because the Rules of Procedure of the Parliament itself do not provide for this as an obligation. As an important institutional novelty, the establishment of the Department for Regulatory Impact Assessment and Evaluation of Regulatory Implementation in the Parliament Service as part of the Legislative and Legal Sector should be highlighted³. This is a positive step towards strengthening the capacity of the Parliament to analyse the impacts of legislative decisions and monitor their implementation. However, given the high number of draft laws submitted by MPs, especially under the abbreviated procedure, it is necessary to further link this institutional set-up with more systematic mechanisms for public consultations and impact assessment of laws proposed in the Parliament.

³ Source: <https://www.sobranie.mk/zakonodavno-praven-sektor.nspix>

2.2 Respecting and Deviations from the Minimum Consultation Period

According to the Government's Rules of Procedure and the Regulatory Impact Assessment Methodology, ENER consultations can take place in two phases:

- o Consultation phase from the date of publication of the notification for the start of the process and preparation of the draft law (minimum 5 days);
- o Consultation phase from the date of publication of the draft RIA report and the draft law (minimum 30 days)⁴.

With the amendments to the ENER, the minimum deadlines for these two phases have been automated. By automating the observance of the minimum period of five days from the publication of the notification to the publication of the draft law, one of the key weaknesses of the previous system is avoided. This provides the user with the opportunity to formally engage in the process of preparing draft laws at the RIA phase.

Additionally, the introduced automated counting of the consultation period facilitates visibility as users know how many days the draft law is open for commenting. When uploading a draft law to ENER, the automated counting has a minimum predefined value of 30 days.

According to data from the Parliament's website, out of a total of 25 draft laws determined at a Government session, previously published on ENER, and submitted to the Parliament for consideration in 2025, in all 25 cases the minimum deadline of 30 days for ENER consultations was respected, counted from the day of publication of the draft law until the day of its passing at a Government session.

2.3 Overview of Published Draft Laws on ENER

The latest changes in the design and layout of ENER made during 2025 have overcome a potential shortcoming of ENER that was identified in the previous two reports, which concerns the inability to automatically signal when a draft law is placed on ENER for consultations. Consequently, with the latest changes in the design of ENER, not only notifications but also draft laws placed on ENER automatically appear in the section 10 latest proposed regulations, i.e. citizens' access to the latest draft laws placed on ENER for public consultations is facilitated. However, a potential problem that remains unresolved is the fact that a ministry can place another version of a draft law for consultations in an already open draft law folder, but the second version will not automatically be listed in the section 10 latest proposed regulations.

Table 3. Published draft laws on ENER for consultations during 2025.

Ministry	Number of draft laws published on ENER
Ministry of Defense	0
Ministry of Foreign Affairs and Foreign Trade	0
Ministry of Agriculture, Forestry and Water Management	3
Ministry of Transport	0
Ministry of Finance	0
Ministry of Environment and Physical Planning	4
Ministry of Justice	13
Ministry of Education and Science	4
Ministry of Culture and Tourism	3
Ministry of Health	0

⁴ The amendment to the Rules of Procedure of the Government of the Republic of North Macedonia of 31.12.2024 increased the minimum consultation time from 20 to 30 days.

Ministry of Interior	5
Ministry of Public Administration	1
Ministry of Digital Transformation	5
Ministry of Energy, Mining and Mineral Resources	3
Ministry of Economy and Labor	2
Ministry of Social Policy, Demography and Youth	0
Ministry of Local Self-Government	1
Ministry of Inter-Community Relations	0
Ministry of European Affairs	0
Ministry of Sports	0
TOTAL	44

In 2025, a total of 44 draft laws were published on ENER, with the largest number of draft laws being published on ENER by Ministry of Justice (13) Ministry of Digital Transformation (5) and Ministry of Interior (5). The remaining ministries have less than five draft laws published on ENER in 2025. For comparison, in 2024 there were 40, in 2023 there were 59 and in 2022 39 draft laws published on ENER. In recent years, there has been a tendency to place a notification on ENER in one year and after a certain period of time, even after several years, to place the draft law, i.e. an increasingly long time gap is observed from the date of publication of the notification to the date of publication of the draft law on ENER. In 2025, such examples are the Draft Law on Amendments to the **Law on Associations and Foundations** (the notification was published in April 2022 and the draft law was placed on ENER in December 2025); Draft Law on Judicial Service (Notification placed in October 2022, and the draft law was published in March 2025) and Draft Law on Amendments to the Law on Prevention of Corruption and Conflict of Interest (Notification published in April 2021, and the draft law was published in February 2025).

According to the statuses in which they were published, all draft laws were published with the status "Open" and were available for public consultations. After the expiration of the 30-day period for public consultations, this status should be changed from open to closed. As of 20.04.2026, out of a total of 44 draft laws placed on the ENER in 2025, the status from open to closed has been changed for 12 draft laws (27.27%). The Ministry of Environment and Physical Planning and the Ministry of Local Self-Government are the only two ministries that have changed the status from open to closed for all draft laws they placed on the ENER in 2025 (MEPP - 4 draft laws and MLSG - 1 draft law). In 2024, the status from open to closed was changed for nine draft laws, and all nine draft laws were proposed by the Ministry of Environment and Physical Planning.

According to the Regulatory Impact Assessment (RIA) Methodology, stakeholders should have the opportunity to be involved in the consultation process for implementing RIA, which is ensured by publishing the notification of the start of the process of preparing draft laws at least five days before the publication of the text of the draft law. In 2025, a total of 53 notifications for the start of the process of preparing draft laws were placed on ENER. For comparison, 48 notifications were published in 2024 and 59 notifications for the start of the process of preparing draft laws were published in 2023.

In 2025, a total of **42** draft Regulatory Impact Assessment (RIA) reports were published on ENER. After reviewing the draft RIA reports, it was determined that in the Consultations section, civil society organisations were listed as stakeholders in **20** draft RIA reports and it was planned that they would be included in the consultation process during the preparation of the relevant draft laws through public consultations, working groups and/or requests for written comments. Compared to 2024, there is an improvement considering that in 2024, out of a total of 40 draft RIA reports published on ENER, civil society organisations were listed as stakeholders for consultation in 9 draft RIA reports, while in 2023, out of a total of 58 draft RIA reports published on ENER, civil society organisations were listed as stakeholders for consultation in 17 draft RIA reports.

Draft RIA reports contain a section to identify the possible positive and negative impacts of the proposed legislation. Depending on the area, the impacts of the regulation can generally be economic, social or

environmental, as well as other types of impacts depending on the nature of the issue being analyzed. The social impact section should include an assessment of the impacts on existing disparities, which includes **an analysis of the impacts on gender equality**. Out of a total of 42 draft RIA reports published on ENER in 2025, seven draft RIA reports included information that the draft law will or will not have an impact on gender equality. For example, the RIA report on the draft law on agriculture and rural development states that the draft law will have a positive impact on strengthening women's participation and family farming, as well as by supporting family farms and equal access to resources, strengthening the roles of women and vulnerable groups. In comparison, in 2023, only one draft RIA report included a comment on the analysis of the impacts of the draft law on gender equality.

2.4 Practice of Publishing Related Required Documents

The analysis also monitored the publication of documents related to the implementation of a regulatory impact assessment for each draft law published on ENER. According to the Methodology, ministries, when planning and drafting laws, publish on their websites and on ENER the relevant documents related to the specific draft law: Notification of the start of preparation of a draft law, draft RIA report, draft law, proposal to law.

In 2025, out of a total of 44 draft laws placed on the ENER, notifications for the start of the preparation of a draft law as well as a draft RIA report were published for all of them.

However, in addition to publishing the three basic documents, the ministries rarely published other documents, such as the final text of the proposal to law and the proposal to the RIA report, adopted at a Government session.

Good examples are: the Ministry of Local Self-Government, which has published on ENER a proposal to RIA report, a proposal to law, as well as a list of received and incorporated opinions and comments regarding the draft amendments to the Law on Local Self-Government; the Ministry of Digital Transformation has published on ENER a proposal to law, a proposal to RIA report, as well as the final text of the adopted laws for three draft laws, and the Ministry of Agriculture, Forestry and Water Management has published a call for public insight and an invitation to public hearings for two draft laws.

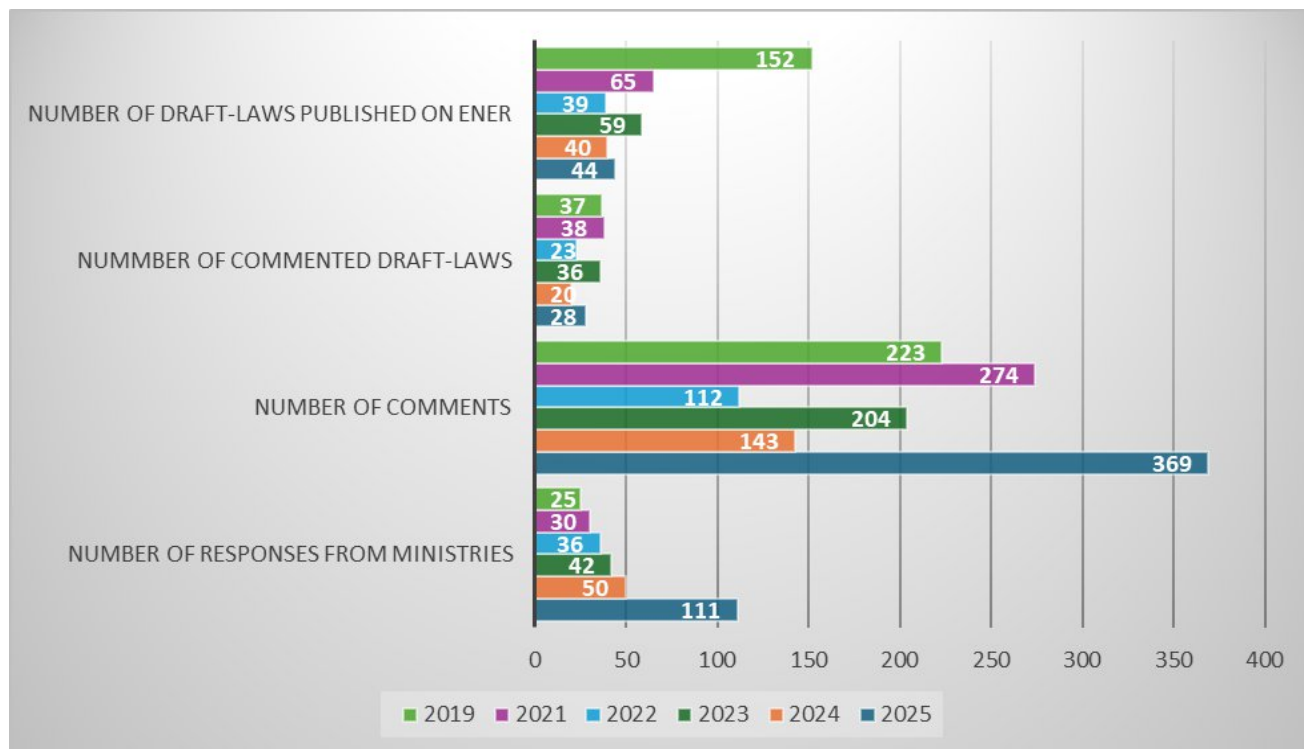
2.5. Practice of Commenting on ENER

In order to analyse how much the public uses the given opportunity to influence laws during their preparation phase, the practice of commenting on draft laws published on ENER was monitored. The practice of the ministries in providing feedback on the remarks and comments raised was also monitored.

Out of a total of **44 draft laws published on ENER in 2025, 28 draft laws were commented on, for which a total of 369 comments were left**. The largest number of comments were given for the following draft laws: Draft Law on Mining (*) (104); Draft Law on Employment and Professional Rehabilitation of Persons with Disabilities (57); Law on Amendments to the Law on Road Traffic Safety (44). To these 369 comments, the ministries have published **111** responses for 6 draft laws, most of which are only information that the comments will be considered. The following four ministries are the only ones that have posted any feedback on the comments given on ENER by the public: MEMMR; MAFWM; MLSG and MDT. As a positive example, the Ministry of Agriculture, Forestry and Water Management should be highlighted, which has provided more detailed responses to the 15 comments received on ENER for the Draft Law on Agriculture and Rural Development.

Compared to previous years, there has been an increase in the number of comments on ENER, i.e. 37 draft laws were commented on in 2019, 38 draft laws in 2021, 23 draft laws in 2022, 36 draft laws in 2023, and 20 draft laws were commented on in 2024.

Chart 1. Commenting on ENER by year



3. Conclusions and Recommendations

The conclusions arise from monitoring: compliance with the obligation to publish draft laws of the ENER, the minimum consultation period, updating the ENER and publishing the necessary documents, as well as the practice of posting comments and providing feedback by the ministries. In addition, the conclusions are based on the involvement in the consultative process and the legislature as the creator of legal solutions.

3.1. Conclusions

The analysis of the practice of publishing draft laws on ENER in 2025 shows that, despite the existence of a clear legal and institutional framework for public involvement in the law-making processes, its implementation remains incomplete and uneven across ministries. The main challenge in 2025 is not the respect of the minimum consultation period for already published draft laws, but the fact that a significant number of the draft laws for which there is an obligation were not published on ENER at all before their submission to the Parliament.

1. **The ministries published on ENER 37.31% of the draft laws submitted to the Parliament in 2025.** Out of a total of 67 draft laws proposed by the Government and ministries, for which there is an obligation to conduct a RIA and prior publication on ENER, 25 draft laws (**37.31%**) were published on ENER before their submission to the Parliament. Although this represents a slight improvement

compared to 2024, the situation is still less favorable compared to previous years (34.65% in 2024, 51.4% in 2023, 37% in 2022, 41% in 2021 and 49.6% in 2019).

2. **Low percentage of ENER publication of draft laws proposed under the abbreviated procedure.** In 2025, out of a total of 15 draft laws proposed by ministries under the abbreviated procedure, only one (6.67%) was previously published on ENER. Although the total number of draft laws proposed under the abbreviated procedure has decreased compared to previous years, their almost complete non-publication on ENER limits the space for public consultations and participation of stakeholders.
3. **The minimum period for commenting of 30 days is respected by the ministries.** Out of a total of 25 draft laws adopted at a Government session submitted to the Parliament in 2025, and previously published on ENER, the minimum period of 30 days for consultations on ENER was respected in all cases.
4. **A positive trend has been observed in the draft laws with the EU flag indication.** In 2025, out of a total of 18 such draft laws, 13 (72.22%) were previously published on ENER, which is an improvement compared to 2024.
5. **Ministries publish only the minimum required related documents for consultations.** The publication of additional documents, such as final texts of laws, proposals to RIA reports and overviews of comments received and accepted, is still a rare practice. Positive examples include the Ministry of Local Self-Government, the Ministry of Digital Transformation and the Ministry of Agriculture, Forestry and Water Management, which have published additional documents or information related to the consultation process.
6. **Increased public interest in commenting on ENER.** In terms of the use of ENER by the public, an increase in the number of comments was observed in 2025. Out of a total of 44 published draft laws, 28 were commented on, with a total of 369 comments. This indicates an increased interest and willingness of the public to engage in the consultative processes.
7. **Ministries rarely respond to ENER comments.** Out of 369 comments, 111 responses were published, covering six draft laws, with most responses being general and limited to information that the comments would be considered. This practice limits public confidence in the effectiveness of the consultations.
8. **Improvement in the recognition of civil society organisations as stakeholders.** In 2025, civil society organisations were listed as stakeholders in 20 out of 42 draft RIA reports, which is a significant improvement compared to 2024. There has also been improvement in the inclusion of information on the impact of draft laws on gender equality, although this practice is still limited and not systematic.
9. **The Parliament of the Republic of North Macedonia does not conduct a consultative process for draft laws proposed by members of parliament and authorised proposers of laws.** In 2025, a total of 290 draft laws were submitted to the Parliament, of which 160, or 55.17%, were proposed by members of parliament and are not subject to the obligation to be previously published on ENER and conduct a regulatory impact assessment. This data indicates a significant presence of laws proposed by members of parliament, for which a mandatory public consultation process is not foreseen. In addition, 134 of these draft laws, or 83.75%, were proposed under an abbreviated procedure, which further limits the space for public debate and substantive participation of stakeholders.

3.2. Recommendations

1. **Ministries should consistently respect the obligation to publish draft laws on ENER.** Ministries should adhere to the Government's Rules of Procedure and publish on ENER all draft laws for which there is an obligation, regardless of whether they will be reviewed in the Parliament under a regular or abbreviated procedure. ENER consultations should be treated as a mandatory and indispensable part of the process of preparing laws, with the aim of timely involvement of the public and increasing the transparency and quality of legal solutions.

2. **The Government should establish a stronger control mechanism for publishing draft laws on the ENER.** Control should be increased whether a particular draft law has been published for consultations on the ENER and it cannot be adopted at a Government session if it has not been previously published on the ENER. Additionally, this practice would increase the transparency of the law-making processes and would provide space for increased public participation and their involvement in the early stages of the preparation of draft laws. The ENER should be accepted as a mandatory obligation when the Government proposes a draft law to the Parliament.
3. **Ministries should regularly administer the ENER.** The obligation for regular administration of the ENER by authorized persons should be raised to a higher level and the statuses of draft laws should be regularly updated, so that the public knows at any time whether the published regulations are actually open for consultations or whether the consultation period has been closed and the regulation has entered the parliamentary procedure.
4. **The practice of regular publication of the necessary documents should be continued and upgraded, as well as the publication of other supporting documents.** Although the basic documents are published regularly, the ministries should also publish the additional documents of the ENER after a session of the Government. This will allow for greater transparency and traceability of the public's influence on the final legal solutions. Additionally, within the framework of the future improvement of the RIA, the Government should consider the possibility of including an anti-corruption review of draft laws, in order to timely identify possible corruption risks even in the phase of preparation of legal solutions.
5. **To strengthen the substantive involvement of civil society organisations and other stakeholders.** Ministries should systematically identify civil society organisations, professionals, chambers, trade unions, academia and other relevant stakeholders in draft RIA reports. Their inclusion as stakeholders should be accompanied by a specific plan for their involvement through public hearings, working groups, written consultations or other appropriate forms.
6. **Improve the quality of impact assessments in RIA.** Ministries should more systematically analyse the economic, social, gender, environmental and other relevant impacts of proposed laws. It is particularly important that impact assessments on gender equality and vulnerable groups become a regular and essential practice, rather than the exception.
7. **Ministries should regularly provide feedback on comments submitted to ENER.** Ministries should respond to comments submitted much more promptly, in order to increase public confidence in the ENER consultation process and to send a clear message that the institutions take public comments seriously. Also, in their responses, ministries should provide an explanation of whether and why certain proposals have been adopted or not. This is crucial for strengthening public confidence in the consultation process.
8. **It is necessary to provide for an obligation for a consultative process for draft laws proposed by members of parliament and authorized proposers in the Rules of Procedure of the Parliament of the Republic of North Macedonia.** In this regard, the role of the newly established Department for Regulatory Impact Assessment and Evaluation of Regulatory Implementation in the Office of the Parliament should be utilized and strengthened. This will also enable the legislative branch to be more fully covered by public consultation mechanisms and will reduce the risk of significant legal decisions being adopted without public consultation.
9. **To promote the good practices of ministries.** The positive examples of ministries that regularly publish documents, provide additional information and provide better quality feedback should be used as a model for other institutions. The exchange of good practices can contribute to a more equal and better quality implementation of public consultation obligations.
10. **To continue improving and promoting ENER as the main tool for electronic consultations.** Continuous technical and content improvement of ENER is needed, as well as its more active promotion to civil society organisations, the professional public and citizens. The increased number of comments in 2025 shows that there is interest in using the platform, but trust in it will only be strengthened if institutions regularly publish documents and provide substantive feedback.