

MANAGING

Deadlines and Strategic Continuity:

An Overview of the Process of Adopting the
New National Strategy for Prevention of
Corruption and Conflict of Interest (2026-2030)



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1. Introduction

Corruption in the Republic of North Macedonia remains the most serious societal challenge, directly undermining economic development, the rule of law and the functioning of institutions. The data in the Corruption Assessment Report on North Macedonia for 2025¹ clearly shows that the anti-corruption fight to date has yielded moderate and unsatisfactory effects. This report notes an alarming trend according to which corruption pressure on citizens has increased rapidly, whereas the judicial system efficiency in processing such cases is at a critically low level. The same data indicate that the public perception of the prevalence of corruption among politicians, judges and public servants is breaking negative records, creating a deep feeling among citizens that corruption has become unpunished, and institutional reforms have remained only at the level of declarative political rhetoric.

In such a destructive environment, strategic planning is not a luxury, but an urgent mechanism for the survival of the entire institutional system. National strategies are the primary societal instrument that should establish strong inter-institutional coordination in preventing this phenomenon. The main pillar in this process is the State Commission for the Prevention of Corruption (SCPC), which derives its direct jurisdiction and legal mandate from Article 18 of the Law on the Prevention of Corruption and Conflict of Interest². This legal provision clearly defines that the SCPC has an exclusive authority to prepare the five-year National Strategy and the corresponding action plans. The law also obliges the SCPC to lead this process through broad and inclusive consultations with state authorities, local self-government, civil society and the media, after which it is obliged to submit the final document to the Assembly of the Republic of North Macedonia for adoption. In this way, the Assembly assumes the role of the final filter that, by adopting the strategy, should provide it with full state and political legitimacy.

However, the actual practice on the ground shows a serious institutional discontinuity. The new National Strategy for Prevention of Corruption and Conflict of Interest for the period 2026–2030 is currently facing a systemic delay of exactly six months. According to the initial framework, the document had to be finalized and adopted by the end of December 2025 at the latest, so that its implementation could begin immediately in January 2026, thereby ensuring continuity between the previous and the new Strategy. After a long and complex harmonization process, the SCPC finally adopted the Strategy at its session held on June 19, 2026. However, at the time of preparing this policy brief, the process is again in an unclear and detrimental standstill, as the Assembly has not yet submitted this Strategy for consideration to the competent parliamentary body, that is, before the Committee on Political System and Inter-Community Relations, meaning that the institutions have been operating in a kind of strategic vacuum for half a year.

This violation of legal deadlines is not an isolated incident, but a chronic repetition of poor inter-institutional practices. The previous National Strategy was also adopted with

1 Corruption Assessment Report on North Macedonia, 2025, available at: https://mcms.mk/images/docs/2025/mcms_nacionalen_izvestaj_2025.pdf

2 Law on Prevention of Corruption and Conflict of Interest, Official Gazette No. 12/2019, available at: <https://shorturl.at/bUoN0>



a full year of delay, thus instead of covering the envisaged framework of 2020–2024, due to parliamentary obstacles and administrative inertia it was transformed for the period of 2021–2025. The success and effects of that previous strategy are the best indicator of the devastating consequences of such delays. According to the Final Report on its implementation, adopted by the SCPC in March 2026, the final implementation outcome of the planned activities is dismal, showing that only 37% of the planned activities were fully implemented over the five years. The majority of key measures in critical sectors remained unimplemented or stuck in a status of permanent implementation. This suggests that the very poor delivery of the institutions in charge of implementing the measures and the total absence of political will on the part of legislature to oversee and exert pressure on the process directly affect these poor results.

The purpose of this policy brief is to provide factual mapping of the process of preparing the new National Strategy 2026-2030, to document the chronological development in detail and to identify the systemic bottlenecks in these six months of delay. By this fact-based analysis, the brief wants to send a clear appeal to the Assembly to urgently initiate the parliamentary procedure for the document and to offer specific recommendations to prevent future key strategic anti-corruption policies from being held hostage to institutional silence.

2. Analysis Of The Process Of Preparation And Development Of The National Strategy For Prevention Of Corruption And Conflict Of Interest (2026-2030)

The process of developing the National Strategy was characterized by a complex methodological setup and a series of consultative steps, the time dynamics of which indirectly indicate the institutional challenges in managing deadlines.

The official start was marked on February 28, 2025, when the initial workshop was held, with a focus on evaluating the previous cycle (2021-2025) and defining a concrete roadmap for the new strategy³. The main discussions focused on the need to revise the performance indicators, as previous practice has shown that institutions often submit formal, but substantively empty implementation reports. The meeting emphasized that the new strategy must be based on a realistic assessment of vulnerabilities and that the deadlines for coordination with the ministries should be strictly defined in order to avoid an interim period without a strategic document. The workshop was attended by representatives of state bodies and institutions involved in the implementation of the National Strategy, representatives of international organizations in the country, as well as civil society sector and the private sector.

To enable this scientific approach, in May 2025, the SCPC formally adopted the Methodology for Corruption Risks Assessment⁴. This specific legal and technical document was crucial as it aims to establish the qualitative and quantitative criteria according to which the likelihood and impact of corruption will be measured.

³ Public announcement by the SCPC, available at: <https://shorturl.at/Sfx5G>

⁴ Methodology for Corruption Risk Assessment for the needs of developing the National Strategy for Prevention of Corruption and Conflict of Interest, May 2025, available at: <https://shorturl.at/XsbnN>

By organizing national focus groups, intensive fieldwork began already in June 2025. Four focus groups were conducted to assess corruption risks in the Republic of North Macedonia, and they were held on June 4 and 5, 2025, and attended by representatives of central government institutions, independent bodies, PEs and JSCs, along with representatives of the business community and the civil society sector⁵. All workshop participants were provided with a structured set of focus group questions, which were to serve as a tool for prior consultation and coordination within the organizations, having the purpose of ensuring active and quality participation in the process of developing the new Strategy.

The process continued in September 2025 by a targeted working meeting between the SCPC and the Platform of Civil Society Organizations for Fight Against Corruption⁶. At this meeting, the civil society sector provided substantive input not by adding new measures, but by delivering specific proposals for strategic optimization of the document. The Platform insisted that the future strategy be concise, significantly shorter and free from unnecessary administrative burden, in order to ensure its real and measurable implementation on the ground and to prevent the recurrence of past inefficiencies.

The fall of 2025 brought a key institutional consolidation. In October 2025, the SCPC adopted the second methodology in this process — the Methodology for development of the National Strategy⁷, which set out the structure, the manner of defining strategic goals and the mechanisms for future monitoring of action plans. In parallel with this, in the same month, using the findings from the June focus groups, the SCPC finalized the official Corruption Risk Assessment⁸, which served as a factual basis for defining the sectoral priorities. Already at this point, the first delays in the process were evident, as instead of defining measures and activities in late October, the SCPC was still in the stage of consolidating the basic documents for designing the future Strategy.

The deviation from the initially planned dynamics became visible in November and December 2025, when thematic workshops were organized to write specific anti-corruption measures and activities by areas and sectors, as well as institutions in charge of their implementation. In the course of these two months, the SCPC organized a total of 14 thematic workshops, meaning two workshops for each area, that is, sector. Within the horizontal areas, workshops on oversight of law enforcement were held on 19.11.2025 and 18.12.2025, whereas workshops dedicated to public procurement were held on 24.11.2025 and 02.12.2025. In parallel with them, sectoral workshops were also organized. Thus, for urbanism and spatial planning they were held on 28.11.2025 and 22.12.2025, for transport and infrastructure facilities on 06.11. 2025 and 24.12.2025, for justice on 14.11.2025 and 28.11.2025, for health on 01.12.2025 and 12.12.2025, and for environment, energy and natural resources on 11.12. 2025 and 27.11.2025. The SCPC invited the representatives of state

5 Public announcement published by the SCPC, available at: <https://shorturl.at/rT6Qk>

6 Public announcement published by the SCPC, available at: <https://shorturl.at/OKAX2>

7 Methodology for development of the National Strategy for Prevention of Corruption and Conflict of Interest in the Republic of North Macedonia 2026-2030, available at: https://dksk.mk/wp-content/uploads/2025/11/10-1551-266_ocred.pdf

8 Corruption Risk Assessment for the needs of developing the National Strategy for Prevention of Corruption and Conflict of Interest 2026-2030, available: https://dksk.mk/wp-content/uploads/2025/11/10-1551-265_ocred.pdf

bodies, institutions, civil society organizations and the private sector to attend these workshops. Hence, it can be quite justifiably concluded that a serious attempt has been made to ensure the participation of a wide and diverse circle of stakeholders, in order for them to contribute to this process. In other words, it can be assessed that the SCPC is establishing a new and positive practice of inclusive development of strategic documents, thus making a significant step forward compared to previous processes, which did not apply such an approach.

The fact that the alignment of the text with the various ministries and institutions was still ongoing throughout December suggests that the institutional timeline had not been planned proactively enough, given that that month was the deadline when the Assembly should have already adopted the document.

The largest administrative vacuum occurred in the first half of 2026. After almost three months of silence, on April 9, 2026, the SCPC sent an email to all stakeholders involved in the development of the Strategy, requesting an opinion on the Strategy with a deadline for their submission no later than April 24. The aim of this interim stage was for all institutions and other stakeholders that are designated to be in charge of an activity or involved entities in a certain area or sector through specific activities to express their views thereto. Additionally, the SCPC required that the institutions in charge also expressed their views on the financial implications of each activity for which they are in charge. Even though this email communication was sent to a large number of stakeholders, the SCPC did not at any time send back a response to those who submitted a particular opinion as to whether their views and requests have been accepted or rejected, and an explanation for the decision made. The stakeholders were left to independently evaluate and compare the working version with the version adopted by the SCPC.

The final stage of consultations followed when the SCPC opened the official public consultation process only on May 27, 2026. According to the announcement⁹ published by the SCPC, interested parties and citizens had the opportunity to submit their comments on the draft Strategy as of June 8, 2026, meaning that the entire consultation process lasted a total of 13 days. The announcement also emphasized, among other things, that although a participatory approach was applied in the preparation of the measures and activities with the active participation of all relevant societal stakeholders, the SCPC nevertheless believed that, before adopting the National Strategy, it should be made available for public review and open to comments from the wider public. Such a commitment by the SCPC represents a positive example of ensuring inclusiveness, particularly in processes of exceptional importance such as the development of strategic documents in the field of anti-corruption. However, what followed after the publication of this announcement leads to the conclusion that such a commitment remained only declarative, since the process was not completed in a transparent and accountable manner, given that the results of the public consultations conducted were not published. Namely, after the consultations were completed, no report on their outcome was published, that is, the public had no insight into what comments, proposals and ob-

⁹ Public announcement published by the SCPC, available at: <https://dksk.mk/mk/%d0%bd%d0%b0%d1%86%d0%b8%d0%be%d0%bd%d0%b0%d0%bb%d0%bd%d0%b0-%d1%81%d1%82%d1%80%d0%b0%d1%82%d0%b5%d0%b3%d0%b8%d1%98%d0%b0-2026-2030/>



servations were submitted by stakeholders and citizens, which of them were accepted, which were rejected, nor was there any explanation given for the reasons why certain proposals were not taken into account. Instead, only the final version of the National Strategy was published, and it was then adopted by the SCPC.

The absence of such a report limits the public's insight into the manner in which the submitted opinions were considered and reduces the possibility of assessing whether the consultative process had a substantial impact on the final content of the Strategy. Publishing the final document, without providing information on the course and results of the public consultations at the same time, leaves the impression that public participation was understood more as a formal obligation than as a mechanism for substantive improvement of the document. Such a practice is not in line with the principles of transparency, accountability and participation that should guide the processes of preparing and adopting public policies.

This gap of almost six months indirectly points to a certain internal institutional standstill in the stage of finalizing and technically consolidating the text within the Commission. After the consultations, the SCPC officially adopted the National Strategy at its session on 19 June 2026 and solemnly submitted it to the Assembly on the same day. This means that the overall preparatory process lasted full 16 months, which, although providing a detailed structure, nevertheless resulted in the ball being passed to the legislature with an already accumulated six-month delay at the national level.

In this context, it is important to note the positive practice of the SCPC regarding the proactive publishing of preparatory materials on its official website. The Commission ensured high digital accessibility of the documents, by duly uploading draft documents and calls throughout the key stages from the initial steps in 2025, through the sectoral workshops in November/December, to the official call for public consultations in May 2026. However, this digital openness in publishing the texts remained in the domain of one-way public information, given that information about the internal harmonization process was lacking, as well as a substantive feedback mechanism on the outcome of the comments submitted after the public review was completed.

Table 1: Chronological overview of the stages in the preparation of the National Strategy (2025-2026)

Date / Period	Key event / Process stage	Analytical context and status
February 28, 2025	Initial workshop and Roadmap	The initial framework for the period 2026-2030 is defined with an emphasis on the need for higher quality and realistic performance indicators.
May 2025	Adoption of the first Methodology	The SCPC formally adopts the <i>Methodology for Corruption Risk Assessment</i> , setting out the criteria for measuring systemic vulnerabilities.
June 2025	National focus groups	Four focus groups are being held to assess corruption risks in the country.
September 2025	Consultations with the civil society sector	Working meeting with the Platform of Civil Society Organizations; proposals are submitted for the strategy to be concise, shorter and realistically applicable in the field.
October 2025	Adoption of the second Methodology	The SCPC adopts the <i>Methodology for development of the National Strategy</i> , defining the structure and manner of monitoring the action plans.
October 2025	Finalization of the Risk Assessment	Development of the official <i>Corruption Risk Assessment</i> , which serves as a factual and empirical basis for sectoral priorities.
November – December 2025	Thematic workshops by areas and sectors	The final sectoral workshops for writing the measures are being held at the moment when the deadline for adopting the document is already expiring.
January – April 2026	Institutional gap	A period of almost four months of internal technical consolidation of the text within the SCPC, while the state is already entering a strategic vacuum without a valid strategy.
May 27, 2026	Beginning of public consultations	The draft text is finally published for public review and the official public consultation process begins to collect final comments.
June 8, 2025	End of public consultations	The public consultations were conducted over a period of 13 days, during which stakeholders and citizens had the opportunity to submit comments, observations and additions to the content of the draft National Strategy.
June 19, 2026	Adoption by the SCPC and submission to the Assembly	The strategy was officially adopted at a session of the SCPC and on the same day it was solemnly submitted to the Assembly, with an already accumulated six-month delay.
End of June 2026 (ongoing)	Parliamentary standstill	The document has not yet been submitted for consideration to the competent parliamentary body, which further prolongs the implementation.

3. Key Findings Of The Process Of Developing The National Strategy For Prevention Of Corruption And Conflict Of Interest (2026-2030)

A comprehensive review of the path that the National Strategy has taken from the initial workshop to the parliamentary doorstep allows for an objective perception of all the qualities and anomalies of this process. The experiences of the past 16 months offer an important lesson on how state institutions cooperate with the civil society sector and how they deal with their own administrative capacities. While certain stages have shown a high degree of inclusiveness and serious analytical preparation, the final steps came across serious institutional weaknesses and breaking deadlines, that directly affect the ultimate achievement of the document itself.

The positive practices that should serve as a model for the future, as well as the systemic shortcomings that jeopardize the success of the new strategy, are elaborated in detail below.

3.1. Advantages of the process

- **Compliance with the sequence of analytical steps in the preparation:** The SCPC's effort to establish a structure in the preparation, rather than approaching ad-hoc writing of measures, is positive step forward in this process. The fact that the process was set up so that specific methodological frameworks were first adopted, and then a field corruption risk assessment was conducted, shows an intention to introduce order into the strategic planning. Regardless of the further expert debates about the quality and content of the methodologies, it is important to note that the Strategy is formally based on analytical steps taken previously, which prevented key sectoral priorities from being established without an appropriate institutional procedure.
- **Inclusive model of horizontal consultations:** Limiting anti-corruption debates only to closed government circles in the past has proven to be a complete failure.

By organizing national focus groups in June 2025 and workshops in November and December of the same year, the SCPC managed to establish a direct dialogue with multiple stakeholders, including practitioners and implementers coming from the public sector, representatives of the civil society sector, the private sector and the academic community. This model made it possible to “extract” problems from practice, that often remain invisible to purely legal texts, and to develop measures and activities adequate to the needs of the fight against corruption.

- **Openness to partnership with the civil society sector:** The inclusion of the Platform of Civil Society Organizations for Fight against Corruption in September 2025 has shown that the SCPC recognizes the civil society as a serious ally. The fact that the requests for strategic optimization were heard and that the document be shorter, more concise and free from unnecessary administrative burden speaks of a willingness to hear the voice of the expert public in order to ensure real applicability in the field.

3.2. Systemic weaknesses and procedural shortcomings

- **Serious failure to meet deadlines and irresponsible introduction to strategic vacuum.**

The adoption of such a key document must be linear and planned on time. The fact is that the previous strategy ended in December 2025, and the new one was sent to the Assembly only in June 2026. This delay of half a year is not only an administrative shortcoming, but has also created a detrimental strategic vacuum at the national level. For months, state institutions, local self-government and judicial authorities have been operating without an active strategic anti-corruption roadmap, which reduces institutional cohesion and slows down reforms in negotiations with the EU.

- **Informational obscurity in the internal consolidation stage.**

Even though the process in 2025 was managed with a high level of transparency, the first half of 2026 brought about a total breakdown in communication by the SCPC. Almost six months have passed between the finalization of the workshops in December 2025 and the official release of the document for public review at the end of May 2026. Over this long period of time, the public has not received a single logical explanation as to what caused the standstill – whether it was due to internal technical difficulties, resistance from certain ministries that did not accept the measures, or the capacity of the Commission itself. All the more so, given the public consultations were also conducted without the public having insight into their final outcome. This informational silence casts a shadow over the otherwise inclusive process.

- **One-sided consultative process and lack of a response mechanism**

True inclusiveness implies two-way communication. Even though the Platform of Civil Society Organizations for FAC and other stakeholders were invited to provide comments, the SCPC did not publish any report on the outcome of public consul-



tations after the process was completed. The civil society sector was left without information on which of their proposals were incorporated, which were rejected, and most importantly for what reasons (legal, financial, or administrative). Without such a written explanation, public consultations risk turning into a formality of “box-ticking” for the international community.

- **Risk of completely losing the first year of implementation due to parliamentary standstill**

If the Assembly does not adopt the Strategy as soon as possible, there is a serious and real danger of losing an entire calendar year. Given that we are already in the second half of 2026, and parliamentary procedures, committee hearings and possible amendments can further drag out the process until autumn or winter, the institutions will practically have no time to even start the activities planned for this year. This will create a “snowball” effect where the outstanding obligations from 2026 will spill over and overburden 2027.

- **Paradox of a shortened strategic scope and de facto shortening of the time-frame**

The delay raises the key logical and substantive question of whether this will actually be a five-year strategy at all. On paper, the document is designed and constructed to be valid for a fixed period from January 2026 to December 2030. However, since the official start has already been extended by more than half a year, and the final limit of activities remains unchanged, the state will in reality receive a shortened, four-year strategy. This creates a serious operational gap, as the institutions will be expected to implement a five-year scope of obligations and reforms in a significantly narrowed and shortened time window. Additionally, it must not be forgotten that the Law on Prevention of Corruption and Conflict of Interest stipulates that a five-year Strategy is being adopted, thereby raising the question of whether the legal framework has been fulfilled.

4. Recommendations For Action

The findings of the analyzed process clearly indicate that the quality of a strategy depends not only on its content, but also on the institutional discipline in its adoption. The serious strategic vacuum, the lack of feedback following public consultations and the real risk of a de facto shortening of the document's five-year timeframe, impose the need for an urgent and coordinated response by all stakeholders. To prevent the National Strategy from becoming yet another formal document without a substantive effect on the ground, decision-makers must immediately address the systemic and legal shortcomings of the preparatory stage.

Based on the identified challenges, specific recommendations for urgent action are defined below, divided according to the role of the key stakeholders in the process:

4.1. To the Assembly of the Republic of North Macedonia

- **Urgent initiation of the parliamentary procedure for the National Strategy**

The Assembly must show political responsibility and without delay place the document on the agenda of the competent committees. Any further delay deepens the detrimental strategic vacuum and further shortens the time for implementing reforms.

- **Legal and procedural harmonization of deadlines prior to voting**

The Assembly, in coordination with the SCPC, must revise the timeframe in the Action Plan before the final adoption of the National Strategy. In order to comply with the imperative legal provision for a five-year strategy, it is necessary to phase out the implementation deadlines (for example, by mid-2031), which will prevent legal uncertainty and the risk of formal violation of the Law on Prevention of Corruption and Conflict of Interest.

4.2. To the State Commission for Prevention of Corruption (SCPC)

- **Introduction of a mandatory response mechanism**

For all future strategic documents and by-laws, the SCPC should establish a practice of publishing an official overview following the completion of public consultations. This document must publicly and exhaustively state which stakeholders'

proposals have been accepted and which have been rejected, with a precise legal or logistical explanation of the reasons.

- **Institutional transparency in the stages of internal work**

The SCPC must abandon the model of “informational silence” during the internal consolidation of documents. Even when it comes to cleaning up texts or inter-institutional harmonization that last for months, the Commission is obliged to proactively inform the public about the status of the process so as not to leave room for suspicion of internal pressures or institutional deficits.

- **Proactive planning of future strategic cycles**

For the next strategic documents, preparatory activities and field assessments must begin at least 9 to 12 months prior to the expiration of the current strategy. This will ensure sufficient time for all filters to be in place without leaving the country in a state of strategic vacuum.

4.3. Guidelines for action by civil society organizations

- **Adapting the independent monitoring to the shortened timeframe**

Civil society organizations that monitor the implementation of anti-corruption policies must adapt their monitoring focus to the newly emerged situation. Since the first year of implementation is seriously jeopardized due to the administrative standstill, monitoring in the upcoming period should specifically measure the ability of institutions to compensate and transfer outstanding obligations from 2026 to 2027, in order to prevent a complete collapse of the initial stage of the Strategy.

- **Ad-hoc evaluation of the final text against the submitted proposals**

In response to the lack of an official report on the public consultations by the SCPC, the civil society sector should, through its own analytical tools, cross-check the final text that will be adopted by the Assembly of the Republic of Macedonia with the proposals that were submitted by the expert public in May/June 2026. This will allow for an independent assessment of the extent to which the voices of stakeholders were truly incorporated into the final document.

- **Continuous public pressure by recording the consequences of the strategic vacuum**

Civil society should continuously document and publicly comment on each additional day spent in a strategic vacuum. Through public alerts and targeted analyses of the standstill, it is necessary to maintain a high level of public awareness and to identify clear political responsibility among societal actors for the delay in this key national reform document.

