

Western Balkan PAR Monitor

POLICY DEVELOPMENT AND COORDINATION

2024/2025



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ABOUT WEBER 3.0

Building upon the achievements of its predecessors, the WeBER (2015 – 2018) and WeBER 2.0 (2019 – 2023) projects, the **Western Balkan Enablers for Reforming Public Administrations – WeBER 3.0** project is the third consecutive EU-funded grant of the largest civil society-led initiative for monitoring public administration reform (PAR) in the Western Balkans (WB). Its implementation period is February 2023 – July 2026. Guided by the SIGMA/OECD Principles, the first two phases of the initiative laid the foundation for WeBER 3.0's ambition **to further empower civil society organisations (CSOs) to contribute to more transparent, open, accountable, citizen-centric and thus more EU-compliant administrations in the WB region.**

WeBER 3.0 continues to promote the crucial role of CSOs in PAR, while also advocating for broader citizen engagement in this process and inclusive reform measures which are user-tailored and thus lead to tangible improvements. By grounding actions in robust monitoring data and insights, WeBER 3.0 will empower civil society to more effectively influence the design and implementation of PAR. To foster collaborative policymaking and bridge the gap between aspirations and actionable solutions, the project will facilitate sustainable policy dialogue between governments and CSOs through the WeBER Platform and its National PAR Working Groups. Finally, through small grants for local CSOs, WeBER 3.0 bolsters local-level PAR engagement, amplifying the voices of citizens – the final beneficiaries of the public administrations' work.

WeBER 3.0 products and further information about them are available on the project's website at www.par-monitor.org.

WeBER 3.0 is implemented by the Think for Europe Network (TEN), composed of six EU policy-oriented think tanks in the Western Balkans:



By partnering with the Centre for Public Administration Research (KDZ) from Vienna, WeBER 3.0 has ensured EU-level visibility.



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¹A joint initiative of the European Union and the OECD.

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More information about the WeBER 3.0 project, the WeBER Advisory Council, members of the WeBER Platform and the project's partners can be found at www.par-monitor.org.

EXECUTIVE SUMMARY

This report assesses the transparency and inclusiveness of four aspects of policy development and coordination: 1) transparency and inclusiveness of government decision-making process, 2) transparency of government planning and reporting, 3) transparency and inclusiveness of policy making and legislation development process, and 4) transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny. The first aspect examines whether transparency in government decision-making is secured through strategic commitments, legal provisions, and systematic publication of information from government sessions. The second looks at whether the government's planning and reporting obligations are regulated, and whether related documents are published on time, performance-oriented, and accessible in open formats. The third segment assesses whether policy-making and legislative development are transparent, inclusive, and evidence-based. The fourth examines the legal and practical mechanisms for advance notification, publication of monitoring and ex-post evaluation reports, and stakeholder involvement in parliamentary oversight. The findings cover the period from 2023 until 2025, as well as the end-of-2022 developments not covered in the previous monitoring cycle.

Transparency of governments' decision-making across the Western Balkans (WB) remains uneven and only partially institutionalised. Where a strategic foundation exists, it tends to be inconsistently translated into comprehensive regulatory arrangements or practical aspects. Regulatory frameworks provide fragmented coverage of transparency requirements. Publication of key government materials, such as agendas, minutes, decisions, and press releases, is most comprehensively covered by the legislation in North Macedonia, while in Montenegro and BiH it is present to a lesser extent. As a result, full transparency of government sessions is rarely ensured (with BiH exhibiting the highest level of transparency in this regard) i.e. the information from government sessions is not published in a uniform and predictable manner. While no government in the region practices comprehensive and systematic online publication of agendas and minutes, governments in Montenegro and Bosnia and Herzegovina (BiH) stood out as those with a degree of transparency. However, publishing agenda items in advance is recorded only in BiH. Similarly, the availability of adopted decisions varies significantly: although several administrations publish adopted decisions regularly (BiH, Albania, Kosovo, and Montenegro), timeliness and accessibility are not uniformly ensured, and

in some cases, access is restricted or unverifiable. Perceptions of non-state actors across the region further reinforce these findings as they generally view transparency of government decision-making as limited, particularly with regard to access to minutes and clarity of decision-making processes.

PAR strategic frameworks across the region generally foresee measures to improve government planning and reporting practices, and central planning documents are largely established by law. Nevertheless, implementation in practice falls short. The publication of annual work plans, multi-annual programmes, and European integration plans, as well as reports on their implementation, is irregular across the six administrations. Montenegro stands out with near-complete public disclosure of all observed planning and reporting documents, while Serbia also demonstrates comparatively strong, though still not fully consistent practices. In contrast, significant gaps persist elsewhere, including limited availability of EU integration plans in North Macedonia and the absence of an established EU-related planning and reporting framework at the state level in BiH. Moreover, planning and reporting practices do not consistently enable performance measurement or meaningful communication of results. While multi-annual government programmes generally include performance indicators, annual plans remain largely output oriented. At the same time, citizen-friendly presentation of key information is limited, with only occasional use of summaries and visual elements, such as in reports on European integration plans in Kosovo, Montenegro, and Serbia. Open, machine-readable data on government performance is effectively absent. These findings are reinforced by key informants' perceptions, which point to inconsistent implementation, selective public communication, and an ensuing low public awareness.

Strategic and legal frameworks across the WB formally commit to transparent and inclusive policy and legislative development, but their scope and coherence vary significantly. While all administrations include measures to improve transparency and participation in their PAR strategic documents, Kosovo stands out as the only administration where measures to improve policy inclusiveness are not envisaged. Inclusiveness of PPDs and primary legislation development is not equally elaborated and fully guaranteed by the current legal framework across the WB, while the transparency of working group procedures is not regulated in any WB administration, representing a region-wide gap. The regulation of secondary legislation development is the weakest across all administrations, with minimum consultation requirements for bylaws largely absent in Albania, North Macedonia, and Montenegro. Free online access to consolidated versions of legal acts is guaranteed by law only in Albania, Kosovo, and Serbia. Quality control of compliance with consultation requirements is absent from legal frameworks across the region, with no centre-of-government bodies assigned a clearly defined oversight function. Furthermore, only Kosovo

and Serbia² mandate impact assessment (IA), including gender impact and publication of IA reports, across all types of acts, while other WB administrations cover only partial aspects of the IA framework or, in the case of BIH, lack any mandatory IA obligation. The practice of conducting IA across the region is equally uneven and generally below standard. Only Kosovo and Serbia meet the defined threshold of 80% for goods (PPDs) subject to IA, and only Serbia addresses gender impact in more than 80% of cases. For laws, the picture is even less satisfactory: only Montenegro surpasses the 80% threshold, without addressing gender impact, which is not a mandatory part of the IA. The publication of IA reports during consultation processes is inconsistent, with only North Macedonia systematically doing so on its national consultation platform. When IA reports are produced, they commonly lack references to external data sources, while other key elements (such as problem analysis, policy objectives and options, affected groups, monitoring, etc.) tend to be generally present. Additionally, public consultations are organised inconsistently across the region and tend to occur at late stages of the drafting process. In Serbia and Kosovo, consultations were organised for all observed PPDs, while results for laws are considerably lower across the entire region. Early-phase consultations are rare, except for Serbia, where they are conducted for all observed PPDs, but are generally low for laws. The use of e-consultation portals varies substantially: North Macedonia is the regional frontrunner (100% of processes announced on the Portal)³, while Montenegro records the lowest utilisation rates (24%). Consultation reports are generally available and follow the required structure in most administrations, but comprehensiveness is an issue in Montenegro and, to a lesser extent, Serbia. Due to the lack of a legal and institutional framework that supports quality control, checks for compliance with the consultation framework are not carried out in practice in the WB administrations. Ultimately, this means that the quality of the consultation process depends entirely on the capacities and discretion of the institution in charge of conducting it. The assessed impact of public consultations on final proposals is low, with fewer than a third of observed processes across the administrations resulting in a high acceptance rate of submitted comments of at least 60% for each individual process. Documents on the work of working groups are mainly not publicly available across the region, despite relatively positive perceptions among key informants who participated in working groups. Key informants generally reported constructive and inclusive experiences (particularly in Serbia), but noted that the quality of participation is often determined by the attitudes of the lead institution rather than formal rules. The majority of citizens across the

² During the monitoring period, the legal framework in Serbia governing IA was amended to now exclude all legal acts and PPDs adopted in the EU accession process from the obligation to undergo IA. The amendments were adopted in March 2026, so their effect on the actual practice of conducting IA could not be assessed in this monitoring cycle and will be covered in the next PAR Monitor edition.

³ This refers only to laws as consultations for PPDs are not mandated.

region (54%) do not perceive themselves as having meaningful opportunities to participate in policy and legal development.

Across the WB, transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny are generally underdeveloped. PAR strategic frameworks partially address transparency, primarily through commitments to publish monitoring reports and improve access to information but fail to include concrete measures for increased stakeholder participation in these processes. Regulations similarly lack such provisions, with North Macedonia as the only notable exception. Parliamentary procedures formally allow stakeholder participation in public hearings in most administrations; however, this is often conditional, invitation-based, and inconsistently applied, limiting genuine inclusiveness. In practice, stakeholder engagement through public hearings varies significantly, with stronger involvement in Albania, North Macedonia, and Montenegro. Moreover, interviewed non-state actors generally perceive such participation as ineffective, citing limited influence on final decisions and a lack of feedback mechanisms. Transparency in policy implementation is further constrained by weak monitoring and evaluation practices. The regular publication of monitoring reports on sectoral policy documents is insufficient across observed policy areas, and where reports exist, they are often not presented in a citizen-friendly format. The practice of publishing ex-post evaluations is largely absent, indicating a systemic gap in assessing policy outcomes and learning from implementation. Finally, the availability of information on draft acts in procedure on the parliaments' websites varies considerably, with Montenegro standing out as the only administration where such documentation is regularly disclosed, followed closely by Serbia, where consultation reports are not consistently available online.

LIST OF ABBREVIATIONS AND ACRONYMS

| | |
|-----------|--|
| ALB | Albania |
| APIGP | Action Plan for the Implementation of the Government Programme |
| BIH | Bosnia and Herzegovina |
| CSO | Civil Society Organisation |
| EC | European Commission |
| EU | European Union |
| FOI | Freedom of Information |
| GAWP | Government Annual Work Plan |
| IA | Impact Assessment |
| KS | Kosovo |
| MKD | North Macedonia |
| MNE | Montenegro |
| NPAA | National Plan for Adoption of the Acquis |
| PAR | Public Administration Reform |
| PPD | Public Policy Document |
| ReSPA | Regional School of Public Administration |
| SIGMA | Support for Improvement in Governance and Management |
| SRB | Serbia |
| WB | Western Balkan |
| WeBER 3.0 | Western Balkan Enablers for Reforming Public Administrations |
| WG | Working Group |

I. WeBER PAR Monitor: What we monitor and how

I.1 WeBER's approach to monitoring PAR

The Public Administration Reform (PAR) Monitor methodology was developed in 2015-2016, as part of the first Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform (WeBER) project. Since the onset, WeBER has adopted a markedly evidence-based approach in its endeavour to increase the relevance, participation and capacity of civil society organisations (CSOs) in the WB to advocate for and influence the design and implementation of PAR. The PAR Monitor methodology is a cornerstone WeBER product, enabling civil society monitoring of PAR based on evidence and analysis.

In line with WeBER's focus on the region's EU accession process, once the SIGMA *Principles of Public Administration* were revised in 2023, the WeBER PAR Monitor methodology was also redesigned in 2024, building on the Principles,⁴ and on SIGMA Methodology,⁵ and complementing the monitoring by SIGMA by providing additional observations focused on transparency, inclusiveness, openness or other aspects of state administrations' work depending on PAR area in question. This revision helps maintain the focus of WeBER's recommendations on EU-compliant reforms, thus guiding the governments in the region towards successful EU accession and future membership. The main changes in the revised PAR Monitor methodology are briefly listed below.⁶

4 OECD (2023), *The Principles of Public Administration*, OECD Publishing, Paris, <https://doi.org/10.1787/7f5ec453-en>.

5 Available at: <https://www.sigmaweb.org/en/publications/documents/2024/assessment-methodology-of-the-principles-of-public-administration.html>.

6 For detailed information on the scope and process of methodology revision please visit <https://www.par-monitor.org/par-monitor-methodology/>.

Table 1: Main changes in the PAR Monitor methodology

STRUCTURE

In order to align with the new SIGMA methodological approach, the following structural changes are introduced:

- Introduction of single indicator per PAR area, divided into sub-indicators, further consisting of several sub-indicator elements (i.e. specific criteria assessed), in order to streamline the approach and emphasise the focus on transparency, inclusiveness and openness in each PAR area.
- Introduction of types of sub-indicator elements, ensuring that all following aspects of reform are covered:
 - 1) Strategy and Policy,
 - 2) Legislation,
 - 3) Institutional Setup,
 - 4) Practice in Implementation, and
 - 5) Outcomes and Impact.
- Introduction of a 100-point scale, for a more nuanced assessment of progress in each PAR area.

DATA SOURCES

- Introduction of interviews with “key informants”, i.e. key non-state actors engaged and familiar with the processes. These interviews serve as a data source for the “Outcomes and Impact” elements instead of the formerly implemented survey of civil society organisations.
- More systematic use of public perception survey results as a data source for “Outcomes and Impact” elements and expanding the scope of the survey to complement the assessment in five PAR areas – all except “Strategy for PAR”.
- Removal of the survey of civil servants as a data source due to persistent issues with ensuring adequate response rates across the region’s administrations.

PAR MONITOR REPORTING

- Six national PAR Monitor reports, one per PAR area (36 in total for the entire PAR Monitor), in order to facilitate timely publication and advocacy for the monitoring results rather than publishing the results of 18 months of research at the end of the process.
- Six regional WB overview reports, one per PAR area (6 in total).

I.2 Why and how WeBER monitors the “Policy Development and Coordination” area

Meaningful citizen participation in the policy-making processes represents a cornerstone of good governance, by ensuring that decisions reflect the actual societal needs, are developed through dialogue with all stakeholders and affected groups and are subject to public scrutiny. Policies shaped through an open and transparent approach are more evidence-based, more legitimate, and consequently more likely to be effectively implemented. Planning plays a crucial enabling role in this process. When governments adopt, publish, and report on planning documents, they provide predictability, allow stakeholders to engage in a timely manner, and create a basis for assessing whether decisions align with stated strategic objectives. WeBER’s monitoring, thus, focuses on the transparency and inclusiveness of key elements of the policy cycle: from government planning and decision-making, through policy development, to policy implementation and evaluation, and, finally, parliamentary scrutiny. By assessing these interconnected stages, the monitoring examines how key principles of good governance transpose into the everyday practice of public administration, and provides insights into how WB governments communicate their decisions with the public, and to what extent the voice of the public is heard when key decisions are being made.

Monitoring in **the Policy Development and Coordination area** is based on all six SIGMA Principles in this area:

Principle 2: Public policies are coherent and effectively co-ordinated by the centre of government; decisions are prepared and communicated in a clear and transparent manner.

Principle 3: The government plans and monitors public policies in an effective and inclusive manner, in line with the government fiscal space.

Principle 4: Public policies are developed based on evidence and analysis, following clear and consistent rules for law making; laws and regulations are easily accessible.

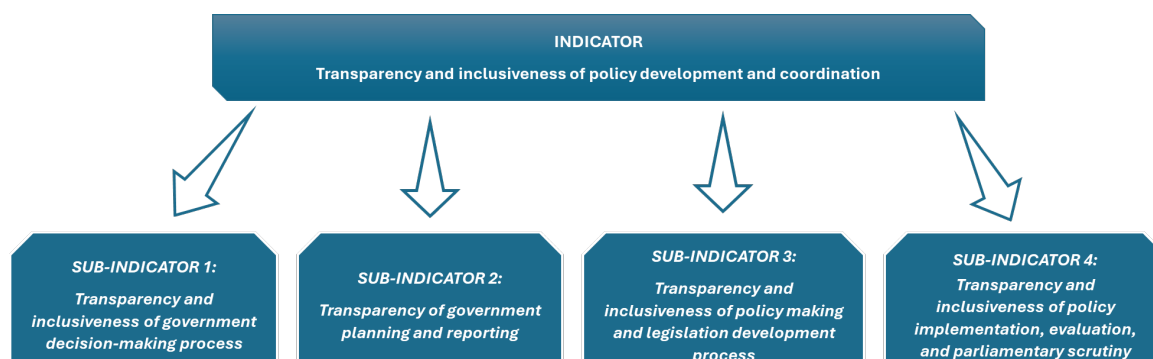
Principle 5: All key external and internal stakeholders and the general public are actively consulted during policy development.

Principle 6: Public policies are effectively implemented and evaluated, enhancing policy outcomes and reducing regulatory costs and burdens.

Principle 7: The parliament effectively scrutinises the government policymaking and ensures overall policy and legislative coherence.

These Principles are assessed from the perspective of the availability, accessibility and timeliness of all relevant information on the government planning, reporting

and decision-making, while also examining the inclusiveness of policy and legislative development. The focus on transparency and inclusiveness also seeks to determine if policies are regularly monitored, evaluated and subject to parliamentary scrutiny.



The monitoring period for the Policy Development and Coordination covers developments since the last PAR Monitor cycle, which lasted from January until November 2022. Thus, this report focuses primarily on the period from 2023 until 2025, as well as the end-of-2022 developments not covered in the previous cycle. Although this report provides a comparison of findings with previous PAR Monitor editions, country scores are incomparable to the previous monitoring due to methodological changes.

The **first sub-indicator**⁷ focuses on the existence of strategic and legal framework provisions that provide for transparent government decision-making, while also examining if key documents are available in practice: agendas for government sessions, meeting minutes, decisions and press releases. For the assessment of outcomes and impact, researchers conduct three key informant interviews with non-state actors who possess significant expertise in the area.

⁷ The first sub-indicator focuses on the following SIGMA sub-principles: The centre of government (CoG) enables and facilitates policy co-ordination across ministries and relevant institutions to ensure overall policy coherence and better and more sustainable policy outcomes; Government decisions are prepared, approved and followed up in a transparent, effective and timely manner, based on clear rules and procedures, through the relevant decision-making structures, including government sessions.

Table 2: Indicator elements under sub-indicator 1

| Indicator element: number and title | Type |
|---|----------------------------|
| E 1.1 There is a strategic document in force that envisages improvement of transparency of government decision-making process | Strategy and policy |
| E 1.2 Regulations stipulate transparency of government decision-making process | Legislation |
| E 1.3 Government regularly publishes agenda items, minutes, and press releases from its sessions online | Practice in implementation |
| E 1.4 Government regularly publishes decisions from its sessions online | Practice in implementation |
| E 1.5 Key non-state actors consider the Government's decision-making process as transparent | Outcomes and impact |

The **second sub-indicator**⁸ assesses the timeliness, availability and regularity of publishing of government planning documents and reports on their implementation, while also examining whether performance-based indicators and citizen-friendly elements are present. Monitoring of strategy and policy, legislation, and practice elements is performed by analysing strategic documents, legal acts and official data publicly available on the websites of relevant institutions. Assessment of outcomes and impact is based on the findings obtained from three key informant interviews, as in the previous sub-indicator.

⁸ The second sub-indicator focuses on the following SIGMA sub-principles: Policy planning documents meet quality requirements and contain adequate analysis and information, including on policy objectives, indicators with targets and monitoring framework. They are developed in a participatory manner and are publicly available; Performance and results, including achievement of policy objectives and outcome indicators, are regularly monitored and reported on; monitoring reports are published on time to enable public scrutiny; The government effectively implements EI plans through prioritising and costing of EI-related commitments, taking into consideration the available resources and capacities of the administration.

Table 3: Indicator elements under sub-indicator 2

| Indicator element: number and title | Type |
|--|----------------------------|
| E 2.1 There is a strategic document in force that envisages improvement of government planning and reporting practice | Strategy and policy |
| E 2.2 Regulations stipulate public availability of government planning documents and reports on their implementation | Legislation |
| E 2.3 Regulations stipulate public availability of government's European integration plans and reports on their implementation | Legislation |
| E 2.4 Government regularly and timely publishes its annual work plans | Practice in implementation |
| E 2.5 Government publishes its programme in a timely manner | Practice in implementation |
| E 2.6 Government's programmes and work plans contain performance indicators for monitoring achievement of results | Practice in implementation |
| E 2.7 Government regularly and timely publishes reports on the implementation of its work plans | Practice in implementation |
| E 2.8 Government regularly and timely publishes reports on the implementation of its programme | Practice in implementation |
| E 2.9 Government regularly and timely publishes its European integration plans | Practice in implementation |
| E 2.10 Government regularly and timely publishes reports on implementation of its European integration plans | Practice in implementation |
| E 2.11 Government's reports on implementing its programmes and work plans include assessments of achievement of key results and performance indicators | Practice in implementation |
| E 2.12 Government plans and reports are citizen friendly | Practice in implementation |
| E 2.13 Data contained in the government's reports on implementing work plans are available in open format | Practice in implementation |
| E 2.14 Key non-state actors consider the Government's planning and reporting activities as transparent, timely and citizen friendly | Outcomes and impact |

The third sub-indicator⁹ seeks to examine if policy and legislation development are transparent, inclusive, and evidence-based, both in the strategic and legal framework and its implementation in practice. This includes meaningful stakeholder participation from the earliest phases, regular and comprehensive reporting on consultations, implementation of and reporting on impact assessments, oversight of consultation requirements, and the impact of public input on final decisions.

Monitoring of strategy and policy, legislation, institutional set-up, and practice aspects is performed by combining various data sources to maximise the reliability of results. It includes qualitative analysis of strategic documents, legal acts and official data that is publicly available or obtained from responsible institutions using FOI requests. The analysis of practice type elements under this sub-indicator is conducted on a sample of PPDs and legal acts adopted in the period of 12 months preceding the monitoring window. Certain elements are based on a sub-sample of two adopted PPDs and three adopted laws assessed as having significant impact on society or specific affected groups. For the outcomes and impact assessment, researchers conduct three key informant interviews with non-state actors, members of working groups for the development of sample PPDs and laws, and use the findings of the WeBER public perception survey.

⁹ The third sub-indicator focuses on the following SIGMA sub-principles: A whole-of-government policy to promote better regulation, evidence-based and inclusive policymaking is established and applied in practice during policy development and legislative drafting; Procedures are in place and consistently applied and monitored to enable pro-active and effective public consultations with stakeholders and the general public, allowing businesses, non-governmental organisations and citizens, including from vulnerable groups to participate in and inform government policymaking; All primary and secondary legislation, including consolidated versions, is easily accessible and available free of charge through a central online database(s). Administrative guidance documents, forms and materials essential for complying with regulations are easily available for businesses and citizens; Regulatory impact assessment (RIA), or other similar tool(s), is adopted and systematically used to support policy development, facilitate consultation and inform decision-making at all key stages of policymaking, covering both primary and secondary legislation, including the impact on the environment and climate where necessary; Consultation with the general public is conducted in an accessible and transparent manner; Ministries hold constructive dialogue with key external stakeholders and collect, analyse and use all responses when finalising the policy proposal. They transparently report on the outcome of the public consultation process and how consultees' views have shaped and influenced policy; All possible impacts of policy proposals are systematically analysed; reasonable efforts are made to quantify and monetise key impacts, including additional costs on the state budget, businesses and citizens; Ministries have clear internal rules and procedures for planning and managing effectively the development of policies and legislative drafting.

Table 4: Indicator elements under the sub-indicator 3

| Indicator element: number and title | Type |
|---|----------------------------|
| E 3.1 There is a strategic document in force that envisages improvement in transparency and inclusiveness of policy making and legislation development process | Strategy and policy |
| E 3.2 Regulations envisage transparency and inclusiveness of policy making and legislative development process | Legislation |
| E 3.3 Regulations stipulate minimum consultation requirements | Legislation |
| E 3.4 Regulations envisage online and free of charge access to consolidated versions of all policy documents and legislation | Legislation |
| E 3.5 Regulations stipulate mandatory ex ante assessment of impacts - including on gender equality - during policy making, and publication of IA reports | Legislation |
| E 3.6 There is a designated government institution for checking compliance with consultations requirements | Institutional set-up |
| E 3.7 Ex ante impact assessments – including on gender equality - are consistently applied during the development of policy documents | Practice in implementation |
| E 3.8 Ex ante impact assessments – including on gender equality - are consistently applied during the development of primary legislation | Practice in implementation |
| E 3.9 Reports on implemented ex ante impact assessments during the development of primary legislation are regularly published online, together with the draft documents | Practice in implementation |
| E 3.10 Published reports on implemented ex ante impact assessments during the development of primary legislation contain key information | Practice in implementation |
| E 3.11 Non-state actors participate in the Government-led working groups for policy and legislative development | Practice in implementation |
| E 3.12 Procedures and decisions of working groups are transparent | Practice in implementation |
| E 3.13 Public consultations on policy documents and primary legislation are regularly held | Practice in implementation |
| E 3.14 Public consultations are conducted in an early phase of policy development | Practice in implementation |
| E 3.15 Reports on public consultations on policy documents are publicly available | Practice in implementation |

| | |
|--|----------------------------|
| E 3.16 Reports on public consultations on primary legislation are publicly available | Practice in implementation |
| E 3.17 Public consultation reports contain all elements of the implemented consultation process | Practice in implementation |
| E 3.18 Online, central consultation portal for the implementation of consultations is regularly used | Practice in implementation |
| E 3.19 Designated government institution regularly checks compliance with public consultation requirements | Practice in implementation |
| E 3.20 Lead ministries proactively inform on public consultations | Practice in implementation |
| E 3.21 Consolidated versions of primary and secondary legislation are easily accessible online, and available free of charge | Practice in implementation |
| E 3.22 Public consultation results have impact on final policy and legislative proposals | Outcomes and impact |
| E 3.23 Key non-state actors consider the work of the Government-led working groups as transparent and inclusive | Outcomes and impact |
| E 3.24 Citizens' perception of their opportunity to participate in the development of laws and strategies | Outcomes and impact |

The **fourth sub-indicator**¹⁰ focuses on the transparency of policy implementation through availability of monitoring reports and ex-post evaluations, advance notifications to affected groups on the upcoming changes to the legal framework, and involvement of non-state actors in parliamentary deliberations through public hearings. Monitoring of this sub-indicator is based on the review of the strategic framework, regulations and websites and documents of relevant institutions. For the assessment of outcomes and impact, researchers conduct three key informant interviews with non-state actors, participants of public hearings organised by the parliament.

¹⁰ The fourth sub-indicator focuses on the following SIGMA sub-principles: The responsible institutions effectively monitor policy implementation and ensure regulatory compliance, based on robust and relevant data, including evidence gathering through direct feedback and consultations with affected stakeholders; Ex post evaluation of major laws and policies is an integral part of the better regulation agenda and is linked to the analysis conducted during the development of the policy. The public administration makes evaluation results publicly available and uses them to inform future policy; Businesses and citizens receive advance notification about upcoming changes in the rules and regulations that will affect them, and sufficient time is allowed for the affected groups to adjust to and align with the new regulatory framework; Parliamentary committees debate and scrutinise legislative initiatives, with active participation of government ministers and senior public servants, and ensure consultation with key stakeholders, while also minimising any risks of undue external influence; The parliamentary services provide expert advice and support to members of parliament for initiating and drafting new laws based on evidence and with input from key stakeholders.

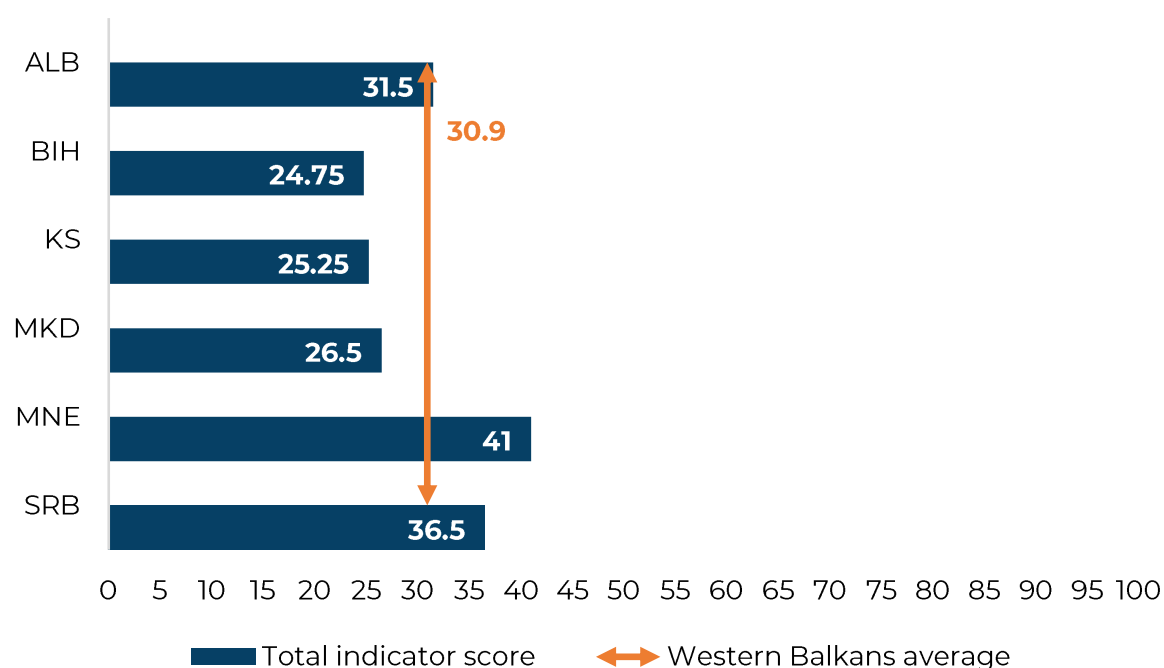
Table 5: Indicator elements under the sub-indicator 4

| Indicator element: number and title | Type |
|--|----------------------------|
| E 4.1 There is a strategic document in force that envisages transparency and inclusiveness of policy monitoring and evaluation practices | Strategy and policy |
| E 4.2 Regulations envisage sending advance notifications to affected groups on the upcoming changes to the legal framework | Legislation |
| E 4.3 Parliamentary rules of procedure envisage participation of interested parties in parliamentary discussions, in the form of public hearings | Legislation |
| E 4.4 Lead ministries publish advance notifications to the affected groups on the upcoming changes to the legal framework | Practice in implementation |
| E 4.5 Lead ministries regularly publish monitoring reports on implementation of policy documents | Practice in implementation |
| E 4.6 Monitoring reports on implementation of policies are citizen friendly | Practice in implementation |
| E 4.7 Lead ministries publish ex-post evaluations on implementation of policies | Practice in implementation |
| E 4.8 Ex-post evaluations on implementation of policies use external data and information produced by non-state actors | Practice in implementation |
| E 4.9 Parliament involves stakeholders, affected groups, and other non-state actors in public hearings | Practice in implementation |
| E 4.10 Online transparency of the work of parliaments | Practice in implementation |
| E 4.11 Key non-state actors consider involvement of stakeholders in public hearings as effective | Outcomes and impact |

II. TRANSPARENCY AND OPENNESS OF POLICY DEVELOPMENT AND COORDINATION: Comparative Western Balkan findings

This section provides a comparative analysis of the assessment results for the six WB administrations. Each sub-section presents the results for one sub-indicator (four in total), beginning with a brief overview of developments since the PAR Monitor 2021/2022. This is followed by a detailed assessment of the sub-indicator elements, starting with the policy, legislative, and institutional framework, then moving to the practice in implementation, and finally outcomes and impact. Each sub-indicator assessment concludes with the presentation of awarded points.

The graph below displays the overall results for the Policy Development and Coordination area, measured on a scale from 0 to 100 points.



National reports for the Policy Development and Coordination area for all WB administrations are available at: www.par-monitor.org

II.1 Transparency and inclusiveness of government decision-making process

Principle 2: Public policies are coherent and effectively co-ordinated by the centre of government; decisions are prepared and communicated in a clear and transparent manner.

State of play

As in previous monitoring cycles, governments in the region continue to face notable challenges in ensuring the adequate publication of performance-related information. The overall public availability of such information remains low across all administrations, limiting transparency, accountability, and the ability of citizens and stakeholders to meaningfully follow government activities. In many cases, information is either not published, published only partially, or presented in formats that are not easily accessible or understandable. This situation is consistent with broader regional assessments. SIGMA has highlighted that open and transparent government decision-making remains a persistent challenge, particularly due to the inconsistent and incomplete publication of key materials such as agendas and decisions from government sessions.¹¹ These gaps reduce the overall openness of the decision-making process and hinder effective public oversight, indicating that further efforts are needed to improve both the availability and quality of information on government performance.

PAR strategic documents in the WB show varying degrees of commitment to improving the transparency of governmental decision-making. Albania, North Macedonia, and Montenegro have embedded actions in their strategic frameworks to enhance transparency of government's work while, in contrast, the PAR strategic frameworks in Kosovo and Serbia lack such measures.

*In **Albania**, the Crosscutting PAR Strategy 2025–2030, and its Action Plan 2025–2027 foresees increases in the transparency of the central government's decision-making agenda through regular publication of ministers' normative acts. In **North Macedonia**, PAR Strategy 2023–2030, with AP, aims at improving transparency in governmental decision-making through the preparation of new Rules of Procedure of the Government and operationalisation of the centre-of-government functions. **Montenegro's** PAR Strategy includes drafting the Law on the Government that would inter alia introduce obligation of publishing minutes of the Government sessions, while other measures aim at improving the system for managing e-sessions of the Government.*

¹¹ SIGMA country reports on the Assessment against the Principles of Public Administration for all WB countries, along with an overview WB report, are available at: <https://tinyurl.com/3uwz5dh7>.

Similarly to the strategic framework, the regulations in the WB also provide uneven coverage of transparency in government decision-making (Table 6). Overall, the publication of agendas is formally required only in Montenegro and North Macedonia. Minutes from Government sessions are explicitly required to be published online only in North Macedonia and are foreseen as an obligation in Montenegro’s Draft Law on the Government, which is yet to be adopted; in other administrations, minutes are kept internally, with limited or no public access. The publication of decisions taken at Government sessions is generally regulated, except in Serbia, where there is no formal obligation of publishing online. Dissemination of press releases is explicitly regulated in Montenegro, BIH, and North Macedonia, with the other half of administrations relying on voluntary communication. Taken together, full and systematic publication of all key documents from the Government’s proceedings - agendas, minutes, decisions, and press releases, is established by law only in North Macedonia and, to a lesser extent, Montenegro and BIH, indicating insufficient transparency regulation across the region.

Table 6: Regulatory framework for transparency of government decision-making

| | ALB | BIH | KS | MKD | MNE | SRB |
|--|-----|-----|----|-----|-----|-----|
| <i>publishing of agenda items regulated</i> | X | ✓ | X | ✓ | ✓ | X |
| <i>publishing of minutes from the sessions regulated</i> | X | X | X | ✓ | X | X |
| <i>publishing of decisions taken at the sessions regulated</i> | ✓ | ✓ | ✓ | ✓ | ✓ | X |
| <i>publishing of a press release for every session regulated</i> | X | ✓ | X | ✓ | ✓ | X |

This, the practice in publication of the same materials online shows multiple gaps. While no government in the region practices comprehensive and systematic online publication of both agendas and minutes, governments in Montenegro and BIH showed relatively stronger transparency practices. In these two administrations, as well as in North Macedonia, agenda items of the governmental sessions are made publicly available – albeit after the sessions are held. At the same time, publishing agenda items in advance of the sessions is barely practiced, with the Council of Ministers of BIH being the positive regional outlier.

Table 7: Online publication practices of government session materials

| | ALB | BIH | KS | MKD | MNE | SRB |
|--|-----|-----|----|-----|-----|-----|
| <i>regular publishing of agenda items (in at least 80% of cases/sessions)</i> | X | ✓ | X | ✓ | ✓ | X |
| <i>regular publishing of minutes from the sessions (in at least 80% of cases/sessions)</i> | X | X | X | X | X | X |
| <i>regular publishing of press releases (in at least 80% of cases/sessions)</i> | ✓ | ✓ | X | X | ✓ | X |
| <i>agenda items published in advance of sessions (in at least 80% of cases/sessions)</i> | X | ✓ | X | X | X | X |

The publication of decisions adopted by governments during their sessions similarly shows variations (Table 8). In Albania, BIH, Kosovo, and Montenegro, most decisions are made publicly available online, with Albania and Kosovo ensuring timely publication within one week of adoption, while Montenegro achieves a high overall publication rate (97.5%) but with significant delays. In BIH, although decisions are published in the Official Gazette and accessible free of charge, publication typically happens more than seven days after adoption. In contrast, North Macedonia and Serbia do not ensure regular online availability of adopted decisions in a comprehensive or free-of-charge format: in North Macedonia, decisions are only published in the Official Gazette under paid subscription and summarised in press releases, while in Serbia, Government conclusions – an important and broadly used type of government decisions – are generally exempt from publication in the Official Gazette (unless the text of a conclusion itself specifies that it should be published). In addition, in Serbia it was not possible to verify publication of other decisions due to the lack of response from the General Secretariat to the FOI request¹². Substantial disparities in the accessibility and timeliness of the online publication of government decisions represent a significant barrier to transparency, while failure to publish such decisions in a timely and accessible manner significantly undermines legal certainty.

¹² It was not possible to determine either the total number of agenda items discussed during Government sessions in the monitoring period, or the number of decisions adopted and their confidentiality status, based solely on publicly available information on Government websites. These data are held by the General Secretariat of the Government. A freedom of information request was therefore submitted (02.02.2026.) to the General Secretariat of the Government, requesting the list of agenda items per session, the list of decisions adopted, their confidentiality status, and the dates of publication of decisions not labelled as confidential. However, the institution did not respond to the request after the submission of an additional clarification to the initial request. Consequently, it was not possible to verify the total number of adopted decisions not formally labelled as confidential, nor to determine the share of such decisions that were made publicly available online.

Table 8: Availability and timeliness of online publication of government decisions

| | ALB | BIH | KS | MKD | MNE | SRB |
|--|-----|-----|----|-----|-----|-----|
| <i>at least 80% of decisions taken, and not labelled as confidential, are available online</i> | ✓ | ✓ | ✓ | X | ✓ | X |
| <i>at least 80% of decisions taken, and not labelled as confidential, are available online and published a week after a session of adoption, at latest</i> | ✓ | X | ✓ | X | X | X |

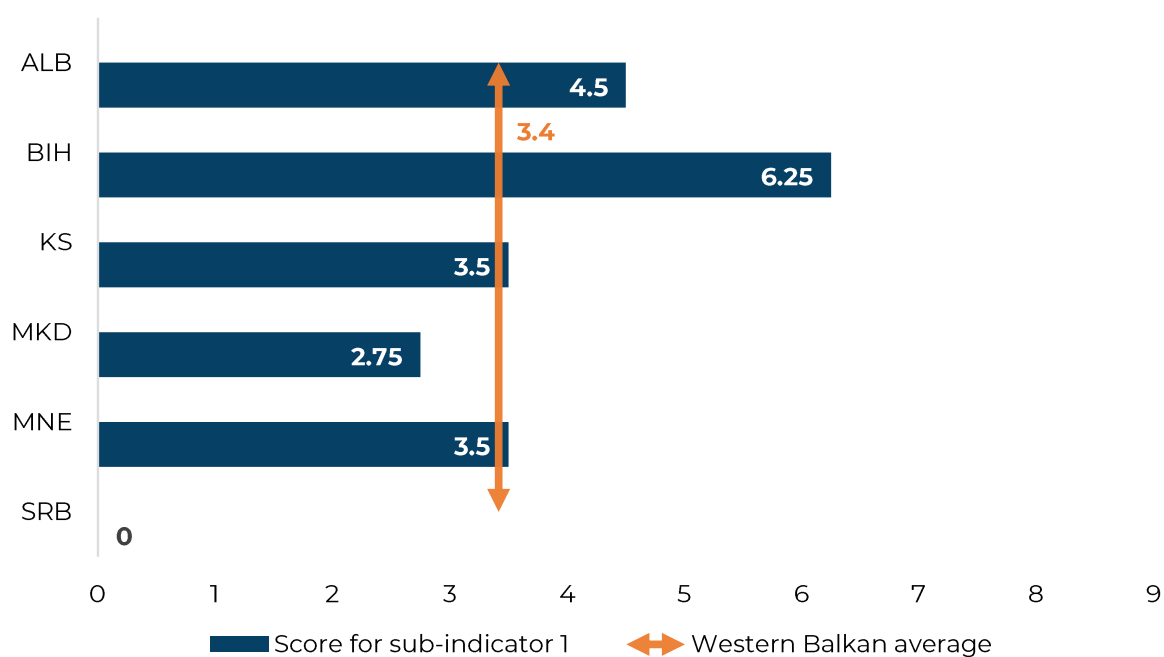
Insights from key informant interviews with non-state actors on the transparency of governmental decision-making returned mixed results (Table 9). In half of the region, interviewees agree that agenda items for government sessions are transparent – in BIH, North Macedonia, and Montenegro, while in others they are not considered as such. They negatively assess the transparency of minutes from government sessions across all administrations, which is in line with the findings of the real-time government sessions monitoring presented above. On the other hand, attitudes were largely positive when interviewees were asked to assess the transparency of decisions adopted at government sessions, with the exception of Montenegro and Serbia. Finally, transparency assessments of communication practices through press releases were mixed, with BIH receiving the most positive and Serbia the most negative assessments. Taken together, the perspectives of non-state actors across the WB confirm the limitations in the transparency of government decision-making observed through the practice monitoring. They also reaffirm the superior performance of BIH relative to the other administrations in the region.

Table 9: Number of non-state actors' responses per agreement scale

| Statement | Administration | Fully disagree | Tend to disagree | Tend to agree | Fully agree |
|--|----------------|----------------|------------------|---------------|-------------|
| The agenda items for the sessions of the government are transparent | ALB | 1 | 1 | 1 | |
| | BIH | | | 2 | 1 |
| | KS | | 1 | 2 | |
| | MKD | | | 3 | |
| | MNE | | | 2 | 1 |
| | SRB | 2 | 1 | | |

| | | | | | |
|---|-----|---|---|---|---|
| Minutes of the sessions of the government are transparent | ALB | 1 | 1 | 1 | |
| | BIH | 3 | | | |
| | KS | 1 | 1 | 1 | |
| | MKD | | 1 | 1 | 1 |
| | MNE | | 3 | | |
| | SRB | 2 | 1 | | |
| Decisions of the sessions of the government are transparent | ALB | | | 1 | 2 |
| | BIH | | | 3 | |
| | KS | | | 2 | 1 |
| | MKD | | 1 | | 2 |
| | MNE | | 3 | | |
| | SRB | | 3 | | |
| The government publicly informs on its decision-making via press releases | ALB | | 1 | 2 | |
| | BIH | | | 1 | 2 |
| | KS | | 1 | 1 | 1 |
| | MKD | | 1 | 1 | 1 |
| | MNE | | 2 | 1 | |
| | SRB | 1 | 2 | | |

Sub-indicator 1: Transparency and inclusiveness of the government decision-making process (maximum score 9)



II.2 Transparency of government planning and reporting

Principle 3: The government plans and monitors public policies in an effective and inclusive manner, in line with the government fiscal space.

State of play

In its latest overview report for the WB, SIGMA highlights persisting challenges in policy planning, implementation, and reporting. While formal planning procedures are largely in place, the report points to the formalistic nature of planning documents, unrealistic planning, and weak links with the budget. Overly ambitious plans, combined with misalignment across planning documents, hinder effective implementation and reporting on results. This includes discrepancies between government work plans, sector strategies, and European integration planning documents. As a result, SIGMA finds that planned activities are frequently not implemented or are carried over from one year to the next – completion rates account for less than half of activities and commitments for government work plans and are even lower for European-integration-related plans. Overall, SIGMA concludes that government planning in the region remains unreliable and unpredictable, with a large portion of legislative activities undertaken outside formally adopted plans.¹³

PAR strategic frameworks in the region, valid at the time of monitoring, have mostly laid out concrete measures and activities for the improvement of governments' planning and reporting practices, except for Kosovo. In the remaining administrations, planned actions differ in direction and scope, however, with the similar focus on improving specific aspects of planning and reporting with clear indication of institutional responsibilities for completing them. Table 10 below presents an overview of the key measures and activities identified in the relevant planning documents.

¹³ SIGMA country reports on the Assessment against the Principles of Public Administration for all WB countries, along with an overview WB report, are available at: <https://tinyurl.com/3uwz5dh7>.

Table 10: Overview of measures and activities for enhancing governmental planning and reporting practices (non-exhaustive)

| | Planned measures/activities | Strategic framework |
|------------|---|---|
| ALB | <ul style="list-style-type: none"> • Improve the Integrated Strategic Planning Information System (IPSIS) • Implement a comprehensive multi-annual European integration planning process • Align the Council of Ministers' General Analytical Programme of Draft acts with government priorities, including coordination of the calendar for acts approval, tracking adopted acts, and reporting on missed deadlines | The Crosscutting PAR Strategy 2025-2030 with AP 2025-2027 |
| BIH | <ul style="list-style-type: none"> • Strengthen coordination of policy proposals across all administrative levels, including through training on planning, monitoring, and reporting processes • Improve IT support for planning, monitoring, and reporting processes | The state-level PAR Action Plan |
| MNE | <ul style="list-style-type: none"> • Establish links between the Government's medium-term work programme, annual work programme, strategic documents, and programme budgeting • Organise trainings for the preparation of ministries' medium-term work programmes for the 2026–2028 cycle • Define and establish the policy coordination function at the level of ministries, through internal acts on systematisation and organisation, and prepare relevant guidelines¹⁴ | The PAR Strategy with AP 2025–2026 |
| MKD | <ul style="list-style-type: none"> • Establish a mechanism to align long-term, medium-term, and annual planning, including harmonising methodology for strategic planning and for preparation of the Annual Government Work Programme (GAWP) with the law on budgets, and adopting a methodology for preparing the National Programme for the Adoption of the Acquis (NPAA) • Ensure regular and timely public reporting on government work, including publication of NPAA and GAWP implementation reports | The PAR Strategy 2023-2030 |
| SRB | <ul style="list-style-type: none"> • Strengthen central planning compliance by aligning the Action Plan for the Implementation of the Government Programme (APIGP) with NPAA and strengthen the technical capacities of the Ministry of European Integration for NPAA preparation and monitoring • Establish annual monitoring of the number of valid regulations by area and track timely adoption of by-laws • Strengthen public policy monitoring and reporting and transparent presentation of results, through adapting the Unified Information System module for the APIGP to the new format and organising training for administration bodies • Establish and implement quality control of consultations and public debates, including improved use of eConsultation portal and reporting on consultation processes as integral part of report on GAWP | The Programme for the Improvement of Management of Public Policies and Regulatory Reform for the 2021-2025, with a revised Action Plan for 2025 |

¹⁴ The PAR Strategy, in its specific objective 5 - Strengthening the evidence-based planning system that leads to sustainable policies and achievement of Government priorities envisages activities on improving strategic planning and reporting practices at the ministerial level that should translate into better planning at the government level as a whole.

Central planning documents guiding governments' work are largely established in law across the region, including annual work plans, multi-annual programmes, and European integration plans. However, the regulatory framework does not consistently require their publication or the publication of reports on their implementation. Serbia and Montenegro are the only cases where such obligations are clearly defined for general government planning documents, while Montenegro is the only example where legislation also requires publication of its European integration plan - the Programme of Accession of Montenegro to the EU, and its implementation reports. By contrast, in North Macedonia and BiH, European integration planning documents are either outdated or not yet fully established. The absence of explicit publication requirements across much of the region is notable. Although this does not prevent responsible government institutions from disclosing plans and results, lack of regulation also negatively affects publication of these documents in practice.

When it comes to publication practices, analysis of public availability of central planning documents and their implementation reports reveals recurring gaps across the region. In none of the administrations is transparency of these documents fully ensured in practice. The assessment was based on two criteria: (1) whether plans and implementation reports are published regularly, covering the last two consecutive planning and reporting cycles (with the exception of multi-annual government programmes, where only the current programme was assessed); and (2) whether they are published in a timely manner, in line with legally prescribed deadlines or, where such deadlines are not defined, within one week of adoption.

Montenegro stands out among WB administrations, with almost full disclosure of observed planning and reporting documents. The only exception is a delay in publishing the Medium-Term Work Programme of the Government 2024-2027, which occurred due to technical reasons.¹⁵ Serbia follows, although with a markedly lower level of transparency (see below Table 11). Additionally, online sources of publication may vary across the region, and, in some cases, this affected the assessment. For example, multi-annual government programmes in Albania (2025-2029) and Kosovo (2021-2025) were publicly available at the time of monitoring, but not on government websites; instead, they were published on the websites of the Parliament and the Ministry of Education, respectively.

Differences are also evident in the reporting practices. In Montenegro, a single reporting mechanism covers both the GAWP and the Medium-Term Work Programme, while elsewhere such approaches are not in place. In BiH, there is no established planning or reporting mechanism for European integration, while in North Macedonia the most recent published NPAA dates to 2017. In Serbia, on the other hand, quarterly reporting on NPAA implementation

¹⁵ Directorate-General of the Government of Montenegro informed WeBER that publication of the 2024-2027 Medium-Term Work Programme was delayed due to proofreading.

is generally timely for the entire observation period, although the report for the second quarter of 2024 was not publicly available, affecting the overall assessment.¹⁶ Taken together, publication practices are neither fully regular nor timely, limiting opportunities for public scrutiny of government work, particularly due to incomplete reporting. Also, reporting practices are far less transparent than planning across the region, particularly for multi-annual programmes and European integration plans.

Table 11: Publication of central planning documents and implementation reports on the work of governments¹⁷

| | ALB | BIH | KS | MKD | MNE | SRB |
|---|-----|-----|----|-----|-----|-----|
| ANNUAL WORK PLANS | | | | | | |
| <i>regularly published</i> | ✓ | ✓ | ✓ | ✓ | ✓ | X |
| <i>timely published</i> | ✓ | X | ✓ | X | ✓ | X |
| MULTI-YEAR PROGRAMMES | | | | | | |
| <i>programme published</i> | X | X | X | ✓ | ✓ | ✓ |
| <i>timely published</i> | X | X | X | ✓ | X | ✓ |
| EUROPEAN INTEGRATION RELATED PLANS | | | | | | |
| <i>regularly published</i> | ✓ | n/a | X | n/a | ✓ | ✓ |
| <i>timely published</i> | ✓ | n/a | X | n/a | ✓ | ✓ |
| REPORTS ON IMPLEMENTING ANNUAL WORK PLANS | | | | | | |
| <i>regularly published</i> | X | ✓ | X | X | ✓ | ✓ |
| <i>timely published</i> | X | X | X | X | ✓ | ✓ |
| REPORTS ON IMPLEMENTING MULTI-YEAR PROGRAMMES | | | | | | |
| <i>regularly published</i> | X | X | X | X | ✓ | X |
| <i>timely published</i> | X | X | X | X | ✓ | X |
| REPORTS ON IMPLEMENTING EUROPEAN INTEGRATION PLANS | | | | | | |
| <i>regularly published</i> | X | n/a | X | n/a | ✓ | X |
| <i>timely published</i> | X | n/a | X | n/a | ✓ | X |

¹⁶ Available at: <https://www.mei.gov.rs/dokumenta/nacionalna-dokumenta.733.html>.

¹⁷ For plans, following documents were observed: the last two annual work plans/programmes, for the current and previous year at the time of monitoring, the current multi-year programme of the Government at the time of monitoring and last two European integration related plans, for the current and the previous year at the time of monitoring. For reports, following documents were observed: the last two reports for each type of planning documents. Thus, the table provides an overview of publication practices, and the results, indicated as positive (✓) or negative (X), are based on cumulative assessments of multiple documents.

Good practices – Transparent government planning and reporting in Montenegro

The Government of Montenegro demonstrates the strongest practice of transparency in government planning and reporting in the region. Of all planning documents and implementation reports analysed in this monitoring cycle, all were published regularly and in a timely manner, with the sole exception of a delay in publishing the Medium-Term Work Programme of the Government 2024–2027 online – due to technical reasons. While publication of central planning documents constitutes a standard requirement under the PAR Monitor methodology, the consistency of publication and overall level of transparency clearly distinguish Montenegro from the rest of the region.

Governmental planning and reporting documents across the region do not fully enable tracking performance, which is the result of occasional usage of performance-related metrics, and irregular reporting practices. Assessment of performance measurement and results achievement was based on two criteria: (1) whether the observed work plans and government programmes include performance indicators; and (2) whether implementation reports provide information on results achieved, either through qualitative assessments or by reporting against those indicators.

Regarding the first criterion, multi-annual government programmes of governments generally include performance indicators, except for Kosovo and North Macedonia. Annual work plans are more output-oriented although in BIH, Kosovo, and Montenegro, they also include performance targets alongside activity-based information. For the second criterion, the existence of performance information could not be assessed in many cases due to irregular or absent reporting. Nevertheless, several examples are noteworthy. In BIH, the 2024 annual report on the work of the Council of Ministers provides narrative information on progress related to strategic initiatives, although without systematically reporting against performance indicators.¹⁸ In Montenegro, reports on implementation of the GAWP for 2024 and 2025, also serving as reports on the medium-term programme, present progress against objectives and performance indicators.¹⁹ In Serbia too, the 2023 report on implementation of the APIGP 2023–2026 includes both results assessment in narrative and reporting against performance indicators.²⁰ Such examples showcase efforts to present results compared to planned priorities. However, largely irregular practices of publication of reports, as noted above, limit not only the ability to fully assess existence of performance information but also the possibility to assess governmental performance vis-à-vis objectives, and thus to call for data-driven accountability.

Citizen-friendliness of planning and reporting documents was assessed based on the presentation of content, specifically looking at whether documents

¹⁸ Available at: <https://tinyurl.com/y6cehdvh>

¹⁹ Report for 2025 available at: <https://www.gov.me/dokumenta/f13ea161-5ff7-4916-94e3-038ce27eab39>.

²⁰ Available at: <https://rsjp.gov.rs/cir/dokumenti-kategorija-cir/program-vlade-i-apspv-cir/>.

include introductions, summaries, or textual and visual elements that convey key information in a clear and accessible manner. While most documents follow formal structures without dedicated citizen-oriented features, some, primarily those related to European integration, stand out for more accessible presentation. In Kosovo, the National Programme for European Integration (2024–2028) and its January–September 2024 implementation report provide structured summaries that facilitate navigation.²¹ In Montenegro, reports on implementation of the Programme of Accession to the EU include summaries and present results by negotiation chapters, types of activities, and responsible institutions.²² In Serbia, quarterly reports on NPAA implementation include summaries showing the total number and percentage of adopted acts by type, as well as the level of fulfilment of obligations in the reporting period. Still, despite these highlights, governmental planning and reporting practices show limited or no efforts to reach the public with adjusted reporting formats.

No data on planned commitments or results of the governments' work is available in open, machine-readable formats. In some administrations, open data portals are not yet operational, such as in BIH and Kosovo. Where such portals exist, relevant datasets are not available on either the open data portals or the websites of relevant institutions. In some cases, documents are published only as scanned PDF files, preventing keyword search, as seen in the Report on Implementation of the Programme of Accession of Montenegro to the European Union for 2025. Overall, open data publication in this area is effectively absent, i.e., not treated as a priority within broader open data policies.

Interviewed key informants across the region largely disagree that government planning and reporting activities are transparent, timely, or citizen-friendly (see Table 12). Montenegro is a partial exception, where most interviewees (two out of three) consider these activities generally transparent and timely, and displaying some citizen-friendly features. Similarly, in BIH, majority of interviewees agreed that these practices are transparent. However, key informants across the region consistently highlight important shortcomings. While formal mechanisms for planning and reporting exist, compliance in practice is often weak, with frequent delays in reporting and late publication of plans. In some cases, new plans are adopted without prior reporting on the implementation of previous ones. Public communication of planning and reporting outcomes is also seen as limited and selective, often influenced by political considerations and electoral cycles. Key findings, results, and implementation gaps are rarely communicated in a clear and accessible manner. Overall, key informants note that these shortcomings contribute to low public awareness and limited interest in central planning documents and their reports, with public attention largely focused on high-profile decisions.

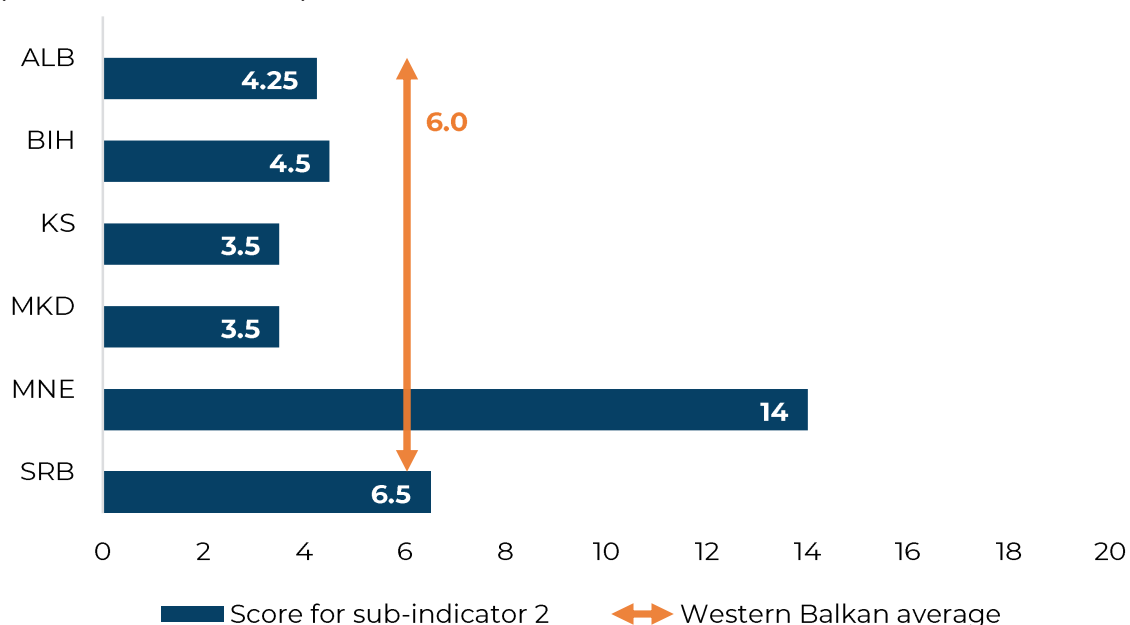
²¹ Available at: <https://tinyurl.com/4f3m4r7k>

²² Report for 2025 available at: https://www.gov.me/dokume_ta/80ef8627-876a-47cd-afa9-44bd5c75724c.

Table 12: Number of non-state actors' responses per agreement scale

| Statement | Administration | Fully disagree | Tend to disagree | Tend to agree | Fully agree |
|--|----------------|----------------|------------------|---------------|-------------|
| Government's planning and reporting activities are transparent | ALB | | 2 | 1 | |
| | BIH | | 1 | 2 | |
| | KS | | 3 | | |
| | MKD | | 2 | 1 | |
| | MNE | 1 | | 2 | |
| | SRB | | 3 | | |
| Government's planning and reporting activities are timely | ALB | 1 | 1 | | 1 |
| | BIH | | 2 | 1 | |
| | KS | | 2 | 1 | |
| | MKD | | 3 | | |
| | MNE | 1 | | 2 | |
| | SRB | 1 | 2 | | |
| Government's planning and reporting activities are citizen friendly | ALB | 1 | 1 | 1 | |
| | BIH | 3 | | | |
| | KS | 1 | 2 | | |
| | MKD | | 2 | 1 | |
| | MNE | 1 | | 2 | |
| | SRB | 2 | 1 | | |

Sub-indicator 2: Transparency of government planning and reporting (maximum score 20)



II.3 Transparency and inclusiveness of policy making and legislation development process

Principle 4: Public policies are developed based on evidence and analysis, following clear and consistent rules for law making; laws and regulations are easily accessible.

Principle 5: All key external and internal stakeholders and the general public are actively consulted during policy development.

State of play

Since the previous WeBER monitoring cycles, legal frameworks governing impact assessment and consultation in the WB have undergone certain changes, but the reform depth and its influence vary significantly. The European Commission (EC) notes that Albania's administrative capacity for evidence-based policymaking and legislative development requires further improvement. Furthermore, secondary legislation remains exempt from the application of the existing rules on public consultations and regulatory impact assessments. Evidence-based policy making remains a weak point of the state level BiH, but the EC points out that the e-consultation system was improved by introducing an obligation for institutions to publish reports. In Kosovo, the EC highlights that the government's rules of procedure clarify different aspects of policy development, but detailed instructions and manuals are still needed to ensure improved interinstitutional coordination. In North Macedonia, the methodology for conducting regulatory impact assessments was improved, as noted by the EC.²³ In January 2026, the Guidelines on Conducting Regulatory Impact Assessments and Preparing Regulatory Impact Assessment Reports were adopted in Montenegro, reiterate mandatory impact assessments for draft laws, regulations, strategic documents, and similar acts. The Guidelines will enter into force on January 1st, 2027. By contrast, Serbia has moved in the opposite direction: amendments to the Decree on the Regulatory Impact Assessment, Decree on the Methodology for Drafting PPDs and Rules of Procedure of the Government) introduced in 2025 and 2026, significantly derogate the current impact assessment and consultation framework.

²³ European Commission country reports for 2025 are available at: <https://tinyurl.com/5eun87sd>.

PAR planning documents across the WB highlight the importance of improving the policy and legal development process through strengthening different aspects related to the public consultation mechanisms. Measures to improve the transparency of policy and legal development are envisaged in strategic documents across all WB administrations, while measures to improve inclusiveness are present in all except Kosovo. They mainly focus on increasing the number of acts undergoing consultations, improving reporting practices, increasing citizen and CSOs involvement in consultations, developing/improving online public consultations platforms and enhancing the capacities of civil servants working on tasks related to policy and legal development.²⁴ Activities further specify how the measures will be implemented in practice, demonstrating a strong strategic commitment to improving transparency and participation opportunities when developing legal acts and policy documents. The current legal framework, however, does not provide for consultation systems that fully encompass transparency and inclusiveness principles through early consultations, public consultations for draft acts, and working groups (WG). The transparency of the work of WGs is not regulated across the WB for any type of observed acts (PPDs, primary and secondary legislation). Furthermore, transparency and inclusiveness of secondary legislation development are the least developed out of the observed types of acts in all administrations. Looking administration-wide, Serbia stands out with the most regulated aspects of transparency and inclusiveness, while North Macedonia features the fewest such elements (see Table 13 below). The findings show that key elements of transparent and inclusive policy and legal development (WG transparency, early consultations, and secondary legislation development) remain only partially regulated across the region, resulting in fragmented consultation systems.

24 Planning documents analysed here include: Crosscutting PAR strategy for 2025-2030 and the Action Plan for 2025-2027 for the Application of the Crosscutting PAR Strategy 2025-2030 of Albania (available at: <https://tinyurl.com/yeuzzvnx>), Action Plan for PAR under the Strategic Framework 2018-2027 of BIH (available at: <https://shorturl.at/tv7hR>), Action Plan for 2025-2027 of the PAR Strategy for 2022-2027 of Kosovo (available at: <https://tinyurl.com/nbt7s4ej>), Government Transparency Strategy with its Action Plan for 2023-2026 of North Macedonia (available at: <https://shorturl.at/ID8yl>), Action Plan for 2025-2026 of the Public Administration Reform Strategy for 2022-2026 of Montenegro (available at: <https://tinyurl.com/2d33w59y>), and Programme for the Improvement of Management of Public Policies and Regulatory Reform for the period 2021-2025, with a revised Action Plan for 2025 of Serbia (available at: <https://tinyurl.com/3prnfw77>).

Table 13: Existence of legal provisions on transparency and inclusiveness of policy and legal development

| | ADMINISTRATION/ CRITERIA | ALB | BIH | KS | MKD | MNE | SRB |
|-------------------------|--|-----------------|-----|-----------------|-----|-----|-----------------|
| public policy documents | Consultations with stakeholders and targeted groups (early consultations), including transparency of consultation results (reports) | ✓ | ✓ | ✗ ²⁵ | ✗ | ✓ | ✓ |
| | Public consultations on the draft proposals (consultations at the end of the process, for anyone interested), including transparency of consultation results (reports) | ✓ | ✓ | ✓ | ✗ | ✓ | ✓ |
| | Transparency of work of working groups, including composition and results of their work | ✗ ²⁶ | ✗ | ✗ | ✗ | ✗ | ✗ ²⁷ |
| | Inclusiveness of work of working groups, i.e., involvement of non-state actors, including transparency of selection process | ✗ ²⁸ | ✗ | ✓ | ✗ | ✓ | ✓ |
| primary legislation | Consultations with stakeholders and targeted groups (early consultations), including transparency of consultation results (reports) | ✓ | ✓ | ✗ | ✓ | ✓ | ✓ |
| | Public consultations on the draft proposals (consultations at the end of the process, for anyone interested), including transparency of consultation results (reports) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Transparency of work of working groups, including composition and results of their work | ✗ | ✗ | ✗ | ✗ | ✗ | ✗ |
| | Inclusiveness of work of working groups, i.e., involvement of non-state actors, including transparency of selection process | ✗ | ✗ | ✓ | ✗ | ✓ | ✓ |

25 In Kosovo, preliminary or early phase consultations for all types of acts are envisaged only as inter-institutional consultations, not consultations with non-state actors. Article 36, Regulation on Rules of Procedure of the Government of the Republic of Kosovo, available at: <https://tinyurl.com/mryjibmk>

26 For all observed types of acts, working groups in Albania report to the establishing authority, which later decides if the report will be publicly available or not. Articles 280 and 281, Law 9000, dated on 30.1.2003, "On the organisation and functioning of the Council of Ministers", Albania.

27The legal framework in Serbia only states that the public call for participation in public debates contains, among other relevant information, information on the composition of the working group which prepared the draft act. This was not considered sufficient since it does not encompass the obligation to publish other material that is relevant to the work of the working group, such as meeting minutes and conclusions adopted during the meetings.

28 Inclusiveness of working groups for developing policy and legal acts is regulated, but the transparency of the selection process is not. Thus, this aspect was not considered as regulated in Albania.

| | | | | | | | |
|-----------------------|--|-----------------|---|---|---|---|---|
| secondary legislation | Consultations with stakeholders and targeted groups (early consultations), including transparency of consultation results (reports) | X ²⁹ | ✓ | X | X | X | ✓ |
| | Public consultations on the draft proposals (consultations at the end of the process, for anyone interested), including transparency of consultation results (reports) | X | ✓ | ✓ | X | X | ✓ |
| | Transparency of work of working groups, including composition and results of their work | X | X | X | X | X | X |
| | Inclusiveness of work of working groups, i.e., involvement of non-state actors, including transparency of selection process | X | X | ✓ | X | X | ✓ |

Similar gaps were noted when observing the minimal consultation requirements, which encompass a minimal process duration, timely stakeholder notification, publication of relevant material, consultation format, and reporting. These requirements are most present when it comes to primary legislation development, followed closely by requirements for PPDs. However, relevant provisions are mainly absent for secondary legislation in Albania, North Macedonia and Montenegro, reiterating the need to further strengthen the transparency and inclusiveness of the development of bylaws, at least those likely to have a significant regulatory impact. Timeliness of informing stakeholders is an aspect that should be strengthened horizontally, since it is not regulated in BIH, Montenegro and Serbia for any type of act. It is also not present for primary legislation in North Macedonia, and for secondary legislation in Albania and North Macedonia (see Table 14 below). Finally, Kosovo stands out as the administration where all observed aspects were regulated for public consultations (since early phase consultations with non-state actors are not prescribed). Even though consultation systems are not equally developed across all forms of participation (early or later stage) or all types of acts, individual procedural aspects for consultation forms that are regulated tend to be well-developed.

²⁹ Consultations for secondary legislation are not mandatory but can be organised upon the decision of the institution in charge of developing the draft act. However, reports from those consultations are only for internal use. Articles 14, 15 and 19e of the Decision No.584, dated on 28.8.2003, "On the approval of the regulation of the Council of Ministers" updated, Albania.

Table 14: Existence of legal provisions on minimum consultation requirements

| | ADMINISTRATION/ CRITERIA | ALB | BIH | KS | MKD | MNE | SRB |
|-------------------------|---|-----|-----|----|-----|-----|-----|
| public policy documents | Minimum duration of consultations | ✓ | ✓ | ✓ | X | ✓ | X |
| | Timeliness of informing stakeholders and the public on holding consultations (advance notifications) | ✓ | X | ✓ | X | X | X |
| | Documents to be published alongside drafts or materials under consultation | ✓ | ✓ | ✓ | X | ✓ | ✓ |
| | Minimum two formats of consultations (submission via email, via post, through consultation portals, or websites of responsible authority, etc.) | ✓ | ✓ | ✓ | X | ✓ | ✓ |
| | Mandatory reporting on implemented consultations, and mandatory provision of feedback on consultees' inputs | ✓ | ✓ | ✓ | X | ✓ | ✓ |
| primary legislation | Minimum duration of consultations | ✓ | ✓ | ✓ | ✓ | ✓ | X |
| | Timeliness of informing stakeholders and the public on holding consultations (advance notifications) | ✓ | X | ✓ | ✓ | X | X |
| | Documents to be published alongside drafts or materials under consultation | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Minimum two formats of consultations (submission via email, via post, through consultation portals, or websites of responsible authority, etc.) | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | Mandatory reporting on implemented consultations, and mandatory provision of feedback on consultees' inputs | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| secondary legislation | Minimum duration of consultations | X | ✓ | ✓ | X | X | X |
| | Timeliness of informing stakeholders and the public on holding consultations (advance notifications) | X | X | ✓ | X | X | X |
| | Documents to be published alongside drafts or materials under consultation | X | ✓ | ✓ | X | X | ✓ |
| | Minimum two formats of consultations (submission via email, via post, through consultation portals, or websites of responsible authority, etc.) | X | ✓ | ✓ | X | X | ✓ |
| | Mandatory reporting on implemented consultations, and mandatory provision of feedback on consultees' inputs | X | ✓ | ✓ | X | X | ✓ |

Significant discrepancies are noted in legal frameworks governing free online access to policy documents and primary and secondary legislation, including availability of consolidated versions of legal acts. Such access is guaranteed by the legislation in Albania and Serbia only, with Kosovo following closely, as free access to secondary legislation (including consolidated versions) is the only aspect not guaranteed. BiH stands out as a negative example, with no provisions on this form of proactive transparency, nor an obligation to publish consolidated versions of legal acts. North Macedonia's framework establishes online access to all observed types of acts, but only upon payment of a subscription for the Official Gazette. Finally, in Montenegro, free online access is legally required only for PPDs.

These legal provisions are directly reflected in practice: Albania, Kosovo and Serbia offer consolidated versions of primary and secondary legislation online, free of charge, and searchable per at least two categories, such as keyword, type of act, name of act, or period of adoption. In BiH, the acts are available free of charge and searchable, but consolidated versions are lacking. In Montenegro and North Macedonia, however, any access requires a subscription payment. Free access to legislation being a basic prerequisite of legal certainty and the rule of law (citizens cannot be expected to comply with or rely on rules they cannot freely access), the uneven regional picture shows a deficit at the foundation of the legal order itself.

One aspect in which all WB administrations are uniformly aligned is the absence of a clearly assigned centre-of-government function to check compliance with external consultation requirements. In Albania and Serbia, certain checks on compliance with consultation requirements are envisaged but are distributed across multiple institutions and do not cover the consultation system in its entirety. In North Macedonia, the Ministry of Public Administration is tasked only with verifying that a draft law is accompanied by an impact assessment, while in Montenegro, the General Secretariat of the Government is in charge of ensuring that all prescribed accompanying materials (including consultation reports) are submitted alongside draft acts for government adoption, yet no institution is mandated with assessing their quality. This gap in the institutional set-up and practice, where no institution is tasked with ensuring the quality of the process, results in the consultation systems being reduced to a mere formality, where emphasis is placed on procedural compliance rather than process quality.

Practices to avoid: Lack of a clearly mandated function for quality assurance of consultations

Quality control of compliance with consultation requirements is absent from legal frameworks across the region, with no centre-of-government bodies assigned a clearly defined oversight function. Even where certain checks are envisaged, they are reduced to technical verification of procedural steps. Without a dedicated quality assurance function, consultation requirements risk being treated as an administrative formality, disconnected from their purpose of informing policy decisions with meaningful stakeholder input. This weakens the credibility of the consultation system in the eyes of both administrations and stakeholders and reduces the incentive for institutions conducting consultations to invest in their quality.

When it comes to evidence-based policy making, impact assessment (IA) for policy documents and primary and secondary legislation (including gender impact assessment), as well as publication of IA reports, are fully legally mandated only in Kosovo and Serbia. In North Macedonia, conducting and reporting on IA is mandated for primary legislation only. Assessment of gender impact is not obligatory in Albania, North Macedonia and Montenegro. Furthermore, publication of IA reports is not mandated in Albania. Once again, BIH stands out as the only administration in which the application of IA is not mandatory. During the monitoring, some noteworthy developments of legal frameworks in Serbia and Montenegro regarding IA were introduced. Namely, in January 2026, the Guidelines on Conducting Regulatory Impact Assessments and Preparing Regulatory Impact Assessment Reports were adopted in Montenegro, explicitly stating that regulatory impact assessments are to be carried out for draft laws, regulations adopted by the Government (including decrees and decisions), as well as strategic documents (including PPDs), and similar acts.³⁰ Given that the Guidelines enter into force on 1 January 2027, their effect on practice has yet to be assessed. In contrast, recent developments in Serbia showcase a significant narrowing of the obligation to conduct IA. The latest amendments to the Decree on the Regulatory Impact Assessment and the Decree on the Methodology for Drafting PPDs, introduced in March 2026, established a basis for exempting all regulations and PPDs adopted in the context of EU accession from the obligation to undergo the IA. It remains to be seen how these amendments will affect practice, but the manner in which the provisions are formulated leaves ample room for ambiguity and arbitrary interpretation. Besides the fact that the current state of IA requirements in the region does not provide grounds for evidence-based policy and legal development, recent developments also show backsliding. Specifically, the case of Serbia indicates that the need for quality IA should not be subordinated to the speed of adoption of acts under the guise of the EU integration process, since doing so undermines the exact principles on which the EU integration is grounded.

³⁰ Guidelines are available at: <https://tinyurl.com/3pebzhhr>

The inadequate regulatory framework is matched by an uneven and generally unsatisfactory practice in conducting IA for draft PPDs and laws. Only in Kosovo and Serbia was ex-ante IA conducted for more than 80% of PPDs adopted in the observed period, which was the defined threshold.³¹ However, only in Serbia did the IA address gender impact for more than 80% of PPDs. For laws, the regional picture is even weaker: IA was conducted for more than 80% of adopted laws in the observed period only in Montenegro, where gender impact was not addressed (as it is not regulated).³² The rest of the region demonstrated substandard results, as seen in Table 15 below. Due to the absence of mandatory IA for PPDs in two administrations (BiH and North Macedonia), region-wide patterns cannot be established. However, data points to a need for strengthening the gender IA as a part of the wider IA process, due to a high discrepancy between acts for which IA was conducted, and those for which gender IA was addressed (except in the case of Serbia). Beyond calling for the detailed prescription of IA obligations across all administrations, the analysis points to a more fundamental issue in North Macedonia and Serbia: even setting aside nationally defined legal exceptions, the vast majority of laws adopted annually remain outside the scope of IA. The effect of such practice is that most regulatory decisions in the WB are adopted without a structured understanding of their likely consequences on society, economy, environment and so on. This also affects the capacity of stakeholders and the public to engage with policy proposals, since the analytical groundwork that would make such engagement substantive is largely absent.

31 Researchers identified the share of policy documents (strategies, programmes, and other applicable documents) that have been adopted by governments in the period of 12 months preceding the monitoring and checked if the IA was conducted for policy documents for which it is mandatory. For more information on the sample size and observation period, refer to Table 22 in the Methodology section.

32 Researchers identified the share of laws that have been adopted by the parliaments in the period of 12 months preceding the monitoring. National provisions on exceptions/exclusions from conducting ex ante impact assessments were not considered, i.e., the entire scope of laws adopted in the observed period was assessed.

Table 15: Consistency in application of IA, including on gender, during legal and policy development (with a minimum of 80% threshold)

| ADMINISTRATION/ CRITERIA | ALB | BIH | KS | MKD | MNE | SRB |
|--|-----|-----------------|-----------------|-----------------|-----|------|
| conducted ex-ante IAs for policy documents | 41% | / ³³ | 83% | / ³⁴ | 44% | 100% |
| gender impact addressed within IA for policy documents | 0 | / | 33% | / | 0 | 100% |
| conducted ex-ante IAs for laws | 35% | / | / ³⁵ | 14% | 83% | 28% |
| gender impact addressed within IA for laws | 3% | / | / | 0 | 0 | 28% |

Even when IA is conducted for laws, the reports are rarely published alongside other material for public consultations. Out of the laws adopted across the region in the observed period for which IA was conducted, only in North Macedonia were IA reports published during the consultation process for all laws for which IA was conducted, on the national consultation platform ENER. The monitoring also examined whether IA reports were published when the Government approved the draft law for submission to parliament, which was confirmed only for Serbia. In other administrations, the publication of IA reports alongside consultation materials and during the government approval stage was inconsistent. This indicates that IA reports are not integrated with the consultation processes, apart from the case of North Macedonia, preventing the expert and general public from engaging with the evidence base for legislative proposals and contributing to the assessment of possible economic, societal, environmental and other effects of proposed legislation.

When it comes to the comprehensiveness of IA reports, the assessment focused on whether they contain and elaborate on a set of ten key elements, including problem analysis, policy objectives and options, affected groups, implementation, monitoring, etc.³⁶ The analysis of a sample of five laws with

³³ Since the obligation to conduct IA is not thoroughly regulated in BIH, the analysis of the consistency of IA application was not conducted for either laws or PPDs.

³⁴ Since the obligation to conduct IA for PPDs is not regulated in North Macedonia, the analysis of the consistency of IA application in PPD development was not conducted.

³⁵ Due to elections taking place during the observed time period, no laws were passed in the parliament.

³⁶ The following key elements were observed:

- 1) Problem analysis
- 2) Policy objectives
- 3) Justification of government intervention/explanatory note
- 4) Policy options, including mandatory status quo option, and preferred option with justification
- 5) Affected groups
- 6) Assessment of all relevant impacts of intervention
- 7) Estimate of costs of preferred option, at least
- 8) Policy implementation and enforcement mechanisms

IA³⁷ revealed that a lack of references to external data sources is the most widespread shortcoming across the region, with the exception of BIH and Kosovo, where the analysis could not be conducted.³⁸ In Albania, three out of five sampled laws lacked references to external data, and one lacked an estimate of the costs of the preferred policy option. In North Macedonia, IA reports for two out of five laws were incomplete in terms of key elements. In Montenegro, references to external data were absent in all observed laws, while other elements were present. In Serbia, one IA report did not systematically address all key elements, and two lacked references to external sources. The absence of clear references to external data in IA reports undermines the possibility for meaningful public scrutiny of the data used to justify legislative proposals. Furthermore, the widespread practice of relying exclusively on data gathered and processed internally by public administration bodies suggests that the administration assesses its own policies against its own data, with no external empirical basis, leaving them vulnerable to institutional bias.

Alongside the quality of the evidence base for draft acts, the inclusiveness and transparency of the WGs preparing them are another important indicator of how open the early stages of policy making are to external input. The analysis of five sample acts (2 PPDs and three laws)³⁹ indicates that the WGs tend to be open to participation of non-state actors, but documents on their proceedings remain unpublished. Montenegro recorded the best results, with confirmed non-state actor participation for all five observed acts, followed closely by North Macedonia, where this was the case for four out of five acts. In Serbia, non-state actor participation was confirmed for three out of five acts. In Kosovo, the analysis was limited to PPDs, and non-state actor involvement was confirmed for one.⁴⁰ In Albania and BIH, participation could not be confirmed for any sampled act. Despite relatively positive results in half of the region in terms of stakeholder participation, the transparency of WG proceedings is absent across the WB, given that public availability of decisions on establishing WGs with lists of members, and conclusions, minutes and reports) on WG meetings is not ensured. Results reiterated the need to address the gap of

9) Monitoring and evaluation mechanisms

10) Use of external sources of information and data (at least a single, clear reference to third party's reports, analyses and similar, e.g., publication title, with authors)

37 A sample of five laws was selected among the wider sample of laws for which IA was conducted. Sample selection was based on an estimate of the significance of the impact of laws on society/affected groups, and five cases which are likely to have a significant impact were chosen.

38 The analysis of IA reports was not conducted for laws in BIH since the IA is not mandatory, while in Kosovo, it was not conducted since no laws were passed in the Parliament in the observed time period due to elections.

39 Sample selection was based on an estimate of the significance of the impact of policy documents and laws on society/affected groups, and five cases which are likely to have a significant impact were chosen.

40 Due to elections taking place during the observed time period, no laws were passed in the parliament of Kosovo.

WG transparency requirements in the legal framework, since the decision on the WG establishment was publicly available only for one observed act in Montenegro: Strategy for the Development of Women's Entrepreneurship for the period 2025-2028.

Once the drafting phase moves from WG deliberations to wider stakeholder engagement, the question of who can participate shifts from membership in the WG to awareness that a consultation is taking place. The analysis of the same sample indicated that authorities in the region need to be more proactive when informing stakeholders on organising consultations. Three or more communication channels were used to announce consultations for all observed PPDs and laws in North Macedonia and Serbia, and for one PPD and one law in Albania.⁴¹ In Montenegro, none of the observed sample units met this level of proactivity, with the website of the responsible body being the only communication channel consistently used for all five acts. In BIH and Kosovo, announcements were limited to the e-consultation platform.⁴² This suggests that the use of multiple and diverse channels remains an exception, rather than a standard. Reliance on one channel, or standard official channels of informing (e-consultation portals and institutions' websites), narrows the outreach to those stakeholders that actively check relevant websites, limiting the outreach and negatively impacting the representativeness of the process.

Opportunities for public participation in the policy and legislative development process are not only narrowly communicated but also unevenly available across the region, with consultation levels that remain generally low and vary considerably by type of act. Out of all observed PPDs and laws, some form of public consultations was organised for 100% of PPDs in Kosovo and Serbia, followed by 59% in Albania,⁴³ while for legislation, the rate was significantly lower in the entire WB (see Table 16 below). Out of those acts for which consultations were organised, early-phase consultations occurred rarely. Serbia is the only administration where early consultations were held for all observed PPDs, though the rate drops to 22% for laws. In other administrations, early consultation rates are low, and in some cases fall to single digits. Taken together, consultations predominantly occur for acts that are already in an advanced stage of drafting, preventing stakeholders from engaging in a formative role and limiting the possibilities to influence the outcome, i.e., the final version of the document.

⁴¹ The use of the following communication channels was observed: websites of lead ministries/responsible bodies and/or relevant government offices, social media of the government institutions (of relevant government offices, or lead ministries/responsible bodies, e-consultation portal, printed or online media, and email communication.

⁴² In BIH, the analysis was based on one law adopted in the observed period for which consultations were conducted, while in Kosovo, it was based only on two PPDs, since no laws were passed in the parliament in the observed period.

⁴³ In the methodology, the defined threshold was 90%, but points were also awarded for shares of 50-89.9%.

Table 16: Consistency in organising public consultations during policy and legal development

| ADMINISTRATION/ CRITERIA | ALB | BIH | KS | MKD | MNE | SRB |
|--|-----|-------------------|-----------------|-----|-----|------|
| public consultations held for policy documents | 59% | / ⁴⁴ | 100% | 0 | 31% | 100% |
| public consultations held for laws | 37% | 25% ⁴⁵ | / ⁴⁶ | 15% | 41% | 21% |
| early public consultations held for policy documents | 20% | / | 33% | 0 | 4% | 100% |
| early public consultations held for laws | 36% | 0 | / | 2% | 5% | 22% |

Furthermore, online consultation portals are more consistently used to announce the consultations than to conduct them end-to-end, as announcements are generally more widespread than online comment collection and report publication. The use of e-consultation portals for conducting consultations was examined by looking into three aspects for each of the five observed PPDs and laws: whether the consultation processes were announced on the portal, together with relevant documents, whether comments were collected online through the portal and whether the final consultation report was published on the portal. North Macedonia is the regional frontrunner, recording 100% compliance across all three dimensions (see Table 17 below). Albania follows closely with high rates of comment collection (97%) and report publishing (95%), but the issue here is noted in the lack of consistent provision of all relevant documents under consultation processes. Kosovo and Serbia share a pattern of using the portal more as a notification tool, than a platform facilitating the process, with comments collected through the portal only in 17% and 15% of observed processes, respectively. Montenegro stands out as the administration with comparatively the lowest results, suggesting a marginal role of their consultation platform in the policy and legal development practices

44 No policy documents were adopted in BIH in the observed time period.

45 The percentage refers to the only law for which consultations were organised (out of the total four laws adopted in the observed time period).

46 Due to elections taking place during the observed time period, no laws were passed in the parliament.

Table 17: Consistency in using e-consultation portals for conducting public consultations during policy and legal development

| ADMINISTRATION/ CRITERIA | ALB | BIH ⁴⁷ | KS ⁴⁸ | MKD ⁴⁹ | MNE | SRB |
|--|-------------------|-------------------|------------------|-------------------|-----------------|-----|
| consultation processes announced on the portal, together with relevant documents | 37% ⁵⁰ | 100% | 100% | 100% | 24% | 90% |
| comments collected online through the portal | 97% | 100% | 17% | 100% | 0 ⁵¹ | 15% |
| final consultation reports published on the portal | 95% | 100% | 67% | 100% | 18% | 66% |

The practice of reporting on conducted consultations, apart from their availability on e-consultation portals, was assessed by checking if the reports were publicly available and comprehensive, where comprehensiveness requires that reports encompass stakeholder inputs from all formats of participation. Availability rates are generally strong across administrations where assessment could be carried out, for both PPDs and laws for all those for which consultations were conducted (see table 18 below). However, reports were available and comprehensive for all conducted consultations only in North Macedonia and the one consultation process in BIH, and in both cases this included laws only. Montenegro is the only administration where all analysed consultation reports failed to adequately present stakeholder inputs from different participation formats: they do not make a clear distinction between comments/suggestions received in electronic format and those submitted during roundtable discussions and similar events. These observed practices risk reducing the consultation reports to a mere formality, rather than a tool for thorough documentation of process inclusiveness.

47 The assessment in BIH was based on the only law adopted in the observed period for which consultations were conducted.

48 The assessment in Kosovo was based only on PPDs, since no laws were passed in the parliament during the observed period.

49 The assessment in North Macedonia was based only on laws, since consultations for PPDs are not mandated.

50 In the case of Albania, the percentage of processes announced on the portal is significantly lower than other rates displayed in the table for this country, since the majority of processes that were available on the portal did not observe the legal requirements for publishing relevant materials/documents, along with the consultation announcement.

51 Even though the portal in Montenegro enables users to submit comments, none of the observed posts on the portal mention submission of comments through the e-Government portal, i.e., they emphasise other channels for providing inputs. Thus, it was assessed that the portal was not utilised

Table 18: Reporting on organised public consultations during policy and legal development

| ADMINISTRATION/ CRITERIA | ALB | BIH | KS | MKD | MNE | SRB |
|--|-----|-----------------|-----------------|------|-----|-----|
| publicly available reports for consultations on PPDs | 90% | / ⁵² | 83% | 0 | 86% | 80% |
| comprehensive reports on PPDs consultations | 80% | / | 83% | 0 | 0 | 80% |
| publicly available reports for consultations on laws | 96% | 100% | / ⁵³ | 100% | 87% | 86% |
| comprehensive reports on laws consultations | 93% | 100% | / | 100% | 0 | 56% |

A closer examination of how thoroughly the consultation process is documented (conducted on a sample of five consultation reports for two PPDs and three laws) shows that reports generally contain the required elements: all comments submitted during the public consultation process listed individually, information on the feedback to each proposal (i.e., accepted, rejected, or partially accepted/rejected), and a rationale for the rejection of each proposal submitted.⁵⁴ All elements were present in 13 out of 22 observed reports: all five in Montenegro,⁵⁵ four out of five in Serbia (the report for one PPD was not available), reports for both PPDs in Kosovo, reports for one law in North Macedonia and one PPD in Albania. In Albania, other reports suffered from the same shortcoming: presenting received inputs and rationale for their rejection/partial approval as aggregate rather than as individual feedback. Finally, in BIH, the analysis could not be conducted since no PPDs were adopted at the central level during the observed period, while consultations were held for only one law, but no comments were submitted during the process. The analysis suggests that reports generally follow the required structure adequately; however, the case of Albania serves as an important reminder that aggregation of stakeholder inputs undermines report quality. Individual listing and addressing each input are significant for their traceability in the decision-making process and for the accountability of public administration bodies in terms of incorporating accepted inputs into the draft act.

⁵² No policy documents were adopted in BIH in the observed time period.

⁵³ Due to elections taking place during the observed time period, no laws were passed in the parliament.

⁵⁴ The analysis was again based on the same sample of two PPDs and three laws, i.e., their consultation reports. The analysis for Kosovo was based only on PPDs, since no laws were passed in the parliament during the monitoring period.

⁵⁵ This should not be confused with the previous claim that reports in Montenegro are not comprehensive, as that claim is based on an assessment of whether inputs from all formats of consultations were encompassed in reports.

The assessed impact of public consultations on final proposals is relatively low. The assessment was conducted based on the same sample of five acts (two PPDs and three laws) and a defined threshold of 60% of accepted comments as a minimum that, when surpassed, testifies that consultations influenced the final form of a draft PPD or law. This threshold was surpassed in the case of nine out of 30 observed acts in the entire region: three in Albania, two in Kosovo and Montenegro each, and one in North Macedonia and Serbia each.⁵⁶ The acceptance rate alone is certainly insufficient for thoroughly evaluating the impact or quality of public consultations, but it serves as a meaningful indicator of the administrations' openness to external feedback. In this case, it shows that there is at least some receptiveness to external impact in parts of the region, even if it is in less than a third of observed processes.

As noted in the analysis of the legal framework, no WB administration has a clearly assigned centre-of-government body responsible for substantive quality control of the consultation process. In practice, this means that the quality of any given consultation depends entirely on the capacity and discretion of the organising institution. The absence of a central institution tasked with checking the fulfilment of consultation requirements, combined with documented legislative gaps in transparency and stakeholder inclusion across the region, means that the prospects for improving process quality are limited. Addressing this requires both closing the specific regulatory gaps that govern individual procedural aspects and establishing an oversight body with the mandate to verify and enforce compliance with quality standards.

While the analysis of the legal framework and practice point to a lack of general transparency of WGs in the entire region and the lack of inclusiveness requirements in three administrations, the picture that emerges from interviews with non-state actors who took part in WGs is more positive. The interviews captured the personal experience of members of WGs that drafted the earlier observed sample acts, and they generally shared positive stances on the outcomes of their participation.⁵⁷ Overall negative stances were recorded only in Kosovo for all three statements from the interview (for one PPD)⁵⁸, and in BIH for one statement related to the availability of WG outputs (see Table 19 below). On the other hand, key informants in Serbia expressed the most positive stances, stating that their respective WGs were characterised by open dialogue, equal treatment of non-state and state actors, and openness to critical

⁵⁶ Assessment for BIH could not be conducted since comments were not submitted for the only law adopted in the observed period for which consultations were conducted.

⁵⁷ Researchers identified and interviewed relevant non-state actors (key informants). Non-state actors were members of the working groups tasked with the development of the five sample PPDs and laws in each administration. As a rule, three non-state actors were interviewed per administration for all statements, apart from Serbia, where four key informants were interviewed.

⁵⁸ In Kosovo, the statements referred to the experience of participation in the WG for the development of one PPD, as it was the only PPD where non-state actors were members of the WG. See previous footnote.

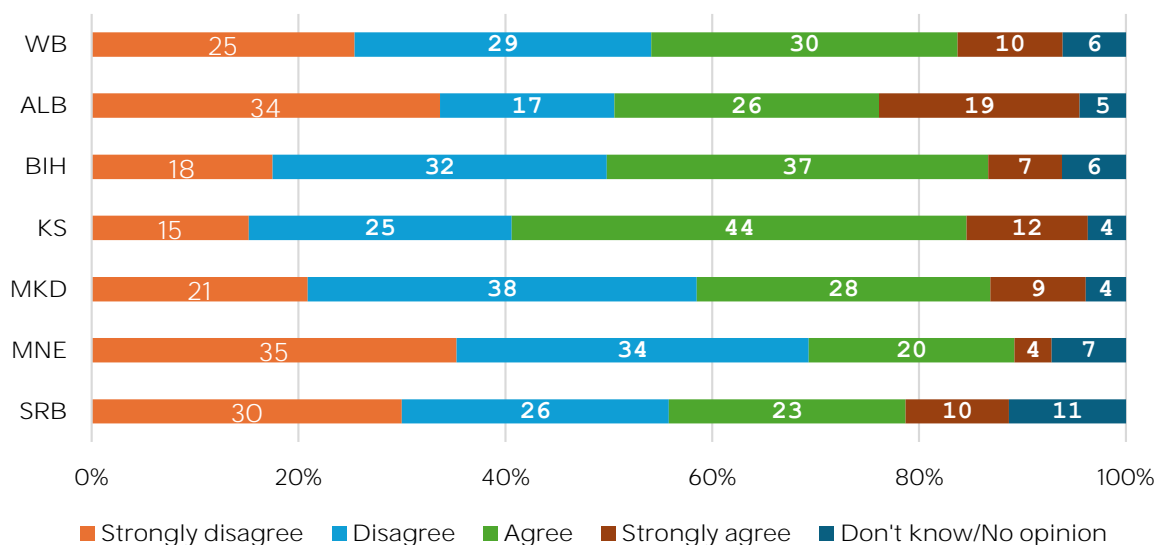
feedback. Several recurring themes emerged from interviews across the region. Timely sharing of WG outputs (including meeting minutes, reports, and draft documents) is inconsistently applied and is identified as a precondition for meaningful participation. Key informants also emphasised that the quality of participation is determined primarily by the institutional culture of the lead body rather than formal regulatory requirements, stating that institutions with a developed culture of engagement with CSOs tend to run more transparent and inclusive processes. This means that experience of non-state actors can vary, within one administration, depending on the policy area and its institutional setting. Additionally, this shows that, although there are no legal obligations in the WB administrations to publish documents related to the work of WGs (decisions on their establishment, meeting minutes and such), this does not necessarily affect the transparency of the WGs from the point of view of their members. However, strengthening the quality of participation in WGs will require systematic recording of, and follow-up, on feedback, and the consistent and timely sharing of all documents produced in the course of WG work.

Table 19: Number of non-state actors' responses per agreement scale

| Statement | Administration | Fully disagree | Tend to disagree | Tend to agree | Fully agree | |
|--|----------------|----------------|------------------|---------------|-------------|---|
| In the work of the working groups, lead ministries decide on my proposals/proposals of my organisation (accept them or reject them) | ALB | | 1 | 1 | 1 | |
| | BIH | | | 2 | 1 | |
| | KS | | 2 | 1 | | |
| | MKD | | | 2 | 1 | |
| | MNE | | 1 | | 2 | |
| | SRB | | | | 1 | 3 |
| In the work of the working groups, lead ministries provide reasons for decisions to accept or reject my proposals/proposals of my organisation | ALB | | 1 | 1 | 1 | |
| | BIH | | | 2 | 1 | |
| | KS | | 3 | | | |
| | MKD | 1 | | 1 | 1 | |
| | MNE | | | 1 | 1 | 1 |
| | SRB | | | | 2 | 2 |
| In the work of the working groups, decisions and documents that came as the result of working groups' proceedings are available to me/my organisation | ALB | | | 2 | 1 | |
| | BIH | | 2 | 1 | | |
| | KS | | 2 | | 1 | |
| | MKD | | 1 | 1 | 1 | |
| | MNE | | | 1 | 2 | |
| | SRB | | | | 1 | 3 |

Finally, citizens across the WB do not see themselves as having meaningful opportunities to participate in policy and legal development. On average, 54% of citizens in the region disagree that they have the opportunity to participate in developing laws and PPDs at the central level of their administration (see Chart 1 below).⁵⁹ Country-level variation is substantial, with Kosovo being the only administration with a majority of agreement among the population (56%), reflecting positive stances. On the other side, a sense of exclusion from decision-making processes is predominant in the rest of the region. Montenegro stands out as the administration with the highest share of disagreement responses of 69%. These perceptions are a reflection of how participation opportunities reach ordinary citizens, i.e., how the government communicates on this matter, so Montenegro's low score aligns with the very low rates of eConsultation portal use.

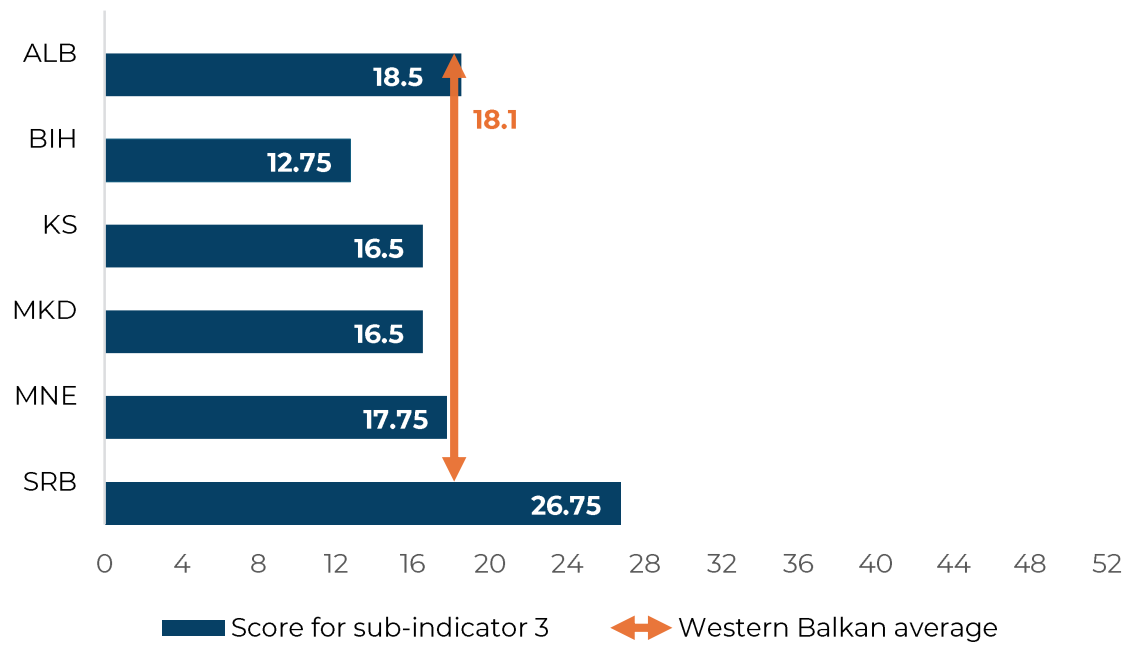
Chart 1: Share of citizens' responses on an agreement scale to the statement "I have the opportunity to participate in developing laws and strategies" (%)



Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was N = 6077.

⁵⁹ The public perception survey was conducted between the 1st and 26th of February 2025 in all WB administrations, on a representative sample of 6077 citizens. For additional information, see the Methodology appendix.

Sub-indicator 3: Transparency and inclusiveness of policy making and legislation development process (maximum score 52)



II.4 Transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny

Principle 6: Public policies are effectively implemented and evaluated, enhancing policy outcomes and reducing regulatory costs and burdens.

Principle 7: The parliament effectively scrutinises the government policymaking and ensures overall policy and legislative coherence.

State of play

Across the WB, the overall state of play indicates weaknesses in the implementation, monitoring, and evaluation of public policies. According to SIGMA,⁶⁰ ex-post evaluation of policies remains almost non-existent across the region. Although formal methodologies for conducting such evaluations are in place in several administrations, their actual application is very limited, resulting in a lack of systematic learning from past policies and weak evidence for future policy-making. These findings are further reinforced by European Commission country reports,⁶¹ which highlight similar structural challenges. Shortcomings range from weak evidence-based policy development in general, like in BIH, to specific challenges in policy monitoring, assessment of sectoral policies, as well as in regular publishing of policy implementation reports as is the case in Serbia.

PAR strategic documents in the WB only partially envisage transparency measures – and lack any measures pertaining to inclusiveness – of policy monitoring and evaluation practices. That said, measures aimed at improving transparency are present in half of the administrations - Albania, North Macedonia, and Serbia, primarily aimed at improving information availability through regular reporting on policy implementation. However, inclusiveness is not systematically addressed, as none of the valid PAR strategic documents foresee concrete measures or activities specifically aimed at enhancing stakeholder participation in policy monitoring and evaluation processes.

Legislation across the region rarely includes provisions on sending advance notifications to affected groups on upcoming changes to the legal framework. Only in North Macedonia does the legal framework clearly oblige ministries to inform stakeholders in advance of the legislative process, including detailed information on timelines and opportunities for participation. Albania comes as a close second, as institutions are obliged to develop annual plans for notifying

⁶⁰ SIGMA country reports on the Assessment against the Principles of Public Administration for all WB countries, along with an overview WB report, are available at: <https://tinyurl.com/3uwz5dh7>.

⁶¹ European Commission country reports for 2025 are available at: <https://tinyurl.com/5eun87sd>.

on public consultations which include forward-looking information on planned legislative changes and targeted groups, but this does not constitute a formal requirement for an advance notification before work on specific legal changes is initiated. With no institutionalisation of early notification practices, stakeholders and affected groups remain primarily informed through the consultation processes, i.e., once the drafting process has already begun, minimising opportunities for timely preparation.

In practice, and in line with the legal framework, advance notification of affected groups on upcoming changes to the legal framework is largely absent. Lead ministries did not inform affected groups in advance of the formal drafting process for any of the sampled laws analysed,⁶² either through official websites or through other means of communication. Serbia represents a partial exception, where prior notification was identified in only one of three cases: the Ministry of Information and Telecommunications, during the preparatory phase of the drafting of the Law on Postal Services, communicated directly with the relevant postal operators and via email.

Parliamentary RoPs across the WB generally provide for the participation of interested parties in public hearings. However, the scope and specificity of these provisions vary considerably. In Albania, Kosovo, North Macedonia, and Montenegro, rules of procedure explicitly enumerate the categories of actors eligible to participate, including CSOs, academic institutions, expert bodies, and interest groups. BiH similarly refers to “interested organisations, institutions and individuals,” ensuring a broad and identifiable pool of potential participants. Kosovo’s framework is particularly inclusive, establishing that public hearings are open to all interested parties and that logistical constraints cannot serve as grounds for exclusion. Serbia’s framework, by contrast, does not enumerate any specific categories of stakeholders – the relevant provision authorises committee chairs to invite “members of the committee, members of parliament, and other persons whose presence is of relevance to the topic of the public hearing,” leaving the determination of relevance entirely to the discretion of the chair. Unlike other administrations in the region, Serbia’s RoP makes no explicit reference to civil society organisations, non-governmental organisations, academic institutions, or professional associations as recognised participants in public hearings.

Beyond regulation, the assessment primarily focuses on the practice in implementation. The monitoring of the public availability of policy implementation reports reveals irregular publication practices across the region. Based on the assessment of publication practices of monitoring reports in five selected policy areas,⁶³ the findings indicate that in BiH and Kosovo, for all observed

⁶² See table 28 in the methodology appendix.

⁶³ Researchers choose five out of the following seven policy areas as framework of observation: 1) Rule of law and fundamental rights, 2) Environment and climate action, 3) Transport, 4) Energy, 5) Competitiveness and innovation, 6) Education, employment, and social policies, and 7) Agriculture and rural development. For details, see table 29 in the Methodology appendix.

strategies, or action plans, no implementation reports were published for the two consecutive years preceding the assessment (2024 and 2023). Montenegro demonstrates somewhat mixed practice, with some implementation reports available across three policy areas, although their publication is not fully regular. For Albania, North Macedonia, and Serbia, monitoring reports on PPDs implementation were found to be fully available, albeit for only one out of the five observed policy areas in each administration. Overall, systematic policy monitoring and reporting practices have yet to gain ground in the WB region, and accountability mechanisms for policy implementation remain weak.

Furthermore, those monitoring reports that are publicly available were not assessed as citizen friendly. In certain cases, reports do include clear summaries and visual elements that facilitate understanding of key results, as demonstrated in individual cases in Albania,⁶⁴ Montenegro⁶⁵ and Kosovo.⁶⁶ In Serbia, for instance, monitoring reports on policy implementation are often presented simply in technical formats, such as Excel tables, unadjusted for use by the general public, with only one isolated example identified deviating from this pattern.⁶⁷ Still, citizen-friendly presentations are rather sporadic than systematic or even occasional occurrences, which heavily reduces their potential for engaging stakeholders or fostering greater public understanding of policy results.

Similarly to monitoring reports, the publication of ex-post evaluations on implemented policies by lead ministries is largely absent across the WB. In Albania, BiH, Kosovo, and North Macedonia, no ex-post evaluation reports have been identified online over the observed period of last three calendar years, including the year of assessment (2022-2025), suggesting either the absence of such practices or their very early stage of development. In such a context, Montenegro and Serbia emerged as the only examples where at least one relevant ex-post evaluation was published online in the observed period. In Serbia, one such document was identified is the Analysis and Evaluation of Existing Social Protection Financing Mechanisms, however without containing any data or feedback by non-state actors.⁶⁸ In Montenegro, two ex-post evaluations were found online with one including feedback from affected

64 Cross-sectoral Justice Strategy Monitoring Report January - December 2023; Monitoring report January-December 2023, Cross-sectoral Juvenile Justice Strategy 2022-2026; Monitoring report January-December 2024, Cross-sectoral Juvenile Justice Strategy 2022-2026; Cross-sectoral Justice Strategy Monitoring Report January - December 2024. See: <https://www.drejtesia.gov.al/strategjia-ndersektoriale-2/>.

65 Smart Specialisation Strategy of Montenegro 2019–2024, Report for 2019 – 2024; Strategy for Scientific Research Activity of Montenegro 2022–2026, Report for 2024. See: <https://tinyurl.com/52zdb7w9>.

66 Report on implementing the Agriculture and Rural Development Strategy 2022-2028 for 2024. See: <https://tinyurl.com/v7bvdtwp>.

67 Education Development Strategy until 2030 with AP, report for 2023 and report for 2024, see: <https://tinyurl.com/fed8bh3w> and <https://tinyurl.com/33782kae>.

68 Analysis and Evaluation of Existing Social Protection Financing Mechanisms within the Ministry of Labour, Employment, Veteran and Social Affairs 2024, see: <https://tinyurl.com/3mkjza2j>.

groups and data produced by non-state actors.⁶⁹ These isolated examples over a period of four years reinforce the overall assessment of low reliance on ex-post evaluations in the region, which limits the ability of administrations to learn from implementation and prevents other interested parties to get acquainted with policy impacts.

When it comes to practice in involving non-state actors in parliamentary public hearings, approaches in the region do not follow a single standard. In the observed period from, November 2024 - November 2025, parliaments in Albania, North Macedonia and Montenegro demonstrated stronger engagement by involving non-state actors in multiple hearings organised by different parliamentary committees. In BiH, participation was more limited, as non-state actors were involved in a single public hearing. No assessment could be made for Serbia, where the parliament does not keep detailed attendance records despite twelve public hearing organised in the observation period, or for Kosovo, where no public hearings were organised due to institutional constraints⁷⁰. While parliamentary public hearings remain one of the possible arenas of influence for interested non-state actors, findings suggest that there is no clear or conscious approach in the region for using them more systematically to improve the inclusiveness of the law-making process.

Table 20: Involvement of non-state actors in parliamentary public hearings

| | ALB | BIH | KS | MKD | MNE | SRB |
|---|-----|-----|----|-----|-----|-----|
| non-state actors involved in at least one public hearing | ✓ | ✓ | ✗ | ✓ | ✓ | ✗ |
| non-state actors involved in more than one public hearing, but all public hearings were organised by single parliamentary committee | ✓ | ✗ | ✗ | ✗ | ✗ | ✗ |
| non-state actors involved in more than one public hearing, that were organised by at least two different parliamentary committees | ✓ | ✗ | ✗ | ✓ | ✓ | ✗ |

The availability of key information on parliamentary law-making processes similarly varies across the WB. The parliament in Montenegro publishes all documentation that should accompany draft legal acts in the procedure, including justifications, ex-ante impact assessment reports, and public

69 Report on the Evaluation of the Strategy for Protection against Ionising Radiation, Radiation Safety and Radioactive Waste Management for the Period 2017–2021, available at: <https://tinyurl.com/3es6wpcq> and Final Ex-post Evaluation Report for the IPARD II Programme (2014–2020), available at: <https://tinyurl.com/4bcwd4w2>.

70 In Kosovo, the prolonged absence of both a functioning government and a constituted Assembly throughout the last 12 months rendered the fulfilment of this element impossible; consequently, it receives 0 points.

consultation reports, where applicable (see Table 16). In Serbia, while draft laws, their justifications, and ex-ante impact assessment reports are systematically published, public consultation reports are not consistently available online. In other administrations, assessment shows even lower or no transparency of parliamentary legislative processes.

Table 21: Online transparency and availability of legislative documents

| | ALB | BIH | KS | MKD | MNE | SRB |
|---|-----|-----|----|-----|-----|-----|
| draft laws in procedure are available online | X | X | ✓ | ✓ | ✓ | ✓ |
| for all draft laws available online justification is published | X | X | ✓ | X | ✓ | ✓ |
| for all draft laws available online reports/results on implemented ex ante impact assessments are published, where applicable | X | X | X | X | ✓ | ✓ |
| for all draft laws available online public consultation reports are published, where applicable | X | X | X | X | ✓ | X |

Good practices – Availability of Information on the Work of Parliament in Montenegro

Montenegro demonstrates the most advanced practice in ensuring the online availability of information on the work of parliament across the region. The Parliament of Montenegro systematically publishes key documentation accompanying draft legislation, including draft laws, explanatory notes, ex-ante impact assessment reports, and public consultation reports, where applicable. The comprehensiveness, consistency, and accessibility of accompanying documentation distinguish Montenegro from other administrations in the region. This practice contributes to greater transparency of parliamentary procedures and enables more meaningful public insight into legislative decision-making processes.

Insights from key informant interviews suggest that non-state actors generally do not perceive their participation in public hearings as effective, with only limited and inconsistent evidence that their proposals get taken onboard.⁷¹ In Albania and Kosovo, all interviewees expressed disagreement that their inputs are considered, pointing to structural issues such as limited speaking time, short consultation deadlines, and lack of follow-up. In BiH and North Macedonia, responses are leaning towards disagreement, with some

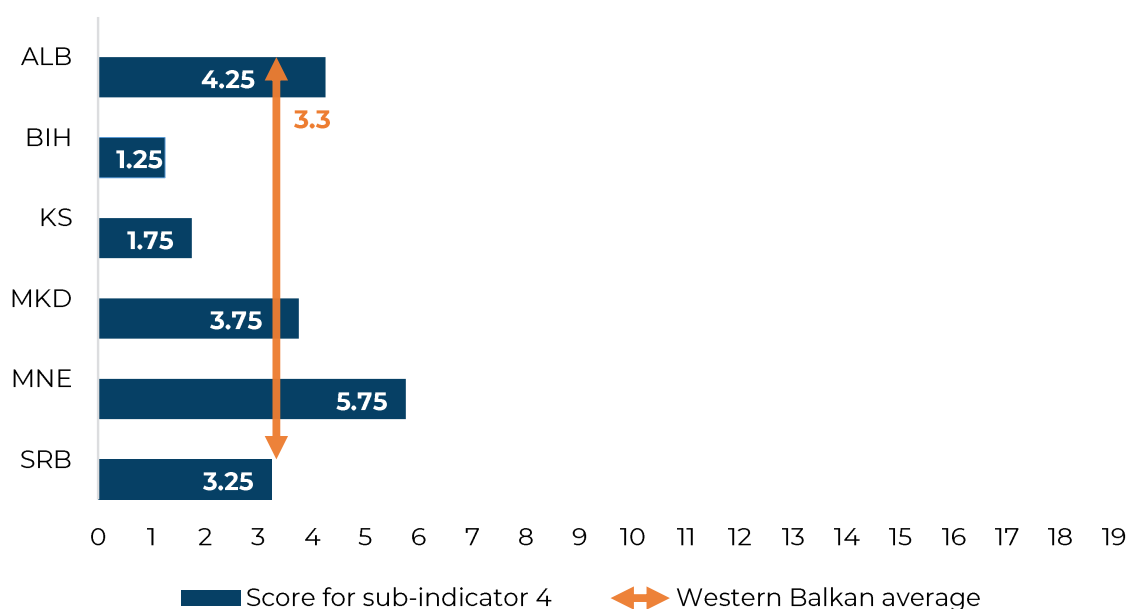
⁷¹ Researchers identified and interviewed relevant non-state actors (key informants), selecting interlocutors from among those who had participated in public hearings in the 12 months preceding the monitoring period. As a rule, three non-state actors were interviewed per administration for all statements; however, no key informant interviews were conducted in Serbia, while in Kosovo and Montenegro, only two key informants who participated in public hearings in the observed period were interviewed.

interviewees acknowledging that proposals are occasionally heard or discussed but emphasising the absence of systematic feedback, while perceptions of two interviewees in Montenegro are polarised. Taken together, very few cases of participation in parliamentary public hearings in the region, together with structural weaknesses expressed by some interviewees, confirm that public hearings are currently neither widely perceived nor used as a meaningful channel for influencing legislative outcomes.

Table 22: Number of non-state actors' responses per agreement scale

| Statement | Administration | Fully disagree | Tend to disagree | Tend to agree | Fully agree |
|--|-------------------|----------------|------------------|---------------|-------------|
| During public hearings, parliamentary committees consider my proposals/proposals of my organisation | ALB | 1 | 2 | | |
| | BIH | | 2 | 1 | |
| | KS | | 2 | | |
| | MKD | | 2 | 1 | |
| | MNE ⁷² | 1 | | | 1 |
| | SRB ⁷³ | | | | |

Sub-indicator 4: Transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny (maximum score 19)



⁷² Interviews were conducted with two key informants, while the third potential interviewee did not respond to requests for participation.

⁷³ Although the National Assembly stated in its response to the FOI request that 12 public hearings were held during the observed period, it does not maintain records of attendance. As a result, it is not possible to determine whether non-state actors participated in these hearings, which prevents verification of this element.

III. CONCLUSION

Governmental decision-making in the WB: restricted access to the public

Strategic and regulatory frameworks across the region only partially ensure transparency of government decision-making. Regulatory provisions for publishing key materials from government sessions, such as agendas, minutes, decisions, and press releases, are often incomplete, and in many cases left to discretion rather than clearly mandated. Consequently, despite the comparatively higher levels of transparency in BiH, the publication of government session materials remains inconsistent across the board. Adopted decisions are more frequently and systematically disclosed than the other items, however their publication is not always timely. As a result, complete public insight into government decision-making processes is not ensured in any administration, which is further reflected in the perceptions of non-state actors which highlight the lack of access to detailed information and weak communication practices.

Looking ahead, governments in the region should prioritise strengthening both the legal framework and its implementation by introducing clear and binding obligations for the proactive, timely, and comprehensive publication of all key materials from government sessions. Attention should be given to ensuring the regular disclosure of agendas and minutes, as well as improving the accessibility and timeliness of government decisions. Enhancing consistency in communication, including systematic use of press releases as well as user-friendly access to information, would further improve transparency. In short, uniformly applied transparency practices are essential for enabling public scrutiny, strengthening accountability, and improving trust in government decision-making processes.

Government planning and reporting: limited transparency and weak results orientation

Legal frameworks for central planning and reporting by the governments in the region are largely established while PAR strategic documents envisage measure for further improvements. Still, the publication of key government planning documents and their implementation reports remains sporadic, irregular and often untimely, with some administrations, such as Montenegro, demonstrating comparatively stronger practices of publishing these documents. Also, performance measurement is insufficiently supported, and reporting on results is thus uneven among administration. At the same time, citizen-friendly

presentations are limited, and no administration in the region produces open, machine-readable data on government performance.

In the period ahead, governments in the region should prioritise stronger compliance with existing regulations by ensuring regular and timely publication of their central planning documents – annual work plans, multi-year programmes, the EU related plans, and their implementation reports. Where such provisions are not in place, a priority should be to establish legal obligations requiring full public disclosure. Strengthening a results-based approach to reporting on implemented plans should also be a key focus, including broader and more systematic use of performance indicators and clearer reporting on achieved outcomes. At the same time, improving the accessibility of information through concise summaries or briefs, visualisations, and other citizen-oriented formats can enhance public understanding and engagement. Finally, introducing open data practices on planned versus implemented commitments would enable greater transparency, increase opportunities for reuse, and strengthen the overall accountability of government actions.

Institutional discretion over enforceable standards of transparent and inclusive policymaking

Transparency and inclusiveness are not yet governing principles in policy and legal development. Across all examined aspects of transparent and inclusive policy and legal development, the monitoring findings reveal a consistent pattern: legal frameworks are present but incomplete, practice consistently falls short of stated commitments, and quality is largely dependent on the discretion of individual institutions rather than on enforceable standards. Secondary legislation remains the least regulated category across all administrations, leaving bylaws largely outside the scope of consultation and IA requirements. Similarly, transparency of working group proceedings is not regulated for any type of act in any WB administration. The practice of conducting IA across the WB reflects the inconsistency of the legal frameworks. Where IA is mandatory, implementation rates vary considerably, and gender impact assessment, even when prescribed, remains the weakest component. IA reports are rarely published during consultation processes, limiting public engagement with the evidence base for legislative proposals. Moreover, consultations across the region predominantly occur at late stages of the drafting process, with Serbia being the only administration where consultations during early stages are consistently organised, albeit for PPDs only. For laws, early consultation rates across the region are consistently low, and in several administrations, they are negligible. The use of e-consultation portals reflects additional issues: portals are more consistently used for announcing consultations than for collecting comments or publishing reports. The consequences of such systems are visible in the public perception: an average of 54% of citizens across the WB do not

believe they have the opportunity to participate in developing laws and policy documents.

Going forward, several key priorities emerge. Strengthening legal frameworks by broadening the scope of mandatory IA, including gender IA with defined methodological standards, and explicitly requiring the publication of IA reports during consultation would go a long way in making IA a genuine tool for evidence-based policy making. Improving the quality of public consultation processes, on the other hand, would primarily require enabling stakeholder involvement opportunities earlier in the policy cycle. Mandatory early-phase engagement needs to be established as a standard requirement for both legal acts and PPDs. Alongside this, e-consultation portals need to be used as end-to-end process platforms. These changes require enforcement mechanisms that currently do not exist in WB administrations. Hence, the establishment of a clearly mandated oversight function at the centre of government, with a focus on consultation process quality, is an equally necessary condition for ensuring that the consultation framework functions as designed. Without central oversight capable of verifying whether consultation requirements are met in substance, improvements to the legal framework alone are unlikely to produce a meaningful change in practice. Finally, rebuilding citizen confidence in the system depends, above all, on whether the practice itself changes visibly.

Limited stakeholder engagement in policy monitoring, evaluation, and parliamentary processes

Strategic and regulatory frameworks across the WB do not sufficiently support transparent and inclusive policy monitoring and evaluation practices. With the exception of North Macedonia, no legal provisions require advance notification of affected groups before the start of legislative drafting, which aligns with evidence from practice, as affected groups and stakeholders are rarely informed before the legislative activity starts. Parliamentary rules of procedure generally allow stakeholder participation in public hearings; however, this is often conditional and invitation-based. Monitoring and reporting on policy implementation are weak across the region, with few administrations regularly publishing implementation reports and even fewer presenting them in a citizen-friendly format. This is even more pronounced for ex-post evaluations, as only a limited number of such documents were publicly available in recent years. Although some administrations demonstrate isolated good practices, such as more accessible reporting formats or broader engagement through parliamentary hearings, these remain exceptions rather than the rule.

Introducing legal requirements for early notification of affected groups on upcoming legal changes, and ensuring enforcement of such provisions, would be among the first steps in the direction of more inclusivity and transparency in

law-making. At the same time, regular, accessible, and citizen-focused reporting on the implementation of policy documents should be practised with no delay, as well as the institutionalisation of conduct and public disclosure of ex-post evaluation results. Finally, to make legislative processes more participatory and meaningful, parliaments should rely as frequently as possible on public hearings as venues for collecting and discussing the ideas and concerns of external stakeholders.

METHODOLOGY APPENDIX

OVERVIEW OF COUNTRY SCORES PER EACH INDICATOR ELEMENT

Table 23: Score for sub-indicator 1 - *Transparency and inclusiveness of the government decision-making process*

| Sub-indicator elements | Element type | Maximum points | ALB | BIH | KS | MKD | MNE | SRB |
|--|----------------------------|----------------|------|------|------|------|------|-----|
| E 1.1 There is a strategic document in force that envisages improvement of transparency of government decision-making process | Strategy and policy | 0.5 | 0.5 | 0.5 | 0 | 0.5 | 0.5 | 0 |
| E 1.2 Regulations stipulate transparency of government decision-making process | Legislation | 1 | 0.25 | 0.75 | 0.25 | 1 | 0.75 | 0 |
| E 1.3 Government regularly publishes agenda items, minutes, and press releases from its sessions online | Practice in implementation | 2 | 0.5 | 1.5 | 0 | 0.5 | 1 | 0 |
| E 1.4 Government regularly publishes decisions from its sessions online | Practice in implementation | 2.5 | 2.5 | 1.25 | 2.5 | 0 | 1.25 | 0 |
| E 1.5 Key non-state actors consider the Government's decision-making process as transparent | Outcomes and impact | 3 | 0.75 | 2.25 | 0.75 | 0.75 | 0 | 0 |
| Total points | | 9 | 4.5 | 6.25 | 3.5 | 2.75 | 3.50 | 0 |

Table 24: Score for sub-indicator 2 - *Transparency of government planning and reporting*

| Sub-indicator elements | Element type | Maximum points | ALB | BIH | KS | MKD | MNE | SRB |
|---|----------------------------|----------------|------|------|------|------|------|------|
| E 2.1 There is a strategic document in force that envisages improvement of government planning and reporting practice | Strategy and policy | 0.5 | 0.5 | 0.5 | 0 | 0.5 | 0.5 | 0.5 |
| E 2.2 Regulations stipulate public availability of government planning documents and reports on their implementation | Legislation | 0.5 | 0 | 0 | 0.25 | 0.25 | 0.5 | 0.5 |
| E 2.3 Regulations stipulate public availability of government's European integration plans and reports on their implementation | Legislation | 0.5 | 0 | 0 | 0 | 0 | 0.5 | 0 |
| E 2.4 Government regularly and timely publishes its annual work plans | Practice in implementation | 1.5 | 1.5 | 0.75 | 1.5 | 0.75 | 1.5 | 0 |
| E 2.5 Government publishes its programme in a timely manner | Practice in implementation | 1.5 | 0 | 0 | 0 | 1.5 | 0.75 | 1.5 |
| E 2.6 Government's programmes and work plans contain performance indicators for monitoring achievement of results | Practice in implementation | 1.5 | 0.75 | 1.5 | 0.75 | 0 | 1.5 | 0.75 |
| E 2.7 Government regularly and timely publishes reports on the implementation of its work plans | Practice in implementation | 1.5 | 0 | 0.75 | 0 | 0 | 1.5 | 1.5 |
| E 2.8 Government regularly and timely publishes reports on the implementation of its programme | Practice in implementation | 1.5 | 0 | 0 | 0 | 0 | 1.5 | 0 |
| E 2.9 Government regularly and timely publishes its European integration plans | Practice in implementation | 1.5 | 1.5 | 0 | 0 | 0 | 1.5 | 1.5 |

| | | | | | | | | |
|---|----------------------------|-----|------|-----|-----|-----|------|------|
| E 2.10 Government regularly and timely publishes reports on implementation of its European integration plans | Practice in implementation | 1.5 | 0 | 0 | 0 | 0 | 1.5 | 0 |
| E 2.11 Government's reports on implementing its programmes and work plans include assessments of achievement of key results and performance indicators | Practice in implementation | 2 | 0 | 1 | 0 | 0 | 2 | 0 |
| E 2.12 Government plans and reports are citizen friendly | Practice in implementation | 1.5 | 0 | 0 | 1 | 0.5 | 0.75 | 0.25 |
| E 2.13 Data contained in the government's reports on implementing work plans are available in open format | Practice in implementation | 1.5 | 0 | 0 | 0 | 0 | 0 | 0 |
| E 2.14 Key non-state actors consider the Government's planning and reporting activities as transparent, timely and citizen friendly | Outcomes and impact | 3 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total points | | 20 | 4.25 | 4.5 | 3.5 | 3.5 | 14 | 6.5 |

Table 25: Score for sub-indicator 3 - Transparency and inclusiveness of policy making and legislation development process

| Sub-indicator elements | Element type | Maximum points | ALB | BIH | KS | MKD | MNE | SRB |
|---|---------------------|----------------|-----|-----|------|------|-----|------|
| E 3.1 There is a strategic document in force that envisages improvement in transparency and inclusiveness of policy making and legislation development process | Strategy and policy | 0.5 | 0.5 | 0.5 | 0.25 | 0.5 | 0.5 | 0.5 |
| E 3.2 Regulations envisage transparency and inclusiveness of policy making and legislative development process | Legislation | 3 | 1 | 1.5 | 1.5 | 0.5 | 1.5 | 2.25 |
| E 3.3 Regulations stipulate minimum consultation requirements | Legislation | 3.75 | 2.5 | 3 | 3.75 | 1.25 | 2 | 2.25 |

| | | | | | | | | |
|--|----------------------------|------|------|---|------|------|------|------|
| E 3.4 Regulations envisage online and free of charge access to consolidated versions of all policy documents and legislation | Legislation | 1.5 | 1.5 | 0 | 1 | 0.75 | 0.5 | 1.5 |
| E 3.5 Regulations stipulate mandatory ex ante assessment of impacts - including on gender equality - during policy making, and publication of IA reports | Legislation | 1.75 | 0.75 | 0 | 1.75 | 0.5 | 1.5 | 1.75 |
| E 3.6 There is a designated government institution for checking compliance with consultations requirements | Institutional set-up | 0.75 | 0 | 0 | 0 | 0 | 0 | 0 |
| E 3.7 Ex ante impact assessments – including on gender equality - are consistently applied during the development of policy documents | Practice in implementation | 1.5 | 0 | 0 | 0.75 | 0 | 0 | 1.5 |
| E 3.8 Ex ante impact assessments – including on gender equality - are consistently applied during the development of primary legislation | Practice in implementation | 2 | 0 | 0 | 0 | 0 | 1 | 0 |
| E 3.9 Reports on implemented ex ante impact assessments during the development of primary legislation are regularly published online, together with the draft documents | Practice in implementation | 1.5 | 0 | 0 | 0 | 0.75 | 0 | 0.75 |
| E 3.10 Published reports on implemented ex ante impact assessments during the development of primary legislation contain key information | Practice in implementation | 2.5 | 1.5 | 0 | 0 | 1.5 | 1.25 | 1.5 |
| E 3.11 Non-state actors participate in the Government-led working groups for policy and legislative development | Practice in implementation | 2 | 0 | 0 | 0.25 | 1.5 | 2 | 1 |
| E 3.12 Procedures and decisions of working groups are transparent | Practice in implementation | 2.5 | 0 | 0 | 0 | 0 | 0.25 | 0 |

| | | | | | | | | |
|---|----------------------------|------|------|------|------|------|------|------|
| E 3.13 Public consultations on policy documents and primary legislation are regularly held | Practice in implementation | 2 | 0.5 | 0 | 1 | 0 | 0 | 1 |
| E 3.14 Public consultations are conducted in an early phase of policy development | Practice in implementation | 1.5 | 0 | 0 | 0 | 0 | 0 | 0.75 |
| E 3.15 Reports on public consultations on policy documents are publicly available | Practice in implementation | 1.5 | 0 | 0 | 0 | 0 | 0 | 0 |
| E 3.16 Reports on public consultations on primary legislation are publicly available | Practice in implementation | 1.5 | 0 | 1.5 | 0 | 1.5 | 0 | 0 |
| E 3.17 Public consultation reports contain all elements of the implemented consultation process | Practice in implementation | 3.75 | 2 | 0 | 1.5 | 0.75 | 3.75 | 3 |
| E 3.18 Online, central consultation portal for the implementation of consultations is regularly used | Practice in implementation | 2.25 | 1.5 | 2.25 | 0.75 | 2.25 | 0 | 0.75 |
| E 3.19 Designated government institution regularly checks compliance with public consultation requirements | Practice in implementation | 1.5 | 0 | 0 | 0 | 0 | 0 | 0 |
| E 3.20 Lead ministries proactively inform on public consultations | Practice in implementation | 2.5 | 1 | 0 | 0 | 2.5 | 0 | 2.5 |
| E 3.21 Consolidated versions of primary and secondary legislation are easily accessible online, and available free of charge | Practice in implementation | 1.5 | 1.5 | 1 | 1.5 | 0 | 0.5 | 1.5 |
| E 3.22 Public consultation results have impact on final policy and legislative proposals | Outcomes and impact | 3.75 | 2.25 | 0 | 1.5 | 0.75 | 1.5 | 0.75 |
| E 3.23 Key non-state actors consider the work of the Government-led working groups as transparent and inclusive | Outcomes and impact | 3 | 1 | 2 | 0 | 1 | 1 | 3 |

| | | | | | | | | |
|---|---------------------|----|------|-------|------|------|-------|-------|
| E 3.24 Citizens' perception of their opportunity to participate in the development of laws and strategies | Outcomes and impact | 4 | 1 | 1 | 1 | 0.5 | 0.5 | 0.5 |
| Total points | | 52 | 4.25 | 12.75 | 16.5 | 16.5 | 17.75 | 26.75 |

Table 26: Score for sub-indicator 4 - Transparency and inclusiveness of policy implementation, evaluation, and parliamentary scrutiny

| Sub-indicator elements | Element type | Maximum points | ALB | BIH | KS | MKD | MNE | SRB |
|---|----------------------------|----------------|------|-----|------|------|------|------|
| E 4.1 There is a strategic document in force that envisages transparency and inclusiveness of policy monitoring and evaluation practices | Strategy and policy | 0.5 | 0.25 | 0 | 0 | 0.25 | 0 | 0.25 |
| E 4.2 Regulations envisage sending advance notifications to affected groups on the upcoming changes to the legal framework | Legislation | 0.5 | 0.5 | 0 | 0 | 0.5 | 0 | 0 |
| E 4.3 Parliamentary rules of procedure envisage participation of interested parties in parliamentary discussions, in the form of public hearings | Legislation | 0.5 | 0.5 | 0.5 | 0.5 | 0.5 | 0.5 | 0 |
| E 4.4 Lead ministries publish advance notifications to the affected groups on the upcoming changes to the legal framework | Practice in implementation | 1.5 | 0 | 0 | 0 | 0 | 0 | 0.50 |
| E 4.5 Lead ministries regularly publish monitoring reports on implementation of policy documents | Practice in implementation | 2.5 | 0.5 | 0 | 0 | 0.5 | 0 | 0.50 |
| E 4.6 Monitoring reports on implementation of policies are citizen friendly | Practice in implementation | 1.25 | 0.25 | 0 | 0.25 | 0 | 0.25 | 0 |
| E 4.7 Lead ministries publish ex-post evaluations on implementation of policies | Practice in implementation | 2.5 | 0 | 0 | 0 | 0 | 1 | 0.5 |

| | | | | | | | | |
|---|----------------------------|------|------|------|------|------|------|------|
| E 4.8 Ex-post evaluations on implementation of policies use external data and information produced by non-state actors | Practice in implementation | 2.5 | 0 | 0 | 0 | 0 | 0.5 | 0 |
| E 4.9 Parliament involves stakeholders, affected groups, and other non-state actors in public hearings | Practice in implementation | 2.25 | 2.25 | 0.75 | 0 | 1.5 | 1.5 | 0 |
| E 4.10 Online transparency of the work of parliaments | Practice in implementation | 2 | 0 | 0 | 1 | 0.5 | 2 | 1.5 |
| E 4.11 Key non-state actors consider involvement of stakeholders in public hearings as effective | Outcomes and impact | 3 | 0 | 0 | 0 | 0 | 0 | 0 |
| Total points | | 19 | 4.25 | 1.25 | 1.75 | 3.75 | 5.75 | 3.25 |

DATA COLLECTION METHODS

For producing this report, the following research methods and tools were used for data collection and calculation of elements:

- Analysis of official documentation, data, and official websites
- Requests for free access to information
- Interviews with stakeholders and key informants.
- Public perception survey.

Under sub-indicator three, samples of PPDs adopted by the governments and laws adopted by the parliaments during a 12-month period were analysed. The table below presents an overview of sample sizes and observation periods in each administration.

Table 27: Sample PPDs and laws under sub-indicator 3

| <i>Administration</i> | <i>Public policy documents</i> | <i>Laws</i> | <i>Observation period</i> |
|-----------------------|--------------------------------|-------------|-------------------------------|
| ALB | 17 | 77 | November 2024 – November 2025 |
| BIH | 0 | 4 | March 2025 – March 2026 |
| KS | 6 | 0 | December 2024 – December 2025 |
| MKD | N/A | 276 | November 2024 – November 2025 |
| MNE | 72 | 155 | November 2024 – November 2025 |
| SRB | 5 | 174 | November 2024 – November 2025 |

Table 28: Sampled laws under sub-indicator 4, element 4.4.

| | ALB | BIH | KS | MKD | MNE | SRB |
|---------------------|--|--|-----------|-------------------------------------|--|---|
| Sampled laws | Draft law on integrated waste management | Law on Amendments to the Law on Value Added Tax | | Law on Public Prosecution | Draft Law on Amendments to the Law on Free Legal Aid | Law on amendments to the Energy Law |
| | Draft law on personal data protection | Law on Amendments to the Law on Salaries and Allowances in the Institutions of BiH | | Law on Associations and Foundations | Draft Law on Consumer Credit | Strategic Environmental Impact Assessment Law |
| | Draft law on the health of plants | Law on Amendments to the Law on Administrative Fees | | Law on Top Management Servants | Draft Law on Amendments and Supplements to the Law on Payment Transactions | Law on Postal Services |

Table 29: Sampled policy areas by administration under sub-indicator 4, elements 4.5-4.8

| | ALB | BIH | KS | MKD | MNE | SRB |
|---------------|------------------------------------|------------------------------------|--|------------------------------------|-----------------------------------|--|
| Sampled areas | Rule of Law and Fundamental Rights | Rule of Law and Fundamental Rights | Rule of Law and Fundamental Rights | Rule of Law and Fundamental Rights | Environment and climate action | Education, employment, and social policies |
| | Environment and climate action | Environment and climate action | Transport | Environment and climate action | Transport | Environment and climate action |
| | Energy | Transport | Energy | Transport | Energy | Transport |
| | Competitiveness and innovation | Energy | Education, employment, and social policies | Competitiveness and innovation | Competitiveness and innovation | Energy |
| | Agriculture and rural development | Agriculture and rural development | Agriculture and rural development | Agriculture and rural development | Agriculture and rural development | Agriculture and rural development |

Monitoring heavily relied on the analysis of official documents publicly available on the websites of administration bodies and on the data and information contained therein. However, in cases where the data was not available, researchers sent requests for free access to information to relevant institutions in order to obtain information necessary for awarding points for the elements.

Table 30: FOI requests

| Administration | Institution | Date of request | Date of reply to the request |
|----------------|--|-----------------|------------------------------|
| ALB | Prime Ministry | 9.3.2026 | 11.3.2026; 12.3.2026 |
| | Prime Ministry | 9.3.2026 | 2.4.2026 |
| | Prime Ministry | 9.3.2026 | 17.3.2026 |
| | Prime Ministry | 9.3.2026 | 17.3.2026 |
| | Minister of State for Anticorruption and Public Administration | 9.3.2026 | 26.3.2026 |
| | Ministry of Justice | 9.3.2026 | 13.3.2026 |
| | Ministry of Environment | 9.3.2026 | No reply |
| | Minister of State for Anticorruption and Public Administration | 18.3.2026 | 24.3.2026 |
| BIH | No FOI requests sent | | |

| | | | |
|------------|--|------------|------------|
| KS | Office of Prime Minister | 24.12.2025 | 14.1.2025 |
| | Office of Prime Minister | 25.3.2026 | 27.3.2026 |
| | Assembly of the Republic of Kosova | 19.12.2026 | 29.12.2025 |
| MKD | General Secretariat of the Government of the Republic of North Macedonia | 06.02.2026 | 19.02.2025 |
| | Ministry of Justice | 06.02.2026 | 25.02.2026 |
| | Ministry of Environment and Physical Planning | 06.02.2026 | 09.02.2026 |
| | Assembly of the Republic of North Macedonia | 06.02.2026 | 25.02.2026 |
| | Ministry of Public Administration | 13.02.2026 | 03.04.2026 |
| | Ministry of Justice | 13.02.2026 | 25.02.2026 |
| | Ministry of Education and Science | 13.02.2026 | 04.03.2026 |
| MNE | Ministry of Labour, Employment and Social Dialogue | 20.2.2026 | 26.3.2026 |
| | Secretariat-General of the Government | 16.2.2026 | 16.3.2026 |
| | Ministry of Social Welfare, Family Care and Demography | 20.2.2026 | 25.2.2026 |
| | Ministry of Education, Science and Innovation | 20.2.2026 | 24.2.2026 |
| | Ministry of Economic Development | 20.2.2026 | 3.3.2026 |
| | Ministry of Agriculture, Forestry and Water Management | 20.2.2026 | No reply |

| | | | |
|------------|---|-------------|-------------|
| SRB | Ministry of European Integration | 3.12.2025. | 12.12.2025. |
| | Ministry of Environmental Protection | 3.12.2025. | 13.1.2026. |
| | Ministry of Mining and Energy | 3.12.2025. | No reply |
| | Ministry of Informing and Telecommunication | 3.12.2025. | 17.12.2025. |
| | Ministry of Science, Technological Development and Innovation | 5.12.2025. | 19.12.2025. |
| | Ministry of Labour, Employment, Veterans and Social Affairs | 5.12.2025. | 16.12.2025. |
| | Ministry of Mining and Energy | 10.12.2025. | 22.12.2025. |
| | Ministry of Information and Telecommunications | 10.12.2025. | 18.12.2025. |
| | Ministry of Environmental Protection | 10.12.2025. | 19.12.2025. |
| | National Assembly | 10.12.2025. | 24.12.2025. |
| | Ministry of Finance | 16.1.2026. | 2.2.2026. |
| | Ministry of Economy | 16.1.2026. | No reply |
| | Ministry of Internal and Foreign Trade | 16.1.2026. | 28.1.2026. |
| | Ministry of Education | 16.1.2026. | 22.1.2026. |
| | Ministry of Agriculture, Forestry, and Water Management | 16.1.2026. | 30.1.2026. |
| | Ministry of Informing and Telecommunication | 16.1.2026. | 28.1.2026. |
| | Ministry of Construction, Transport and Infrastructure | 16.1.2026. | 27.1.2026. |
| | Ministry of European Integration | 25.2.2026. | 05.03.2026. |
| | The General Secretariat of the Government | 02.02.2026. | 18.02.2026. |

Interviews with key informants were conducted and used as a base for point allocation for elements 1.5, 2.14, 3.23 and 4.11. Additionally, they were used to collect qualitative, focused, and in-depth inputs on monitored phenomena. Selection of interviewees was based on purposive, non-probability sampling, targeting interlocutors based on their expertise on the topic. For element 3.23, selection of interviewees was based on their membership in the working groups tasked with the development of sample PPDs and laws.

Key informant interviews were comprised of a set of up to four questions where the participants expressed their agreement on a four-point scale: fully disagree, tend to disagree, tend to agree and fully agree. Points under elements 1.5, 2.14, 3.23 and 4.11 were allocated if all key informants stated that they tend to agree/fully agree with the statement. Additionally, a set of open-ended questions was used, allowing for a discussion with interviewees and on-the-spot sub-questions rather than strictly following a predetermined format. Interviewees were given full anonymity in terms of personal information and institutional/organisational affiliation.

Table 31: Interviews with non-state actors

| Administration | Date | Number of interviews |
|-----------------------|--|-----------------------------|
| ALB | 06.02.2026.(2) 11.02.2026. (3) 15.02.2026.(2) 26.02.2026.(2) | 9 |
| BIH | 03.03.2026.(9) | 9 |
| KS | 11.12.2025.(6) 05.03.2026.(3) | 9 |
| MKD | 15.01.2026.(6) 22.01.2026. (9) | 9 |
| MNE | 05.03.2026. 07.03.2026. 09.03.2026. 12.03.2026.(2) 13.03.2026. 23.03.2026. 01.04.2026. | 8 |
| SRB | 03.02.2026. 04.02.2026. 06.02.2026. 11.02.2026. 18.02.2026. 19.02.2026. 23.03.2026. | 7 |

List of interview questions

➤ Element 1.5

The following questions are used for point allocation for element 1.5. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 0.75 points are allocated.

1. To what extent do you agree with the following statement: **Agenda items for the Government's sessions are transparent.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
2. To what extent do you agree with the following statement: **Minutes of the Government's sessions are transparent.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
3. To what extent do you agree with the following statement: **Decisions from the Government's sessions are transparent.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
4. To what extent do you agree with the following statement: **The Government publicly informs on its decisions via press releases.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. How are agenda items for Government sessions typically made known to the public or stakeholders?

2. Who usually has access to agenda items before sessions take place, and how does that affect transparency or participation?
3. How useful are the existing records of meeting minutes for understanding how decisions were reached? Additionally, does the current level of transparency of meeting minutes contribute to accountability?
4. Do you find that the decisions made at Government sessions are presented clearly and understandably to the public?
5. Are there types of decisions that are more or less transparent than others? If so, why do you think that is the case?
6. How would you describe the tone and level of detail of Government press releases — are they informative, selective, or general?
7. Do you think the press releases reflect the actual content and rationale of Government decisions?
8. In your opinion, what should a fully transparent and accountable Government decision-making process look like?

➤ **Element 2.14**

The following questions are used for point allocation for element 2.14. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 1 point is allocated.

1. To what extent do you agree with the following statement: **Government's planning and reporting activities are transparent.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
2. To what extent do you agree with the following statement: **Government's planning and reporting activities are timely.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
3. To what extent do you agree with the following statement: **Government's planning and reporting activities are citizen friendly.**
 - a) fully disagree

- b) tend to disagree
- c) tend to agree
- d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. Do Government planning documents explain and present clearly Government priorities, objectives, and expected results?
2. Are there opportunities for external stakeholders or the public to provide input during the planning stage? Does this practice vary among planning documents?
3. When it comes to timeliness, are there mechanisms to ensure that planning and reporting cycles are respected and aligned with budgetary or policy cycles?
4. Can you recall a case where the timeliness of reporting (or lack of it) had an impact on policy follow-up or accountability?
5. How effectively does the Government communicate the outcomes of its planning and reporting to citizens, in terms of conveying key messages and results? How do you assess citizens' awareness or interest in these documents?

➤ **Element 3.23**

The following questions are used for point allocation for element 3.23. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 1 point is allocated.

1. To what extent do you agree with the following statement: **In the work of the working groups, lead ministries decide on my proposals/proposals of my organisation (accept them or reject them).**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
2. To what extent do you agree with the following statement: **In the work of the working groups, lead ministries provide reasons for decisions to accept or reject my proposals/proposals of my organisation.**
 - a) fully disagree
 - b) tend to disagree

- c) tend to agree
 - d) fully agree
3. To what extent do you agree with the following statement: **In the work of the working groups, decisions and documents that came as the result of working groups' proceedings are available to me/my organisation.**
- a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. Reflecting on your experience in participating in working groups, how would you describe the overall atmosphere and dynamics of cooperation?
2. What was the usual process after you submitted a proposal, how was it recorded or followed up?
3. Can you recall examples of proposals that were accepted and others that were not? If there were examples of your proposals being rejected, can you identify if the reasons for rejecting proposals were usually linked to policy priorities, legal constraints, or other factors?
4. Did you feel that your input was considered equally to the inputs provided by representatives of government bodies?
5. Did you find that the lead ministry/institution was open to alternative perspectives or critical feedback?
6. Were there topics or issues where discussion seemed less open or pre-decided?
7. When it comes to decisions and outputs of the working group, when did you usually receive the documents (draft laws/policy documents, meeting minutes, preparatory material, conclusions, etc.): during the process, after each meeting, or only once the final product was published?
8. Were the documents clear enough to understand how different inputs were reflected in the final version?
9. What would you say distinguishes a genuinely inclusive working group from one that is only formally inclusive?

➤ **Element 4.11**

The following questions are used for point allocation for element 4.11. Point allocation is determined based on fully agree/tend to agree responses. If all key informants fully agree/tend to agree with the statement, 3 points are allocated.

1. To what extent do you agree with the following statement: **During public hearings, parliamentary committees consider my proposals/ proposals of my organisation.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. How often have you or your organisation taken part in such hearings, and in what policy areas?
2. In your experience, do all participants have equal opportunities to express their opinions?
3. When you or your organisation submitted comments or recommendations, how were they received and treated by members of the committee?
4. After a hearing, do you receive any follow-up information on how your contributions were treated?
5. Do you think that the current feedback mechanisms are sufficient to ensure accountability of parliamentary committees?

The public perception survey was conducted based on a questionnaire targeting the general public (18+ permanent residents) of WB countries. The survey was conducted through computer-assisted telephone interviewing (CATI) in combination with computer-assisted web interviewing (CAWI).

The survey was conducted between the 1st and 26th of February 2025. The margin of error for the sample of 6077 citizens is $\pm 3,51\%$, at the 95% confidence level.

Table 32: Public perception survey questions in the area of Policy Development and Coordination

| Statement 1 | Strongly disagree | Disagree | Agree | Strongly agree | Don't know/ No opinion |
|--|-------------------|----------|-------|----------------|------------------------|
| I have the opportunity to participate in developing laws and strategies of the [country name]. | 1 | 2 | 3 | 4 | 99 |

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