

The Former Yugoslav Republic of Macedonia Labour Inspection Audit
Project on 'Enhancing Labour Inspection Effectiveness'
(RER/09/50/NOR)

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Foreword

This audit of the labour inspection system in the Former Yugoslav Republic of Macedonia was carried out in June 2009 at the request of the Ministry of Labour and Social Policy, which has responsibility for labour inspection in the country. The purpose of the audit was to establish, jointly with the Government, an action plan for improving, reinvigorating and modernizing the labour inspection system in the country within the framework of the already-ratified labour inspection Conventions.

The audit was undertaken utilizing the ILO's participatory labour administration-related methodology, which includes interviews with the main governmental bodies concerned with labour inspection and the social partners. Visits to regional inspection services were also carried out and initial feedback was provided to the Government.

The audit report contains a number of important recommendations for consideration by the Macedonian Government and, where appropriate, the social partners. These recommendations relate to such areas as the structure and organization of labour inspection services; human resources and career development of staff; organization of visits; registries and work accident reports; sanctions and administrative procedures; and cooperation with other partners. Other suggestions and recommendations may be considered in the context of the participatory approach adopted by the ILO.

The audit was carried out in the context of the inter-regional technical cooperation project on Enhancing Labour Inspection Effectiveness, financed by the Government of Norway. The valuable support provided by this project will enable the action plan to be implemented.

I would like to take this opportunity to thank the Government and social partners in the Former Yugoslav Republic of Macedonia for their very positive engagement in this endeavour. I would also like to thank my colleague Ms Carmen Bueno, Labour Inspection Expert SRO-Budapest, and Ms Irena Dimitrova, Head of International Relations Unit, Bulgarian Labour Inspectorate, for their technical contribution.

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I. Main economic, social and political elements

The Former Yugoslav Republic of Macedonia (hereinafter, Macedonia) is located in south-eastern Europe, bordering Kosovo (within the meaning of UNSC Resolution 1244, 1999) and Serbia in the north, Bulgaria in the east, Greece in the south and Albania in the west. It has an area of 25,713 square kilometres. The capital is Skopje.

After the Second World War, Macedonia became a constituent republic of the Socialist Federal Republic of Yugoslavia. In 1991, Macedonia obtained its independence from Yugoslavia peacefully, under the designation of the Former Yugoslav Republic of Macedonia. The current Constitution, adopted in 1991, provides the foundation for a democratic parliamentary republic.

Macedonia is a NATO partner country and was granted candidate country status with regard to EU membership in 2005, a European partnership having been adopted in 2008, updating the previous one of January 2006. A Stabilization and Association Agreement (SAA) was also signed in 1991.

The population is 2,066,718, according to 2009 estimates, with a 0.262 per cent annual growth rate in 2007 and average life expectancy of 72.18 years for men and 77.38 years for women.

There are five main ethnic groups: Macedonians (64.2 per cent), Albanians (25.2 per cent), Turks (3.9 per cent), Roma (2.7 per cent) and Serbs (1.8 per cent). The official language is Macedonian, although the Albanian language is also widely spoken (20 per cent). Estimates suggest that Orthodox Christianity is the most common religion in the country (64.7 per cent), followed by Islam (33.3 per cent).¹

The economy relies heavily on services, which in 2007 accounted for an estimated 60 per cent of GDP, with industry accounting for about 28 per cent, and agriculture only about 13 per cent. GDP growth is estimated at 5.4 per cent in 2007, with improvements in the manufacturing, construction and financial sectors.²

Annual inflation rose to about 3 per cent in 2006–07, reflecting increased prices for oil, food and tobacco.

Macedonia suffers from a high trade deficit (up to 30 per cent of GDP). Manufacturing of metals, clothing and textile products forms the basis of Macedonian exports, followed by iron and steel, food, beverages and tobacco.

Macedonia is ranked 68th in the 2008/2009 Human Development Report (UNPD).

¹ Data on population, religion and geographical details taken from CIA World Factbook Macedonia, available at: www.cia.gov.

² Data on economy taken from Economist Intelligence Unit country and profile reports, available at: <http://www.eiu.com>

The official unemployment rate remains extremely high (34.2 per cent) and undeclared work is still a major problem. An employment strategy has been developed which defines objectives for 2010 in line with the European Employment Strategy and Guidelines, in accordance with the revised Lisbon Strategy. Several initiatives have been undertaken to reform the unemployment benefit system and to encourage temporary employment and the employment of older workers who have been made redundant.

A total of 50 per cent of the labour force is employed in services, 30.4 per cent in industry and 19.6 per cent in agriculture.

II. Legislative framework for the labour inspectorate

Article 32 of the **Constitution** of the Republic of Macedonia, approved on 17 November 1991 (amended in 2001 and 2005), recognizes the following rights: to work, free choice of employment, protection at work, safety means during temporary unemployment, access to every job under equal conditions, appropriate remuneration, to be paid daily and weekly and annual leave. Furthermore, the Constitution emphasises the prohibition of forced labour (Article 11), rights to social security and social insurance (Article 34), the right of assistance to citizens who are infirm or unfit for work and particular protection for invalids (Article 35), the right to establish trade unions (Article 37), the right to strike (Article 38), the right to health care (Article 39), the particular protection of mothers and minors, and prohibition of the employment of persons under 15 years of age (Article 42).

The core labour legislation is included in the **Labour Relations Law** (Official Gazette of the Republic of Macedonia No. 65/2005, last amended in 2008). It regulates such matters as employment contracts, recruitment, employees' obligations, employers' obligations, on-the-job training, trial working, voluntary periods, termination of the employment contract, wages, working time, overtime, night work, breaks, weekly rest, annual leave, absence from work, special protection during pregnancy, absence from work due to pregnancy, childbirth and parenthood, recess for breast-feeding mothers, prohibition of the employment of persons under 15 years of age, special protection of employees under 18 years of age, protection of disabled and older employees, labour disputes, trade unions and employers' associations, collective agreements, strikes, the Economic and Social Council and working abroad. Supervision of the implementation of this Law, other laws and regulations on labour relations, collective agreements and employment contracts shall be conducted by the labour inspection.

Occupational safety and health is regulated mainly by the **Law on Occupational Safety and Health** (Official Gazette No. 92/2007). The law was elaborated in virtue of the principles of Framework Directive 89/391 EU, but much of the *acquis* still needs to be transposed. The law lays down preventive measures, rights, obligations and the responsibilities of the employer (risk assessment, organization of work, equipment, health examinations, training, information and participation of employees, first aid and protection from fire, and evacuation and rescue).

In 1997, Macedonia adopted a **Law on Labour Inspection** (Official Gazette No. 35/1997) which regulates the general rule of labour inspectors, their tasks, the independence principle, obligation of identification, required qualifications, conflicts of interest, visit procedures and powers, visit minutes, professional confidentiality, some rights and obligations of the entity subject to inspection, accident investigations and sanctions. Nevertheless, the law does not set out the organization of the Labour Inspectorate or the sanctioning procedure. No mention is made of the provision of advice and information to workers and employers. Therefore, substantial amendments to the existing labour inspection legislation are necessary in order to strengthen the institutional capacity of the Ministry of Labour and Social Policy and the Labour Inspection.

The Law on Civil Servants and State Employees (Official Gazette No. 50/2000, with several amendments) mentions the status, rights, duties and responsibilities of civil servants and also the responsibilities of the Agency for Civil Servants.

Other laws include provisions related to labour inspection, such as the Law on the Employment and Work of Foreigners (Official Gazette No. 70/2007), the Law on Volunteers (2007), some provisions of the Law on Trade (2004) and the Law on Protection against Smoking (1995, amended 2003).

III. The labour inspection system in the Ministry of Labour and Social Policy

At national level, the Ministry of Labour and Social Policy (hereinafter MLSP) is the main authority for labour and social protection matters, including labour inspection. The internal organization of the Ministry is regulated in the Regulation on the Systematization of Workplaces in the MLSP (2006).³

Labour inspection depends on the State Labour Inspectorate (hereinafter SLI). The SLI is in charge of the effective enforcement of labour legislation, with the object of decreasing the number of illegally employed persons, protection of the legal rights of workers and ensuring safe and healthy working conditions. At the head of the SLI a Director represents the Inspection, organizes and coordinates its work and guarantees quality and efficiency, in accordance with the Law. He is appointed by the Government and reports to both the Government and the Minister.

Within the SLI there are three sectors at the same level: the Sector for Labour Relations Inspection, the Sector for OSH Inspection and the Sector for OSH Legislation, with three Heads of Sector.⁴

Within the Sector for Labour Relations there are three Departments, which cover Region 1 (Central), Region 2 (Eastern) and Region 3 (Western). Each Department has a Head of Department. Department Region 1 covers the offices in Skopje, Veles, Kavadarci and Negotino. Department Region 2 covers the offices in Kumanovo, Kriva

³ See the Ministry of Labour and Social Policy organizational chart in Annex II.

⁴ See the State Labour Inspectorate organizational chart in Annex III.

Palanka, Kratovo, Probistip, Sveti Nikole, Stip, Radovis, Valandovo, Strumica, Gevgelija, Kocani, Vinica, Berovo and Delchevo. Department Region 3 covers the offices in Tetovo, Gostivar, Kicevo, Debar, Struga, Ohrid, Resen, Bitola, Makedonski Brod, Demir Hisar, Krusevo and Prilep.

Within the Sector for OSH Inspection there are two Departments, which cover Region 1 and Region 2. Each Department has a Head of Department. Department Region 1 covers the offices in Skopje, Prilep, Kavadarci, Bitola, Resen, Struga and Debar. Department Region 2 covers the offices in Kumanovo, Veles, Stip, Kocani, Strumica, Delcevo, Probistip, Tetovo and Gostivar.

The Sector for OSH Legislation, recently created for the transposition of the EU Directives on safety at work, has only one officer at central level.

During the audit process, a new Sector was in preparation at the SLI at central level for Coordination, Training and Administrative Execution and a new OSH Sector in the MLSP at central level has already been set up.

This internal organization of the SLI is also based on the Regulation on the Systematization of Workplaces in the MLSP.

The SLI does not have the status of a legal entity and therefore has no individual budget but funds are allocated to it by the MLSP on request, upon submission of a plan and a programme.

The Sector for Labour Relations Inspection, and respectively labour relations inspectors, deals with the implementation of standards with regard to labour relations, employment and social insurance in all sectors of the economy, including mining, public administration and the self-employed.

The Sector for OSH Inspection, and respectively OSH inspectors, covers occupational safety and health in the public and private sectors, with the sole exception of the mining industry.

The MLSP has no territorial structure, although some of its functions have been decentralized, for example, employment, social services and labour inspection. The SLI has 30 regional offices, although only in 16 of them are there both labour relations and OSH inspectors. In the rest, there are only labour relations inspectors. In 17 of these regional offices there is only one labour relations inspector and in 11 of these regional offices there is only one OSH inspector. In those offices with only a labour relations inspector – who have just legal background – the inspector performs both labour relations and OSH functions, but it seems not to have received specific OSH training.

In some cases, labour relations inspectors in less industrialized regions have to travel for 8–12 days each month to other offices to support their colleagues.

There are other bodies with specific inspection tasks, such as the state administrative inspectors under the Ministry of Justice, supervising the implementation

of legal provisions by the public authorities; the mining inspectors, under the Ministry of the Economy, supervising occupational safety and health in the mines in accordance with the Law on Mining, although labour relations issues are covered by the labour relations inspectors of the SLI; radiation protection and nuclear safety inspectors; market inspectors; environmental inspectors under the Ministry of the Environment; and sanitary inspectors under the Ministry of Health in charge of enforcing sanitary legislation and protecting public health, in accordance with the Law on Health Protection.

IV. ILO Conventions ratified by Macedonia

The Republic of Macedonia has ratified 69 ILO Conventions, which are listed in Annex I.

They include labour inspection Conventions No. 81 and No. 129, both ratified in 1999; Convention No. 155 on occupational safety and health; and Convention No. 144 on tripartite consultation. Convention No. 150 on labour administration has not yet been ratified.

First reports of the Labor Inspection relevant Conventions are still outstanding.

V. Industrial relations and tripartite structures

The Former Yugoslav Republic of Macedonia has ratified several international labour conventions which have direct relevance to social dialogue, including the Freedom of Association Convention, 1948 (No. 87), the Protection of the Right to Organise and Collective Bargaining Convention, 1949 (No. 98), the Workers' Representatives Convention, 1971 (No. 135) and the Tripartite Consultation Convention, 1976 (No. 144).

On the trade union side, the Federation of Trade Unions of Macedonia (FTUM/SSM) was long the only workers' organisation participating in tripartite social dialogue with the Government and the employers, on the one hand, and in collective bargaining with the employers, on the other. Established in 1908, at present FTUM has 18 affiliated branch units, in both the public and the private sector, and 35 local offices. According to the Federation, it has 200 employees and 200,000 members from different economic sectors and activities, including construction, agriculture, trade, metallurgy, chemicals, administration and judiciary, health care, journalism, defence, finance, police, post offices and other. FTUM is not affiliated at international level but has observer status with the ETUC and all its branch units are members of both ITUC and ETUC. FTUM is the only trade union organization represented in the Economic and Social Council.

The Confederation of Free Trade Unions of Macedonia (CFTUM/KSS) was established in 2005 on the separation of three branch unions from FTUM (the Autonomous Education, Science and Culture Union, the Autonomous Defence Employees Union and the Financial Workers Union of Macedonia). It currently has 70,000 members in nine branches, including the Autonomous Energy, Mining and

Industry Union, the Transport and Communications Union, the Catering and Tourism Union, the State Administration Union, the Agricultural Union and the Autonomous Local Administration Union. It is not a member of any international confederation, but it has applied for affiliation with ITUC and ETUC.⁵ Among its branches, the Autonomous Energy, Mining and Industry Union, the Transport and Communications Union and the Autonomous Education, Science and Culture Union are already members of an international organization. They do not participate in the tripartite social dialogue, but they have been invited to parliamentary discussions on legislative amendments.

The Confederation of Trade Union Organizations of Macedonia (CTUOM/KSOM) was established towards the end of 2004, when the Federation of Transport Workers and the Federation of Construction Workers merged. They report increasing membership, covering over half of all employees in the railway company, car parks, the fire-fighters, the police, and one large factory, but they are less well represented in the private sector. The Confederation is not yet a member of any international organisation, but an application process has started for full membership of ITUC. The Federation of Transport Workers is a member of the ITF. The Confederation has attended meetings for discussions on legislative amendments, but they do not participate in any tripartite structures.

The Union of Independent and Autonomous Trade Unions of Macedonia (UIATUM) is a member of the ICFTU, but no further information is available.

On the employers' side, the Confederation of Employers of the Republic of Macedonia was registered in 2006 as an employers' organization. With 472 direct members and about 1,100 collective members, it covers 20,000 employees. It is a member of the Economic and Social Council because it is the only organization which meets the representativeness criteria laid down in the law. It is also a member of a body for corporate social responsibility. It is a member of UBCCE (Union of Black Sea and Caspian Confederation of Enterprises), AREC (Adriatic Region Employers' Centre) and other bodies.

The Organisation of Employers of the Republic of Macedonia was established in 1994. It has 150 members, including the largest companies in Macedonia. The Organization is a signatory to the general collective agreement and has signed eight branch collective agreements, with three more branch agreements still being negotiated. It is not a member of any international organization.

The National Federation of Temporary Work Agencies was registered as an employers' organization in 2008. It comprises six private employment agencies and accounts for 45 per cent of the Macedonian temporary agency work market. The Federation is a member of CIETT (Confederation of Private Employment Agencies) and of EUROCIETT (European Confederation of Private Employment Agencies).⁶ It is not a member of the Economic and Social Council, but since September 2008 has been

⁵ Source: http://www.kss.mk/eng/index_en.php

⁶ Source: [http://www.euro-ciett.org/index.php?id=113&tx_ttnews\[tt_news\]=76&tx_ttnews\[backPid\]=15&cHash=b117df3db0](http://www.euro-ciett.org/index.php?id=113&tx_ttnews[tt_news]=76&tx_ttnews[backPid]=15&cHash=b117df3db0)

participating in tripartite discussions organised by the Government on labour law issues, such as gross wages, amendments to the Law on Pension and Disability Insurance and all other topics in the field of labour relations.

Besides the abovementioned employers' organizations, an Association of Employers in Traffic and Communications exists, but no further information is available.

Trade unions and the employers' organizations may play a part in collective bargaining if their membership equals or exceeds 33 per cent of the total number of employees of a particular enterprise or branch for which the collective agreement is concluded. Some newly established trade unions are not satisfied with this criterion for representative status, on the grounds that the requirements are too high.

There are two types of collective agreements, registered by the MLSP and published in the Official Gazette: general collective agreements, which cover the whole economy or one part of it (several branches), and branch collective agreements.

The Law on Labour Relations defines the legal basis for the functioning of tripartite social dialogue. In particular, it provides for the establishment of an Economic and Social Council (ESC), which serves as a forum for tripartite consultation between the Government and the social partners on labour and social issues.

The Economic and Social Council (ESC) was established in 2006 with an agreement concluded between representatives of the Government, the workers' and the employers' organisations. It has nine members: the Government is represented by the MLSP, the Minister of Finance and the Deputy Minister of the Economy; workers are represented by FTUM; employers are represented by the Organisation of Employers of the Republic of Macedonia. The Department of Labour within the MLSP provides the ESC secretariat and every member of the Council has a deputy. The Council is chaired by the MLSP and is both a consultative and a negotiating body. Its operational activity seems to have diminished in recent years. The Council has no subcommittee related to labour inspection, however, discussions have been held on labour inspection methods, as reported by the MLSP. The current composition of the ESC does not reflect the present context of industrial relations and it lacks resources. Some employers' organizations and confederations of trade unions are excluded from this body. New criteria for representation need to be defined in order to inject pluralism into the ESC and the tripartite social dialogue in general. Also, the mandate of this body is narrow and its resources meagre. It has to be modernized in its composition and structure, mandate and method of functioning and its resources increased significantly if social dialogue is to function more effectively in Macedonia.

Article 44 of the Law on Occupational Safety and Health provides for a Council for Occupational Safety and Health as an expert advisory body. The Council comprises 15 members, four of whom are from representative employers' organizations, four are from representative trade unions, three are nominated by the Government and four are from different areas related to safety at work, occupational medicine, the Association of

Safety Officers and experts in occupational medicine. It seems that the Council is not functioning at present as no meetings have been reported.

According to the Law on Occupational Safety and Health, employees in enterprises with more than ten persons can appoint workers' representatives, who have the right to be present and to state their opinion during inspections and to see the minutes submitted by the inspector. However, inspectors are not fully aware of their obligation to involve these representatives in inspections and the common practice is that they do not contact them.

VI. Labour inspection: main features and developments

General description

The Labour Inspectorate was established in 1946 at the time of the former Yugoslavia.

Article 256 of the Law on Labour Relations provides that the Labour Inspectorate shall supervise the implementation of the Law on Labour Relations, other laws and regulations on labour relations, collective agreements and employment contracts which stipulate employees' and employers' rights and obligations with regard to the employment relationship. This Law regulates labour relations between employers and workers and also, unless a special law stipulates otherwise, the labour relations of employees employed by state bodies, local government, institutions, public enterprises and other legal entities and natural persons carrying out public services.

Article 48 of the Law on Safety at Work also assigns its supervision to the State Labour Inspectorate. This law applies to all spheres of the public and private sectors, except the armed forces, the police, certain activities of the rescue and protection forces and domestic servants.

Article 8 of the Law on Labour Inspection mentions the tasks of inspection and supervision, but does not contain any provision on tasks of advice and information, as contained in the ILO Labour Inspection Conventions.

Both the Labour Relations Inspection and the Safety at Work Inspection have 30 regional offices – in Skopje, Veles, Kavadarci, Negotino, Kumanovo, Kriva Palanka, Kratovo, Probistip, Sveti Nikole, Stip, Radovis, Valandovo, Strumica, Gevgelija, Kocani, Vinica, Berovo, Delchevo, Tetovo, Gostivar, Kicevo, Debar, Struga, Ohrid, Resen, Bitola, Makedonski Brod, Demir Hisar, Krusevo and Prilep – most of them covering several municipalities. The administrative division of the country comprises 84 municipalities. In some cases, labour relations and OSH inspectors share offices and most facilities.

Under the supervision of the Heads of the Departments, labour relations inspectors enforce labour legislation and OSH inspectors enforce occupational safety and health legislation (see above). There are no regional directors or heads and, therefore, inspectors in regional offices act with considerable autonomy, reporting

solely to their Heads of Department. There are Coordinators in the regional offices, whose task it is to communicate with the Heads of Department, but they have the same rank as regular inspectors.

Both the Labour Relations and the OSH Sections function mostly as separate inspectorates, each enforcing particular laws and regulations. There is no regulation concerning inspection teams. In certain cases, and according to the current plan or programme (see below), labour relations and OSH inspectors may make visits jointly but they write their reports separately. Joint inspections constitute about 10–20 per cent of the total. Sometimes, as in the case of Skopje, the distance between the respective premises of the OSH and the labour relations inspectors makes it more difficult to make joint visits.

In an attempt to develop a more integrated labour inspection system and due to a lack of resources, in the 11 regional units with only one labour relations inspector (see below), they perform both labour relations and OSH functions. However, it seems that labour relations inspectors – who have only a legal background – have not received specific OSH training.

Human resources and career development

In line with the Law on Civil Servants, inspectors must be citizens of the Republic of Macedonia, of legal age and with an adequate level of education and working experience. They must not have been subject to an injunction banning them from exercising a particular profession, business or office and must be in good general health.

The recruitment of inspectors follows the procedure laid down in the Law on Civil Servants. Once a job becomes available, a public announcement is made by the Agency for Civil Servants (hereinafter ACS), at the request of the MLSP. The applicants are selected for their eligibility, then the shortlisted candidates take a professional examination, consisting of two parts, a general section and a specialized section, testing the knowledge and skills necessary for the specific position. The exam – which involves multiple-choice questions – is prepared by the State Labour Inspectorate and is taken on computer at the Agency for Civil Servants. The five most successful candidates are interviewed at the MLSP in front of a Committee, appointed by the State Secretary, with three members: a representative of the Human Resources Department of the MLSP, a representative of the SLI and a representative of the ACS. A final list with the best five candidates of the five candidates is prepared, containing the number of points from 1 to 10, minutes are submitted to the ACS and the State Secretary has the final decision.

Inspectors cannot be employed on a temporary basis.

According to the Law on Civil Servants, the employment of inspectors is not limited in time, but their performance is evaluated annually by their immediate superior. The template for evaluation is specified by the ASC and contains several segments: tasks, goals, six activities conducted during the previous year and the

objectives to be fulfilled during the following year. If an inspector receives a negative evaluation three times in a period of five years or for two consecutive years, the inspector can lose his/her position. The results of the evaluation are sent by the inspector's immediate superior to the Human Resources Department in the MLSP and to the ASC. No labour relations or OSH inspector has received a negative evaluation in the last five years. This evaluation system is applied to all civil servants.

Inspectors are not ranked at different levels, grades or titles. The only categories at present are Inspector, Head of Department, Head of Section and Director. Inspectors cannot be promoted. The only way to be appointed to a higher position is by successfully completing a public selection process. This is open to all civil servants in the country and therefore it may turn out that the higher levels are occupied by persons with no previous labour inspection experience. Existing inspectors are given no preference. The public administration system in Macedonia is a work-post system and the fact that inspectors cannot be promoted is demotivating for them.

An inspector's employment may be terminated by mutual agreement, on (written) request, by virtue of the law and in other cases, such as retirement or criminal charges.

The Law on Civil Servants and the Anticorruption Law also regulate disciplinary matters and procedure. This year, after anonymous tip-offs, disciplinary measures were instigated against inspectors in two or three cases, with wage reductions of between 10 and 30 per cent for three to six months.

Inspectors' salaries are regulated by the Law on Civil Servants. The salaries are fixed, with nothing extra for good performance or complex tasks and no annual adjustments in accordance with increases in the cost of living. The average salary for an inspector is 350 euros per month. Last year, salaries for all civil servants were raised by 10 per cent.

The Law on Labour Inspection does not permit inspectors to carry out the supervision of enterprises in which they themselves or a close family member are an owner or a co-owner, a member of a management board or have any other interest. A new Law on Prevention of Conflicts of Interest was recently adopted (2007). According to their reports, inspectors do not engage in other activities owing to a lack of time, but they are not very aware of these legal prohibitions.

There are 102 labour inspectors in Macedonia: 1 Director of the State Labour Inspectorate, 3 Heads of Sectors, 5 Heads of Department, 61 inspectors specialised in labour relations and 32 specialised in safety at work, attached to the abovementioned 30 regional offices. Different departments within the MLSP report different figures for the number of inspectors. At present, there are no vacancies for inspectors but ten new recruitments were planned for 2009. Recruitments were suspended for the whole public administration, however, due to the global crisis.

Women account for 40 per cent of inspectors.

There is some support personnel for administrative tasks in the largest regional offices, but inspectors are usually also responsible for administrative tasks, writing everything by hand.

According to the Law on Labour Inspection, inspectors must have completed a university education, that is, have a degree in law, mechanics, civil engineering, architecture, electrical engineering, technology or labour protection, as well as at least three years' experience in the field.

By training, the labour relations inspectors are all lawyers, with a minimum of three years' experience, and have passed the professional examination for working in public administration, as specified in the recruitment procedure of the ACS.

The OSH inspectors are graduate engineers, in five different technical fields, with a minimum of three years' experience. They also have to pass the professional examination for working in public administration, as specified in the recruitment procedure of the ACS.

The ASC has a general training plan for all civil servants and the Human Resources Department at the MLSP draws up an annual plan for all of its employees, including inspectors. There is no individual training plan for inspectors, no training unit and no training coordinator at the SLI (there are plans for a new unit for Coordination, Training and Administrative Execution at central level). In the first six months of 2009, two workshops were held, one lasting three days, the other only one. Seven other workshops are planned before the end of the year. New recruits are paired with more experienced inspectors for the first three months and during that period they are not obliged to report on their inspection activities. The mentor receives no additional payment for the tutoring.

The SLI's Annual Plan and Programme for 2009 contains a list of general activities that are intended to be done during the year, broken down on a monthly basis. The Plan contains no measurable objectives or figures, or specifications of the budget needed for its implementation. The Plan and Programme are not discussed with the social partners because they are seen as internal documents. They do not seem to be disseminated among the social partners and the latter are not consulted in their elaboration.

The Labour Inspectorate Annual Report is published on the MLSP website. Its structure and content do not fully comply with the requirements of ILO Recommendation 81 (1947). Each inspector transmits monthly reports on his/her activity to the Heads of Department (see below).

There are two cars available for the three inspectors in Kumanovo and nine cars for the 26 inspectors in Skopje, who receive about 30 euros per month per car for petrol. Inspectors claim that the condition of some of the cars is not safe. They sometimes carry out visits with their own cars, but without reimbursement for fuel. The number of computers is 25 in Skopje and three in Kumanovo. There is no internet connection at any regional office. Each inspector has a professional mobile phone.

There is no technical equipment for carrying out measurements and no personal protection equipment for visits.

Visits

Inspectors can make visits in accordance with the abovementioned Annual Plan and Programme, to follow up complaints or on their own initiative. Complaints were the reason for around 4 per cent of the total number of visits made by labour relations inspectors in 2008 (this information is not available for OSH inspectors). Citizens can submit a request in writing, orally or even anonymously. A call centre was recently set up to receive information about irregularities. The reported minimum number of monthly visits for both OSH and labour relations inspectors is 60.

Inspectors are obliged to carry out inspections at least once a year at employers in industry, trade, construction, agriculture, forestry, transport, communal services, craft trade, hotels and restaurants, school and university workshops and laboratories. In other sectors, inspections should be carried out at least once every three years. This regulation may be incompatible with ILO Conventions No. 81, Article 16, and No. 129, Article 21.

Visits tend to be poorly prepared, mainly because of the lack of registers, data and time.

Inspectors do not use any procedural manuals, checklists or templates in their visits.

According to the law, the inspectors are authorized, at any time during the day or night, to enter an employer's premises without prior notice and regardless of working hours. Inspectors in their visits are obliged to inform the manager, legal representative or some other responsible person of their presence. They also have to show their identification document to a responsible or other authorized person at the premises being inspected. The law makes no provision for cases in which inspectors might deem that such prior identification might detract from the effectiveness of the inspection.

The employer is obliged to allow the inspectors to carry out the visit without disturbance or interference, and to provide them with files, documents, acts, information or other necessary data. In case of obstruction they can notify the Misdemeanour Commission or call the police, although the latter do not tend to act immediately. In practice, employers may lock the premises to block inspectors' access.

Labour inspectors are authorized to collect the necessary data and information, to take statements from workers, to give oral or written orders, to request assistance from the competent state bodies and to request the presentation of personal identification documents by workers, who are obliged to show the documents requested.

The documents that may be required by labour relations inspectors are: registration documents for performing a certain activity; electronic records of working hours in enterprises with more than 25 workers and manual records for other enterprises; personnel files of employees; contracts; evidence of payment of salaries and social security contributions; a written order concerning holidays, breaks during work and weekly rest.

OSH inspectors check, depending on the size of the enterprise and the nature of the work performed there, the following documents: technical documentation; notification for starting the activity; records for the performed activity; documentation related to the training of workers in safe working practices once every three years; medical examinations; first aid kit and first aid training.

It is also possible for the inspector to temporarily seize documents from the employer for further analysis at the Inspectorate offices, but they must be returned within eight days, at the latest. For this purpose, the inspector must issue a special receipt, stating all the documents taken and the deadline for their return.

If a minor violation is established, at the end of the visit the inspectors have to produce minutes, in which they shall note all remarks, the actions needed to put right any problems and the deadline for their correction. After the deadline has expired, inspectors are obliged to verify whether the recommendations have been followed or not. In case of an employer's failure to fulfil the prescriptions, the inspector is obliged to notify the Misdemeanour Commission. A copy of the minutes is submitted to the employer, but not to the workers or their representatives. The deadline for correction of established irregularities is left at the discretion of the inspector, but it cannot exceed 30 days, except for the suspension of activities (see below).

Authorization and registration

Some public institutions have computerized systems related to their needs. The Central Register of Enterprises – in which all companies are registered – is among them, but inspectors do not have direct access to it. However, a tender procedure is in progress for the implementation of software which will enable the State Labour Inspectorate to have direct access to the information system of the Central Register of Enterprises.

The Tax Authority also has a computerized system with information on all legal and physical persons obliged to pay taxes and contains data on entrepreneurs and their premises. However, this register is not accessible to the inspectors.

The Employment Agency also has a database, but the SLI has no access to it, for example, to verify the validity of documents submitted by employers.

The situation is similar with regard to the databases of other authorities: the State Statistics Office, the Health Insurance Fund and the Pension and Disability Fund.

Although employers are obliged to notify the State Labour Inspectorate of their commencement of activities, there has been no report of a corresponding registry at the Ministry of Labour and Social Policy.

At the level of the SLI there does not seem to be a common registry containing comprehensive data on enterprises and labour inspection activities. Inspection visits are recorded on paper at the respective regional offices. Each inspector keeps records on their visits in an individualized and personal system and therefore information is not shared by the different inspectors, even at the territorial level. Inspectors report monthly in writing concerning the visits made, mentioning only the name of the company and giving very brief information about the outcome.

The use of a registry does not seem to be one of the working methods employed, whether for the preparation of visits or for follow-up purposes.

No registry of occupational accidents exists at Ministry level and it is not clear whether there is a register of occupational diseases at the Institute of Occupational Health.

Notification of workplace accidents and diseases

According to the Law on Safety at Work, employers are duty bound immediately – but no later than 48 hours after the accident – to file a written report to the Labour Inspection on every lethal or collective accident and about any workplace injury that has caused temporary disability to work for more than three working days, as well as about any event which represents an imminent risk to the safety of the employees at work. Minor accidents at work with no need for absence from work are not declared.

No rulebook has yet been adopted concerning the notification of accidents at work and thus there is no standardized report form that employers can fill in and submit. Therefore, reports contain general data and a short description of the event.

In practice, compliance with the legal obligation of notification of accidents is very low and in some cases OSH inspectors receive information about lethal or serious workplace injuries from the Ministry of the Interior or the police or from the Macedonian Occupational Safety and Health Association (MOSHA), although there is no formal collaboration agreement. Every accident MOSHA hears about is immediately reported to the MLSP, which must report back to MOSHA within seven days.

In case of a lethal, collective or serious injury OSH inspectors are duty bound to conduct an investigation on the spot. After gathering all the relevant data, the OSH inspector should write a report on whether any previously prescribed OSH measures related to the injury had been or had not been implemented.

Despite the measures taken to reduce the number of lethal injuries at work, in 2008, OSH inspectors conducted 12 inspections of lethal accidents. Given the problems with informal employment, it is probable that the true figure is higher.

According to the Law on the Health Register (Official Gazette of Republic of Macedonia 20/2009) the Institute of Public Health is authorized to keep records on all accidents and diseases. A List of Occupational Diseases was published in the Official Gazette in 2004 with about 100 listed diseases, but there are no reliable data on occupational diseases. Physicians (general practitioners or specialists in occupational medicine) are obliged to report every case involving occupational diseases to the National Public Health Institute. It is not clear whether there is an obligation for employers to notify occupational diseases and which body is in charge of the investigation of these diseases.

The Institute for Occupational Health under the Ministry of Health plays a role in occupational health but they have no special facilities for the treatment of occupational diseases. Occupational health specialists at this Institute and in private occupational health services are in charge of preventive medical examinations.

The Sanitary Inspection has no special duties in relation to the investigation of occupational diseases.

Collaboration with other authorities

Since Macedonia is a small country, institutional relations tend to be very personal and usually good. There have been a number of initiatives for joint inspections with the Trade Inspectorate, the Financial Police and other institutions.

Collaboration between labour relations and OSH inspectors is common on some issues, as may be observed in the construction sector. In fact, the two inspectorates share offices and work together. Some joint visits are planned in advance and others are arranged on the inspectors' own initiative.

Even if each inspectorate acts in accordance with its specific competences, it is common practice that, whenever inspectors find an irregularity outside their competence, they pass the information to the other inspection. They have no official channel or document to use for conveying information or for communication purposes and they usually telephone or send letters or written notes to pass on information about a situation involving possible irregularities.

The police may be called in cases of obstruction (when an inspector is denied access to working premises), but it seems they generally do not act immediately.

Sanctions and administrative procedures

Articles 56 to 59 of the Law on Occupational Safety and Health make provisions for misdemeanours. Fines are 1,000 euros for misdemeanours, category I; 2,000 euros for misdemeanours, category II; and from 5,000 to 8,000 euros for misdemeanours, category III.

Articles 264 and 265 of the Law on Labour Relations make provisions for misdemeanours. The fines range from 7,000 to 15,000 euros for the misdemeanours in Article 264.

The Law does not lay down objective criteria for any gradation of the sanction imposed.

According to the Law on Misdemeanours, the Law on Occupational Safety and Health and the Law on Labour Relations, once the OSH inspector identifies a violation of Article 56 of the Law on Occupational Safety and Health or the labour relations inspector identifies a violation of Articles 264 and 265 of the Law on Labour Relations, the inspector is obliged to offer the perpetrator the so-called Settlement Procedure. The inspector has to record the most important elements of the misdemeanour, such as time, place and manner of perpetration, description of the misdemeanour and the witnesses. The minutes have to be signed by both the inspector and the perpetrator. The perpetrator is offered the opportunity to pay the fine within eight days of receiving the payment order. The payment must be made to the account cited in the payment order. If the perpetrator pays the fine within the deadline, they only have to pay half the amount.

This new procedure has been in operation only since the beginning of 2009 and so far no perpetrator has voluntarily paid the fine.

If the perpetrator does not voluntarily pay the fine, the inspector can submit a proposal for the initiation of a Misdemeanour Procedure in front of the Misdemeanour Commissions under the Ministry of Labour and Social Policy, created very recently (one for labour relations issues and one for OSH issues). At present, there is little awareness among inspectors about the functioning of these Commissions.

Inspectors claim that the legal requirements for initiation of the Misdemeanour Procedure are too demanding and they cannot follow up the process to completion.

When an OSH inspector identifies a violation of Article 58 of the Law on Occupational Safety and Health or a labour relations inspector identifies a violation of Articles 264 and 265 of the Law on Labour Relations, they are obliged to offer the perpetrator the so-called Mediation Procedure in front of a Mediation Commission under the MLSP, created very recently (there is one Commission for both labour relations and OSH issues). Both parties, inspector and perpetrator, sign the minutes and the SLI has to submit the latter to the Mediation Commission within three days. The Mediation Commission is composed of a President and two members. The President has to initiate the procedure within 48 hours of receiving the request. The presence of the inspector and the perpetrator before the Commission is obligatory. The agreement has the effect of an executive document. The perpetrator has to pay the fine – reduced by half – and to eliminate the irregularity. If no agreement is reached, the Mediation Commission shall inform the SLI in order to initiate a Misdemeanour Procedure.

OSH inspectors are empowered to impose spot fines on employees who fail to use personal protective equipment provided by the employer. The amount of the fine is 50 euros.

If an OSH inspector finds an immediate threat to the life or health of the employees, the inspector shall suspend the entire operation or parts of it until the irregularity is removed. The employer has the right to appeal within eight days to the MLSP.

OSH inspectors are also empowered to send files to the Public Prosecutor in case of criminal violations, in accordance with the Criminal Code. In 2008, 14 criminal charges were reported.

If a labour relations inspector finds someone working illegally, or if an employer is not paying social contributions or the minimum wage, or has paid no wages for three months, does not observe working hours or does not keep electronic records of working time and overtime, the inspector shall suspend activities until the irregularity is dealt with. The suspension will be for seven days in the case of failure to observe working time. If an employer repeats the abovementioned irregularities, the suspension shall last for a period of one to five years and the inspector shall submit a declaration that court proceedings are being initiated. The employer has the right to appeal to the MLSP within eight days.

Relations with the social partners

In general, the social partners are aware of the importance of labour inspection activities. They would like more effective inspection and to be involved in general planning and follow-up.

The Economic and Social Council is not yet operational and cannot be considered an effective institution for the discussion of proposals. Moreover, the Council for Occupational Safety and Health provided for in the Law on Occupational Safety and Health has not yet been established. In some cases, employers' and workers' organizations are involved in the drafting of new labour legislation, but consultation is not a regulated process and social actors express quite different opinions on their involvement in the final outcome.

Trade Unions of Macedonia are calling for more active labour inspection and perceive an urgent need for more inspectors, better training and better selection of the companies chosen for visits. The priorities, in their view, are problems with illegal working, unpaid wages, dismissals and overtime. They also complain of low implementation of the legal provisions related to workers' representatives at enterprise level.

According to the employers' organizations, understaffing and training are also serious problems with regard to labour inspection. A better plan for labour inspection

is needed, with objective criteria to avoid biased inspections focused on the “same enterprises”.

The social partners in Macedonia believe that the Economic and Social Council should be strengthened as an effective tripartite social dialogue structure in practice and it should be given a legal framework. In the same spirit, the Council on Occupational Safety should be established soon.

Findings

General comments and labour inspection structure and organization

1. There is no inherent or structural barrier to operating an effective and efficient labour inspection service, given that Macedonia is a small and dynamic country, but there is room for improvement in some areas. In some cases, this can be accomplished by rationalizing, streamlining and consolidating some procedures and structures. In particular, additional funding is needed to cover the current vacancies, increase the number of inspectors and provide them with at least the minimum logistical and technical support.
2. The recent adoption of a number of important new labour and OSH legislative acts will require specific training for the inspectors and the social partners. Training is a major target for the Macedonian Labour Inspection and efforts should be concentrated on a better and permanent approach.
3. Macedonia has a fairly well organized and rationally structured labour inspectorate, divided into two technical branches (OSH and labour relations), with a good informal network of relationships within the Ministry and with other public administration services. Both the labour relations inspection and the OSH inspection have good informal coordination and some local good practices with regard to coordination have been identified, particularly at the territorial level. Nevertheless, an institutional approach should be developed to facilitate a real integrated labour inspection system, as recommended by the ILO.
4. No ethical problems have been noted among inspectors. This forms a good basis for building a modern and more effective inspection service, although there are a number of problems (mentioned below) which may affect progress.

Human resources and career development

5. Although inspectors have the status of civil servants, there is no career plan for their development and no graduated steps and incentives for promotion have been established. Salaries are not attractive and this can lead to staff losses. Vacancies are not filled quickly. In general, Macedonian labour inspection (in both areas) is understaffed.

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6. Inspectors do not have enough secretarial support. This situation can increase the number of tasks of the inspectors. Other deficiencies include: transport services (sometimes inspectors use their own cars because there are not enough official ones and it seems that expenses are not reimbursed), office facilities, registers and appropriate software for recording inspection visits. OSH inspectors have no personal protection equipment for their visits and no technical measuring tools.
 7. Although there are some training activities, there is no national training plan/programme for inspectors. There is no specific training for new recruits (only a mentoring system), and no refresher, on-the-job or specialist training. In some regions, labour relations inspectors with a legal background are in charge of OSH inspections, but lack specific training.

Visit

8. Visits are performed in conformity with an annual plan and programme, at the request of individuals (but only around 4 per cent are complaint-based) and on the inspector's own initiative. Inspectors barely prepare for visits because of the lack of registries or databases.
9. Inspectors do not have enough resources to assist them in carrying out the various inspection procedures and visits. Checklists and other support materials would be useful.
10. Although there is fruitful informal collaboration, there is a clear need for more coordination with other authorities, particularly the sanitary and taxation authorities.
11. Joint visits should be improved, starting with planning.

Registries and data collection

12. Successful planning depends on an up-to-date master register of establishments at the labour inspectorate. At present, this does not exist. Lists of establishments exist at central and taxation authority levels, but not at the ministerial level.
13. There is an urgent need to develop a proper system to maintain and update registers at national level. Registers should be computerized at headquarters and in the regional units. Computer training should be provided to office staff. The master register would be a useful tool for planning, preparing and following-up inspections. This register would also help in the development of better general data and statistics at labour inspection level and for purposes of annual reports.

Notification of workplace accidents and diseases

14. There is no register for occupational accidents and diseases. No information is compiled at central level.

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15. The investigation of accidents and diseases at the workplace could be improved with better collaboration between other authorities in and outside the Ministry of Labour and Social Policy. The status of the Institute for Occupational Health is not adequately defined and there is no connection with the OSH inspection, which does not allow for the emergence of a true prevention culture.

Collaboration with other authorities

16. Collaboration and relations with other institutions and authorities are good but informal. There is no agreement at any level. A more targeted institutional and formal approach is needed.

Sanctions and administrative procedures

17. Efficiency could be increased by a better awareness of the new sanctioning procedures among the staff.
18. Infractions should be graduated according to different criteria to allow for better application of the sanctions system.

Social dialogue

19. It is important for the social partners that their concerns and opinions are taken into account, as provided for in ILO Convention No. 81. In general, they are aware of the important role of labour inspection in the implementation of labour law, but there is a lack of real knowledge on how to collaborate. The social partners are calling for a more active and dynamic inspection, expressing the need for more inspectors, better training and better selection of the companies chosen for inspection. The trade union presence in SMEs and the private sector is low, and participation by workers' representatives in inspections conducted at the workplace is patchy.

Recommendations

General comments and labour inspection structure and organization

1. Establish formal plans for a better integrated labour inspection system at all levels, from drawing up the plan to the visit itself.
2. A new Law on Labour Inspection and a better integrated labour inspection system could be developed in line with ILO Conventions 81 and 129.

ILO suggestion: A working group at the labour inspection level, with the collaboration of a consultant, aimed at attaining both abovementioned targets.

3. The Ministry should take steps to increase the number of inspectors at the regional level and provide them with better material resources (offices, tools, vehicles,

computers and technical support). Safe and adequate transport services or reimbursement of costs for the use of private cars should also be provided.

4. As illegal work is becoming a major challenge, some multidisciplinary pilot activities could be undertaken.

ILO suggestion: A multidisciplinary programme, based on other European experiences, can be established to deal with new challenges. This should also involve the tax and market inspectorates.

Human resources and career development

5. The successful implementation of a modern system of labour inspection will require determined efforts to rationalize and strengthen the labour inspection system and careers. Vacancies need to be filled quickly. The government should provide budget resources to boost staff levels.
6. Aside from the need for appropriate qualifications and to train newly recruited officials in the inspection services, it is also necessary to train existing officials, including refresher, on-the-job (in-service) or specialist training. A general and national training plan for inspectors should be established and its sustainability ensured.

ILO suggestion: The training activities could be planned and developed with ILO support. ILO Turin Centre is working to produce a new training programme (introduction programme plus an advanced course) that could be used for this purpose.

7. In addition to the worries with regard to staff vacancies at the technical level, another serious problem is the poor motivation due to low salaries and limited career prospects. Personnel policies need to be redesigned to ensure that inspectors have promotion incentives.

ILO suggestion: A working group should be established at the labour inspection level, with the collaboration of a consultant, with a view to revising the career plan.

Visits

8. Internal procedures should be improved and inspection forms and procedures should be prepared with a view to facilitating information exchange and enhancing the value of inspection visits. Checklists should be drawn up for use during inspections.
9. Before inspections take place, inspectors should prepare the visits by checking files, records, location of the establishment, contact persons, number of workers, previous violations, employer's general attitude, work accidents, complaint letters, trade union presence and more. To facilitate the monitoring of non-compliance by sector and by locality, it would be useful to establish a file and registry system (see register recommendation below).

ILO suggestion: These activities could be planned and developed with ILO support and within the framework of the technical cooperation project, with the help of some consultancies.

Registries, data collection and notification of workplace accidents and diseases

10. The Central Register of Enterprises should be accessible to the labour inspectorate. Moreover, a computerized register of enterprises should be implemented at the Ministry of Labour and Social Policy. Forms and registration sheets should be prepared and IT support at the national level should be put in place.
11. A national-level register on occupational accidents and diseases should be developed, disaggregated by gender (maintaining personal confidentiality), to allow better analysis of trends, as well as planning visits and organizing campaigns for prevention purposes.

ILO suggestion: These activities could be planned and developed with ILO support and within the framework of the technical cooperation project, with the help of some consultancies.

Collaboration with other authorities

12. Institutional agreements should be worked out among the different authorities.

Sanctions and administrative procedures

13. Graduation of the sanctions should be established to facilitate inspection work.

Social partners

14. Awareness-raising campaigns on the role of the labour inspectorate should be undertaken among the social partners. Leaflets and other media tools should be developed.

ILO suggestion: These awareness activities could be planned and developed with ILO support and within the framework of the technical cooperation project.

15. The institutional consideration of the subject of labour inspection at the Economic and Social Council (subcommittee) could be an option to promote the involvement of the social partners in the activities and general planning of labour inspection.
16. The establishment and regulation of the Council on Occupational and Safety, as an expert advisory body on occupational safety matters, is needed.

Action Plan

CONCLUSIONS RECOMMENDATIONS MINISTRY ACTIONS ILO ACTIONS

ANNEX I:**List of ILO conventions ratified by Macedonia⁷**

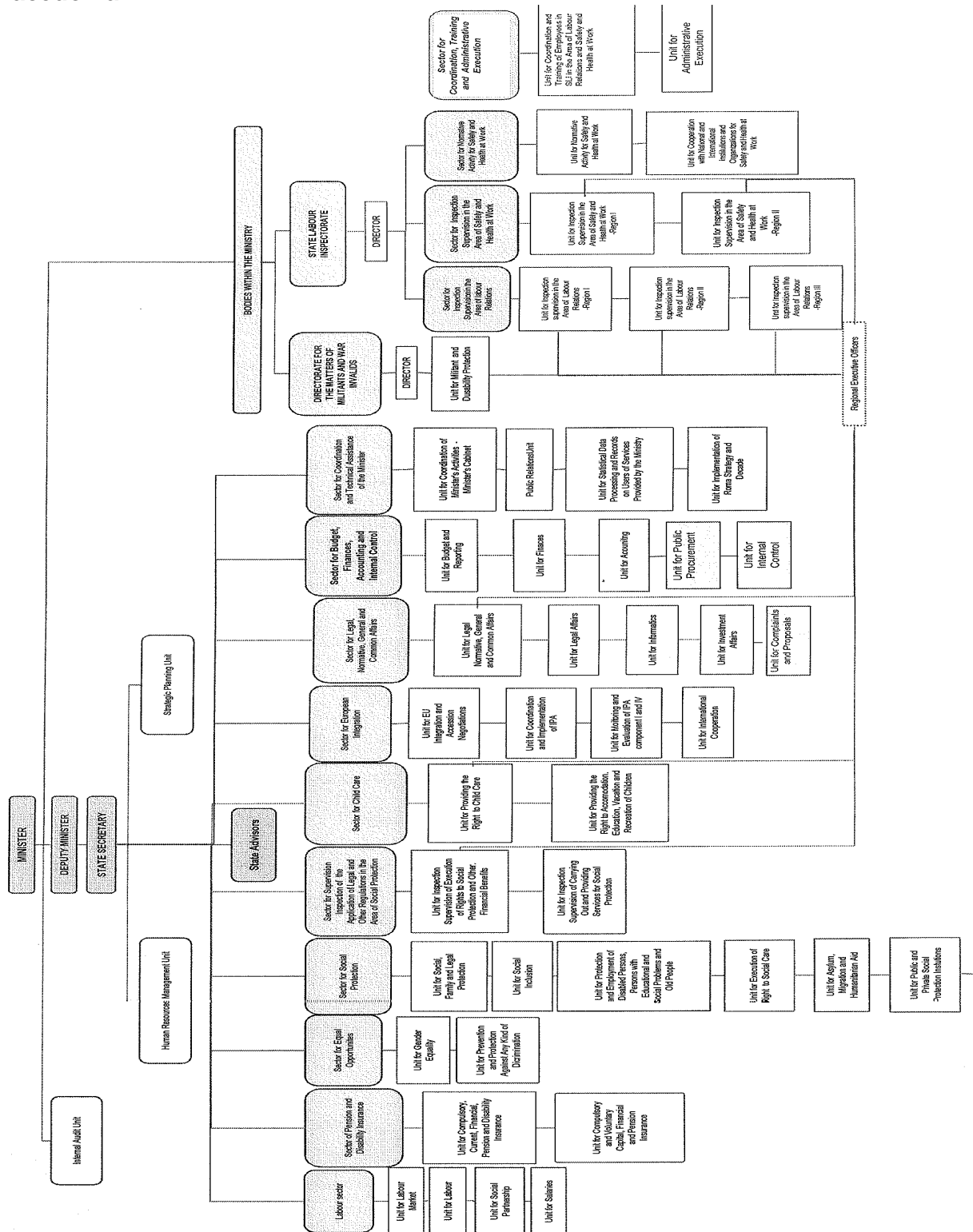
<u>C2 Unemployment Convention, 1919</u>	17:11:1991
<u>C3 Maternity Protection Convention, 1919</u>	17:11:1991
<u>C8 Unemployment Indemnity (Shipwreck) Convention, 1920</u>	17:11:1991
<u>C9 Placing of Seamen Convention, 1920</u>	17:11:1991
<u>C11 Right of Association (Agriculture) Convention, 1921</u>	17:11:1991
<u>C12 Workmen's Compensation (Agriculture) Convention, 1921</u>	17:11:1991
<u>C13 White Lead (Painting) Convention, 1921</u>	17:11:1991
<u>C14 Weekly Rest (Industry) Convention, 1921</u>	17:11:1991
<u>C16 Medical Examination of Young Persons (Sea) Convention, 1921</u>	17:11:1991
<u>C17 Workmen's Compensation (Accidents) Convention, 1925</u>	17:11:1991
<u>C18 Workmen's Compensation (Occupational Diseases) Convention, 1925</u>	17:11:1991
<u>C19 Equality of Treatment (Accident Compensation) Convention, 1925</u>	17:11:1991
<u>C22 Seamen's Articles of Agreement Convention, 1926</u>	17:11:1991
<u>C23 Repatriation of Seamen Convention, 1926</u>	17:11:1991
<u>C24 Sickness Insurance (Industry) Convention, 1927</u>	17:11:1991
<u>C25 Sickness Insurance (Agriculture) Convention, 1927</u>	17:11:1991
<u>C27 Marking of Weight (Packages Transported by Vessels) Convention, 1929</u>	17:11:1991
<u>C29 Forced Labour Convention, 1930</u>	17:11:1991
<u>C32 Protection against Accidents (Dockers) Convention (Revised), 1932</u>	17:11:1991
<u>C45 Underground Work (Women) Convention, 1935</u>	17:11:1991
<u>C48 Maintenance of Migrants' Pension Rights Convention, 1935</u>	17:11:1991

⁷ Source: ILOLEX – 13 May 2009.

<u>C53 Officers' Competency Certificates Convention, 1936</u>	17:11:1991
<u>C56 Sickness Insurance (Sea) Convention, 1936</u>	17:11:1991
<u>C69 Certification of Ships' Cooks Convention 1946</u>	17:11:1991
<u>C73 Medical Examination (Seafarers) Convention, 1946</u>	17:11:1991
<u>C74 Certification of Able Seamen Convention, 1946</u>	17:11:1991
<u>C80 Final Articles Revision Convention, 1946</u>	17:11:1991
<u>C81 Labour Inspection Convention, 1947</u>	17:11:1991
<u>C87 Freedom of Association and Protection of the Right to Organise Convention, 1948</u>	17:11:1991
<u>C88 Employment Service Convention, 1948</u>	17:11:1991
<u>C89 Night Work (Women) Convention (Revised), 1948</u>	17:11:1991
<u>C90 Night Work of Young Persons (Industry) Convention (Revised), 1948</u>	17:11:1991
<u>C91 Paid Vacations (Seafarers) Convention (Revised), 1949</u>	17:11:1991
<u>C92 Accommodation of Crews Convention (Revised), 1949</u>	17:11:1991
<u>C97 Migration for Employment Convention (Revised), 1949</u>	17:11:1991
<u>C98 Right to Organise and Collective Bargaining Convention, 1949</u>	17:11:1991
<u>C100 Equal Remuneration Convention, 1951</u>	17:11:1991
<u>C102 Social Security (Minimum Standards) Convention, 1952</u>	17:11:1991
<u>C103 Maternity Protection Convention (Revised), 1952</u>	17:11:1991
<u>C105 Abolition of Forced Labour Convention, 1957</u>	15:07:2003
<u>C106 Weekly Rest (Commerce and Offices) Convention, 1957</u>	17:11:1991
<u>C109 Wages, Hours of Work and Manning (Sea) Convention (Revised), 1958</u>	17:11:1991
<u>C111 Discrimination (Employment and Occupation) Convention, 1958</u>	17:11:1991
<u>C113 Medical Examination (Fishermen) Convention, 1959</u>	17:11:1991
<u>C114 Fishermen's Articles of Agreement Convention, 1959</u>	17:11:1991
<u>C116 Final Articles Revision Convention, 1961</u>	17:11:1991
<u>C119 Guarding of Machinery Convention, 1963</u>	17:11:1991
<u>C121 Employment Injury Benefits Convention, 1964</u>	17:11:1991

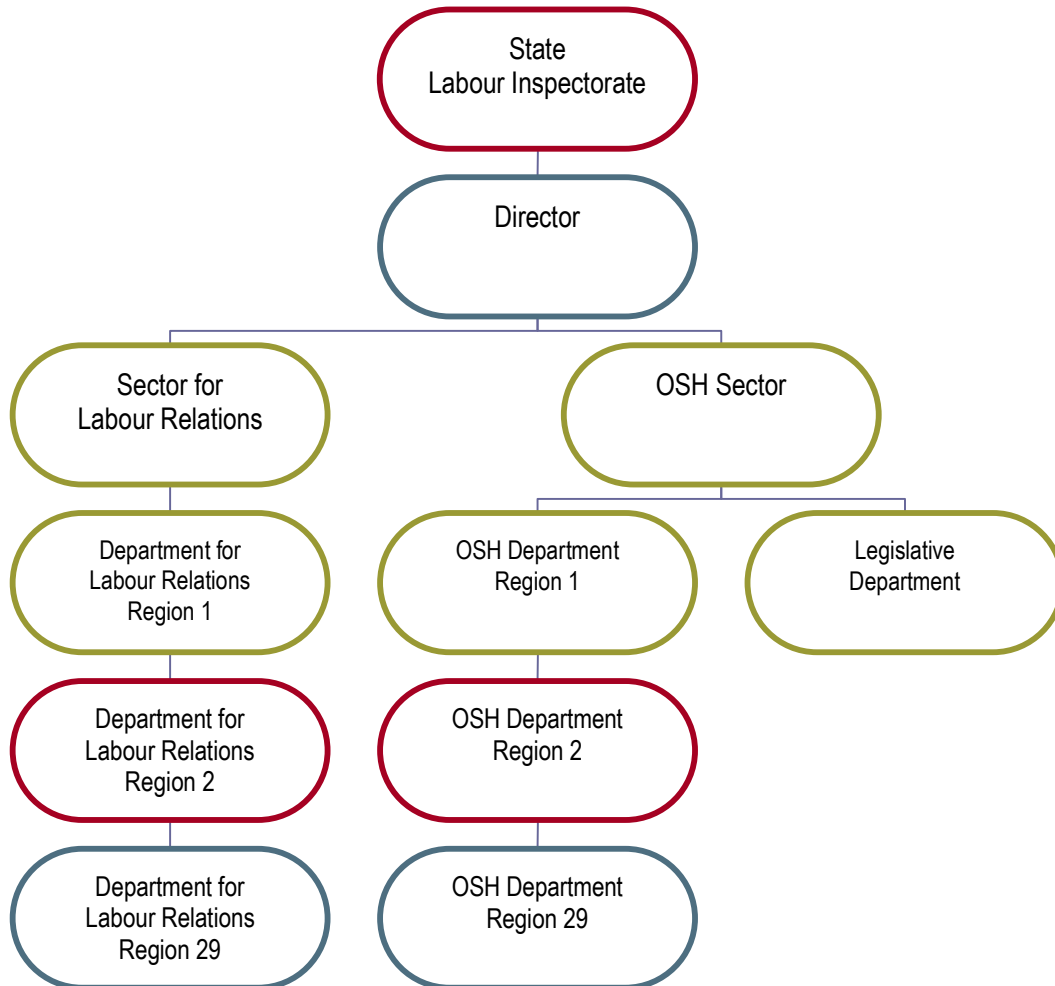
<u>C122 Employment Policy Convention, 1964</u>	17:11:1991
<u>C126 Accommodation of Crews (Fishermen) Convention, 1966</u>	17:11:1991
<u>C129 Labour Inspection (Agriculture) Convention, 1969</u>	17:11:1991
<u>C131 Minimum Wage Fixing Convention, 1970</u>	17:11:1991
<u>C132 Holidays with Pay Convention (Revised), 1970</u>	17:11:1991
<u>C135 Workers' Representatives Convention, 1971</u>	17:11:1991
<u>C136 Benzene Convention, 1971</u>	17:11:1991
<u>C138 Minimum Age Convention, 1973</u>	17:11:1991
<u>C139 Occupational Cancer Convention, 1974</u>	17:11:1991
<u>C140 Paid Educational Leave Convention, 1974</u>	17:11:1991
<u>C142 Human Resources Development Convention, 1975</u>	17:11:1991
<u>C143 Migrant Workers (Supplementary Provisions) Convention, 1975</u>	17:11:1991
<u>C144 Tripartite Consultation (International Labour Standards) Convention, 1976</u>	08:12:2005
<u>C148 Working Environment (Air Pollution, Noise and Vibration) Convention, 1977</u>	17:11:1991
<u>C155 Occupational Safety and Health Convention, 1981</u>	17:11:1991
<u>C156 Workers with Family Responsibilities Convention, 1981</u>	17:11:1991
<u>C158 Termination of Employment Convention, 1982</u>	17:11:1991
<u>C159 Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983</u>	17:11:1991
<u>C161 Occupational Health Services Convention, 1985</u>	17:11:1991
<u>C162 Asbestos Convention, 1986</u>	17:11:1991
<u>C182 Worst Forms of Child Labour Convention, 1999</u>	30:05:2002

ANNEX II: Organization chart of the Ministry of Labour and Social Policy of Macedonia⁸



⁸ Source: MLSP of Macedonia.

ANNEX III: Organization chart of the Labour Inspectorate⁹



⁹ Source: MLSP of Macedonia.