

1) **Fiche to be used for each step:**

The step under review	Join the EU Third Countries trusted list for the validation of electronic signatures as advanced electronic in the EU as a first step towards pursuing mutual recognition of qualified trust services
Baseline	Baseline is 0
Deadline of the step	December 2025
Actual results	<p>The Law on Electronic Documents, Electronic Identification and Trust Services (Official Gazette no. 101/19, 275/19, 3/25 and 135/25), ensuring alignment with Regulation (EU) No 910/2014 (eIDAS) and the revised EU Digital Identity framework was adopted. The legal framework on electronic signatures is complemented by the relevant bylaws (Annex 10 and 11), ensuring high standards and full and detailed compliance with eIDAS.</p> <p>The Ministry of Digital Transformation has been designated as the competent supervisory authority for trust services, and it is operational, with clearly defined responsibilities for supervision and oversight of trust service providers.</p> <p>The institutional, legal and technical prerequisites for joining the EU Third Countries Trusted List have been established. There are currently two trust service providers registered in the Register of Trust Service Providers that provide advanced and qualified electronic signature services, which are certified and audited by conformity assessment bodies accredited in the EU.</p> <p>Preparatory activities for the inclusion in the EU Third Countries Trusted List have been completed, including the assessment of national trust service providers of electronic signatures. The Ministry first reviewed and verified the complete set of relevant documents. This included checking the certificates confirming that the national providers—KIBS and Makedonski Telekom—comply with EU legal, technical, and security requirements for qualified trust services (Annex 2 and Annex 3, Attestations of conformity), as well as reviewing the decisions on their registration as qualified trust service providers (Annex 4 and Annex 5). The Ministry also applied the checklists (Annex 6) used for assessing the issuance of qualified electronic signature certificates.</p> <p>Following these checks, an official request for the inclusion of the Republic of North Macedonia in the EU Third Countries Trusted List (Annex 1) was submitted to the European Commission on 30th of October 2025, however no response has been received yet. In parallel, the Ministry carried out supervisory inspections of both</p>

	<p>providers, and the records and authorisation of such inspection is in the Annexes 6, 7 and 8.</p> <p>The fact that national trust service providers are certified and audited by conformity assessment bodies accredited in EU Member States demonstrates full alignment with EU standards and confirms the country's readiness for inclusion. Any further progress now depends on the completion of procedures at the EU level.</p>
<p>Evidence provided</p>	<p>Annex 1: An official letter submitted to the European Commission expressing the intention of the Republic of North Macedonia to join the EU Third Countries Trusted List (https://trusteid.mdt.gov.mk/)</p> <p>Annex 2: Attestation of conformity of qualified trust service provider Clearing House KIBS AD Skopje (KIBS), demonstrating compliance with the applicable legal, technical and security requirements for the provision of qualified trust services. (electronic signatures, electronic seals and time stamps), issued by conformity assessment bodies accredited in the EU.</p> <p>Annex 3: Attestation of conformity of the qualified trust service provider Makedonski Telekom AD Skopje, demonstrating compliance with the applicable legal, technical and security requirements for the provision of qualified trust services (electronic signatures, electronic seals and time stamps), issued by conformity assessment bodies accredited in the EU.</p> <p>Annex 4: Decision on the registration of a provider of qualified trust services in the register of trust services and electronic identification schemes for Makedonski Telekom</p> <p>Annex 5: Decision on the registration of a provider of qualified trust services in the register of trust services and electronic identification schemes for Clearing House KIBS AD Skopje (KIBS)</p> <p>Annex 6: Checklist for assessment of Qualified trust service for the issuance of qualified certificates for electronic signatures, relating to the issuance of qualified certificates for qualified electronic signatures</p> <p>Annex 7: Minutes of the supervision conducted on a trust service provider KIBS</p> <p>Annex 8: Minutes of the supervision conducted on a trust service provider Makedonski Telekom</p> <p>Annex 9: Authorisation for conducting supervision of the Qualified trust service providers</p> <p>Annex 10: Rulebook on setting the standards which should be contained in the qualified certificates for electronic signature and electronic seal, the meeting of the technical standards, the method of generating qualified electronic signatures or qualified electronic seals, the standards which should be contained in the certificates</p>

for validation of qualified electronic signature or qualified electronic seal and the standards which should be met by the qualified confidential service for storage of qualified electronic signatures or qualified electronic seals

Annex 11: Methodology for accreditation of the compliance assessment bodies and laboratories for testing of the means

Annex 12: Information on the Government session with a Report on the Registered Qualified Trust Services in the Register of Electronic Identification Schemes and Trust Services

Annex 12a: English version of the Information on the Government session with a Report on the Registered Qualified Trust Services in the Register of Electronic Identification Schemes and Trust Services

Annex 13: Information on the Government session with a Report on the Verification of the Registered Trust Service Providers and Issuers of Electronic Identification Schemes in the Register of Trust Service Providers and Electronic Identification Schemes

Annex 13a: English version of the Information on the Government session with a Report on the Verification of the Registered Trust Service Providers and Issuers of Electronic Identification Schemes in the Register of Trust Service Providers and Electronic Identification Schemes.

<p>Checks performed in the verification of the step and related findings</p>	<p>The measures undertaken to verify the fulfilment of the step included a comprehensive review of compliance with the applicable EU and national legal framework governing electronic identification and trust services, in particular the alignment with Regulation (EU) No 910/2014 (eIDAS).</p> <p>The verification covered confirmation of the formal designation and operational readiness of the Ministry of Digital Transformation as the competent supervisory authority for trust services, including its mandate, responsibilities, internal procedures and supervisory functions. In this context, the results of the audit process were examined and documented through the relevant audit report, which is provided as an annex to this report.</p> <p>In addition, the certification and assessment documentation of qualified trust service providers was reviewed to verify compliance with the applicable legal, technical and security requirements, fully aligned with the relevant European Commission standards. This verification is further supported by the officially adopted Government Information accompanied by the Report on the verification of registered trust service providers and electronic identification scheme issuers entered in the Register of Trust Service Providers and Electronic Identification Schemes, which is attached as supporting documentation.</p> <p>Furthermore, on-site and desk-based supervision activities carried out by the competent authority were assessed. This included a review of the minutes from inspections conducted at trust service providers, as well as the records and conclusions of the working group(s) involved in the supervisory and assessment process. The checklist used by the authority for the verification of compliance with trust service providers was also examined and is attached as an annex. Where available, this checklist is provided for both trust service providers to ensure consistency and transparency of the supervisory approach.</p> <p>The verification also covered the administrative acts related to the granting of qualified status. In this regard, the decisions on the designation of qualified trust service provider status, based on which the providers were entered into the national register, are included. In cases where these documents are not readily available within the authority, they are to be provided by the respective trust service providers (KIBS and Telekom) and attached accordingly.</p> <p>Moreover, the submission of the official request to the European Commission to join the EU Third Countries Trusted List was verified, together with the completeness, accuracy and internal consistency of the accompanying preparatory documentation.</p> <p>The findings confirm that the step is being implemented in accordance with the applicable legal and procedural rules and that the core substantive requirements have been fulfilled. Any remaining actions are of a procedural nature and are dependent on further guidance and instructions from the European Commission.</p>

Compliance with general principles and DNSH principle	The implementation of the steps does not contravene the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement. The implementation of the steps does not contravene the 'Do No Significant Harm' principle (DNSH).
Double funding	Contributions from third parties were not reported in support of the achievement of this step.
Clear conclusion on the achievement of the step	Fully achieved