**ANNEX**

**Comments & Responses on the draft of Multiannual Operational Programme “TRANSPORT” 2024-2027 or the Republic of North Macedonia**

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| **Page number & Section** | **Comment EU DG NEAR** | **Accepted/Not Accepter/Partially Accepted** | **MKD MTC response on comments** |
| General comments for the OP | Transport issues can be addressed in a more comprehensive manner incorporating aspects related to sector reforms, institutional support, alignment with the EU acquis and general modernisation of the sector. Furthermore, issues such as green, sustainable transport, which were mentioned several times as possible key areas of intervention for a transport-related OP are referred to indirectly as results of the improvements on the infrastructure network and not as the target of specific activities. Urban mobility is not included either. | Accepted | The comprehensiveness of addressing transport issues within the OP has been augmented to include explicit references to sector reforms, institutional support, alignment with the EU acquis, and the modernisation of the sector. The Programme now articulates a clearer strategy towards promoting green, sustainable transport. This includes specific activities aimed at directly achieving sustainable outcomes, rather than only referencing them as indirect results of infrastructure improvements. |
| General comments for the OP | Make sure that the Programme covers more widely the above-mentioned issues, and that the budget reflects this accordingly. Considering that the IPA II Operational Programme for Transport foresees several strategic projects targeting comprehensive reforms in key sectors (urban mobility plan Skopje, implementation of transport strategy, aviation strategy), it is important that they get contracted as soon as possible under the current framework and that they are not postponed. | Accepted | The budget for the OP has been methodically reviewed and realigned to encapsulate a broader range of the issues highlighted, such as sector reforms and sustainable transport initiatives. The Programme now more accurately reflects the intended strategic priorities, ensuring that the necessary financial resources are designated to support these critical areas effectively |
| General comments for the OP | Check the budget proposal, with regard to the respect of maximum EU contribution and the Major projects budget requests. | Accepted | A thorough review of the budget proposal has been conducted to ensure adherence to the maximum EU contribution limits and the requirements for Major projects budget requests. The budget has been adjusted where necessary to comply with these financial parameters, ensuring the Programme is aligned with the fiscal stipulations set out by the Commission |
| General comments for the OP | Ensure consistency between what is marked as ‘significant objectives’ and the text of the Programme, and add missing information accordingly. | Accepted | Consistency checks have been performed across the Programme to ensure that the ‘significant objectives’ are accurately reflected in the text of the Programme. Where disparities were found, the text has been updated to include any previously missing information, thus providing a coherent narrative and clear direction for the Programme's objectives and expected impacts |
| OP Page 5  1.1 Programme Summary  - Markers  (from DAC form) | The significant objectives of environment, DRR, climate mitigation and adaptation have not been treated in a consistent manner. Throughout the document references to these topics occur, however they remain generic. Only the greenhouse gas emissions appear in the indicators.  It is difficult to see in a concrete manner what is the contribution to the environmental objectives. For DRR and climate adaptation one would expect a description of climate vulnerability and ways to enhance climate resilience of roads and rail. Leaving climate risk assessment to the contractors sounds very late in the planning cycle. It was good to see a condition on biodiversity positive measures, even though this also remains a short mention without further information or elaboration. | Accepted | The comment is acknowledged. Modifications are suggested across the entire document.  The OP has undergone a comprehensive review with substantial enhancements to ensure alignment with climate goals, the integration of green infrastructure, and the application of the Green Deal principles to mobility and transport infrastructure:   * Introduction of targeted actions to reduce the environmental impact of transport. * Updating the support areas for road and rail to explicitly consider environmental factors. * Outlining specific measures to mitigate environmental impacts. * Including climate adaptation strategies and risk assessments as a core component of the OP, ensuring resilience in transport infrastructure planning and implementation. * Incorporation of biodiversity concerns by promoting the integration of green infrastructure with transport development, aligning with habitat connectivity goals and enhancing sector planning.   Articulation of a clear vision statement for environmental objectives within the transport sector, directly referencing North Macedonia’s international commitments under the UNFCCC and CBD. |
| OP Page 9  1.2. Summary of the Programme | In the section concerning the Markers from DAC form, environment, DRR, and climate mitigation and adaptation are indicated as significant objectives. For the sake of consistency, please refer in the summary to these significant objectives.  Since the SOP is cantered on the TEN-T network, please make reference to further alignment to chapter 21 TEN-T network. This should be reflected further in the document as one of the main outcomes. | Accepted | Both comments are acknowledged. Modifications are suggested to address the comments |
| OP Page 15  2.3. Institutional setting, leadership, and capacity | Please provide sufficient information on environment, DRR, and climate change mitigation and adaptation, all indicated as significant objectives of this programme. For example, information is missing on the responsible stakeholders and responsibility sharing concerning these areas, including with regards to implementation and monitoring responsibilities. Information on the laws that govern these themes is also missing. Please provide the missing information and ensure that, in general, the information provided in this document is sufficient to confirm that environment, DRR, and climate change mitigation and adaptation are “significant objectives”, as indicated for this program. | Accepted | Comment is addressed with changes in the text. |
| OP Page 23  2.7. Socio-Economic Analysis (including SWOT analysis) - Transport Infrastructure Development | Part of text “Aligned with NTS vision for 2030, North Macedonia aspires to establish a modern, integrated transport network that supports sustainable economic growth and ensures mobility for all citizens. This vision encompasses a well-maintained, safe, reliable, affordable, and accessible transport system that is resilient to emergencies and environmentally conscious” was marked with comment stating: Please explain what this does practically imply | Accepted | The comment has been taken into account and the text has been clarified: North Macedonia's commitment to a resilient transport system translates into tangible steps such as building durable infrastructure, promoting public transit for lower emissions, and integrating ecological considerations early in project planning, which includes comprehensive climate risk assessments to inform adaptive strategies. |
| OP Page 25  2.7.Socio-Economic Analysis (including SWOT analysis) - Rail | The maps presented are maps of the updated network. As the delegated acts are not adopted yet, these documents are not official. Therefore, a disclaimer that the maps are indicative and subject to adoption of delegated acts should be included. | Accepted | Disclaimer is provided below maps. |
| OP Page 26  2.7. Socio-Economic Analysis (including SWOT analysis) - Rail | The definition of “extended core” will be valid only when the TEN-T regulation is adopted. Therefore, please revise the text to reflect this. | Accepted | Comment is acknowledged and the current status of the TEN-T regulation. The document is revised to reflect the accurate terminology and status of the regulation until it is officially adopted |
| OP Page 30  2.7. Socio-Economic Analysis (including SWOT analysis) - Rail | Part of the text “This data underscores the importance of efficient and sustainable railway transport infrastructure, including both railways and roads. Railways, being a more environmentally friendly mode of transport when compared to roads or air travel, can significantly reduce a country's overall emissions. By investing in and promoting both rail and sustainable road transport, North Macedonia has the potential to curb its escalating emissions trend. Moreover, aligning with the European Union's environmental standards is necessary for North Macedonia's EU integration process. Hence, improvements in both railway and road railway infrastructure improvements benefit the transport sector and are critical to the country's sustainability and integration goals” was marked with comment stating: This is good, but what are the options for road transport (most investments go there). Suggest to address this comment in the following section on road. | Accepted | Comment is reflected and text revised accordingly |
| OP Page 31  2.7. Socio-Economic Analysis (including SWOT analysis) – Rail (SWOT) | Please consider highlighting the maintenance, as applicable. | Accepted | Comment is reflected in SWOT |
| OP Page 32  2.7. Socio-Economic Analysis (including SWOT analysis) – Roads | The maps presented are maps of the updated network. As the delegated acts are not adopted yet, these documents are not official. Therefore, a disclaimer that the maps are indicative and subject to adoption of delegated acts should be included. | Accepted | Disclaimer provided below map |
| OP Page 40  2.7. Socio-Economic Analysis (including SWOT analysis) – Roads | Please indicate if it could also reduce GHG emissions. | Accepted | Comment is reflected in the text |
| OP Page 42  2.7. Socio-Economic Analysis (including SWOT analysis) – Roads SWOT | The weakness no. 13 implies that there is a need for climate vulnerability and risk assessment followed by adaptation measures.  Please consider indication of maintenance issues, as applicable | Accepted | Both comments are addressed in SWOT |
| OP Page 43  Summary of SWOT analysis for the transport sector | Please consider spelling out abbreviations the first time they are mentioned. | Accepted | It is ensured that all abbreviations are spelled out upon their first mention for clarity. List of abbreviations is added at the beginning of the OP. |
| OP Page 45  3.1. Coherence with the IPA III Programming Framework and with the specific policy instruments of the enlargement process | Throughout the OP, please insert references/footnotes to documents that you refer to. | Accepted | References added through the document |
| OP Page 47  4.1. Interaction of the programme with IPA III annual action plans or measures and interventions from other donors/International Financial Institutions | Please update in line with the Commission's outcome of the maturity assessment and quality review and retained ADs under IPA 2024. | Accepted | OP is updated in line with comment |
| OP Page 49  4.2.1. Intervention Logic | In order to better precise the objective, we suggest the following change “Improved management, implementation and control of the EU financial assistance, including through development of human capital, in accordance with EU requirements and best practices”. This needs to be reflected in the diagram as well as throughout the OP. | Accepted | Suggested changes are incorporated, improving the clarity and precision of the objective. This revision is reflected in both the diagram and throughout the OP. |
| OP Page 51  4.2.2. Detailed Description of Each Area of Support – Area of Support Rail | The activities presented focus exclusively on investments.  Please include as well the activities necessary for strengthening capacities, improving legal and regulatory frameworks, fostering sector reforms, etc, in view of achieving the objectives stated. | Accepted | New output with “soft” activities added related to strengthening capacities, improving legal and regulatory frameworks, fostering sector reforms |
| OP Page 52  4.2.2. Detailed Description of Each Area of Support – Area of Support Rail | Comment related to delivery methods for Activity Reconstruction/ rehabilitation of the railway bridges on Railway Corridor X - major project: Twinning offers valuable support for aligning with EU acquis and increase institutional capacity. Therefore, we suggest to include grant (e.g. twinning) among the delivery methods, here as well as for following areas of support. | Not accepted | We have reservations about the suitability of twinning for these activities. However, newly added output 1.2 related to strengthening capacities, enhancing legal and regulatory frameworks is added and twinning is indeed considered as viable option |
| OP Page 53  4.2.2. Detailed Description of Each Area of Support – Area of Support Rail | Comments related to conditions for Activity Reconstruction/ rehabilitation of the railway bridges on Railway Corridor X - major project:  Please refer as well to EIAs and SEAs.  Please take into consideration that it would be more relevant to have such assessment available in the planning and design phase.  Please indicate clearly how concretely all of these will be achieved and take note that details on such topics are missing in the general section of the document. | Accepted | OP is revised in line with the comments. The integration of biodiversity interests is also comprehensively addressed in the mainstreaming section. This includes detailed Environmental Impact Assessment studies (EIAs), alignment with the National Biodiversity Strategy and Action Plan (NBSAP), and specific biodiversity positive measures detailed in project documentation. While these are acknowledged as the conditions detailed explanations are appropriately situated in the mainstreaming section and project documentation, ensuring a structured and organised presentation of all components and commitments. |
| OP Page 63  4.2.2. Detailed Description of Each Area of Support – Area of Support Roads | The activities presented focus exclusively on investments.  Please include as well the activities necessary for strengthening capacities, improving legal and regulatory frameworks, fostering sector reforms, etc, in view of achieving the objectives stated. | Accepted | Activities related to capacity strengthening, legal and regulatory framework enhancements, and sector reforms are included to better align with the stated objectives |
| OP Page 75  4.2.2. Detailed Description of Each Area of Support – Area of Support 3 – Other Support | Please take note that no budget support is possible under the Operational programmes. Maybe a direct grant could be considered for the retention policy. In this respect, please consider grant as additional implementation modality.  Please consider adding Twinning as an additional implementation modality. | Accepted | Grants/ Twinning as additional implementation modalities are included. |
| OP Page 96  7. Financial Tables by Areas of Support and by Year (including co-financing rates if applicable) | Please review and update this table in line with the updated EU contribution allocation for year 2024. | Accepted | The financial tables have been reviewed and updated to reflect the current EU contribution allocation for 2024 ensuring accurate and transparent financial planning for the program. It is noted that the EU funding for the year 2024 is set at EUR 6.9 million, with the highest payment amounts anticipated for the last year of the programme, 2027. |